

**Fawley Waterside Response to Inspector's
Questions (Rep No. 152)**

Independent Examination of the New Forest National
Park Local Plan

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1 Q10.1 to Q10.8 Policy SP25 Land Adjacent to the former Fawley Power Station

- 1.1 Fawley Waterside have worked closely with NFDC and NFPA in the preparation of site allocation SP25 and the associated allocation within NFDC's Local Plan. Detailed representations to the emerging Local Plans have been submitted which set out the background, status, capacity, impacts, infrastructure and viability.
- 1.2 Fawley Waterside support the Authorities Examination Statement regarding SP25 questions 10.1 to 10.8.

2 Q10.9 Does the Proposed Development meet the major development test for National Parks?

- 2.1 Fawley Waterside assessed the proposals and their relationship to the major development test and the character and purposes of the National Park in the response to the consultation on Potential Alternative Housing sites dated 26 July 2017¹.
- 2.2 This report provided evidence on the need for the proposed development on part of the site known as Tom Tiddlers, (now Policy SP25), as an integral part of the comprehensive regeneration of the former Fawley Power Station site.
- 2.3 The report provided evidence on the site's history (section 4), an assessment of the impact of development on the ecological and landscape value of the site (sections to 9), the emerging masterplan (section 3) and the principles for mitigation and the strategy for enhancing the landscape and ecology of the site (sections 7 & 8) and overall making a positive contribution to the natural landscape and bio-diversity and local economy of the National Park.
- 2.4 Since then further work has been done to assess the relationship of the proposals to the National Park in the context of the preparation of both the NFPA and NFDC Local Plans, and the pre-application process that include Environmental Impact and Habitat Regulation Assessment, and detailed landscape and master planning studies, and extensive consultation with Natural England, the Environment Agency, and other stakeholders including the Hampshire and Isle of Wight Wildlife Trust and the RSPB. Further surveys have been undertaken and the design and mitigation strategy has been tested in more detail.²
- 2.5 We note the NFPA's background paper on the major development test is supported.³
- 2.6 The Statement of Common Ground (September 2018) (SOCG) signed by the Authority, Natural England, Fawley Waterside Ltd and New Forest District Council on landscape matters confirms the agreed position that the redevelopment of the site can deliver significant landscape-scale enhancements and deliver significant wildlife and biodiversity enhancements to offset any harm (paragraph 116, moderating any detrimental impacts on the environment, landscape and recreational opportunities).

Scope for Developing Outside the National Park

- 2.7 The enlargement of the power station's existing dock and the adaptation and reuse of the basement to create a working canal are central to the sites regeneration as a sustainable community.
- 2.8 Higher density uses are created around the dock and quayside and canal.
- 2.9 The HSE exclusion zone restrictions prevent housing in the area north of the former power station site, which combined with the National Grid Substation has to be retained and seriously restricts masterplanning options for the land outside the national Park. Tom Tiddlers, the land to the south of the power station and which concerns this designation, is of low value, as will be discussed further in later sections of this report and lends itself more readily to be developed as part of the overall scheme to allow it to be viable.
- 2.10 Therefore, Policy SP25 allows the creation of a mixed neighbourhood including lower density family homes, in the form of detached and semi-detached houses, terraced cottages and town houses, reflecting the characteristics of towns and villages in the New Forest. The New Forest character of village greens open to the droving and grazing by New Forest livestock would be a feature of the development in Policy SP25. These master planning principles have been tested in extensive consultation and developed in detail since July 2017. As can be seen from the current masterplan the

¹ See Document 1 – sections 2 to 10 and the appendices

² Document 2 – a schedule of surveys that have been undertaken in the Fawley Waterside EIA and HRA

³ NFPA background paper on the major development test, dated May 2018

principles remain the same, and the quality of design and landscaping would be very high, and controlled by a Design Code.⁴

- 2.11 The homes would be within 10 minutes' walk or an easy cycle ride of a working dock and quayside, where shops, market, community services and marine businesses and a wide range of employment would be concentrated. It would also be well served by bus, cycle and ferry services.
- 2.12 It also performs an important role supporting the viability of the comprehensive regeneration of the former power station site. This has been tested and confirmed by the independent viability consultants appointed jointly by the National Park Authority and District Council.⁵

The Impact of Permitting or Refusing the Development on the Local Economy (sub)

- 2.13 There are no viable options to retain, convert, and refurbish the power station. Equally, there are no viable options to comprehensively regenerate the power station site without limited encroachment into the National Park.
- 2.14 The power station has a negative impact on the landscape and natural beauty of the National Park.⁶
- 2.15 A viable, comprehensive regeneration of the power station site is necessary, and should be a high priority. It would deliver enhancements to the natural beauty and landscape of the New Forest National Park, and its biodiversity.
- 2.16 In its current state the power station is a wasting asset and makes no contribution to the local economy of the New Forest.
- 2.17 Its regeneration as a sustainable mixed use community with a working dock and quayside at its heart would provide opportunities for a range of marine businesses which traditionally have formed an important part of the New Forest's economy.
- 2.18 New local employment and community services, combined with improvements to public transport, would support existing communities in the New Forest. The new community would also act as a catalyst to local food production within the New Forest, and as a source of demand for locally based crafts, in for example house building, this would encourage rural employment, and tackle pockets of social deprivation that exist in some New Forest communities on the Waterside.

