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Fareham Borough Council
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By email only: planningpolicy@fareham.gov.uk

28th February 2020

Dear Sir/Madam

Re: Fareham Draft Local Plan 2036 Supplement consultation

Thank you for consulting the RSPB on the Fareham Draft Local Plan 2036 Supplement. We have reviewed the documents provided for consultation and would like to make the following comments.

Local Plan 2036 Supplement

Trees, Woodland and Hedgerows

The RSPB welcomes Fareham Borough Council's inclusion of section 4.23 of the Local Plan 2036 Supplement document, outlining the Borough's position on Trees, Woodland and Hedgerows. However, it is critical that opportunities for the planting of new trees, woodlands and hedgerows consider the existing habitat value of areas where these new trees are proposed. Woodland and hedgerow creation should not undermine important open habitats such as chalk grassland or areas functionally linked to the Special Protection Areas (SPAs) used by waders and brent geese. We welcome that the policy looks to encourage the planting of native trees and woodland. The RSPB also welcomes the emphasis outlined regarding the protection of existing trees and woodland and the benefits that these existing trees and ecosystems provide to biodiversity and climate change mitigation. Trees and woodlands have a central role to play in supporting biodiversity, enhancing wellbeing, and mitigating climate change when planted in a sustainable manner and managed accordingly.

Climate Change

The RSPB welcomes Fareham Borough Council's inclusion of section 4.35, outlining the Borough's position on Climate Change. The most recent State of Nature report (2019)¹ states that climate change is one of the driving forces behind the loss of biodiversity in recent decades, and there is increasing recognition that urban planning strategies need to be designed to provide maximum benefit for multiple aims; for biodiversity, wider ecosystem service delivery, and mitigation of climate change. The RSPB know that without urgent action to tackle climate change, millions of species will be at risk of extinction.

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The RSPB is part of BirdLife International,
a partnership of conservation organisations
working to give nature a home around the world.

SHELAA

The RSPB recognises the challenges that Fareham Borough Council faces as it seeks to accommodate development on a scale predicted to be required within the Plan period. However, the RSPB is increasingly concerned by the incremental loss of Special Protection Area (SPA) supporting sites across the Solent and therefore concern by the number of sites assessed as developable within Fareham Borough Council's Strategic Housing and Employment Land Availability Assessment (SHELAA) which are part of the network of sites used by brent geese and waders.

Dark-bellied Brent Geese (*Branta bernicla bernicla*) are winter visitors to the Solent from their breeding grounds in Siberia. Traditionally wintering on coastal mud flats, terrestrial feeding sites such as farmland with cereals and pasture or amenity grasslands are important feeding sites for Brent Geese, with greatest use at high tide when coastal mud flats are unavailable to Brent Geese. Maintaining and enhancing scale and connectivity of these important high tide feeding and roosting sites for Brent Geese is extremely important in order to prevent the loss of wintering Brent Geese and waders.

We acknowledge the inclusion of impacts to sites identified in the Solent Wader and Brent Goose Strategy (SWBGS) within the assessment of site suitability within Fareham Borough's SHELAA. However, across the sites assessed as developable within the SHELAA **one Primary Support** site, **four Secondary Support** sites, and **nine Low Use** sites within the SWBGS will be lost or partially lost. Sites within the SWBGS are classified based on value of the site in the context of the wider network of sites, its populations in terms of national importance, and the maximum count of bird use at the site. Further information on classification can be found in the SWBGS Guidance on Mitigation and Off-setting Requirements (October 2018)² and Interim Project Report: Year Two (2019)³. We provide further comment on these sites below.

Romsey Avenue, Portchester

Romsey Avenue, Portchester (SHELAA site 207) has been identified as a 'Developable Housing Site' within Fareham Borough's SHELAA. The 12.71ha site is a Brent Geese and Solent Waders Primary Support Area. The Ecology Comment for Romsey Avenue identifies that '*partial retention of the site and its enhancement, along with financial contribution, is required to mitigate for loss of a Primary Support Area*'. Any mitigation or compensation for the loss of a Primary Support site within the SWBGS network must ensure the continued ecological function ensuring that there are significant net benefits to the wader and brent goose network through the creation and ongoing management of any replacement sites. It is preferred that schemes affecting Primary Support Areas such as this come through the local plan process, however, we are aware that a planning application for this development (P/18/1073/FP) has been submitted and is currently under consideration. The proposed Bird Conservation Area associated with this application represents a 78% reduction in the size of the Primary Support site. This is wholly inadequate to appropriately mitigate for the partial loss of the Primary Support site. Mitigation in relation to recreational disturbance of the retained area of SWBGS Primary Support site has not been considered and will need to be included in the mitigation required for the Romsey Avenue development. Therefore, based on the current information it cannot be excluded that the allocation of this site will result in an adverse impact on the integrity of the SPA.

