Hampshire & Isle of Wight Wildlife Trust

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Consultation response: Shaping Fareham's future together – Local Plan Scoping

Hampshire & Isle of Wight Wildlife Trust welcomes the opportunity to respond to Fareham Borough Council's Local Plan Scoping Consultation.

The Trust is an independent charity founded in 1961 and part of The Wildlife Trusts movement. Locally, we have more than 29,500 members and manage around 5,000 hectares of land for wildlife across Hampshire and the Isle of Wight.

We have been a key partner in the development of the Hampshire and Isle of Wight Local Nature Recovery Strategies (LNRSs), providing ecological evidence, mapping opportunities for nature-based solutions and supporting community engagement. We are now helping to drive implementation through local restoration projects, partnership working and ambitious place-based programmes. Our Wilder 2030 strategy can be found here: https://www.hiwwt.org.uk/our-strategy.

Nature recovery should be a central strategic priority within the Fareham's Local Plan. It should be embedded throughout the plan's vision, objectives, spatial strategy, site allocations and development management policies, helping to meet housing, infrastructure and economic needs while strengthening climate resilience, public health, ecological networks and local prosperity.

Strategic Planning Context
Planning is one of the most important tools available to shape the future of places and communities. To achieve truly sustainable development, nature must be recognised as critical infrastructure that underpins healthy communities, climate resilience, economic prosperity and quality of life.

The preparation of a new Local Plan comes at a pivotal time, alongside planning reform, devolution and the implementation of Local Nature Recovery Strategies. Together, these changes create a significant opportunity to align growth with environmental capacity, ensuring that development contributes positively to nature recovery and long-term resilience across Hampshire and the Solent.

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We are keen to work constructively with Fareham Borough Council throughout the plan-making process by providing ecological expertise, supporting stakeholder engagement and helping to identify practical solutions that deliver benefits for both people and nature.

A strong Local Plan should treat nature recovery and climate resilience as cross-cutting themes that underpin housing, health, economic growth, transport, heritage and infrastructure. The following recommendations seek to embed these principles consistently across the proposed strategic priorities.

1) Thinking about Fareham's future, which outcomes do you think the new Local Plan should prioritise?

The new Local Plan should prioritise outcomes that recognise nature as the foundation upon which sustainable communities and economic prosperity depend. Nature is not simply an environmental consideration, it underpins the delivery of housing, jobs, health, infrastructure, climate resilience, flood management, attractive places, and thriving town centres. By treating nature as critical infrastructure, the Local Plan can support all three dimensions of sustainable development, social, economic and environmental, ensuring that growth enhances rather than depletes the natural assets on which communities and businesses rely. This approach aligns with growing national recognition that nature recovery is fundamental to long-term growth, health, security and quality of life. Prioritising the protection, restoration and enhancement of nature will therefore help Fareham deliver homes, employment opportunities and infrastructure while creating healthier, more resilient places, supporting community wellbeing, fostering local pride, and safeguarding prosperity for current and future generations.

Nature must be recognised as critical infrastructure that underpins each of these strategic outcomes:

Housing
Nature and housing should not be viewed as competing priorities. Housing development supports nature recovery through green and blue infrastructure provision, accessible natural greenspace, climate resilience through nature-based solutions such as nutrient neutrality, flood risk mitigation and biodiversity net gain.

Supporting jobs and business growth
Natural England's 2025 Strategy: Recovering Nature for Growth, Health and Security, the Government's Environmental Improvement Plan and the Dasgupta Review outline how nature plays a vital role as the foundation of economic growth.

- Investment in nature could unlock £80bn in economic activity and 80,000 jobs[1]
- Investing in nature can deliver up to £34 for every £1 spent [2]

Nature, nature recovery and nature-based solutions should form part of the council's economic strategy, recognising nature as a foundation for growth and supporting its integration across policy mechanisms.

Enhancing town, district and local centres
Town centres play an important role in supporting economic vitality and community wellbeing. Enhancing town, district and local centres should integrate nature into urban environments to improve air quality, reduce urban heat, encourage healthier lifestyles and create more attractive places to live, work and visit.

[1] https://www.rspb.org.uk/media-centre/investing-nature-could-unlock-new-jobs

[2] https://base-prod.rspb-prod.magnolia-platform.com/dam/jcr:67df3da7-ab10-4ece-bebb-52d5726f345b/downloads/pdf/the-case-for-public-investment-in-nature.pdf

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Natural assets enhance town and district centres through urban greening, tree planting, green infrastructure and public realm improvements that support biodiversity. Green and blue infrastructure also creates attractive, climate-resilient centres that encourage people to spend time, work, visit and live in them, whilst supporting health, wellbeing and access to nature. This evidence is set out in Natural England's Green Infrastructure Planning and Design Guide[3] and supports evidence regarding Green and Blue Infrastructure and as part of conservation and enhancement of the natural, built and historic environment.