Meeting the Need in Some Other Way

- 2.19 The need for the regeneration of the power station is unique to the site. It cannot be achieved in any other way.
- 2.20 The new homes that are proposed in Policy SP25 cannot be accommodated elsewhere within the National Park in a more sustainable location or with less impact on the special character of the National Park.
- 2.21 Therefore, without SP25 as part of the comprehensive regeneration of the power station site there would be greater pressure for development to take place in the New Forest and on green belt land within both the National Park and District Council plan areas.

⁴ Document 3 - Fawley Waterside masterplan August 2018.

⁵ Fawley Waterside Viability Report by Nationwide CIL 2017, submitted as part of the core evidence.

⁶ Reference NFPA Background Paper on Major Development test, paragraphs 2.5 to 2.8, and New Forest National Park Landscape Character Assessment (2015) page 70, and New Forest National Park Tranquil Area Mapping Report (2015) page 70.

Summary on Public Interest

- 2.22 The Tom Tiddlers land is not typical of the wider Forest and its special qualities and as such its value is lower.
- 2.23 The scheme proposals place high quality development upon a small part of the land, well related to the heart of the regeneration and reflecting New Forest vernacular. Grazing streets and greens further articulate the new place.
- 2.24 Additionally, the balance of Tom Tiddlers is enhanced through the creation of the lagoon, planting of appropriate grassland and wetland species and the commencement of proactive management.
- 2.25 All of this change will be perceived but where the change to the character and amenity of the view will, in the main, be limited to the local level where views will generally be enhanced due to the removal of the dominant and intrusive built form of the Power Station and replaced with a built form that is more domestic in scale.

The cost of, and scope for, developing elsewhere outside the Park

- 2.26 The consequences of creating a higher density scheme on the Power Station site, to avoid extending into the park, would either result in the loss of green or public open space and / or, the increase in building heights. Building heights within the scheme have been carefully considered through the evolution of the masterplan. The current scheme creates variety to the skyline, consistent with the settlement that has evolved over time.

The extent to which any detrimental effects can be moderated

- 2.27 The Statement of Common Ground (September 2018) (SOCG) signed by the Authority, Natural England, Fawley Waterside Ltd and New Forest District Council on landscape matters confirms the agreed position that the redevelopment of the site can deliver significant landscape-scale enhancements and deliver significant wildlife and biodiversity enhancements to offset any harm (paragraph 116, moderating any detrimental impacts on the environment, landscape and recreational opportunities).

Habitat Loss on Tom Tiddlers

- 2.28 Policy SP 25 allocates 8 ha of land on the Tom Tiddlers site for housing. Section 5 of our previous response to the selection of alternative housing sites assessed the ecological value of the Tom Tiddlers land and concluded that it is in decline and management is required to maintain the nature conservation value of the Tom Tiddlers SINC.⁷

Enhancement of the Ecology of Tom Tiddlers SINC

- 2.29 The proposals for Tom Tiddlers are described in detail in Section 8 of the submission on alternative housing sites.⁸ The objectives are to restore the coastal character of the SINC that has been lost since reclamation in the 1960s, and mitigate the loss of 8 ha for development.
- 2.30 The biodiversity enhancement plan involves the re-excavation of part of the original intertidal area to create a saline lagoon with fringing saltmarsh and coastal grassland. Extensive livestock grazing will be restored to the whole of Tom Tiddlers including the saltmarsh fringe (characteristic of the national park landscape).

⁷ Document 1 – Section 5

⁸ Document 1 – Section 8

- 2.31 These works and the long term management plan will increase species diversity, compensate for the limited loss of habitat, and will contribute to and enhance the value of the SINC and the adjacent coastal SPA, SAC and Ramsar site.

A Significant Environmental Gain

- 2.32 The total area of almost 400 ha of wildlife habitat to be created, restored and managed will offset any habitat losses.⁹

Conclusion on Major Development Test

- 2.33 The landscape, recreation and ecological impacts can be mitigated in accordance with paragraph 116 of the Framework.
- 2.34 Moreover, the net environmental benefits to the landscape, recreation and bio-diversity of the New Forest National Park amount to significant public benefits that support the major development test.

⁹ See Tables 1 and 2 of the Fawley Waterside Access and Nature Conservation Plan, Areas of habitat within the nature conservation plan and habitat lost to development.

3 Q10.10 How has the effect on international and national nature conservation designations been taken into account?

- 3.1 The policies for the former Fawley power station site in the District and National Park plans have been prepared together by NFDC and NFPA.
- 3.2 They have been informed by the masterplanning and EIA work being undertaken by the site promoters. That has included an environmental group of stakeholders including the local planning authorities, Natural England and the Environment Agency and others that have been meeting for more than two years discussing and shaping the nature conservation plan for the project.
- 3.3 The starting point for this has been the international and national designations of the Solent coastline and the New Forest.
- 3.4 The Statement of Common Ground (September 2018) (SOCG) signed by the Authority, Natural England, Fawley Waterside Ltd and New Forest District Council on landscape matters confirms the agreed position that the redevelopment of the site can deliver significant landscape-scale enhancements and deliver significant wildlife and biodiversity enhancements to offset any harm (paragraph 116, moderating any detrimental impacts on the environment, landscape and recreational opportunities).

Does the policy provide an effective framework to ensure appropriate mitigation?

