



**Hampshire &  
Isle of Wight  
Wildlife Trust**

Beechcroft House  
Vicarage Lane  
Curdridge  
Hampshire  
SO32 2DP

01489 774400

Planning Policy East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire  
GU31 4EX

Monday 4<sup>th</sup> March 2024

### **CONSULTATION: East Hampshire District Council Local Plan Update (Regulation 18)**

Hampshire & Isle of Wight Wildlife Trust is an independent charity founded in 1961 and together with 46 others we are part of The Wildlife Trusts, the largest grass roots nature conservation federation in the UK with 900,000 members. Locally across Hampshire and Isle of Wight we have over 27,000 members and we currently manage 5,000 hectares of land for wildlife, primarily nature reserves of local, national, and international importance.

We welcome the opportunity to comment on the draft East Hampshire Local Plan. While we are pleased to see the environment as a key issue of the Local Plan, we consider that the Local Plan in its current form suffers from a lack of development of key policies; it does not represent current best practice in policy clarity and ambition to put nature into recovery across the district.

The Wildlife Trusts are calling for at least 30% of land and sea to be restored for nature and climate by 2030, in line with national and international commitments.

We would welcome East Hampshire District Council in joining this ambition and putting in place a clear target for nature's recovery by 2030 backed by mapping and appropriate policy mechanisms to ensure that the state of nature is turned around and wildlife starts to recover during this decade.

#### **Biodiversity Net Gain**

To ensure that biodiversity net gain truly halts nature's decline and puts it into recovery, we encourage the Council to amend draft **Policy NBE2 Biodiversity, Geodiversity and Nature Conservation** and set a target for development to go above and beyond the Government's 10% minimum Biodiversity Net Gain, instead aiming for at least 20% biodiversity net gain.

We recommend looking at Kent County Council's assessment (<https://kentnature.org.uk/wp-content/uploads/2022/07/Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf>) of the potential effect of a 15% or 20% Biodiversity Net Gain target on the viability of residential-led development in Kent. In summary a shift from 10% to 15% or 20% Biodiversity Net Gain did not materially affect viability in the majority of instances when delivered onsite or offsite. The biggest cost in most cases is to get to the mandatory, minimum 10% Biodiversity Net Gain. The increase to 15% or 20% Biodiversity Net Gain in most cases costs much less and is generally negligible and because the Biodiversity Net Gain costs are low when compared to other policy costs, in no cases are they likely to be what renders development unviable.

We believe at least 20% net gain should be achieved, and that any offsite gains should be strategically targeted through Local Nature Recovery Strategies, secured in perpetuity and be additional to other commitments and initiatives to recover nature.

LNRS and the Nature Recovery Network should be the spatial foundation for directing delivery of BNG and the wording of the policy should reflect this. We recommend that when allocating off site BNG delivery the land within the LNRS and NRN is preferred.

### **Nature Recovery Network Local Nature Recovery Strategies**

We are disappointed that the only mention of Local Nature Recovery Strategies is in the introduction to **draft Policy NBE2: Biodiversity, Geodiversity and Nature Conservation** under ‘why we need this policy’. We strongly recommend that the council go beyond the minimum national requirements. The Local Nature Recovery Strategy (LNRS) should be used by planning authorities to support land use planning in both plan making and development management. It should be used to ensure that the location of new development avoids the best areas for nature and associated action makes a positive contribution to nature recovery.

The Local Nature Recovery Strategies should act as a spatial framework, alongside the Nature Recovery Network, informing where development should be avoided and where investment in nature should be directed, e.g. through Biodiversity Net Gain. This should be reflected within the local plan by embedding the LNRS into policy.

We would strongly recommend that the council commits to the creation and maintenance of a functioning Nature Recovery Network as this is a key mechanism through which the biodiversity of the district can be protected and enhanced. It is now well established that nature is in trouble and that to put nature on the road to recovery it needs bigger, better, more and joined up space to thrive. The Nature Recovery Network, embedded within national policy through the Environment Bill, is the key mechanism to deliver nature’s recovery within the local plan, providing multiple benefits and meeting the government’s 25 Year Environment Plan targets.

