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Isle of Wight  
Wildlife Trust**

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## **Consultation: Submission Version of the Island Planning Strategy (IPS) Regulation 19 2024**

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, we have over 29,000 members, including over 3,400 on the Isle of Wight, 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 pre-submission version of the Island Planning Strategy. While we are pleased to see the environment as a key issue of the Strategy, we consider that in its current form, the Strategy suffers from a lack of development of key policies; which risks a failure to comply with legal obligations in the Environment Act 2021.

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 the Isle of Wight 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.

In order to be compliant with the requirements of the Climate Change Act 2008 and the Environment Act 2021, including the enhanced environmental duty in the latter, we recommend the Island Planning Strategy must do the following.

### **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 **EV2: Ecological Assets and Opportunities for Enhancement** 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](#) 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. Independent research by [DEFRA](#) has found that the price of 10% or 20% BNG to be similar, with little impact on overall costs. Furthermore, [DEFRA](#) conclude that the 10% BNG target is the

minimum necessary to ensure no net loss of biodiversity within development projects, so to truly achieve a 'net-gain' the Island Planning Strategy must set targets beyond this minimum level of BNG.

To allow biodiversity to thrive on the Island, we recommend restoring keystone species, as per the Environment Act 2021, to help restore natural function and increase ecosystem services for the local environment. As an integral part of this strategy, we recommend the re-introduction of beavers to support the natural functions of the local ecosystem. From the [River Otter Beaver Trial](#) in Devon (2015-2020) we know that beavers deliver significant ecological benefits, with dams reducing peak river flows and, therefore, reduce flood risk.

It is clear from our experience of working with prominent businesses across the area, that action is not only vital for nature - and popular with local communities - but also good for business, and the Island economy. The Island's unique biodiversity and breathtaking landscapes attract millions of visitors each year, and with UNIESCO biosphere reserve designation – it is more important than ever to increase Biodiversity Net Gain target to comply with strengthened Biodiversity Duties set out in the Environment Act 2021 and to enhance the natural environment.

### **Local Nature Recovery Strategy (LNRS)**

We welcome the reference to the Local Nature Recovery Strategy (LNRS) in draft policies **EV2: Ecological Assets and Opportunities for Enhancement, EV5: Trees, woodland and hedgerows, EV6: Protecting and providing green and open spaces and EV9: Protecting our Landscapes and Seascapes**

We would strongly recommend that the council commits to the creation and maintenance of a functioning LNRS as this is a key mechanism through which the biodiversity on the Island 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 needs bigger, better, more, joined up space to thrive. The Isle of Wight Council has a duty to conserve and enhance biodiversity and must "have regard" to relevant local nature recovery strategies in the process, as per the Levelling-Up and Regeneration Act 2023. The LNRS, embedded within national policy through the Environment Act, is the key mechanism to deliver nature's recovery and climate resilience 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 the Isle of Wight Council prepare and use the Nature Recovery Network as a foundational tool for the Local Plan to:

1. 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.
2. Assess, identify, and prioritise opportunities for ecological enhancement through local plans and strategies.
3. 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.

4. Inform the design of any development in such a way that it makes a net contribution to the Nature Recovery Network.
5. Inform and target biodiversity net gain delivery and other nature-based solutions.
6. 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 contribute most effectively to restoring nature.
7. Send a clear market signal to developers of your expectations for all future planning to contribute positively and meaningfully to nature's recovery.
8. Identify and prioritise opportunities for building climate resilience through local plans and strategies, targeting areas most vulnerable to sea level rise and extreme weather as a result of climate change.

The Nature Recovery Network and Local Nature Recovery Strategies should also guide where development should not take place to avoid severance of the landscape and ecological corridors. This will help to support compliance with the enhanced biodiversity duties set out in the Environment Act 2021 and the provision with the Levelling Up and Regeneration Act that spatial development plans must take account of any local nature recovery strategy, especially: the priorities set out in the strategy for recovering or enhancing biodiversity, and the proposals set out in the strategy as to potential measures relating to those priorities.<sup>1</sup>

For more information on Nature Recovery Network, we recommend reading the South East Nature Partnerships' 'Principles of Nature recovery Networks across the South East of England' document, available here: <https://hantswightlnp.files.wordpress.com/2021/07/joint-south-east-nrn-principles-senp.pdf>