- 3.5 The Policy requires a comprehensive and integrated approach that includes the use of land adjoining the power station in the national park to provide habitat mitigation.
- 3.6 The Nature Conservation and Access Plan illustrates how the strong policy for an estate-wide approach and net biodiversity gains can be achieved in practice, the plan has informed the policy, and vice versa, the strong policy requirement has set the framework for an exceptional nature conservation plan.
- 3.7 The international and national designations are taken into account in the very high standards of design and mitigation required in Policy SP25 which makes support for the proposals conditional on a series of key requirements being met:
- 3.8 Support is subject to an exceptionally high standard of design and layout being secured across the whole of the Power Station site with clear net positive public benefits being demonstrated in relation to the landscape and setting of the National Park; public access improvements; the provision of suitable greenspace for recreation; and habitat enhancements to ensure net gains in biodiversity. To further demonstrate these benefits, the Authority will require the submission and approval of a whole-Estate Plan to show how the proposals integrate with the wider area.
- 3.9 The requirement for habitat enhancements to ensure net gains in biodiversity recognises the special environmental sensitivity of the location.
- 3.10 The requirement for a whole Estate Plan showing how the proposals integrate with the wider area locks in the estate wide approach of the Nature Conservation and Access Plan which covers 400 ha of land around the power station site and Policy SP25 site. The Nature Conservation and Access Plan is appended to the Statement of Common Ground on landscape matters confirming the agreed position between the signatories.
- 3.11 This provides a strong framework to ensure mitigation not only offsets any harmful impacts, but delivers net biodiversity gains into the coastal area protected by the Solent SPA and the New Forest SPA and related designations.

4 Q 10.11 Are the proposals to provide at least 30 ha of SANG realistic, appropriate and consistent with national policy? Where would the SANG be provided?

4.1 The Nature Conservation and Access Plan shows where the SANG would be provided. It also shows that it is realistic to provide 40 ha of SANGs, a much greater area than the policy requirement, and a much larger area of accessible open space. This is necessary to achieve an overall net biodiversity gain and ensure that the recreational pressures are fully mitigated. This very high standard is justified by paragraph 116 of the Framework which requires major development in the National Park to demonstrate they are in the public interest.

5 Q 10.12 How has the effect on the Site of Importance for Nature Conservation Interest been taken into account?

- 5.1 Policy SP 25 states that: ***"Any loss of the designated SINC must be kept to an essential minimum and compensated through the enhancement of the biodiversity value of the remaining habitat and/or the compensatory provision of alternative habitats of equivalent or higher value to achieve a net gain for biodiversity."***
- 5.2 The Nature Conservation Plan contains proposals for compensatory provision that would provide a net gain for biodiversity, these are described in our answer to Q 10.9.

6 Q 10.13 How is the site affected by Flood Risk?

- 6.1 The Statement of Common Ground (September 2018) (SOCG) signed by the Authority, Fawley Waterside Ltd, Environment Agency and New Forest District Council on flood risk and Sequential Test matters confirms that both the Sequential Test and the Exception Test have been met in relation to the proposed allocation in Policy SP25 of the Authority's Local Plan.
- 6.2 The Fawley Waterside Sequential Test (New Forest National Park Area) (WSP, June 2018) demonstrates that there are no reasonable alternative sites to the land identified in Policy SP25 in Flood Zone 1 (lowest flood risk).

7 Q10.14 Is the requirement for at least 50% of the dwellings to be smaller dwellings (less than 100 sqm) justified? (10.14)

- 7.1 Fawley Waterside supports the provision of housing for local people living and working in the New Forest. It will provide a wide range of affordable and market flats and houses for local residents. Some will be reserved specifically for people living and working in the New Forest. Many will be available at affordable prices and rents.
- 7.2 Half of the proposed houses in the National Park will be provided at less than 100sqm. Many more flats in the District Council area will also be less than 100sqm and equally able to meet the objective of Policy SP21. Due to the unique boundaries of the District Council and National Park and the holistic approach to developing a new community, those smaller units within the District Council land will be equally capable of meeting the needs of residents living and working in the New Forest.
- 7.3 The requirement in Policy SP25 for "the majority" of dwellings provided to be smaller dwellings should be reworded to state that "no less than 50% of the houses in the National Park should be less than 100sqm." If a higher proportion was insisted upon it would prevent the provision of larger two bedroom and three and four bedroom homes. This would hinder the creation of a sustainable community, and reduce the choice of new homes available to local residents. Whilst in support of the wider policy, in the interests of *soundness*, we believe that the above modification removes ambiguity and results in a policy that is more effective (and as such deliverable) and is planned positively as it reflects the balance made between the requirements sets out in policy SP21 and also the site context.

Document 1

Representations on Behalf of Fawley Waterside
New Forest National Park Local Plan Review – Potential
Alternative Housing Sites Consultation

26 July 2017

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1 Introduction

- 1.1 This representation is submitted on behalf of the owners of the former Fawley Power Station, Fawley Waterside Limited ("FWL").
- 1.2 The New Forest National Park Authority ("NFNPA") published the New Forest Local Plan Consultation Draft ("draft Local Plan") in October 2016. The draft Local Plan identified Fawley Power Station as a site which could potentially provide major development in the National Park. FWL submitted representations to support the inclusion of land to the south of the Power Station and at Calshot as part of the comprehensive regeneration of Fawley Power Station.
- 1.3 The National Park Authority is consulting on four potential alternative residential sites following advice from Natural England on sites previously proposed for allocation. The alternative sites include the land to the south of Fawley Power Station and at Calshot.
- 1.4 This representation provides support for the proposed allocation of land south of Fawley Power Station (also referred to as Tom Tiddlers Ground) and seeks to address matters raised for its potential allocation for housing.
- 1.5 FWL also continue to support the allocation of land for residential development at Calshot, which is being promoted by New Forest District Council (NFDC).

