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Our ref: 310893
Your ref: N/A



Planning Strategy Team
Fareham Borough Council

BY EMAIL ONLY

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Dear Sir/Madam,

Fareham Borough Council – Regulation 18 Local Plan Consultation - Supplement

Thank you for your consultation dated 13 January 2020 which was received by Natural England on the same date. We welcome the opportunity to comment on the Supplement to the Fareham Draft Local Plan 2036.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Since the original Regulation 18 consultation in 2017, the housing need for the Borough has increased to reflect the government's recently released 'standard methodology' and changes within the revised National Planning Policy Framework (NPPF). The current consultation on the Supplement to the Draft Local Plan includes newly allocated sites and the proposal of two Strategic Growth Areas (SGAs) established to address any unmet housing need within the South Hampshire area.

Natural England's general advice on the Draft Local Plan 2036 provided in December 2017 and on the Issues and Options consultation provided in July 2019 still stands with regards to designated sites, nutrient neutrality, Solent recreational disturbance, Solent Wader and Brent goose sites network, air quality, water resources, ancient woodland and irreplaceable habitats, green infrastructure and ecological networks, protected species, landscape, coastal, climate change, soils, biodiversity net gain and the provision of Biodiversity Mitigation and Enhancement Plans (BMEPs).

However please find our detailed comments below on some of the new proposed allocations, the two SGAs and on policies under the Natural Environment section of the Supplement.

Housing allocations

- Rookery Farm (SHELAA ref 0046) – approx. 150 houses

Natural England advise that the policy for this allocation should ensure any development proposals in this area will address the requirements of the Habitats Regulations with regards to impacts including recreational disturbance to Solent and Southampton Water Special Protection Area (SPA) and nutrient enrichment of Solent designated sites.

Additionally, the Hampshire Ecological Network mapping shows an area of approximately 0.5ha lowland mixed deciduous woodland present towards the western end of this site. Any proposals should ensure that the mitigation hierarchy is engaged to protect and enhance priority habitat and other features of ecological interest, and to ensure a net gain for biodiversity. Provision should be

made for green infrastructure that includes measures to protect and enhance biodiversity features and improves ecological connectivity within and extending out of the site. Please see further advice on these aspects below.

Strategic Growth Areas

It is advised the policies relating to the SGAs place more emphasis on the need for development to comply with existing environmental policy and legislation, particularly the Habitats Regulations 2017 with regards to European sites and the revised NPPF, and that proposals seek to protect and enhance existing ecological features and achieve biodiversity net gain. Please see further detailed comments on the proposed SGAs below.

- ***Strategic Growth Area: North of Downend***

Natural England welcome the intention for a comprehensive area-wide master-planning approach.

The Downend Chalk Pit Site of Special Scientific Interest (SSSI) is located adjacent to the proposed SGA area. The policy should clearly outline that the masterplan must ensure a sensitively designed layout that protects this site from various aspects associated with development including encroachment, tipping, surface water drainage and access (informal or otherwise). Large buffers are recommended along with creation and enhancement of ecological corridors within the site and connecting to the surrounding landscape. Development should ensure it achieves biodiversity net gain that includes habitat creation - provision of chalk grassland priority habitat would be well suited to the geology in this area.

The policy should ensure the requirements under the Habitats Regulations are met with regard to impacts including water quality and recreational disturbance on Solent Special Protection Areas (SPAs).

- ***Strategic Growth Area: South of Fareham***

Natural England welcomes the recognition in the Supplement that further work is required to inform a Council-led strategic masterplan for the area.

Solent Wader and Brent Goose Network

The proposed SGA currently supports a number of areas that form part of the Solent Wader and Brent Goose (SWBG) network of supporting habitat to the Solent SPAs. These sites provide alternative roosting and foraging sites for SPA species, and therefore support the functionality and integrity of the designated sites. These sites contribute to the achievement of the SPAs' conservation objectives and are therefore protected in this context.