Further work undertaken as part of the SWBGS has looked to identify areas suitable for strategic wader and brent goose reserves. This area including the allocation would be ideally placed to form part of the network of sites retained to support the SPA, we therefore urge the removal of this allocation.

Land between Fareham and Stubbington

Land between Fareham and Stubbington has been identified as a Strategic Growth Area. This area contains the largest proportion of sites assessed as developable within the SHELAA. We highlight those sites below:

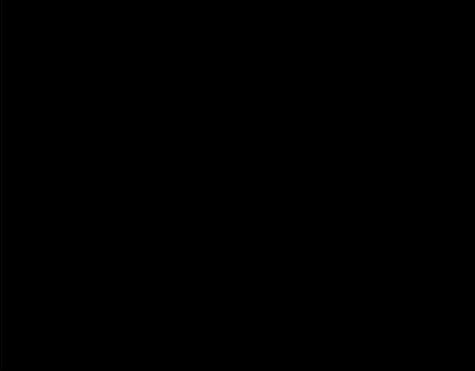
- Land South of Longfield Avenue, Fareham (SHELAA site 3008) – identified as containing both SWBGS **Secondary Support** and **Low Use** sites.
- Land South of Oakcroft Lane, Stubbington (SHELAA site 1341) – identified as containing both SWBGS **Secondary Support** and **Low Use** sites.
- Land East of Titchfield Road, Titchfield (SHELAA site 3059) – identified as containing SWBGS **Low Use** site.
- Land at Titchfield Road and Ranvilles Lane (SHELAA site 3190) – identified as containing SWBGS **Low Use** site.
- Newlands Plus – Area B1 and B2 (SHELAA sites 3199 and 3200) – both are identified as containing SWBGS **Low Use** sites.

SWBGS Guidance on Mitigation and Off-setting Requirements (October 2018) states in paragraph 24 under *Secondary Support Areas* that *'In-combination, these sites (Secondary Support Areas) are essential to secure a long term, permanent network as this ensures a geographical spread of sites across the wider ecological network, thereby meeting the needs of each discrete subpopulation'*. Paragraph 35 under *Low Use* outlines the wider importance of Low Use sites: *'All Low Use sites have the potential to be used by waders or brent geese. These sites have the potential to support the existing network and provide alternative options and resilience for the future network. The in-combination loss of these sites would impact on the continued ecological function of the wader and brent goose network. In all cases proportionate mitigation, off-setting and/or enhancement measures will be required.'*

Considering the annual housing need for Fareham Borough at 520 houses per year, with a total requirement for 8,320 new houses developed over the duration of the Local Plan (not including the 10-15% buffer proposed for the new Local Plan), the RSPB is concerned by the proposed loss of sites between Fareham and Stubbington and the impact that these developments in-combination will have on the wider SWBGS network of sites and its connectivity. The land between Fareham and Stubbington provides one of the last stepping-stones between SWBGS sites from Portsmouth Harbour SPA to the east of the Borough and Southampton Water SPA to the west. Therefore, the assessment of this in-combination effort of the loss of these sites identified in the SHELAA needs to be considered within Fareham Borough Council Local Plan. Further, any development identified within 5.6km of the Solent SPAs will need to contribute towards the Solent Recreation Mitigation Strategy (SRMP). Development located immediately adjacent is likely to require more than financial contribution to the strategy in order to fully mitigate likely significant impacts upon the SPAs.

We hope you find these comments useful. We would welcome the opportunity to discuss these comments with you in further detail.

Yours sincerely



References

1. Hayhow DB, Eaton MA, Stanbury AJ, Burns F, Kirby WB, Bailey N, Beckmann B, Bedford J, Boersch-Supan PH, Coomber F, Dennis EB, Dolman SJ, Dunn E, Hall J, Harrower C, Hatfield JH, Hawley J, Haysom K, Hughes J, Johns DG, Mathews F, McQuatters-Gollop A, Noble DG, Outhwaite CL, Pearce-Higgins JW, Pescott OL, Powney GD and Symes N (2019) The State of Nature 2019. The State of Nature partnership.
2. SWBGS Steering Group (2018) Solent Waders and Brent Goose Strategy (SWBGS): Guidance on Mitigation and Off-setting Requirements
3. Whitfield, D (2019) Solent Waders and Brent Goose Strategy 2019 Interim Project Report: Year One. Hampshire and Isle of Wight Wildlife Trust. Curdridge.