Fawley Waterside Proposals

- 1.6 Fawley Waterside are developing proposals for a comprehensive redevelopment of the Power Station site and surrounding land to provide approximately 1,500 homes, and 90,000 square metres of commercial and employment space.
- 1.7 The proposals also include the enlargement of the dock and creation of a canal, provision of a boat stack, primary school, public open space and habitat enhancement, SANGs, a saline lagoon and a new access from the B305.
- 1.8 The majority of the proposals are on the Fawley Power Station site, within NFDC. The proposals within the National Park are:
 - 100 -150 dwellings;
 - Public open space to include informal recreation and play areas;
 - Saline lagoon;
 - Coastal grazing marsh;
 - A two form entry primary school;
 - An access road from the B3053;
 - Creation of new footpaths and cycleways; and
 - Approximately 30 hectares of Suitable Alternative Natural Greenspace (SANG).

- 1.9 The emerging Fawley Waterside proposals also include 20-30 dwellings on land at Calshot which is being promoted by NFDC.

The Alternative Housing Sites Consultation

- 1.10 The National Park Alternative Housing Sites consultation paper is inviting feedback on the principle of land to the south of the former Fawley Power Station being brought forward for residential development to support the comprehensive regeneration of the Power Station site.
- 1.11 The consultation paper identifies that the site could accommodate 100-150 dwellings and that additionally, land in the National Park could also support the regeneration of the Power Station site through the provision of a new primary school close to Calshot Village and areas of Suitable Alternative Natural Greenspace (SANGs).
- 1.12 NFNPA identify the following key matters for a potential allocation:
- For residential development to be supported on land within the National Park, it would be important that new housing provision contributed towards meeting the identified housing needs arising from within the National Park
 - The need to ensure the loss of SINC land is fully compensated through significant enhancements to the remaining SINC habitat
 - The need to ensure that any greenfield development in the Park is only supported as part of the comprehensive regeneration of the wider brownfield Power Station site;
 - Redevelopment of the Power Station site should reduce the overall visual and landscape impact of the site to benefit the surrounding National Park landscape; and
 - Ensuring that the design of any SANG provision within the National Park reflects its status as a nationally protected landscape and strengthens the landscape character of the New Forest.
- 1.13 The remainder of this report addresses the following matters:
- Why the Proposed Development is needed;
 - Rationale for the Proposed Development Design;
 - Background of Tom Tiddlers Ground;
 - Ecological Value of Tom Tiddlers Ground;
 - Landscape Value of Tom Tiddlers Ground;
 - Proposed SANGs Strategy for Fawley Waterside;
 - Proposed Enhancement of the Ecological Value of Tom Tiddlers Ground;
 - Impact on Landscape Value and Visual Appearance;
 - The National Planning Policy Framework and Development in National Parks;
 - Conclusions.

2 Why the Proposed Development is needed?

- 2.1 This section sets out why the Proposed Development in the National Park is required as part of the comprehensive regeneration of the Fawley Power Station Site.

Housing Strategy

- 2.2 The draft NFNPA Local Plan (October 2016) does not propose to meet the objectively assessed housing need set out in the New Forest Strategic Housing Market Assessment. This is due to the significant constraints associated with developing within the National Park.
- 2.3 The proposed release of land south of Fawley Power Station offers a unique opportunity in this regard. The release of a relatively limited amount of land can support the comprehensive regeneration of the Power Station site. This would provide a total of 1,500 new homes across the land within NFDC and NFNPA.
- 2.4 The Fawley Waterside proposals will help address the shortfall in housing needs for both NFNPA and NFDC by delivering a range of unit sizes. The smaller units would primarily be provided on the Power Station site to maximise the efficiency of the use of this land and reduce the impact of higher density development in the National Park.

Viability

- 2.5 The extent of the land proposed to be developed on Tom Tiddlers Ground has been driven by urban design principles and viability of the proposed Fawley Waterside scheme.
- 2.6 The proposed new homes in the National Park will be low density, larger houses. This contrasts with the high density, apartment led approach to homes proposed for the Power Station site.
- 2.7 The proposed homes in this area will be of higher value than elsewhere within the proposed development. This differentiation of housing type and the increased values are critical to the overall viability of the Fawley Waterside regeneration proposals.
- 2.8 Fawley Waterside is undertaking an assessment of the viability of the proposals and the need for the inclusion of housing on Tom Tiddlers Ground to support the regeneration of the Power Station site.
- 2.9 As part of this viability work, alternative scenarios have been considered that only locate development within the Power Station site. These options do not produce a viable development, and

therefore prevent the comprehensive regeneration of Fawley Power Station.