Green spaces are Britons' biggest source of pride in their local areas.[4] Natural England's Nature Towns and Cities initiative outlines how neighbourhoods can be renewed through green infrastructure, supporting health and wellbeing benefits, cutting healthcare costs and boosting economic growth. They outline that:

- Urban green spaces protect communities from climate threats, cooling air by 2-8°C and cutting pollution by up to 22%
- Natural flood management solutions save millions in potential damage costs
- Beyond environmental benefits, these spaces create essential social hubs for connection and recreation
- They revitalise neighbourhoods, attract investment, and build communities that people take pride in.

Protecting green spaces, biodiversity and landscape

The local plan should refer to conserving and enhancing the natural environment, as per policy N1 of the NPPF and reference ambition for nature recovery to align with the LNRS objectives. Moving from "protection" to proactive restoration, recovery and enhancement of our natural environment best reflects these policies alongside the local authority's biodiversity duty and protected site strategies, section 110 of the Environment Act 2021. Additionally, everyone should have access to a green or blue space within 15 minutes of their home as part of the Access to nature chapter of the Environmental Improvement Plan 2025.

Tackling climate change and managing flood risk

Nature plays a critical role in tackling climate change and managing flood risks through nature-based solutions. Fareham Borough Council declared a climate emergency in 2019, has faced impacts of wildfires and drought within its borough because of climate change. The NPPF is clear that sustainable development must meet the challenge of climate change, and the Government recognises the risks biodiversity loss and critical ecosystems collapse could have on the UK's resilience, security and prosperity.

Nature-based solutions should be prioritised where capable of delivering multifunctional benefits, climate adaptation, climate mitigation and biodiversity benefits. The plan should require habitat-based flood management, urban tree cover expansion for urban cooling, river restoration, blue-green corridors, multifunctional blue and green infrastructure, green roofs and walls and climate adaptation through nature recovery. This would also support Section 40 of the NERC Act 2006, as amended by Section 102 of the Environment Act 2021, which places a duty on public authorities to conserve and enhance biodiversity through the exercise of their functions.

Improving transport and reducing congestion

Transport infrastructure that incorporates natural and ecological elements forms a core part of sustainable green mobility networks, promoting active travel alongside supporting nature recovery and ecological

[3] https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design%20Guide%20-%20Green%20Infrastructure%20Framework.pdf

[4] https://www.moreincommon.org.uk/wp-content/uploads/2026/04/wates-webinar-final.pdf

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connectivity. Country parks, active travel networks and low-carbon transport links can connect people to nature, jobs and everyday services close to home, while reducing car dependency, congestion and air pollution.

Supporting health, education and community facilities

Nature supports physical and mental health, reduces pressure on public services and helps communities adapt to rising heat and climate risk. There is £2.1bn NHS savings from green space access[5], an estimated £6.2–£8.4bn health benefits from recreation[6] and 20m people who gain health benefits from nature annually.[7] This evidence supports nature being embedded into health and community facilities, supporting NPPF policy HC1.1e. identify wider opportunities to promote good health when planning for healthy communities and chapter 19, conserving and enhancing the natural environment. Access to nature is preventative public service infrastructure, which should be planned for to support healthy communities and function as community facilities.

Nature helps development in children[8]. Greenspace is associated with a range of positive outcomes during our childhood and teenage years. These include beneficial outcomes across many aspects of health and development including birth, development of the nervous system, thought processes, behaviour, bodyweight, mental health and wellbeing and school performance. Research by the Wildlife Trusts shows that nature-based education supports health and wellbeing, alongside changes in confidence, behaviours, motivation and willingness to take risks, highlighting particular benefits for neurodiverse students and children from low socioeconomic backgrounds. Nature-based education and access to nature for children, should form part of educational plans in Fareham.

Protecting heritage and local character

Natural England identifies what the historic environment can offer for nature recovery objectives, providing case studies and examples of where historic assets, archaeology sites and landscapes are also natural assets, habitats and often wildlife rich places. These places facilitate nature corridors and ecological networks, connecting people to nature and support actions taken to mitigate against climate change and improve soil, water and air quality. [9] Following this advice, we recommend that ambition for nature recovery is included within heritage priorities, as an integral part of historic assets and their conservation and to best adhere to national policy.

Ensuring infrastructure keeps pace with growth

Nature should be reflected as critical infrastructure that underpins sustainable development, incorporated into plans alongside other infrastructure provision. Nature-based solutions offer multiple benefits, supporting flood mitigation and natural flood management, sustainable drainage systems, urban cooling, coastal defences, nutrient neutrality, clean air, health and wellbeing and as part of strategic accessible natural greenspace.

[5] https://sustainablehealthcare.org.uk/activity/nhs-forest/

[6] https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/healthbenefitsfromrecreationnaturalcapitaluk/2022

[7] https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalaccounts/2024

[8] https://www.wildlifetrusts.org/sites/default/files/2026-09/FixNatureCompendium.pdf

[9] https://historicengland.org.uk/content/docs/advice/nature-recovery-historic-environment/

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Investing in nature can deliver up to £34 for every £1 spent[10] and Hampshire's rivers, wetlands and saltmarsh already help protect the region's core infrastructure. Investing in nature now can reduce future repair costs, disruption and pressure on sensitive sites.