### **Green infrastructure**

Green Infrastructure should support both biodiversity, and mitigation and adaption for the climate crisis. We would like to see the draft Island Planning Strategy 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 recommend that a commitment to the Building with Nature accreditation should be included in draft policy **C1: High Quality Design for New Development**. This draft policy highlights plans to incorporate areas of green infrastructure into developments but falls short of laying out a detailed Green Infrastructure Framework for development on the Island. The accreditation would bring 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 is delivering maximum benefits for the health and wellbeing of residents, and for nature's recovery, in line with legal requirements and targets including [Mission 9](#) of the Levelling-up and Regeneration Act 2023 and the legal targets from the Environment Act 2021, notably on air quality.

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<sup>1</sup> [https://www.legislation.gov.uk/ukpga/2023/55/pdfs/ukpga\\_20230055\\_en.pdf](https://www.legislation.gov.uk/ukpga/2023/55/pdfs/ukpga_20230055_en.pdf)

## Nutrient Neutrality, Rivers and Water Quality

We welcome the inclusion of nutrient neutrality in draft policy **EV4: Water Quality Impact on Solent Marine Sites (Nitrates)**. This policy would prevent net increases in nitrates through mitigation measures in areas discharging into Solent international sites. It is essential that the Strategy complies with legal targets set out by the Environment Act 2021, to reduce nitrogen, phosphorus and sediment contribution from agriculture in the water environment by at least 40% by 2038.

The Hampshire and Isle of Wight Wildlife Trust is well positioned to deliver mitigation for nitrates, prioritising significant added value. We are currently one of the only organisations delivering an established nitrates mitigation programme and provide other nature-based solutions services. We would be pleased to discuss these in more detail with you.

However, exclusion from nutrient neutrality for developments that connect to Sandown, Brighstone, Shorwell and St Lawrence wastewater treatment works is detrimental to water quality and marine life in the English Channel.

Lukely Brook and the River Caul Bourne are ecologically important and rare chalk streams. 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, increased development pressure and a legacy of human modification and intervention have resulted in significant and ongoing decline in biodiversity and water quality.

There are no mentions of chalk streams within the Island Planning Strategy. To reflect the importance of these precious watercourses and ensure the necessary protection, specific chalk stream protections must be integrated into the Local Plan. We would strongly encourage that the recommendations of the Catchment Based Approach Chalk Stream Strategy are embedded within the local plan including a commitment that **“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”**.

Draft policies **EV13: Managing our water resources** and **EV14: Managing Flood Risk in new development** do not go far enough to achieve these safeguards so we strongly recommend that the policy text is amended to **prohibit new development that is within or adjacent to river corridors and their tributaries**. A well-functioning floodplain and associated habitats are integral to the management of water resources, water quality, flooding and building in climate resilience, particularly in the face of climate change, extreme weather and sea level rise. An additional water quality policy should be created to protect and restore our rivers. We encourage wording like the following:

*Protections of 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.*

While it is positive to see the inclusion of 'minimum buffer zones around watercourses to be considered in the design of development' in draft policy **EV2: Ecological Assets and Opportunities for Enhancement**, the suggested buffers of 8 metres and 16 metres are not sufficient to ensure protections of rivers and water courses. We would recommend a minimum of 20 metre to prevent incidents of polluting run-off and make space for water, the key to fostering a sustainable future.

We are pleased to see the requirement for new homes to meet a water efficiency standard of 100 litres per person per day in draft policy **EV13: Managing our water resources** is positive. However, we think this could be taken further and would recommend that the council amend the draft policy to 90 litres or less per person per day, in order to reach Environment Act targets to reduce household usage.

### **Site Allocations and Recreational Disturbance and Impacts**

Planning ahead for the housing needs of the Island, 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 as mentioned in the Nutrient Neutrality, Rivers and Water Quality section above. In light of this, we welcome the inclusion of a site level flood risk assessment in all development proposals at **KPS2: HA44 Newport Harbour**, in accordance with the Newport Harbour Masterplan flood risk assessment.

The council has the opportunity to deliver ambitious green infrastructure and creation and enhancement of nature which goes above and beyond the minimum 10% biodiversity net gain. Currently we feel there is a lack of ambition to contribute to nature's recovery through the proposed strategic developments.

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,

Lorna Selby  
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