Masterplanning approach

- 2.10 Creating a high quality environment which retains characteristics of a traditional New Forest settlement has been a key focus of the masterplanning approach for the Fawley Waterside proposals.
- 2.11 This approach has considered the creation of place as well as the biodiversity, ecological and landscape value of the areas surrounding the Power Station site.
- 2.12 The enlargement of the existing dock and construction of a new canal has been central to the masterplanning process. This will provide a focal point for the new community and is key to creating activity and a sense of place for the proposed development. The dock will enable marine business and recreation to be at the heart of the community.
- 2.13 The approach to urban design is to create a relatively high density urban core, focusing activity in the areas around the dock. To balance this high density and provide a range of dwelling types, the masterplan includes an area of lower density housing to the south, transitioning into the New Forest and the proposed habitat enhancements for Tom Tiddlers Ground.
- 2.14 It is necessary to include part of Tom Tiddlers Ground to achieve a balance of walkable residential neighbourhood, all within 10 minutes of the dock where shops, market, community services and employment will be concentrated.
- 2.15 This also allows the creation of a neighbourhood of larger detached and family homes, with low densities reflecting existing settlements in the New Forest. It is intended that New Forest village characteristics, such as perambulation of grazing livestock and ponies, would be a feature of the development proposed for Tom Tiddlers Ground.

Developing a sustainable community

- 2.16 A key objective of Fawley Waterside is to create a sustainable community by regenerating a brownfield site to provide sufficient employment, services and facilities to meet the needs of future residents and support existing communities.
- 2.17 This requires a critical mass of housing, commercial and leisure uses to be provided which cannot be achieved solely on previously developed land. There are a number of constraints affecting the Power Station Site which limit the spatial distribution of land uses and also the amount of developable land (this is discussed in more detail in Section 3).
- 2.18 The land in the National Park provides an important role in achieving a sustainable community. It enables the lower density homes to be predominantly located on Tom Tiddlers Ground, maximising the higher density housing, commercial and leisure uses on the previously developed land.

Other uses

- 2.19 In addition to housing provision, land within the National Park is also needed to provide a new primary school, open space and recreation areas, SANG, and a new access.
- 2.20 The new access will help to connect the Calshot community to the new services and facilities at Fawley Waterside, by providing cycling and pedestrian routes. This will also allow the diversion of the existing bus route through the site, connecting nearby communities to the new jobs and services to be created.
- 2.21 As the proposals include development on Tom Tiddlers Ground, a designated SINC, it is recognised that there will need to be a significant environmental benefit for the remainder of this lands. The proposals seek to create a saline lagoon and grazing marsh to support habitats for coastal birds and other wildlife, this is discussed in Section 8.

3 Rationale for the Proposed Masterplan

- 3.1 This section sets out the key influences that have shaped the masterplan and the inclusion of development on the Tom Tiddlers Ground to the south of the Power Station site. The current draft version of the masterplan is found in Appendix 1.

Existing Constraints to Development

- 3.2 Existing constraints on the Fawley Power Station site limit the areas of land that can be used for housing. These are set out below and have contributed to the rationale for the masterplan and extent of proposed development on Tom Tiddlers Ground.

National Grid

- 3.3 There are two National Grid buildings within the Power Station site and an operational area that it leases. It is not anticipated that the use of the site by National Grid will cease before the end of the proposed Local Plan period. It is therefore a long term constraint that restricts development.

HSE Exclusion Zones

- 3.4 Any potential development on the Fawley Power Station site is constrained by HSE exclusion zones associated with the oil refinery. Approximately 14 hectares of land falls within the “middle zone” which restricts residential and other sensitive development.
- 3.5 The entire Power Station site is within the “outer zone” which does not allow a primary school to be located in this area.
- 3.6 This impacts on the spatial distribution of development within the Power Station site. The exclusion zones require the primary school to be located on land within the National Park.
- 3.7 The proposed location of the school has been extensively tested to balance easy walking distances from the new residential development, integrating with Calshot and minimising impact on sensitive habitats and the wider landscape.

Existing Infrastructure

- 3.8 Within the Power Station site, the developable land is restricted due to physical constraints of the existing infrastructure.
- 3.9 There are a number of underground features which limit the footprint of the proposed development. These include the foundations of the chimney, support structures for the dock and cable tunnels amongst others.

- 3.10 Other features, such as the flood defences, also impact on the spatial distribution of development due to access restrictions.

Environmental Context

- 3.11 Section 5 sets out the baseline biodiversity and ecological value of Tom Tiddlers Ground.
- 3.12 The land proposed for development within Tom Tiddlers Ground is acid grassland. This has helped to inform the shape and extent of land proposed for development as the translocation of this habitat can be accommodated as part of the wider ecological enhancement strategy. The proposed strategy for enhancing the ecological value of Tom Tiddlers Ground is set out in Section 8.
- 3.13 The historic photographs and images in Section 4, show the position of the coastline prior to the construction of Fawley Power Station and the infill of Tom Tiddlers Ground. The location of the proposed saline lagoon reflects this historic coastline.

The Location of Development in New Forest National Park

- 3.14 The extension of the proposed development south of the Fawley Power Station site was considered to be the most appropriate option. This was based on a number of factors including ecological value, potential for ecological mitigation and enhancement, visual impact, retention of the ancient woodland and urban design principles. The historic changes to Tom Tiddlers Ground were also a significant factor in this decision making process.

4 Background and History of Tom Tiddlers Ground

- 4.1 The following section explains the historical context for Tom Tiddlers Ground and the changes arising from the construction of the Power Station.