Environmental decline is already creating economic risk and cost. Water stress, nutrient pollution, habitat loss, flooding and coastal change are no longer abstract future threats; they are direct constraints on growth, development and resilience. Wildfires, heatwaves and coastal change are growing risks across the region, affecting communities, infrastructure and insurance costs. Restoring wetlands, reconnecting rivers, increasing tree cover and enhancing coastal habitats provide long-term protection. Well-designed green infrastructure creates places where people want to spend time, increasing footfall and informal surveillance, and strengthening community cohesion. Nature is foundational to growth and must be invested in as infrastructure.

2) What are the most important issues about future development in the borough that the Council should be aware of?

The most important issue facing future development is ensuring that growth takes place within environmental limits and actively contributes to nature recovery, climate resilience and community wellbeing, rather than increasing existing pressures on natural systems. Nature should be recognised as critical infrastructure that underpins economic prosperity, public health, water security, climate adaptation and quality of life. Key issues include biodiversity loss, water scarcity, flood, wildfire and drought risk, climate adaptation, ecological connectivity, access to nature and the need for sustainable infrastructure.

The borough must respond to the continuing decline of wildlife and habitats by embedding nature recovery throughout the Local Plan. Development should support the delivery of the Local Nature Recovery Strategy (LNRS), strengthen ecological networks and contribute to the international commitment to halt nature's decline and protect at least 30% of land for nature by 2030. The NPPF paragraph 3 states that planning decisions must reflect relevant international obligations. The Government recognises the risks biodiversity loss and critical ecosystems collapse could have on the UK's resilience, security and prosperity.[11] Natural England's 2025 Strategy and the 2021 Dasgupta Review identify nature's vital role as the foundation of economic growth. Fareham must incorporate climate and nature into strategic growth plans to reflect the reality of the crises for generations now and in the future.

Water availability is becoming a major constraint on growth across Hampshire and the Solent. Future development must be planned alongside sustainable water supply, wastewater treatment and river protection. Growth should not place additional pressure on rivers, wetlands, chalk streams and other sensitive habitats, particularly where drought, abstraction and pollution are already affecting environmental quality.

The River Meon should be subject to additional protections as a chalk stream. Chalk streams are globally rare, irreplaceable and sensitive water bodies that require particular protection from abstraction, wastewater discharges, nutrient loading, surface-water runoff and pollution. Additional growth should therefore be planned alongside sustainable water supply and wastewater capacity and should avoid harm to, and seek restoration of, the river and its catchment. As a trust we recognise chalk streams as

[10] https://base-prod.rspb-prod.magnolia-platform.com/dam/jcr:67df3da7-ab10-4ece-bebb-52d5726f345b/downloads/pdf/the-case-for-public-investment-in-nature.pdf

[11] https://www.gov.uk/government/publications/nature-security-assessment-on-global-biodiversity-loss-ecosystem-collapse-and-national-security

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irreplaceable habitats due to their rare, unique and irreplaceable features. We would recommend the protection of chalk streams within policy wording to safeguard these rare habitats.

Fareham's Solent and Portsmouth Harbour coast, the River Hamble, Titchfield Haven National Nature Reserve and Stubbington Meadows, amongst others include or support Ramsar sites, Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs). Their mudflats, saltmarshes, reedbeds, freshwater lagoons, wet meadows and coastal scrub support over 90,000 wintering waders and wildfowl across the Solent, including 10% of the global population of dark-bellied Brent geese, which is recognised in Fareham's Greener Future Appendix A[12]. Additionally, saltmarsh stores carbon, coastal habitats strengthen flood and climate resilience, and the area supports Fareham's distinctive character and birdwatching tourism. Development beyond designated boundaries can nevertheless cause indirect and cumulative harm through recreational disturbance, habitat fragmentation, water-quality pressures and the loss of functionally linked feeding and roosting land.

The Local Plan must therefore use the Solent Waders and Brent Goose Strategy's mapping of SPA, core and support areas for these globally significant birds, together with the LNRS and other ecological evidence, to steer allocations towards land of least environmental value, apply the mitigation hierarchy and safeguard the integrity of protected sites to align with NPPF policy N1.1a, N1.1c and N2.2. Strategic provision for bird-disturbance mitigation, Suitable Alternative Natural Greenspace (SANG), Strategic Access Management and Monitoring (SAMM), nutrient reduction, green and blue infrastructure and habitat creation and restoration will be essential if new housing and infrastructure are to be accommodated lawfully without eroding the natural systems on which the borough's resilience, wellbeing and long-term prosperity depend. These issues are particularly important to the location, scale and design of future development in Fareham because the borough's growth, character and economy is directly linked with the network of internationally and nationally important water and coastal environments.

