

FAREHAM

BOROUGH COUNCIL

Allison Potts,
Area Manager,
Natural England,
Eastleigh House,
Upper Market Street,
Eastleigh,
SO50 9YN,

Contact: Lee Smith
Tel.: 01329 824427
Date: 6th October 2021

Letter sent by email only

Dear Ms Potts,

Potential Recreational Impacts upon the New Forest from the occupiers of new residential development in Fareham Borough

I am writing with regard to the above matter which has recently been raised with this Council by Natural England.

You will be aware that Footprint Ecology has been commissioned by a partnership of local authorities around the New Forest, to understand the impacts of recreation on the New Forest international nature conservation designations.

This Council is aware of the Footprint Ecology work and the Steering Group and the fact that their work had recommended 'that the zone of influence should ... exclude the following local authorities: Fareham, Gosport, Winchester and the Isle of Wight.' Natural England confirmed its support for the Footprint Ecology report and recommendations contained therein.

On the 26th July my Planning Strategy colleagues were advised during a meeting with Natural England that your position had now altered in respect of the 'Zone of Influence', and that Natural England no longer accepted the recommendation in the published Footprint Ecology work. On 29th July, Natural England wrote to this Council in response to the Revised Publication Local Plan consultation, raising the issue of potential impacts upon the New Forest with the Council. Following the letter to the Council on the 29th July, Natural England have started to raise the same issue in response to planning application consultations across the Borough.

We have not received any letter or plan from Natural England which clarifies which parts of the Borough you consider may have recreational impacts upon the New Forest. Furthermore, Natural England have not offered or suggested any 'lead-in time' to this Council for carrying out any assessment work or to put any necessary strategy in place. It appears that Natural England's advice applies with immediate effect to all planning application consultations you respond to.

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This Council is acutely aware of the need to consider the effects of proposed developments upon Protected Sites, whilst making provision for new housing within the Borough in line with the amount specified by the Government. The issues relating to nitrates within the Borough has resulted in housing developments being significantly delayed over the last 2 ½ years whilst mitigation schemes have been developed, secured and provided.

Following on from the experience with nitrates, it is hugely disappointing that the actions taken by Natural England put this Council in a position where it is unable to determine planning applications for new housing, and housing developments will again face being stalled for a lengthy period of time.

As I am sure you can appreciate, a further block on housing development within the Borough is now generating considerable concern to developers and Council Members alike, in light of the impact upon the local housing market and the number of houses the Council is required to plan for.

In order that I can fully brief Members of this Council on the issue and advise applicants/ developers what is required of them, it would be helpful if you could explain to me why Natural England has not accepted Footprint Ecology's recommendation in respect of the likely 'Zone of Influence'.

From the correspondence to date, Natural England's position seems to pivot on the fact that *'although the average visit rate for the borough is lower than that for neighbouring Eastleigh, it is notable that postcode data resulting from the telephone survey show visit frequencies in the western parts of Fareham are similar to those in the neighbouring borough of Eastleigh, suggesting the visit rate from these areas are higher than the average visit rate applied to the whole borough'*.

By email dated 21st September to my colleague Richard Wright, Mary Andrew has advised us that the map being used to determine the Zone of Influence, is Map 6 of the Footprint telephone survey [report](#). We are surprised that one map out of the whole body of evidence, including on-site visitor surveys as well as telephone surveys, has been used as the basis of Natural England's position.

It would be helpful to understand why Natural England consider this piece of evidence should be given greater weight than other elements of the survey work, and indeed the overall visitor rate. For example, the Zone of Influence report uses Table 8 (Frequency of visit by local authority) in the Telephone Survey report, as well as Map 6, to exclude Gosport from the Zone of Influence. This table shows a clear difference between Fareham and Eastleigh visit frequencies with Eastleigh interviewees visiting the New Forest heaths and woods more than three times as often in the categories of daily, most days and 1-3 times a week. The overall average visitor frequency from Fareham is similar to (albeit slightly less than) Winchester, which has been excluded from the Zone of Influence. The justification of using Map 6 over all other pieces of data in the reports is not understood.

The letter from Natural England to this Council on the 29th July, goes on to suggest that because of this similarity with neighbouring Eastleigh, *'it is advised that the 13.8km zone is*

applied within the borough of Fareham to ensure all new development coming through in that area provide appropriate mitigation'. We are keen to understand the geography to which your advice applies as on one hand the concern seems to arise from telephone survey data showing similarities between the western parts of Fareham and Eastleigh, but the advice appears to suggest that the 13.8km zone applies to the whole borough. The obvious question this poses is where is the centre of origin of the 13.8km zone?

The Footprint Ecology report itself advocates the use of administrative boundaries and states that *'the Fareham boundary is around 13.9km from the bridge at Totton on the A33 (sic A35) (i.e. the main crossing point) so truncating the zone of influence in this way makes sense given the travel constraints posed by Southampton Water'*. By following the report's recommendations, this excludes the whole of the Borough from the 13.8km Zone.

We accept that the Zone of Influence report Map 1 shows a 13.79km buffer which includes the majority of the borough, but this map does not accord with the report's own conclusion, nor our own measurements, on where the buffer zone should be drawn. This 13.79km buffer is based entirely on 'how the crow flies' and does not take into account the geography of this part of South Hampshire and the effect Southampton Water has on the distance residents of this Borough must travel to reach the New Forest.

We also note that the New Forest National Park's website has been updated to include the following statement *'Please note, however, that it is Natural England's advice that the 13.8km zone of influence should also be applied to the borough of Fareham to ensure a precautionary and consistent approach is adopted that ensures in-combination effects from new development are appropriately mitigated. This is due to western parts of Fareham having similar visitor frequencies to those in the neighbouring borough of Eastleigh'*. Notwithstanding this statement, this Council is receiving comments from Natural England on planning applications in the centre of the Borough, not just the western parts, which are in the region of 20km from the bridge at Totton.

In closing I would be grateful for your urgent clarification on why Natural England has not accepted the recommendations contained within Footprint Ecology's report and the basis for taking the position it has. If it would be helpful to meet and discuss this matter further, I would be happy to do so.

Yours sincerely,



Lee Smith
Head of Development Management