The SWBG sites sited within the proposed SGA are classified for supporting wader species including golden plover, lapwing and green sandpiper, which form part of the waterbird assemblage qualifying feature of the Solent and Southampton Water SPA. Together these sites form an important part of the overall SWBG network across the Solent due to its arable nature and close proximity to the coast, within a heavily urbanised Borough, and that it currently connects two river valleys in this part of the Solent, the Meon and Alver. Unmitigated, development within the SGA may have a detrimental impact on the SWBG network in this area by leading to a permanent loss of supporting habitat for these species and breaking the wider ecological connectivity between the two river valleys. Indirect effects on the other sites in the area may be caused primarily via recreational disturbance and/or changes to land management amongst other factors associated with development.

Where avoidance of impacts on these sites is not possible, mitigation will be required. A framework for guidance on mitigation and off-setting requirements has been prepared by the SWBGS Steering Group to achieve the long-term protection of the wider brent goose and wader network from land take and recreational pressure arising from new development. The non-designated sites are defined as Core Areas, Primary Support Areas, Secondary Support Areas, Low Use and Candidate sites.

The long term aim is to secure permanent bird refuges across the Solent.

Natural England strongly recommends that this policy addresses the impact of development on supporting habitat in line with the SWBG Strategy and offsetting and mitigation guidance in order to inform an updated draft local plan Habitats Regulations Assessment. The local plan should include a commitment to ensure the continued ecological function of the SWBG network in the SGA area and that there is certainty with regard to the appropriateness and deliverability of mitigation. It is recommended that the mitigation approach is referenced in the policy text and the identified area shown on the policy map. Natural England provide further advice on how such impacts may be overcome below.

Recreational disturbance

The SGA is situated in close proximity to the Solent and Southampton SPA. Development in this area is likely to lead to an increase in recreational disturbance to qualifying SPA species, alone and in combination with other development across the Solent. Natural England recommends the Policy identifies that development in the area will require significant provision of green infrastructure to address any alone impacts on the Solent and Southampton Water SPA. Such GI provision can be teamed up with mitigation to address other aspects of the development in the SGA – please see below for further advice.

It is advised that full contributions will also be required to the Bird Aware Strategy to address in-combination effects on other SPAs across the Solent, in line with the Bird Aware Definitive Strategy (originally called the Solent Recreation Mitigation Strategy) as adopted by existing Council policy.

Ancient Woodland

Oxleys Coppice Site of Importance for Nature Conservation (SINC) is situated in the north of the SGA area and is already bordered by development along its northern edge. It is understood the woodland habitat has suffered for some time from impacts associated with development including recreational disturbance, soil compaction, eutrophication, and lack of appropriate management. Further development in close proximity to the site is likely to lead to further detrimental impacts on this ancient woodland.

Tips Copse is another ancient woodland present on the edge of the southern part of the SGA. This small woodland is also bordered by development along its western edge and is likely to have suffered similar impacts to Oxleys Coppice. It is at risk of further deterioration with more development in the area.

Ancient woodland is an irreplaceable habitat and development in the SGA should ensure it is compliant with [Natural England standing advice](#) and the NPPF. Specific measures are likely to be required to protect and enhance ancient woodlands in the locality and further information has been provided in later sections.

Strategic approach

This area is unique within the Fareham borough due to its arable nature and locality within the wider Solent network. Unmitigated impacts will be likely to cause a loss of functionally linked land to the Solent SPAs and therefore lead to an adverse effect on the Natura 2000 network. Unmitigated development is also likely to lead to deterioration or loss of irreplaceable habitat within local ancient woodlands.

We therefore strongly advise that a strategic approach is used for development across this sensitive area that addresses multiple aspects, including mitigation for European sites, GI provision and biodiversity net gain. We support the intention of the draft local plan for a Council-led masterplan approach. It is recommended that specialists are engaged to pull together a strategy that identifies the current ecological baseline to inform a landscape-scale green infrastructure (GI) and ecological mitigation strategy, around which development can be designed.

Such an approach could take the form of securing substantial areas of ecological mitigation land to form part of a wider green infrastructure network that enhances ecological connectivity between the

Meon and Alver valleys. Such a network should seek to make strong connections with the nearby Titchfield Haven National Nature Reserve (NNR) in the west, and the proposed Country Park at the airfield in the south-east. Such a GI strategy should provide an enhanced rights of way network and areas of public open space for residents, but also provide areas exclusively managed for waders and other wildlife with minimal access that can include features such as wetland scrapes and scrub creation. A farmland wildlife management project could be set up to support waders, skylark and other farmland biodiversity such as arable flora.