The borough must prepare for increasing risks from flooding, drought, overheating, wildfires and extreme weather. Nature-based solutions such as wetlands, sustainable drainage systems, urban greening, tree planting and habitat restoration can help communities adapt while providing wider environmental and social benefits. Green spaces, rivers, woodlands and other natural assets should be planned and funded as essential infrastructure alongside roads, schools and utilities. High-quality green and blue infrastructure can improve health, reduce flood risk, support biodiversity and enhance the attractiveness of places to live and work.

New homes should be delivered in locations that are sustainable, supported by infrastructure and capable of providing access to nature, active travel opportunities and healthy living environments. Development should create nature-positive neighbourhoods and integrate green infrastructure early into the plan making process. Access to high-quality natural green space should be considered essential community infrastructure. Future development should improve access to nature for all residents, helping to support physical and mental health, reduce inequalities and create stronger, healthier communities. This supports the delivery of multiple NPPF policies across green infrastructure provision, planning for healthy communities and conserving and enhancing the natural environment.

A healthy natural environment is fundamental to long-term economic success. Nature supports tourism, workforce wellbeing, climate resilience, investment and local prosperity. The Council should recognise that environmental enhancement and economic growth are mutually reinforcing rather than competing objectives.

[12] https://moderngov.fareham.gov.uk/documents/s37223/Appendix+A+-+Farehams+Greener+Future.pdf

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3) Thinking about the environment, which outcomes do you think the new Local Plan should prioritise?

We do not consider it appropriate to rank these priorities, as climate change, flood risk, biodiversity and habitats, nature recovery, landscape protection, green infrastructure, water quality and water resources, renewable energy and the historic environment are intrinsically linked and mutually reinforcing. Nature recovery should be treated as the thread that connects these themes and enables the delivery of sustainable, resilient and attractive places.

Nature should be recognised as critical infrastructure that underpins many of these objectives. Healthy ecosystems help mitigate and adapt to climate change, reduce flood risk, improve water quality, enhance biodiversity, support nature recovery and strengthen landscape character. Green infrastructure and nature-based solutions can deliver multiple benefits simultaneously, including natural flood management, urban cooling, habitat creation, ecological connectivity, improved public health and climate resilience. Together they are essential for building resilience to climate change whilst delivering benefits for wildlife and communities.

Water quality, wastewater capacity and water resources are similarly linked to biodiversity, climate resilience and landscape protection. Healthy rivers, wetlands and catchments support wildlife, reduce flood risk, improve drought and wildfire resilience, enhance water quality and contribute to the environmental capacity needed to accommodate sustainable growth. Hampshire and Isle of Wight Wildlife Trust is well positioned to deliver biodiversity net gain and mitigation for nitrates or carbon, prioritising significant added value alongside nature recovery. Nutrient neutrality delivery schemes should be encouraged to go beyond offsetting and secure nutrient reduction.

The River Meon should receive particular recognition and protection as a chalk stream that is globally rare and supports wildlife-rich and biodiverse habitats. As a Trust, we recognise chalk streams as irreplaceable habitats due to their rare, unique and irreplaceable characteristics and they are recognised in the NPPF as sensitive water bodies that should 'require particular consideration in managing development due to their environmental value'. Development should therefore avoid harm to the River Meon and its catchment and seek opportunities to restore and enhance its ecological integrity.

The historic and natural environments are also closely connected. Natural England identifies how the historic environment can support nature recovery objectives, providing case studies and examples of where historic assets, archaeology sites and landscapes are also natural assets, habitats and often wildlife rich places. These places can facilitate nature corridors and ecological networks, connecting people to nature and support actions taken to mitigate against climate change and improve soil, water and air quality.[13] Historic landscapes, waterways, woodlands and green spaces contribute significantly to local character, cultural heritage, biodiversity and people's sense of place. Protecting and enhancing these assets can therefore deliver benefits for both nature recovery and heritage conservation.

The Solent's interconnected mudflats, saltmarshes, reedbeds, freshwater lagoons, wet meadows and coastal scrub, together with the network of SPA sites, core areas and support areas identified through the Solent Waders and Brent Goose Strategy, should be recognised as multifunctional natural infrastructure rather than considered solely under biodiversity and habitats. These habitats support more than 90,000 wintering waders and wildfowl, including 10% of the global population of dark-bellied Brent geese. Their protection, restoration and connection would simultaneously advance nature recovery and ecological

[13] https://historicengland.org.uk/content/docs/advice/nature-recovery-historic-environment/

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resilience; capture and store carbon, help manage coastal change, flood risk and defence, strengthen Fareham's distinctive coastal landscape and form a strategic green and blue infrastructure network. Healthy coastal wetlands can also improve water quality by intercepting runoff and nutrients, support more resilient water systems and water storage, and provide space for recreation, wellbeing and the borough's birdwatching tourism, where this is carefully managed to avoid disturbance.

