



**Hampshire &
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Wildlife Trust**

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Response to the Hampshire Mineral and Waste Plan – Partial Update – Regulation 19 Consultation

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.

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

We would encourage Hampshire County Council to join in this ambition and put 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.

We welcome the opportunity to comment on the draft Mineral and Waste Plan.

Vision and Spatial Strategy

The Trust welcomes the plan's ambitions to balance the needs of the environment, Hampshire's communities and the local economy.

Hampshire's natural environment faces significant and urgent challenges and we are seeing continued damage and loss to habitats and species as a result of development, industry, intensive agriculture and recreational pressure. Of the protected sites that we do have, only half are in favourable condition. The impacts of pollution and exploitation of finite resources is compounded by the effects of climate change.

We would emphasise the fact that a healthy natural environment is the essential foundation of a strong, stable economy and resilient society. We would recommend that the Minerals and

Waste Plan adopts and embeds a natural capital approach, which recognises and fully values the stock of natural capital assets (including soils, freshwater, farmland, forests, atmosphere, oceans, ecological processes and the natural processes that underpin them) and the ecosystem benefits that they provide.

We would point to the recent report from the Hampshire and Isle of Wight Local Nature Partnership (LNP), [Natural Wealth](#) as a useful overview of the approach and the county's natural capital assets. The report provides a useful set of principles that should guide decision making:

- Biodiversity double lock: first and foremost, protect and restore biodiversity and increase connectivity between habitats by building our Nature Recovery Network.
- There must be overall net gain in natural capital stock with prioritisation for protecting and enhancing existing assets to ensure nature's recovery.
- Natural capital underpins all other forms as capital (financial capital, human capital, social capital and manufactured capital) and thus must be given equal weight within economic planning and decision-making.
- Investment should prioritise creating multiple benefits, including biodiversity, carbon sequestration, water and air quality, soil health, reducing flood risk, pollination, health and wellbeing.
- Investment should recognise our unique prize natural capital assets across Hampshire and the Isle of Wight, including chalk streams, chalk grassland, mudflats, seagrass, wood pasture, lowland meadows and historic water meadows and should contribute to their protection, enhancement or connectivity.

We are therefore disappointed that the proposed vision states that the plan should only 'respect Hampshire's unique natural and built environment':

'Carbon neutral and resilient minerals and waste development, which: supports health, well-being, and quality of life for all; enables the creation of thriving places; and respects Hampshire's unique natural and built environment.'

The Trust would like to see a significant strengthening of the vision to recognise the foundational role that protecting and enhancing the natural environment has in achieving all other stated goals.

Section 4 – Protecting Hampshire's Environment

We would emphasise the importance of giving natural capital equal weight in planning decisions as other forms of capital and that the ambition should go beyond maintaining and protecting, to actively enhancing and improving habitats to support nature's recovery. We are pleased to see the inclusion of the forthcoming Local Nature Recovery strategy (LNRS) within this section of the plan and in *Appendix C - Implementation and monitoring*. We believe that the LNRS and connected Nature Recovery Network mapping should form the spatial foundation and policy framework for planning decisions relating to both appropriate site allocation and directing mitigation and compensation to have maximum impact. This Strategy should enable planning authorities to 'front-load' environmental considerations in a more effective and strategic way.

Policy 2: Climate change mitigation and adaption

Mineral and Waste planning can have a significant positive or negative impact on the county's ability to mitigate, adapt and build resilience to the changing climate.

Given the role that burning fossil fuels plays in driving the escalation of global heating, we do not feel that a policy permitting the exploration and production of new oil and gas sites is in line

with the stated commitments on climate. We do not believe that there is an evidenced need for new oil and gas within Hampshire and economic opportunism should not override concerns about contributing further to the climate emergency.

We welcome the recognition within the supporting text of the opportunities for nature-based climate solutions and we would like to see prioritisation of this approach included within the policy itself. In addition, nature-based solutions that aim to deliver carbon sequestration or resilience to climate impacts (such as natural flood and drought defences) should also maximise the potential to deliver additional benefits, including increased biodiversity.

Nature-based solutions should, where possible, be strategically targeted through the Local Nature Recovery Strategy to form an integral part of the nature recovery network and put the foundations in place to tackle both the climate and nature emergencies long term.