Historic Context

- 4.2 The land now occupied by Tom Tiddlers Ground has had a chequered history as shown by the sequence of historic maps reproduced in Figures 1-6 in Appendix 1.
- 4.3 The 18th and 19th century maps show the network of intertidal creeks that drain the intertidal flats to the north east of where the power station now stands. The intertidal is shown extending out into the main Southampton Water channel to the end of Calshot Spit. Apart from a small area to the north of Ashlett Creek, there is no saltmarsh vegetation covering the intertidal, as these maps were drawn prior to the invasion of Southampton Water with *Spartina townsendii* (and later *S. anglica*) that occurred in the late 19th century.
- 4.4 The inner landward edge of the intertidal is marked by a sea wall that demarcates the junction of intertidal flats and coastal grazing marshes. The coastal grazing marshes would have been created by historic reclamation of intertidal saltmarshes to increase the grazing potential of the land. The complex pattern of drainage ditches within the coastal grazing marshes is beautifully illustrated in the 18th century map.
- 4.5 Inland of the grazing marshes the first edition OS map of the 1860s shows the outline of Chambers Copse, an ancient woodland that has persisted on the western edge of the power station to this day.
- 4.6 This broad pattern of important landscape features persisted throughout much of the 20th century and is shown in some detail from air photographs taken of this shoreline in 1929 as shown in figures 4 and 5. The main difference is the dense growth of *Spartina* marsh covering the intertidal mudflats north of Calshot Spit. This saltmarsh grass colonised much of the Solent in the late 19th and early 20th century.
- 4.7 The Construction of Fawley Power Station The construction of Fawley Power Station in the 1960s resulted in the infilling of a large area of former intertidal saltmarsh, mostly dominated by the cord grass *Spartina anglica* that was seaward of the old sea wall.
- 4.8 Infilling also resulted in the destruction of most of the coastal grazing marshes and their complex of drainage ditches inland of the sea wall.

Only a few small relicts of these former coastal grazing marshes persist, as for instance within the Solent View SINC.

- 4.9 The approximate extent of the infilling that covered the intertidal and coastal grazing marshes is shown in Figure 6.
- 4.10 The coastal reclamation therefore straddled the old sea wall covering both the intertidal and coastal grazing marshes.
- 4.11 The material used to infill Tom Tiddlers Ground and the method used is not well documented.
- 4.12 There was an initial reclamation of the grazing marshes using marine dredged silt during the 1950s, followed by a much more extensive reclamation of the intertidal in 1962¹. It was at this time that the name Tom Tiddlers Ground was applied to the area.
- 4.13 This later reclamation appears to have consisted of a combination of silt and clay with coarser gravels towards the northern end of what is now Tom Tiddlers Ground. The infill material appears to have had a saline influence as the vegetation that subsequently developed included several coastal species. This included nationally scarce grasses such as Stiff and Borrer's saltmarsh grass, Divided sedge and Curved hard-grass².
- 4.14 More recent surveys undertaken in 2015 have shown these coastal species to have declined in distribution and abundance, being largely confined to the relict grazing marsh within Solent View Valley SINC and the strip of mown coastal grassland along the southern edge of Tom Tiddlers Ground (outside of the SINC).

¹ Chatters, C. (2009) *Flowers of the Forest – Plants and people of the New Forest National Park*. WildGuides Ltd.

² Chatters, C. (2009) *Flowers of the Forest – Plants and people of the New Forest National Park*. WildGuides Ltd.

5 Ecological Value of Tom Tiddlers Ground

- 5.1 This section provides an overview of the current ecological value of Tom Tiddlers Ground.
- 5.2 Following reclamation of the coastal habitats in the 1960s, Tom Tiddlers Ground developed into a series of seasonally wet pools and saline influenced coastal grassland that supported a diversity of coastal plants and birds. However, natural succession has changed the ecology of the area so that it is now dominated by scrub, recent wet woodland, grassland and reedbeds. The grassland, reedbed and saltmarsh habitats are all identified as priority habitat types in accordance with Section 41 of the NERC Act (2006). The range of habitats and presence of notable species ensures the area still meets the qualifying criteria for Site of Importance for Nature Conservation (SINC) designation.
- 5.3 The vegetation and flora of Tom Tiddlers Ground was surveyed in 2015 (Cox, 2015) which revealed the extent of scrub, woodland and reedbed that now dominates the area as shown in Table 1. The dominant habitat present is scrub and woodland that occupies 47% of the SINC. This ranges from low bramble scrub to tall willow and birch scrub and young wet woodland. Reedbeds cover some 35% of the SINC. These vary from dense tall reed in permanently damp hollows to rather open short reedbeds on seasonally wet ground that occur with low tangles of bramble and a mix of tall grassland and fen species such as fleabane and hemp agrimony.
- 5.4 Small patches of saltmarsh vegetation dominated by saltmarsh rush and sea clubrush still remain in the SINC – although these are not tidally inundated. These patches of saltmarsh vegetation are limited to the line of the old sea wall that can still be discerned through the middle of Tom Tiddlers Ground. More extensive areas of tall rather rank and species poor upper saltmarsh, dominated by sea couch-grass, occur along the eastern coastal edge of the SINC.
- 5.5 The northern end of Tom Tiddlers SINC consists of unmanaged acid grassland. The acid grassland supports a diversity of vascular plants although lacks many of the exacting acid grassland species of short grazed grassland. More interesting species that still occur scattered through the sward include patches of kidney vetch, hare's foot clover and in one location, bee orchid.
- 5.6 A particular feature of the acid grassland is the abundant and luxuriant growth of the lichen *Cladonia rangiformis* which in late summer creates a crispy layer of small grey bush-like growths up to about 5cm tall.