The Local Plan should therefore avoid treating climate change, flood risk, biodiversity and habitats, nature recovery, landscape protection, green infrastructure, and water quality and resources as competing priorities: safeguarding functionally linked feeding and roosting land and delivering strategic habitat creation, restoration, access management and long-term monitoring can secure benefits across all of these outcomes while helping future development remain within environmental limits. We therefore encourage the Council to adopt an integrated approach that recognises the interrelationship between these priorities and ensures they are embedded throughout the Local Plan, rather than being treated as separate policy considerations. A coordinated approach will deliver greater benefits for communities, the environment and the long-term resilience of the area, as well as economic benefits.

4) Do you agree that the Local Plan should consider providing space to help mitigate pressures from development on the environment (such as for bird disturbance, water quality, nature enhancement)?

Yes, we strongly agree that the Local Plan should identify and provide sufficient land and strategic measures to mitigate and address the environmental pressures arising from development, including impacts on protected bird populations, water quality and wider nature enhancement.

This approach is consistent with the NPPF policy N1, which requires planning policies and decisions to enhance and safeguard the natural environment, minimise impacts on biodiversity, provide net gains for biodiversity, strengthen ecological networks, and improve environmental conditions, including waterbodies and water quality through green infrastructure provision. The NPPF is clear that development should not simply avoid harm but should actively seek opportunities to protect, restore and enhance nature.

- Policy N1.1c. states that the LNRS alongside other strategies, management plans and evidence should be used to steer the location of development, including through site allocations, in ways which utilise land of least environmental value.
- Policy N2.2 states that the mitigation hierarchy should be applied, whereby if harm to biodiversity cannot be avoided, adequately mitigated or as a last resort compensated for, it should be refused. Policy N6 also states that development should be refused or only be permitted where there are no adverse effects on sites of particular importance for biodiversity or where benefits of proposals outweigh the impacts.
- The importance of considering indirect and cumulative impacts is also reflected in policy N6.3, which recognises that development may be unacceptable where it would adversely affect designated sites or important ecological interests, even where the development is not located directly within those sites.
- Under the Habitats Regulations, the competent authority must be satisfied that proposals will not adversely affect the integrity of the protected site before it can be approved.

This reinforces the need for the Local Plan to identify strategic mitigation, and enhancement measures capable of addressing off-site and cumulative effects arising from growth. The Local Plan should therefore allocate and safeguard appropriate land for measures such as Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM), bird disturbance mitigation, nutrient mitigation schemes, strategic green infrastructure and nature recovery projects supporting habitat creation and restoration.

Fareham has internationally and nationally designated sites on the Solent, Portsmouth Harbour, the River Meon, the River Hamble, Titchfield Haven National Nature Reserve, Stubbington meadows (a partnership with the Trust and Fareham Council) amongst others, which include Ramsar sites, Special Protection Areas (SPAs), Special Area of Conservations (SACs) and Sites of Special Scientific Interest (SSSIs). These habitats host over 90,000 waders and wildfowl including 10% of the global population of dark-bellied Brent geese. The variety of habitats including mudflats, saltmarshes, reedbeds, freshwater lagoons, wet meadows, and coastal scrub not only attract rare species, but are a natural solution to the climate crisis with saltmarshes capturing and storing carbon.[14] These sites also support Fareham's tourism economy with the borough being celebrated as one of the best birdwatching sites in Hampshire.[15]

Regarding bird disturbance mitigation, Hampshire and Isle of Wight Wildlife Trust lead on the co-ordination of survey work and analysis of data for the Solent Waders and Brent Goose Strategy, working alongside local authorities, including Fareham Council and partners such as Natural England, RSPB, Hampshire County Council and Coastal Partners. The strategy includes spatial mapping of the network highlighting SPA sites, core areas and support areas to support waders and brent geese. These birds are globally significant, heavily protected winter migrants that serve as the definitive iconic symbol of the Solent's cold-weather coastline. More information can be found out about the strategy here: https://solentwbgs.wordpress.com/.

We are also a partner in Bird Aware Solent, a partnership organisation whose aim is to mitigate the additional recreational disturbance to overwintering and breeding birds using the Solent brought about by additional development, through engagement, education, and raising awareness. One of their key aims is to reduce disturbance of coastal birds by human activity. Increased recreational pressure associated with housing growth can have significant indirect impacts on protected and designated sites. The provision of strategic mitigation land and long-term monitoring and management can reduce disturbance and help ensure compliance with environmental legislation. Providing space for these purposes will help ensure that growth can be accommodated while maintaining the integrity of important habitats, rare and sensitive species, mitigating against impacts of development and recreational disturbance, whilst also supporting long-term environmental resilience and promoting tourism that is unique to the area.