It is positive that the supporting text in this section states: *'In addition, consideration should be given to the resilience of utilities such as Waste-Water Treatment Works and any proposals will need to ensure that they have suitable adaptation measures in place to manage future climate change events and maintain operation.'* We would recommend that this is strengthened to require planning approval to be **contingent on** the pre-existence of parallel investment in more than adequate water treatment and other essential infrastructure.

Policy 3: Protection of habitats and species

The Minerals and Waste Plan should set an ambitious framework for protecting, restoring and enhancing habitats and species.

We do not believe that the current minimum requirement of 10% net gain in biodiversity (in line with mandatory BNG) is adequate to halt nature's decline and move towards recovery. Nor do we feel it is reflective of the opportunity for exemplary schemes to be delivered through effective mineral and waste planning.

We are urging local planning authorities to aim for at least 20% Biodiversity Net Gain. This recommendation is based on evidence such as Kent County Council's [assessment](#) of the potential effect of a 15% or 20% Biodiversity Net Gain target on the viability of residential-led development. (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 would argue that delivering biodiversity improvements through the Mineral and Waste plan should be dealt with outside of the BNG framework, with the requirement to achieve the maximum on-site gain possible for each development, and a strict absolute minimum of 20% delivered. Biodiversity improvements should be secured for the long term (ideally in perpetuity) and be additional to other commitments and initiatives to recover nature.

Where off-site gains are required in order to meet the recommended minimum 20% net gain, these should be strategically targeted through Local Nature Recovery Strategies.

We would also stress the importance of a robust assessment of existing habitats and species and potential enhancements, as well as oversight and scrutiny of delivery and long-term management plans to ensure that implementation is at the required standard.

We have concerns that the agreed mitigation and biodiversity improvements on site could be delayed until use of the site (for example, for excavation of gravel, sand etc) has been completed and restoration is possible. Whilst we appreciate that the Plan suggests that restoration should take place as soon as possible and in a phased manner where appropriate, in some cases this could constitute a significant and unacceptable temporal lag. A mechanism should be developed to enable the gains for nature to be realised concurrent with development and site use. This might involve one development purchasing 'credits' to achieve the level of gain assessed as appropriate, while 'banking' habitat improvements to be delivered through the restoration of the development that can be traded on for future developments.

The Trust has experience of delivering high-quality restoration projects at mineral sites (for example Testwood Lakes Nature Reserve in Totton, Blashford Lakes Nature Reserve, near Ringwood or Swanwick Lakes Nature Reserve in Fareham). We understand that there is opportunity for individual developments to deliver way above 10% biodiversity gain. We have significant concerns about the proposal that any additional biodiversity gains, beyond the minimum 10%, could be traded in a way that would enable other developments to deliver less and offset their requirements.

Policy 8 – Water Management

We welcome the Plan's explicit recognition of the importance and vulnerability of Hampshire's natural water resources.

Of particular note are the ecologically unique chalk streams that run through the Plan area. Chalk streams are 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, agricultural intensification, increased recreation and a legacy of human modification and intervention have resulted in significant and ongoing declines in biodiversity and water quality. Between 2010 and 2016 the ecological status of surface water bodies across Hampshire declined, with 82% of water in Hampshire's rivers, streams and lakes failing to reach 'good' ecological status (as defined by the EU Water Framework Directive) and none achieving good chemical status or overall health.

It is positive that the policy clearly states that mineral and waste developments must not result in the deterioration of the state of any water waterbody or cause significant adverse risk to the quantity and quality of water resources, however it is not clear what would be deemed appropriate mitigation should risk be identified through the WFD screening assessment or Hydrogeological/Hydrological assessment.

The stipulation, within the supporting text, for an undeveloped area of 8m on either side of the river is, for example, entirely inadequate. Best practise in development would suggest a minimum 20m buffer.

We strongly recommend that *Policy 8 - Water Management* is amended to provide more detail on the required protection and enhancement of rivers for new developments. 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.'*

Given the state of our wastewater and drainage infrastructure, that frequently fails and which is unable to meet existing requirements or adhere to licensed conditions, this plan must ensure that it does not add further burden to the acute pressures faced by Hampshire's water environment. 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".

Policy 10 - Restoration of minerals and waste developments

As previously noted, the Wildlife Trust manages some important nature reserves today that have been secured through agreements for the restoration and management of mineral extraction and landfill developments.