- 5.7 This *Cladonia rangiformis* rich grassland dominates the central area of the acid grassland and appears to have increased in extent over the last 20-30 years.
- 5.8 However, the diversity of lichens in this area has declined over this time. Two local species, *Cladonia foliacea* and *Cladonia scabriuscula*, of less acidic grasslands were frequent in the late 1980 and 1990s but not found in 2015.
- 5.9 A total of six *Cladonia* taxa were recorded in 2015, not a high total, (at least 10 would be expected from a rich site) but the extent of lichen dominated grassland is unusual and a valuable feature.

Tom Tiddlers SINC	Area (Ha)	Site percent
Scrub & Wood	21.25	47.68%
Grassland	4.45	9.98%
Reedbed	15.63	35.08%
Saltmarsh	3.24	7.26%

- 5.10 Breeding bird surveys of Tom Tiddlers Ground have been undertaken in 2015 and 2016. These reveal a diversity of scrub and reed nesting birds. Two specifically protected species (listed on Schedule 1 of the Wildlife and Countryside Act) were recorded, Cetti's warbler and Dartford warbler.
- 5.11 A total of four Red list species were present (cuckoo, song thrush, linnet and nightingale) and eight Amber list species mallard, dunnoek, bullfinch, reed bunting, common whitethroat, lesser whitethroat, willow warbler and Dartford warbler.

Summary

- 5.12 In summary, the nature conservation value of Tom Tiddlers SINC has declined in recent years as scrub and reed have dominated the vegetation and coastal influence has declined. The area of dry acid grassland has been retained although this is being colonised by scattered scrub and species diversity is declining as ranker grasses are becoming dominant.
- 5.13 As a consequence of these changes, the specialist coastal plants have declined in distribution and extent and coastal birds are not present in the SINC.
- 5.14 Whilst the coastal character of the SINC has declined, scrub and reedbed nesting birds have colonised the area. This includes a number of Red and Amber listed species including the Red listed nightingale and Schedule 1 Dartford warbler and 5-6 singing Cetti's warblers.
- 5.15 In the absence of management, the nature conservation value of Tom Tiddlers SINC will continue to decline as scrub and secondary woodland colonise the remaining open areas of grassland and reedbed.
- 5.16 This can be seen in the area of acid grassland where an open savannah landscape of scattered holm oaks has colonised the

grassland. As the scrub matures into young woodland it will also lose its current value for scrub nesting birds such as Dartford warbler and nightingale.

- 5.17 The scrub habitat is already sub-optimal for Dartford warbler and this species will not persist in the SINC as a breeding bird for much longer.

6 Landscape Value of Tom Tiddlers Ground

- 6.1 This section sets out the baseline landscape qualities of Tom Tiddlers Ground against the special qualities of the New Forest National Park.
- 6.2 The site is designated as National Park and as such has an inherently high landscape value.
- 6.3 However if the land parcel is assessed in more detail the following is apparent:
- The entire area was fenced off during the construction of the Power Station, the excavated natural soils from beneath the main turbine hall and dock were subsequently deposited across Tom Tiddler's Ground.
 - The northern end of the ground was reclaimed by using gravel dredging ballast from the tunnel of the dock while the southern was made of disposal from the site excavation during construction.

The Special Qualities of the New Forest National Park

- 6.4 As a result of the historical changes to Tom Tiddlers Ground, it is atypical of the National Park and its special qualities. The nine special qualities of the National Park³ are set out below (as first published in the 2010 Management Plan and as agreed through public consultation in 2007) along with commentary on how Tom Tiddlers Ground reflects these qualities.

"The New Forest's outstanding natural beauty."

The supporting text goes on to say that:

"The sights, sounds and smells of ancient woodland with large veteran trees, heathland, bog, autumn colour and an unspoilt coastline with views of the Solent and Isle of Wight."

The National Park encompasses a wide variety of different landscapes, from the woodlands and rolling heathland in the centre of the Forest, to the flat and wild coastline and the farmed landscape of small fields, hedgerows and narrow lanes. Together these form an extensive area of unspoilt and ancient countryside, with hidden villages and hamlets, which has largely been lost from other parts of lowland Britain."

³ Annex 4 of the NFNPA Management Plan 2015-2020

- 6.5 Tom Tiddlers Ground is not unspoilt countryside or coastline rather it is land that has been created by man through the infilling of intertidal saltmarshes when the Power Station was constructed. Whilst there is a strong visual connection to the coastline, as set out in Section 6, this is read in the context of the built form and associated infrastructure of the Power Station. As such, the coastline has undergone significant changes in this area and is not an area that is free from development.

"An extraordinary diversity of plants and animals of international importance."

- 6.6 Whilst ecology on Tom Tiddlers is recognised, this is at a local level, through the designation of the SINC. Section 5 considers its ecological value and identifies that it is in decline through natural succession and changes to flora and fauna.

"A unique historic cultural and archaeological heritage, from royal hunting ground to ship-building, salt making, the two world wars and 500 years of military coastal defence."

- 6.7 Whilst the site has been subject to human intervention, such heritage is limited on this land, with the dominant use being the Power Station and in a wider context the presence of the oil refinery.

"An ancient commoning system that maintains so much of what people know and love as 'the New Forest' forming the heart of a working landscape based on farming and forestry."

- 6.8 Tom Tiddlers Ground is not open to the commoning system.