Nature Recovery Network mapping is about taking a strategic spatial approach to the natural environment, identifying areas of existing value, and looking for opportunities to create connections with new habitats that will benefit people and wildlife. Without such spatial mapping, it will not be possible to identify where interventions are required in order to create the nature recovery network and thus deliver the environmental policy ambition.

Therefore, we strongly recommend that East Hampshire District Council prepare and use the Nature Recovery Network as a foundational tool for the Local Plan to:

- Identify areas within the local plan area that are of special importance within the context of the Nature Recovery Network, including: existing habitats that are of highest value, areas that buffer existing core habitat, and gaps within the existing ecological network that, if filled, would improve ecological connectivity and reduce fragmentation.
- Assess, identify and prioritise opportunities for ecological enhancement through local plans and strategies.
- Identify the best sites for development and those areas where development should be avoided. Sites of core importance to the Nature Recovery Network should be protected and development should not result in severance of ecological connectivity within the network.
- Inform the design of any development in such a way that it makes a net contribution to the Nature Recovery Network.
- Inform and target biodiversity net gain delivery and other nature-based solutions.

- Inform the use of building standards that promote biodiverse developments within local plans (e.g., Building with Nature standards) to ensure that development targets action to most effectively contribute to restoring nature.
- Send a clear market signal to developers of your expectations for all future planning to contribute positively and meaningfully to nature's recovery.

### Green Infrastructure

Green Infrastructure should support both biodiversity, and mitigation and adaptation for the climate crisis. We would like to see the Draft Local Plan adapt the green infrastructure policy to set high quality green infrastructure principles across the built footprints of new and existing areas. This would lead to increased sustainability of developments, boost climate resilience and public wellbeing, as well as increase value, support a resilient economy and desire to live in the area.

Therefore, we welcome the inclusion of the Building with Nature accreditation in the supporting text of draft **Policy NBE12: Green and Blue Infrastructure which sets a new framework for green infrastructure**. It brings together existing guidance and good practice to recognise high-quality quality green infrastructure where wellbeing, biodiversity and water are core foundations. We recommend that the accreditation is embedded into the policy text itself to ensure maximum benefits for the health and wellbeing of residents, and for nature's recovery are delivered.

### Water Quality

We encourage that draft **Policy NBE9 Water Quality Impaction on the Solent International Sites** is amended to include a strong preference to the mitigation schemes that will deliver wider environmental benefits. Hampshire and Isle of Wight Wildlife Trust is well positioned to deliver biodiversity net gain and mitigation for nitrates, prioritising significant added value. We are currently one of the only organisations delivering an established, high-quality nitrates mitigation programme and provide other nature-based solutions services. We would be pleased to discuss these in more detail with you.

We are pleased to see the requirement for new homes to meet a water efficiency standard of 95 litres or less per person per day in draft **Policy NBE8 Water Quality, Supply and Efficiency** is positive. However, we think this could be taken further and would recommend the council to amend the draft policy to 90 litres or less per person per day.

The River Itchen is a chalk stream. Chalk streams are rare, ecologically important habitats and a vital natural capital asset. They provide key regulatory and provisioning services as an important source of water for drinking, agriculture and industry. Pressures from over abstraction, increased development and a legacy of human modification and intervention have resulted in significant and ongoing declines in biodiversity and water quality.

Of added importance is the current, unacceptable state of river water quality with no rivers achieving good chemical status and only 16% of designated rivers meeting good ecological health. This is indicative of the current state of play with our water and drainage infrastructure that frequently fails and, which is unable able to meet existing requirements or adhere to licensed conditions. Given the current lack of confidence in effective and timely investment in our critical water infrastructure, this plan must ensure that it does not add further burden to the acute pressures faced by the District's water environment, notably chalk catchments such as the Itchen.