Fareham council has a responsibility under the Wildlife and Countryside Act 1981 to protect all wild birds, their eggs and active nests. The Council also has a statutory biodiversity duty, which requires it to have regard to the purpose of conserving and enhancing biodiversity in exercising its functions. As such, the Local Plan should take a proactive approach to addressing environmental impacts rather than relying solely on site-level mitigation once development proposals come forward.

Water quality is another significant consideration. Increased development can place additional pressure on sensitive water environments through wastewater discharges, nutrient loading and increased surface water runoff. The NPPF states that development should, wherever possible, contribute to improving local environmental conditions, including water quality, especially in relation to sensitive water bodies such as chalk streams (DP3.2c; P3.2f; F8.1; N2.1e). Strategic land and infrastructure provision within the Local Plan can support nutrient mitigation, wetland creation, natural flood management and catchment-scale nature recovery initiatives which both protect and enhance water quality. Hampshire and Isle of Wight Wildlife Trust is well positioned to deliver biodiversity net gain and mitigation for nitrates or carbon, prioritising

[14] https://www.hiwwt.org.uk/super-saltmarshes

[15] https://www.solent.news/guide/wildlife-nature-reserves

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significant added value. Nutrient neutrality delivery schemes should be encouraged to go beyond offsetting and secure nutrient reduction.

Overall, providing space and strategic mechanisms to address bird disturbance, water quality and nature enhancement is not only justified but necessary to ensure that development contributes positively to nature recovery, complies with environmental legislation and the council's biodiversity duty, and aligns with the objectives of the NPPF.

5) Are there any heritage assets, landscapes or environmental features that you believe require greater recognition or protection?

The Local Nature Recovery Strategy highlights areas of particular importance for biodiversity and areas that could be important for biodiversity. These areas should enhance the natural environment, support nature recovery and be protected and safeguarded. This will support the objectives and ambitions of the LNRS, NPPF policy and wider benefits from natural capital, nature-based solutions and ecosystem services. The River Meon is a globally rare and irreplaceable chalk stream and, as a sensitive water body, requires particular protection from abstraction, wastewater discharges, nutrient loading, surface-water runoff and pollution. Additional growth should therefore be planned alongside sustainable water supply and wastewater capacity and should avoid harm to, and seek restoration of, the river and its catchment.

Fareham's Solent and Portsmouth Harbour coast, the River Hamble, Titchfield Haven National Nature Reserve and Stubbington Meadows include or support Ramsar sites, Special Protection Areas, Special Areas of Conservation and Sites of Special Scientific Interest. Their mudflats, saltmarshes, reedbeds, freshwater lagoons, wet meadows and coastal scrub support over 90,000 wintering waders and wildfowl across the Solent, including 10% of the global population of dark-bellied Brent geese[16]. Additionally, saltmarsh stores carbon, coastal habitats strengthen flood and climate resilience, and the area supports Fareham's distinctive character and birdwatching tourism. Development beyond designated boundaries can nevertheless cause indirect and cumulative harm through recreational disturbance, habitat fragmentation, water-quality pressures and the loss of functionally linked feeding and roosting land.

The Local Plan must therefore use the Solent Waders and Brent Goose Strategy's mapping of SPA, core and support areas, together with the LNRS and other ecological evidence, to steer allocations towards land of least environmental value, apply the mitigation hierarchy and safeguard the integrity of protected sites. Strategic provision for bird-disturbance mitigation, Suitable Alternative Natural Greenspace, access management and monitoring, nutrient reduction, green and blue infrastructure and habitat creation and restoration will be essential if new housing and infrastructure are to be accommodated lawfully without eroding the natural systems on which the borough's resilience, wellbeing and long-term prosperity depend. These issues are particularly important to the location, scale and design of future development in Fareham because the borough's growth and economy is connected to network of internationally and nationally important water and coastal environments.

6) Thinking about infrastructure and services, which outcomes do you think the new Local Plan should prioritise?

The Local Plan should recognise that nature is itself critical infrastructure. Healthy rivers, wetlands, woodlands, soils, parks, green spaces and ecological networks underpin public health, economic prosperity, climate resilience, water security and community wellbeing. Nature should therefore not be

[16] https://moderngov.fareham.gov.uk/documents/s37223/Appendix+A+-+Farehams+Greener+Future.pdf

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treated as an optional environmental consideration, but as essential infrastructure that supports and enhances the delivery of all other infrastructure and services. Nature is a foundation of sustainable growth, helping to secure clean water, reduce flood risk, improve air quality, support workforce health and productivity, and create attractive places in which people want to live, work and invest.

In particular, the Local Plan should prioritise nature recovery, as set out in the LNRS, parks and open spaces and the wider provision of green and blue infrastructure, as these deliver multiple benefits across many of the outcomes listed. Access to nature supports physical and mental health, reduces pressure on healthcare services, strengthens community cohesion and helps communities adapt to rising temperatures and climate-related risks. This also supports the Government's 15-minute commitment and NPPF policy HC1.1e. identify wider opportunities to promote good health when planning for healthy communities. Nature should be planned as preventative health infrastructure, not simply as recreational space.