Through careful long-term care and management, these sites now provide some of the most valuable wildlife habitat in the county, boasting nationally significant populations of species including gadwall, coot and shoveller duck.

Restoration plans should be ambitious and seek to secure as much gain as possible for biodiversity and wider environmental benefits.

We support the stated aim of the plan to secure multiple benefits from after-use. We would, however, suggest that careful consideration should be given to the design of restoration plans to ensure that ‘multiple objectives’ do not undermine biodiversity improvements through, for example, promoting inappropriate recreational, leisure and amenity uses. There should be sufficient investment in SANGs alongside the restoration or creation of space for nature. Safeguarding biodiversity gain within the same site is possible, where necessary, through allowing sanctuary and non-access areas and careful zoning.

Sufficient funding should be allocated for the long-term management of restoration sites, with agreements exceeding the suggested minimum of 30 years and ideally safeguarding biodiversity improvements in perpetuity.

As previously noted, in relation to *Policy 3 – Protection of Habitats and Species*, the Trust would be concerned if restoration of extraction and landfill sites was delayed for significant periods, without alternative mechanisms to deliver mitigation off-site at the point that permission is granted. Given the urgency of halting nature’s decline, we cannot afford to put mitigation and enhancement measures on hold until the site’s mineral or waste purpose has been satisfied.

Policy 12 - Flood risk and prevention

We welcome the attention given within the policy to the need to assess flood risk and impacts for the lifetime of the development, taking into account projected climate change impacts.

The policy should give weight to the need to ensure that development design and restoration plans actively reduces flood risk. This can be achieved through investment in nature-based approaches, including the creation of wetlands. Prioritising this approach will also bring additional biodiversity benefits and can also aid in reducing pollution reaching our sensitive rivers (see comments addressing Policy 31 – Liquid waste and wastewater management)

Policy 13 – Traffic

We welcome the inclusion of ‘severance’ of ecological networks in the list of environmental impacts to be assessed. We would also like to see consideration of the impacts of highway pollutants and hydrocarbons in road run-off that contaminates habitats and waterways.

Policy 24 - Oil and gas development

As stated in response to *Policy 2 - Climate change mitigation and adaptation*, the Trust opposes the policy to permit further exploration and production of new oil and gas within Hampshire. It is essential to transition from the use of fossil fuels if we are to avoid the worst impacts of climate change. Embracing this transition should see resources and investment focused on harnessing and developing renewable energy sources such as onshore wind and solar.

We do not believe that there is an evidenced, overriding need for oil and gas in Hampshire. Furthermore, we believe that the environmental impacts from the necessary development, infrastructure, traffic and storage facilities is disproportionate to the economic benefits that could be derived.

The proposed policy to allow oil and gas development within the National Parks ‘*in exceptional circumstances where there are no other suitable locations (outside of National Parks) which can offer a sustainable alternative to development within the National Parks and where the reasons for the designation are not compromised*’ is wholly unacceptable and undermines the ability for these important protected landscapes to fulfil their potential to significantly contribute to nature’s recovery.

Policy 31 - Liquid waste and waste-water management

Investment in sufficient and effective wastewater and liquid waste treatment infrastructure is essential to avoid further unacceptable pollution of our rivers, seas and wider environment, through for example storm overflow incidents or breakdown of pipelines and pumping machinery.

Existing infrastructure is currently failing both nature and our communities, with significant ecological and human health risks. It is important that investment is made in renewing and maintaining failing infrastructure, as well as developing further new facilities to deal with future demand.

The scale of housing and other development planned for the county in the coming decades, combined with increasing extremes in weather means that rapid investment in fit-for-purpose wastewater treatment should be of the highest priority.

Nature-based approaches should form part of the solution. Creating strategically located wetlands and reedbed habitat where wastewater can be intercepted can significantly aid the filtration of pollutants including micro plastics and chemicals and toxins, act as a CSO buffer and provide additional environmental and biodiversity benefits.

Views given here on specific policies are in no way exhaustive and the Trust has a wide-ranging interest in ensuring that the approach to Mineral and Waste planning is truly sustainable and puts nature and natural capital at the heart of policy making.

We would be happy to provide further information or discuss these issues in more detail.

Yours Faithfully,



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