Conversely this plan has the opportunity to drive effective investment and safeguards through its policies.

We would like to see the recommendations of the Catchment Based Approach Chalk Stream Strategy embedded within the local plan including “Planning approval must be contingent on the pre-existence of or parallel investment in more than adequate supply and treatment infrastructure with no additional burden on chalk aquifer abstraction. Developers should make water-company developer contributions to help cover the costs of addressing such impacts”.

We strongly recommend that **Policy NBE8 Water Quality, Supply and Efficiency** is amended to have more detail on the protection and enhancement of rivers new developments must meet. We suggest the following wording:

*Development that is within or adjacent to river corridors and their tributaries will be required to conserve and enhance:*

*The natural characteristics of the river, its springs, headwaters and associated species*

- *Water sources and water quality*
- *The river corridor’s ecosystem, geodiversity and ecological connectivity*
- *The natural functioning of the river through the seasons*

*taking into account:*

- *Biodiversity and geology*
- *Natural Buffers (minimum 20m) to prevent incidents of polluting run-off and protect biodiversity;*
- *Increased public access to the river corridor and the associated impacts of this increase;*
- *Marginal vegetation and the ecological value of the area including its role as an ecological network;*
- *Aquatic and riparian vegetation of the river environment.*
- *The varying size and associated habitats within a corridor which, in order to avoid uncertainty, are defined as the habitats immediately surrounding the waterbody that contribute toward its character and ecology including but not exhaustively flood plains, water meadows, wet woodland, reedbeds, fens, mires, bankside vegetation and other smaller waterbodies within close proximity and/or sharing the same topography and geology.*

### **Nature Based Solutions**

We are pleased to see the inclusion of Nature Based Solutions in draft Policy CLIMI: Tackling the Climate Emergency however, we recommend that any nature-based solutions that aim to deliver increased levels of carbon sequestration must also provide additional wider environmental benefits, including delivering increased biodiversity. We encourage that investment in Nature Based Solutions is prioritised to be within the Local Nature Recovery Strategy to ensure that they have the have a more effective impact on increasing local biodiversity

### **Strategic allocations**

Planning ahead for the housing needs of the district, the council must be confident that the environment can accommodate the in-combination effects of development at this scale. Environmental limitations must be considered, such as the water and drainage infrastructure being overwhelmed. The council has the opportunity to deliver ambitious green infrastructure and creation and enhancement of nature which goes beyond the minimum conservation and 10% biodiversity net gain. Currently we feel there is a lack of ambition to contribute to nature's recovery through the proposed strategic developments.

In addition, we are concerned about the locations of the sites allocated which are in close proximity or adjacent to designated sites and habitats of high ecological importances (e.g. SINC's etc.) and the negative impacts they might have.

Currently we have concerns about the proximity of many of the site allocations to rivers including **ALT1 – Land at Brick Kiln Lane Alton**, **ALT6 – Land at Wilsom Road Alton** and **ALT7 – Land at Lynch Hill Alton** and the potential impacts to the River Itchen Catchment from **FMS4 – Land south of Winchester Road Four Marks**. As previously mentioned, we would recommend that there are 20m natural buffers between watercourses and development to ensure protection for biodiversity and reduce the risk of pollution reducing water quality. As mentioned in the above water quality section, the council has a responsibility to ensure that new development does not add further burden to the pressures faced by the district's water environment through policies which strengthen protection but also investing into the water and sewage infrastructure.

We hope that you will find our comments helpful and, if you have any questions or wish to discuss these matters further, please do not hesitate to contact us. I also ask that you keep the Trust informed of the progress and outcome of this plan.

Yours Sincerely,



Holly Gray  
Policy and Advocacy Officer  
Hampshire and Isle of Wight Wildlife Trust

Email: [campaigns@hiwwt.org.uk](mailto:campaigns@hiwwt.org.uk)  
Main Switchboard: 01489 774400