There are also important links between nature and education. Access to nature-rich spaces, outdoor learning environments and wildlife-friendly school grounds can support children's physical health, mental wellbeing, development and connection to the natural world. Integrating nature into educational settings helps create healthier learning environments while fostering environmental stewardship and resilience for future generations. This supports the role of schools and education facilities as part of a wider healthy and sustainable community.

Walking and cycling routes should be delivered through connected green infrastructure networks and ecological corridors wherever possible. Green corridors support the Lawton principles for ecological network recovery and nature conservation where nature is bigger, better, more and joined up. This makes active travel routes more attractive, accessible and resilient, while simultaneously improving biodiversity, habitat connectivity, air quality and public health. Well-designed green infrastructure can therefore support both sustainable transport and nature recovery objectives.

Similarly, community facilities, leisure and sports facilities, and new development should be integrated with accessible green and blue spaces so that residents can benefit from nature close to where they live, supporting the Government's 15-minute commitment. High-quality green infrastructure creates healthier, more attractive and more resilient communities, whilst supporting local nature recovery and delivering wider social and economic benefits.

Water and wastewater infrastructure should be planned alongside the protection and restoration of the natural environment. This is particularly important because Fareham has already experienced water scarcity, drought and wildfire impacts associated with climate change, which have an impact on growth and environmental quality. Prolonged dry periods reduce river flows and the capacity of sensitive habitats, including the River Meon chalk stream to withstand abstraction, nutrient loading and pollution. Wetter winters are expected because of climate change, and intense rainfall can overwhelm drainage and sewer networks. Sewage impacts are a locally significant infrastructure issue: Southern Water's East Hampshire Drainage and Wastewater Management Plan[17] identifies the need to plan for significant development at Fareham, investigate the effects of wastewater discharges on designated Solent and harbour habitats, and improve network and treatment-work resilience to prevent pollution incidents in Fareham. In 2025, there were 13 sites polluted by Southern Water, 155 sewage dumps and 569 hours duration.[18] The Local Plan should not rely on future upgrades alone: the scale and phasing of development must be aligned with demonstrable water-supply and wastewater-treatment capacity, with requirements for water efficiency,

[17] https://pp.southernwater.co.uk/media/sihol0ve/l2-east-hampshire-river-basin.pdf

[18] https://www.top-of-the-poops.org/place/fareham

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SuDS, wetland and floodplain restoration, reduced runoff and nutrient pollution, and long-term monitoring so that growth does not intensify drought stress, sewage discharges or harm to the River Meon, Portsmouth Harbour and the wider Solent.

Overall, rather than viewing infrastructure priorities in isolation, the Local Plan should adopt an integrated approach that treats nature and green infrastructure as a strategic priority underpinning all infrastructure provision. Investment in nature delivers benefits for health, education, active travel, water management, climate resilience, economic growth and community wellbeing, while also helping to reverse biodiversity loss and support the objectives of the Local Nature Recovery Strategy.

Nature-rich green infrastructure supports the effectiveness and resilience of almost every other infrastructure category while delivering benefits for nature recovery, climate adaptation, public health and sustainable economic growth.

13) What do you think the Council should prioritise when planning for future housing growth?

Housing growth should be planned within environmental limits and directed to the most sustainable locations, ensuring that development supports healthy communities, climate resilience and nature recovery. The Council should prioritise the delivery of high-quality, affordable and energy-efficient homes alongside the infrastructure needed to support them. Nature should be recognised as critical infrastructure that underpins successful communities, public health, economic resilience and climate adaptation, as identified in the Natural England's 2025 Strategy: Recovering Nature for Growth, Health and Security, the Government's Environmental Improvement Plan and the Dasgupta Review.

The Local Plan should prioritise previously developed land and urban regeneration opportunities where these can be delivered without compromising environmental quality or community wellbeing. Where greenfield development is demonstrated to be necessary, site selection should follow the mitigation hierarchy, as per NPPF policy N2.2, directing development towards land of least environmental value, N1.1c. and avoiding areas important for nature recovery, ecological connectivity, flood management and climate resilience. The Hampshire Local Nature Recovery Strategy should be used to inform site selection, nature recovery, BNG, green and blue infrastructure, alongside wider infrastructure planning.

Housing growth should contribute positively to nature recovery rather than simply minimising harm, as outlined in NPPF policy N1. New development should provide high-quality, multifunctional green and blue infrastructure, accessible natural greenspace, sustainable drainage systems, urban greening, habitat creation and biodiversity enhancements from the outset. Green infrastructure should form part of the primary structure of development, guided by the LNRS to support wildlife, active travel, climate resilience, flood management and community wellbeing.

Natural England's Green Infrastructure Framework includes mapping and standards, covering accessible greenspace standard, urban nature recovery standard, urban greening factor standard and urban tree canopy standard[19]. We recommend that this guidance and best practice is followed and reflected in policy. Walking and cycling routes should be integrated with green infrastructure networks and ecological corridors to support healthier lifestyles, reduce car dependency and improve ecological connectivity. Access to nature should be treated as preventative health infrastructure given its well-evidenced benefits for physical and mental health.