Woodland management plans should be put in place for Oxleys Coppice and Tips Copse. Expert opinion suggests that maintaining a buffer of at least 50m around the Ancient Woodland will be required to protect against the urbanising impacts of light and activity, trampling, littering or dumping of rubbish, invasive garden species, vandalism and pet predation, and this can extend to at least 100m to address increased recreational pressures. This approach is recommended along these ancient woodlands, taking into account the current context of their close proximity to existing development and lack of ecological connectivity in the area.

To ensure the appropriate management and security of such a scheme in perpetuity, we would recommend that such land is transferred into the ownership and management of a suitable third party such as the Hampshire and Isle of Wight Wildlife Trust, the RSPB or Hampshire County Council. An extension to the Titchfield Haven NNR could be explored.

Natural England will be happy to further engage with Fareham Borough Council to develop an approach that meets the needs described above.

Policy XX: Sheltered Housing – Land South of Cams Alders

This allocation for sheltered housing provision and general affordable housing provision is located on an existing Site of Importance for Nature Conservation 'Fort Fareham Grassland' that supports woodland and meadow communities. It also lies adjacent to Fort Fareham SINC known for supporting wet woodland communities.

As previously advised, allocations and development proposals should ensure they engage the mitigation hierarchy, where impacts on designated ecological sites/features should first be avoided, and where not possible, adequately mitigated. Where this is not possible, any loss of priority habitat should be appropriately compensated. All residual ecological impacts will need to be addressed before any net gain for biodiversity can be achieved.

Natural England recommends an alternative site is found for this allocation that avoids loss of SINC habitat, and where this is not possible the policy should make clear how requirements set out within the NPPF, NERC Act 2006 and Fareham's own local policies on nature conservation will be met.

Natural Environment

Natural England have outlined some recommendations below on Policies found under the Natural Environment section of the draft Local Plan Supplement. Further specific advice on incorporating biodiversity net gain into the local plan is also made below.

Biodiversity net gain

Embedding biodiversity net gain

It is highly recommended that the draft local plan incorporates a policy for biodiversity net gain. Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. The NPPF highlights the role of '*policies and decision making to minimise impacts and provide net gains for biodiversity*' (para 170).

Planning Practice Guidance describes net gain as an ‘*approach to development that leaves the natural environment in a measurably better state than it was beforehand*’ and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, the [Biodiversity Metric 2.0](#), can be used to measure gains and losses to biodiversity resulting from development. We advise you to use this metric to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

The Chartered Institute of Ecology and Environmental Management, along with partners, has developed ‘[good practice principles](#)’ for biodiversity net gain, which can assist plan-making authorities in gathering evidence and developing policy.

Wider environmental gains

Natural England focusses our advice on embedding biodiversity net gain in development plans, since the approach is better developed than for wider environmental gains. However your authority should consider the requirements of the NPPF (paragraph 72, 102, 118 and 170) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space or biodiversity strategies. Opportunities for environmental gains, including nature based solutions to help adapt to climate change, might include:

- Identifying opportunities for new multi-functional green and blue infrastructure.
- Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) and climate resilient
- Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape.
- Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links.
- Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore)
- Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habitats

Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.

Evidence gathering

Existing environmental evidence can be gathered from various sources including online data sources like [MAGIC](#), the [Hampshire Biodiversity Information Centre](#) (HBIC), and strategies for green infrastructure, open space provision, landscape character, climate and ecosystem services and biodiversity opportunity mapping. We advise that reference is made to the **Hampshire Ecological Network Mapping** dataset – this comprises the Local Ecological Network mapping for Hampshire, prepared by HBIC. The network comprises statutory designations, non-statutory designated sites, ancient woodlands, and other non-designated priority habitat, and other ecological features such as undesignated water bodies. Usefully, the Hampshire network mapping also identifies areas where there is the greatest potential to enhance the network, referred to as the network opportunities layer, based on habitat suitability indices. This can be useful where deciding where to create or enhance habitat.

