

The Whitewater Valley Preservation Society – response to public consultation on the National Planning Policy Framework

About the Whitewater Valley Preservation Society

The Whitewater Valley Preservation Society was founded in 1980. Our vision is to protect the River Whitewater and its valley. Our mission is to defend the valley from inappropriate development and its resultant impact on the river. Our aim is to fight unacceptable development proposals, which pose a significant threat to the health of the river and the landscape of its valley.

The River Whitewater runs from its source at Bidden in North East Hampshire to its confluence with the River Blackwater. This represents approximately nine miles of chalk stream, which is important at a European level.

The Water Framework Directive identifies the river as a main water body and a Site of Importance to Nature Conservation (SINC). Natural England and the Environment Agency recognise several Sites of Special Scientific Interest (SSSI) along the length of the river. These designations should afford statutory protection.

Hart District Council's Landscape Character Assessment defines the special character of the valley, recognising the centuries which have moulded the river's course from Greywell to Riseley. The local planning authority has a duty to protect the river. It should ensure that any plans enhance the environment and its biodiversity. Any development which could affect the river's biodiversity, and specifically species identified in the Biodiversity Action Plan, should be assessed.

The Whitewater valley contains many listed buildings and heritage assets, which are entitled to protection through policies on the historic environment in the National Planning Policy Framework (NPPF).

Whitewater Valley Preservation Society comments on the NPPF consultation

There are many elements for which we would like to express support, and several that concern us and for which we will request changes. We are looking to secure the implementation of a Nature Recovery Network. Sitting as part of an Environment Act, which requires the establishment of an ecologically coherent network following the principles set out by Sir John Lawton's Making Space for Nature, we need policy that will:

- Protect the existing elements of a potential network of protected wildlife sites, like nature reserves;
- Require local authorities to provide a spatial plan for the network, linking up current wildlife-rich areas through planning that allows wildlife to move and flourish; and
- Require development to contribute to the establishment of the network, by actively creating spaces for nature in all new developments.

The review of the NPPF presents an opportunity to ensure that development contributes to the establishment of a Nature Recovery Network but so far has not strengthened the relevant policies sufficiently.

Whitewater Valley Preservation Society responses to specific questions in the public consultation

Qu 2: Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

Local Wildlife Sites need to be included in the list of things which provide a specific reason for restricting development. They're one of the last refuges for wildlife and are hugely important for people and wildlife and need protection under the planning system. A key issue is the lack of any protection for those undesignated sites that already make up part of the potential network. Whitewater Valley Preservation Society calls strongly for Local Wildlife Sites (formerly known as Sites of Nature Conservation Interest) to be included in the hierarchy of *protection*.

Qu 6: Do you have any other comments on the text of chapter 3?

This consultation is lacking important strategic policies on conservation and that the enhancement of the natural environment needs to be 'spatially planned'. Positive spatial planning for the environment not only makes it easier to locate development in a way that avoids damage to existing sites but can make the most of the benefits that nature provides to communities (ecosystem services) and enable development to help strengthen these services. There needs to be a requirement that local strategic plans, as a minimum, work The Whitewater Valley Preservation Society welcomes the policy support for net gains for the environment. However, there is a lack of clarity and consistency in the current draft of the revised NPPF on net biodiversity gain had how this links to a Nature Recovery Network. The contribution needs to be a requirement, not merely an option which is encouraged.

Qu 20: Do you have any other comments on the text of Chapter 8?

There is no reference to the importance of local access to nature in promoting healthy communities; people need nature to feel happier and healthier and this is a right that everyone should have.

Qu 34: Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

No.

Qu 35: Do you have any other comments?

- The government has included a requirement for policies and decisions to provide net gain for biodiversity – more wildlife after the development than before. Local Authorities should be required to map a Nature Recovery Network and resources provided to do so.
- There is a recommendation that existing sites designated for biodiversity, wildlife corridors and stepping stones should be mapped. The Whitewater Valley Preservation Society supports this recommendation.
- Local Wildlife Sites need to be specifically included in the sites that should be identified and mapped as components of local wildlife-rich habitats.
- It is suggested that only sites for habitat restoration or creation that are identified by local partnerships should be added to this map - this can be challenged. This is because local partnerships may not exist in all areas, not have sufficient resources to do this work, which should be carried out by the local authority.
- The Whitewater Valley Preservation Society agrees with the proposed wording for ancient woodland. But it is wrong to suggest aged and veteran trees are not also irreplaceable habitats. New policy wording and related commentary around "irreplaceable habitats" should include both ancient woodland and aged and veteran trees.
- The wording that has always underpinned protection of Areas of Outstanding Natural Beauty (AONB) – that designated landscapes 'have the highest status of protection in relation to landscape and scenic beauty' is omitted. It is crucial that this commitment is reinstated to the final NPPF, or developers could exploit uncertainty about their level of planning protection.

Please accept this as the Whitewater Valley Preservation Society's formal response to the consultation. We look forward to hearing from you as the review progresses.

[Online survey](#) to respond