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**From:** Sienna Somers [REDACTED]  
**Sent:** 06 December 2021 15:04  
**To:** PlanningPolicyConsultation  
**Cc:** Planning Policy Internet  
**Subject:** Gosport Local Plan Reg 18 response  
**Attachments:** Gosport LP Reg 18 HIWWT response (1).pdf

Dear Planning Policy Team,

Apologies for the delay! Please find attached Hampshire & Isle of Wight Wildlife Trust's response to Gosport's Reg 18 Local Plan consultation.

A quick note to say that this is one of the better Local Plans that I have seen locally recently in terms of protection and enhancement of the ecological network and green infrastructure – so well done!

Kind regards,

Sienna

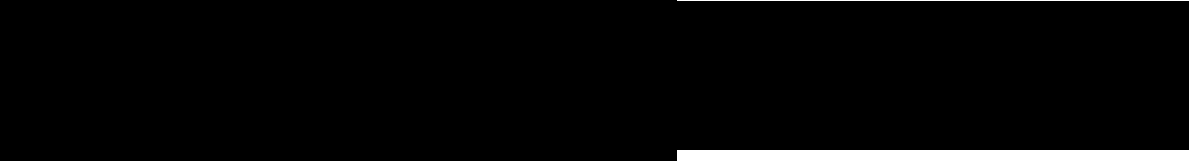
Sienna Somers  
Policy and Advocacy Manager

Hampshire & Isle of Wight Wildlife Trust

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Submitted via email to: [planningpolicyconsultation@gosport.gov.uk](mailto:planningpolicyconsultation@gosport.gov.uk)

**6<sup>th</sup> December 2021**

### **CONSULTATION: Gosport Borough Local Plan 2038 (Regulation 18)**

Dear Planning Policy Team, Planning and Regeneration Services,

We welcome the opportunity to comment on the Gosport Borough Local Plan 2038. Overall, we are pleased to see the natural environment at the forefront of this plan and broadly welcome your policies on the environment, biodiversity and green infrastructure.

In particular, we are extremely pleased to see a very strong focus across the plan on the Local Ecological Network and using the network to inform and target biodiversity net gain delivery.

We would, however, like to see the Local Ecological Network map included within the draft plan and a map of the strategic development sites layered with the Local Ecological Network map. As an example, the recent Isle of Wight Draft Local Plan (Reg 18) included an interactive map with changeable layers to allow you to view the strategic site allocations alongside designations, green infrastructure, local ecological network mapping, flood risk etc. This allows the public to better understand the impacts of the strategic housing and employment allocations, and thus make more informed responses to the proposed locations.

#### **Biodiversity Net Gain**

We welcome the inclusion of a stand-alone Biodiversity Net Gain (BNG) policy (LE8) within the draft plan, especially the inclusion of BNG needing to contribute towards the wider Local Ecological Network and considering the long-term management of BNG sites.



We consider that the greatest challenge for the implementation of BNG will be monitoring both onsite and offsite provisions, as habitats created will need to be maintained for 30 years, especially where BNG is in parallel to green infrastructure. We therefore suggest adding the following into policy LE8:

- requiring regular reporting by developers
- a clear statement that failure to meet milestones in habitat condition would trigger a response from the Council
- statement that amenity features should not be claimed as having high ecological quality unless they have a robust ecological management plan.

Furthermore, we believe there is real opportunity for Gosport Borough Council to be leaders in this area and go beyond 10% BNG and include a 20% minimum BNG to channel investment to the creation and maintenance of the ecological network and green infrastructure. Local Nature Partnerships are recommending the adoption of 20% minimum BNG by Local Planning Authorities, and some councils are pioneering this approach, including South Cambridgeshire District Council and Lichfield District Council. This would ensure that BNG truly halts nature's decline locally and puts it into recovery.

It is worth noting that biodiversity net gain provision can work in parallel with green infrastructure, so investment in biodiversity net gain could be used to create areas for both people and nature to enjoy.

### **Green infrastructure**

We welcome the Green Infrastructure Network Policy D4 and the mention of how it can support both biodiversity, and mitigation and adaption for the climate crisis.

However, there is significant recreational pressure on wildlife-rich and sensitive sites which hinders nature's recovery but also demonstrates what people are seeking in terms of their outdoor recreation. Traditional amenity spaces lack the enjoyment and fulfilment of more nature-rich spaces, and we are seeing an increasing proportion of the public seeking these wilder spaces.

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.

An exemplary approach to this would be the Building with Nature Standard, 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 all proposals for green infrastructure

should be expected to be designed with the [Building with Nature standards](#), or an equivalent benchmark set by the Council. This will ensure that all green infrastructure is delivering maximum benefits for the health and wellbeing of residents, and for nature's recovery.

### **Nutrient Neutrality (Point 2e of Policy D5)**

We strongly encourage the Council to state that it will give a strong preference to nitrate mitigation schemes that will deliver wider environmental benefits, especially for biodiversity. For example, our Nitrate Reduction Programme is demonstrating a way of mitigating and reducing the impact of nitrates in the Solent from planned housing developments, through the creation of new nature reserves on formerly intensively managed farmland - creating new habitats for local wildlife and helping nature to recover.

For more information visit: <https://www.hiwwt.org.uk/reducing-nitrates-solent>

### **Government's Standard Method for calculating housing targets**

We applaud Gosport Borough Council for challenging the Government's standard methodology for calculating housing targets and instead suggesting lower, more realistic target for the city.

As the former Secretary of State for Housing, Communities and Local Government, Robert Jenrick MP, has stated, the Government's standard method for calculating housing need is only "a starting point" for councils, and local authorities should take environmental constraints and land supply into consideration in determining the number of homes that can be delivered. The Government also "recognises that not everywhere will be able to meet their housing need in full".

However, we encourage the Council to go further and firmly reject the current numbers under the standard methodology, arguing "exceptional circumstances" given that more than 80% of the area is already built on, and a further 12% of it is designated.

In our view, we consider a case for exceptional circumstances exists which justifies an alternative approach to determining local housing need and an appropriate housing target for the Council, rather than underdelivering and then presumption in favour of sustainable development may be applied.

### **Wilder Hampshire and Isle of Wight**

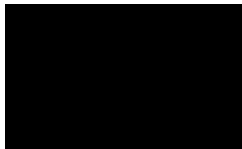
The Wildlife Trusts are calling for at least 30% of land and sea to be restored for nature and climate by 2030, in line with national and international commitments – planned and delivered as a nature-recovery network and providing nature-based solutions such as pollution reduction, carbon removal and flood management. As part of this, we have an

ambition to double the land that we manage for nature including new nature reserves, rewilding sites and creation of new wildlife habitats through our [nature-based solutions program](#).

We would welcome Gosport Borough 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.

We trust that you will find our comments helpful and, if you 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 planning strategy.

Yours sincerely,



**Sienna Somers**

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