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7<sup>th</sup> December 2017

Your Ref:

Our Ref: 13.65.3.22

Dear Planning Strategy & Regeneration Team

**PROPOSAL: DRAFT LOCAL PLAN 2036**

**LOCATION: FAREHAM BOROUGH**

Thank you for contacting the Wildlife Trust in relation to this Draft Local Plan consultation. In commenting on this draft plan we have provided our comments in our standard letter format, explicitly detailing the relevant paragraph or policy that our comment relates to. We trust this is acceptable, however, if required we could provide our comments in a different format. Our comments are as follows.

**Environment: Paragraph 1.38 - Page 9.**

We are pleased to see the value of the borough's natural environment is reflected in this paragraph, but consider that the national and international designations applying to the coastal and estuarine areas should be highlighted by reference of their inclusion as part of the Natura 2000 suite of sites (Special Protection Areas (SPA) and Special Areas of Conservation (SAC)) and list of sites covered under the Ramsar Convention. Whilst highlighting some of the features of ecological importance this paragraph only highlights designations of national importance.

**Vision and Strategic Priorities - Paragraph 2.7: Key Strategic Priorities - Page 12**

Point 9: We are pleased to see that one of the key priorities of this draft plan is the protection and enhancement of the Borough's biodiversity and local, national and international sites. However, we do consider that this point should be reworded to reflect that it is the *sites* which are of local, national and international importance that are being protected, rather than the designations, unless that is what is intended post Britain's exit from the European Union. We therefore suggest the following wording change;

*'Protect and enhance the Borough's landscape features, valued landscape, biodiversity and the local, national and international sites of nature conservation importance'*

**Natural Environment – Landscape – Policy NE1: Landscape - Page 77**

We consider that the wording of this policy needs to be changed to be consistent with the wording used in National Policy;

*'Development proposals must protect, enhance and not have significant adverse impacts.....'*

Point f) We are pleased to see the inclusion of this policy but consider it important that as well as having regard for important 'natural landscape features' the policy seeks to enhance and reconnect ecological networks were they have been compromised.

### **Biodiversity and Nature Conservation – Paragraph 9.7 - Page 78**

We are pleased to see the inclusion of this paragraph but consider that the Council should look to develop this plan as an exemplar delivering net gains as a minimum. The Lawton report (Lawton 2010, Making Space for Nature: A review of England's Wildlife Sites and Ecological Network) highlights the need for a step-change in our approach to wildlife conservation from trying to hang on to what we have to the re-establishment of ecological processes and ecosystem services, for the benefits of wildlife and people. Given the importance of ecological features within and around the Borough and the influence that they have on residents' lives, we consider that the Council should look to embrace the natural environment and have the protection and enhancement of biodiversity within the Borough as one of the key assets underpinning this local plan.

Whilst we support the hierarchical approach to nature conservation in principle, recent studies have shown that much of the wildlife outside of protected areas is declining and this is in part due to the hierarchical approach that we take to nature conservation through the planning system. As we have stated above the Lawton Report highlights that, if we are to halt the decline in biodiversity we need to take a step-change in our approach to wildlife conservation from trying to hang on to what we have to the re-establishment of ecological processes and ecosystem services, for the benefits of wildlife and people. We consider that the theme running through this plan should seek to establish the creation and maintenance of functioning ecological networks as this is a key mechanism through which the biodiversity of the Borough can be protected and enhanced.

The National Planning Policy Framework (NPPF) contains some positive policies on ecological networks that encourage local authorities to promote their preservation, restoration and recreation, and to identify and map components of local ecological networks as a way of minimising the impacts of planning policies on biodiversity. Despite the clear policy driver within the NPPF, there is little evidence of ecological network mapping making its way into local planning processes currently and, as such, potentially valuable local plan policies on ecological networks are not being supported with the spatial information needed to make them meaningful and deliverable. Therefore we strongly recommend that the Borough Council use ecological network mapping in the development of this plan.

### **Policy NE2: Biodiversity and Nature Conservation – Page 79**

As stated above we consider a wording change to ensure that the delivery of 'net gains in biodiversity' is the minimum required achievement.

*'Development proposals should seek to provide opportunities to incorporate biodiversity within the development and deliver net gains in biodiversity, where possible.'*

### **Policy NE3: Solent Special Protection Areas - Page 81**

The Borough Council will be aware of recent work that has and is being carried out to inform a significant update of the 2010 Solent Waders and Brent Goose Strategy (SWBGS). Part of this update will involve changes to the terminology used to classify sites and as such this policy will need to be changed to reflect these changes. In addition, the new SWBGS seeks to provide guidance on mitigation and off-setting requirements, where development proposals seek to utilise important sites used by waders and brent geese. These proposals include the protection of existing 'core' and 'primary network' sites along with the creation of sanctuary sites across the Solent, which will be secured and maintained in favourable condition for perpetuity. For this approach to work, each Local Authority needs to identify suitable sites that can be promoted and secured for waders and brent geese through their policies and ensure that developer contributions are sought to fund them, where other sites identified through the SWBGS are lost to development.

### **Policy NE5: New Moorings – Page 88**

We consider the first paragraph of this policy should also include mention of the Solent Special Area of Conservation, since the impacts of new moorings may be greatest on the intertidal habitats that make up the SAC. Suggested wording change;

*'New Moorings will be permitted provided that they are located outside of the Mooring Restriction Areas (as shown on the Policies Map) and where it can be demonstrated that they would not have a significant adverse impact on the Solent Ramsar, SPA and SAC.'*

### **Policy D1: High Quality Design – Page 90**

Point h) We welcome this policy but recommend that in addition the policy should require that arrangements are put in place for the whole life management and maintenance of any SuDS features installed. A failure to put in place arrangements for their future management can mean that SuDS fail to function effectively. Furthermore, SuDS features should be designed with the additional objectives of enhancing water quality & biodiversity.

### **Policy D5: Energy and Water Efficiency – Page 97**

We welcome the adoption by the Borough Council of the optional water efficiency requirement of 110 litres per person per day (l/pppd), which exceeds the Building Regulations requirement of 125l/pppd. Elsewhere in Hampshire, some water companies have worked with the Local Authority to offer discounts on connection fees for developers who go even further than this (for example, by installing additional water saving devices or features, such as smaller baths). Partnerships such as this may become more necessary as our water resources become more stretched across the south-east. We note that the policy states that such measures will be implemented 'where there are water supply issues'; taking a regional view of water resources management would suggest that this definition should apply across the south east, rather than being dependent upon water company boundaries (the 'water stressed' designation). It would seem short-sighted to allow greater water wastage in parts of the Borough simply because the water there is supplied by a different company whose resources are considered to be more reliable.

### **Policy D6: Water Resources – Page 98**

We welcome the recognition of the need to protect and enhance waters within the Borough, which is in line with the requirements of the Water Framework Directive. The lack of reference to this EU Directive suggests that the Local Plan will seek to protect water resources regardless of the situation post- Britain's exit from the European Union; a commitment which we warmly welcome.

### **Development Allocations**

#### **Housing Site HA5 – Page 145**

The status of this site in the new Solent Wader and Brent Goose Strategy has changed from 'Uncertain' to 'Secondary Support Area' and as such mitigation measures will be required.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful and if you wish to discuss these matters further, please do not hesitate to do so. I also ask that you keep the Trust informed of the progress of this local plan.