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https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Standards%20for%20England%20Summary%20v1.1.pdf

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An exemplary approach to green infrastructure is the Building with Nature Standard[20], which 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 all proposals for green infrastructure will be expected to be designed with the Building with Nature standards, or an equivalent standard set by the Council. This will ensure that all green infrastructure delivers maximum benefits for the health and wellbeing of residents, and for nature's recovery. Green infrastructure can also support natural flood management, which aligns with NPPF policy F2.1c. planning for effective flood risk management and maximising natural flood management techniques. Green infrastructure provision within plan making also supports delivery against other NPPF policies including PM13.1a. setting standards; CC1.1d planning for climate change and N1.1d. identifying environmental opportunities and safeguards.

UK flood risk and drainage consultancy, Unda outline that under the NPPF, local authorities expect SuDS to manage water quantity and to improve water quality, amenity and biodiversity. [21] Green SuDS deliver against all four, which is why Local Planning Authorities and Lead Local Flood Authorities increasingly apply a "green first" principle. Green SuDS manage water above ground using planting, soil and surface flow, adding amenity and biodiversity. This approach supports NPPF policies F8.1 improvements in water quality, biodiversity and amenity through sustainable drainage systems and watercourses and chapter 19 conserving and enhancing the natural environment.

Particular attention should be given to ensuring that housing growth does not place unacceptable pressure on water resources, wastewater infrastructure, internationally important habitats, rivers, chalk streams and protected sites. Future growth should be aligned with environmental capacity and supported by nature-based solutions that improve water quality, reduce flood risk, increase climate resilience and contribute to wider nature recovery objectives.

Overall, the Council should prioritise sustainable, nature-positive growth that delivers homes alongside nature recovery, climate resilience, infrastructure provision and healthy communities, ensuring that development leaves nature in a better state than before and supports thriving communities.

19) Which principles should guide decisions about where development is located?

Decisions about the location of development should be guided by environmental capacity and the principle that nature is critical infrastructure underpinning sustainable growth, public health, water security, climate resilience and long-term prosperity. The Local Plan should follow the mitigation hierarchy and use the Hampshire Local Nature Recovery Strategy, the Solent Waders and Brent Goose Strategy and other ecological evidence to direct growth towards land of least environmental value, as per NPPF policy N1.1c and N2.2.

Development should not only avoid designated sites, irreplaceable habitats and areas important for nature recovery, but should actively seek to safeguard and enhance the natural environment, maximising opportunities for the conservation, enhancement and recovery of landscapes and sensitive habitats, species and waterbodies, as stated in the NPPF policy N1. Particular weight should be given to protecting the River Meon chalk stream, the Solent and Portsmouth Harbour coast, the River Hamble, Titchfield Haven National Nature Reserve, Stubbington Meadows and the wider network of Ramsar sites, SPAs, SACs and SSSIs from direct, indirect and cumulative harm, including recreational disturbance, habitat

[20] https://sintali.com/about-building-with-nature

[21] https://www.unda.co.uk/news/green-suds-nature-based-drainage-in-modern-planning/

fragmentation, abstraction, wastewater discharges, nutrient pollution and surface-water runoff. Policy N2.2 states that the mitigation hierarchy should be applied, whereby if harm to biodiversity cannot be avoided, adequately mitigated or as a last resort compensated for, it should be refused. Policy N6 also states that development should be refused or only be permitted where there are no adverse effects on sites of particular importance for biodiversity or where benefits of proposals outweigh the impacts. The River Meon and the coastal habitats are of international importance and global recognition. Their mudflats, saltmarshes, reedbeds, freshwater lagoons, wet meadows and coastal scrub support over 90,000 wintering waders and wildfowl across the Solent, including 10% of the global population of dark-bellied Brent geese. These birds are globally significant, heavily protected winter migrants that serve as the definitive iconic symbol of the Solent's cold-weather coastline.

Development should only be located where water supply, wastewater treatment and other infrastructure have demonstrable capacity, so that growth does not worsen drought pressures, sewage impacts or water quality that Fareham and Hampshire have recently experienced. Locations should also enable multifunctional green and blue infrastructure, sustainable drainage, natural flood management, habitat creation and restoration, accessible natural greenspace and connected wildlife networks to be designed in from the outset. This will support delivery of multiple NPPF objectives, across HC1: Planning for healthy communities, CC1: Planning for climate change, F2: Planning for effective flood risk management and chapter 19: Conserving and enhancing the natural environment. This approach would help new development adapt to flooding, drought, overheating, wildfire and coastal change, while delivering measurable biodiversity gains, strengthening ecological connectivity and actively contributing to nature recovery rather than simply minimising harm.

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.

Kind regards,
Niaṁ Tickner

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