Biodiversity data can also be obtained from developments that were subject to Environmental Impact Assessment (EIA) Monitoring, the discharge of conditions or monitoring information from legal agreements with a biodiversity element. This can help establish a baseline to understand what assets exist and how they may relate to wider objectives in the plan area. Cross boundary environmental opportunities can also be considered by working with neighbouring authorities, local nature partnership and/or the local enterprise partnership. The relationship between environmental assets and key strategic growth areas may help to highlight potential opportunities that development

could bring for the natural environment. The following may also be useful when considering biodiversity priorities in your plan area:

- What biodiversity currently exists, what is vulnerable or declining?
- How are existing assets connected, are there opportunities to fill gaps and improve connectivity?
- How does the above relate to neighbouring authority areas, can you work collaboratively to improve links between assets or take strategic approaches to address issues or opportunities?

Applying the mitigation hierarchy

The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF. The policy should ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for European sites should be dealt with **separately** from biodiversity net gain provision.

Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts. It is also important to note that net gains can be delivered even if there are no losses through development.

The policy for net gain, or its supporting text, should highlight how losses and gains will be measured. The [Biodiversity Metric 2.0](#) can be used for this purpose as a fully tested metric that will ensure consistency across the plan-area and we would encourage its use. Alternatively your authority may choose to develop a bespoke metric, provided this is evidenced based.

The following may also be useful considerations in developing plan policies:

- Use of a map within the plan. Mapping biodiversity assets and opportunity areas ensures compliance with national planning policy and also helps to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain.

NB: The Hampshire Ecological Network Mapping dataset would be ideally placed to provide this evidence base.

- Use of a biodiversity net gain target. Any target should be achievable and evidence based and may be best placed in lower tier documents or a Supplementary Planning Document, to allow for regular updates in line with policy and legislation.
- Consideration should be given to thresholds for different development types, locations or scales of development proposals and the justification for this. Setting out the scope and scale of expected biodiversity net gains within Infrastructure Delivery Plans can help net gain to be factored into viability appraisals and land values. Natural England considers that all development, even small scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to Technical Note 2 of the CIEEM guide which provide useful advice on how to incorporate biodiversity net gain into small scale developments.
- Policy should set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. The plan policy should set out the approach to onsite and offsite delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. Further detail could be set out in a supplementary planning document.
- The policy could also usefully link to any complementary strategies or objectives in the plan, such as green infrastructure.

Monitoring

Your plan should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

LPAs should work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up front information on monitoring will help to streamline the project stage.

Please find further comments below on Policies found under the Natural Environment section of the draft Local Plan Supplement:

Landscapes

Natural England welcomes the proposed designation of six Areas of Special Landscape Quality within the Borough, the requirement for development in these areas to meet stringent criteria with regards to landscape and contribute to and enhance landscape.

Trees, Woodland and Hedgerows

Natural England welcomes a policy to ensure protection and enhancement of trees, woodland and hedgerows. However we recommend that it includes requirements with regards to ancient woodland and veteran trees to ensure development complies with the NPPF and Natural England [standing advice](#) on irreplaceable habitats. It should be emphasised that any proposals that would result in the loss of ancient woodland and/or veteran trees will not be permitted, in line with national policy and NE standing advice.

Flood Risk and Sustainable Drainage Systems (SuDS)

It is welcomed that Policy NEXX Managing Flood Risk and Sustainable Drainage Systems includes a requirement for development to demonstrate how SuDS will be implanted and maintained over the lifetime of the development. Details should also be provided of who will carry out the SuDS maintenance, with step-in rights agreed with an appropriate authority where a private management company fails.

Air Quality

It is advised that Policy NEXX: Air Quality incorporates a requirement for impacts on the natural environment to be considered as well as human receptors. Development will be required to engage with the Habitats Regulations to identify likely significant effects on European sites from air quality, alone or in combination with other plans or projects.

We would be very happy to comment further as the plan progresses. If you have any queries relating to the detail in this letter please contact me on 07787005505.

Yours faithfully

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