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25<sup>th</sup> June 2015

Your Ref:  
Our Ref: 14.07.5.2

Dear Planning Policy Team

**PROPOSAL:**  
**GOSPORT BOROUGH LOCAL PLAN 2011 – 2029: NOTICE OF PROPOSED MODIFICATIONS**

**LOCATION:**  
**GOSPORT BOROUGH, HAMPSHIRE**

Thank you for consulting the Wildlife Trust with regard to the proposed modifications to the Local Plan 2011 – 2029, we welcome the opportunity to comment. With regard to the Major Modifications, we have no comments to make, but have included in the table below some comments to the Minor Modifications submission.

**Minor Modifications:**

Reference	Proposed Modification	Reason
<b>Chapter 3</b>		
Para 3.44	[2 <sup>nd</sup> sentence] The Borough also has numerous locations which contain important habitats <del>s</del> and species that are identified on the UK List of Priority Species and Habitats and the Hampshire Biodiversity Action Plan priority species.	S missing off habitats
<b>Chapter 7</b>		
Para 7.57	It will be important to take opportunities to protect and enhance the biodiversity within the site particularly in relation to priority habitats <del>s</del> and species that are identified on the UK List of Priority Species and	.S missing off habitats
Para 7.112	Change in wording of paragraph	It is worth noting that ecological survey work at this site has confirmed the presence roosting bats, slow worm, badgers and autumn lady's tresses, amongst other species. As such this paragraph is outdated and

Reference	Proposed Modification	Reason
		should perhaps include a statement along the lines of <i>'an Ecological Management Plan should be prepared and European Protected Species Mitigation licences will need to be sought from the statutory licencing authority where appropriate'</i> .
Para 7.155 and Policy LP42	The site is adjacent to internationally important <b>habitats</b> and consequently the relevant considerations (as set out in Policy LP42) apply.	This is a general comment relating to the title of Policy LP42. We consider this would be best titled <b>'Internationally Important Sites'</b> or <b>'Internationally Important Species and Habitats'</b> since it is not just the habitats that are of international importance, but also the numbers and diversity of wintering waterfowl that use the habitats.
Policy LP44 and associated paragraphs	Minor wording amendments relating to LP44 point 2, and paragraphs 12.85 and 12.86, and any others that may be relevant.	Whilst we welcome the use of this wording in this policy, we consider that the Borough Council should be aiming for a 'no net loss in biodiversity' and ensuring the ecological networks are maintained as well as prioritising BAP species. This approach is highlighted in paragraphs 109 (point 3) and 114 (point 1) of the NPPF and is a key theme in the Natural Environment White Paper.
Appendix F GO0015 Priddy's Hard	Amendments to SINCs	The Wildlife Trust has been objecting to the recent development proposals at Priddy's Hard (15/00165/FUL) and note the removal of the buildings from the SINC designation. We note that recent documentation submitted in support of the application states that an access road has also been removed from the SINC designation, this conflicts with what is stated in these revisions and on the revised map. Clarification is therefore requested.

We trust that you will find our comments useful and would welcome the opportunity to discuss them in more detail should you wish to do so. We would also like to add that we are pleased to see the

Borough Councils commitment to protecting nature conservation, and would welcome to opportunity to work with you to ensure that these Policies are delivered.

**Yours sincerely**



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