"The iconic New Forest pony together with donkeys, pigs and cattle roaming free."

- 6.9 None of the typical forest animals are able to roam on this land.

"Tranquillity in the midst of the busy, built-up south of England."

- 6.10 Tranquillity, and perception of tranquillity, sense of remoteness, peace and naturalness is less apparent on the site due to the presence of and noise generated by the Power Station. Additionally the site is subject of light spill from the Power Station further affecting the perception of tranquillity.

"Wonderful opportunities for quiet recreation, learning and discovery in one of the last extensive gentle landscapes in the south including unmatched open access on foot and horseback."

- 6.11 The Power Station use and current, albeit limited, operations reduce the opportunities to experience quiet recreation. This small element of the park is not a gentle landscape nor does it have particularly good access by foot or horseback, with a single footpath crossing the Site.

"A healthy environment: fresh air, clean water, local produce and a sense of 'wildness'."

- 6.12 The scale and massing of the Power Station lead to this land parcel having a very limited sense of 'wildness.' It is an environment heavily influenced and affected by the presence of the Power Station.

"Strong and distinctive local communities have real pride in and a sense of identity with their local area."

- 6.13 Whilst there is a local community at Calshot, the Power Station has visually dominated Tom Tiddlers Ground since its construction. With the closure of the Power Station the sense of community that may have been prevalent as a result of the activity of the working community has been lost.

Summary

- 6.14 As such, the Tom Tiddlers land is not typical of the wider Forest and its special qualities and as such its value is lower.
- 6.15 A range of visual receptors currently have views across the Tom Tiddlers Ground. The value of these receptors ranges from low to high, relative to their location within a designated landscape or from a heritage asset.

7 Proposed SANGs Strategy

- 7.1 The Fawley Waterside proposals include the delivery of all SANGs within the National Park. A key criteria for the potential allocation of land south of Fawley Power Station is to ensure that any SANG in the National Park reflects its status as a nationally protected landscape and strengthens its landscape character. This section explains the proposed approach to SANGs on land within the National Park.
- 7.2 SANGs are areas of countryside that are designed to provide an alternative attraction to recreational users to nearby internationally important wildlife sites. As a consequence of their creation, there should be no net increase in recreational use of these protected wildlife sites.
- 7.3 The concept was initially developed in relation to the Thames Basin Heaths Special Protection Area (SPA) which spans the counties of Hampshire, Surrey, Berkshire and West Sussex and comprises a complex of fragmented heathland sites. The standard equation for the provision of SANGs of 8ha per 1000 head of population was developed on the basis of the density of visitors to this SPA.
- 7.4 The New Forest SPA supports many of the same heathland birds for which the Thames Basin Heaths SPA has been classified, in particular the Dartford warbler, woodlark and nightjar. These nest on the ground or in low shrubs and are vulnerable to disturbance from walkers and in particular dogs.
- 7.5 The SANGs strategy for Fawley aims to provide areas of open space that will divert visitors away from the New Forest SPA. This will include both the new residents of the development and existing local residents. It may also provide an alternative destination to visitors from outside of the New Forest.
- 7.6 The landscape character of such alternative open spaces or SANGs is critical if they are to perform the function of providing an attractive alternative to the New Forest SPA.
- 7.7 The features of the New Forest that are of principal attraction to visitors was investigated by Footprint Ecology⁴ which showed some significant differences between the visitor profile for the New Forest compared with both the Thames Basin and Dorset Heaths, as shown in Table 2. It shows that dog walkers make up a smaller proportion of visitors to the New Forest when compared with the other heathland SPA whilst 'other' purposes are much more significant.

⁴ Sharp, J., Lowen, J. & Liley, D. (2008). Changing patterns of visitor numbers within the New Forest National Park, with particular reference to the New Forest SPA. Unpublished report, Footprint Ecology

Purpose	Dorset Heaths (%)	Thames Basin Heaths (%) ⁵	New Forest (%) ⁶
Dog walking	80	59	24 (20)
Walking	10	32	30 (50)
Jogging	2	4	(0)
Cycling	2	6	6 (3)
Horse-riding	1	2	1 (3)
Other	5	10	39 (24)

Table 1: Main purposes of leisure visits to the Dorset Heaths and New Forest National Park and top two stated purposes of visits to Thames Basin Heaths

7.8 The other main reasons for visiting the New Forest were sightseeing (6% for household interviewees, 3% for visitor interviewees), relaxing/picnicking (4% for household interviewees, but 13% for visitor interviewees), visiting a town/village (7% of visitor interviewees), cycling (5% for visitor interviewees) and horse riding.

7.9 Other visitor studies referred to by Footprint Ecology provide further insight into the reasons why visitors are attracted to the New Forest. They state:

“The PROGRESS and University of Portsmouth reports also offer an interesting insight into why visitors come to the New Forest – rather than any other site – to conduct their particular activity. This helps us identify the ‘appeal factors’ which together comprise the ‘uniqueness’ of the New Forest. In turn, this gives us hints as to the principles of selection of potential alternative sites to offset visitor pressure. Forty-three per cent of Portsmouth respondents listed ‘scenery’ as their principal reason, followed by ease of accessibility (37%), ‘peace and quiet’ (30%), ‘to see the animals’ (20%) and ‘because it’s the New Forest’ (18%). The PROGRESS report produced similar findings: scenery was top (51%), followed by ‘peace and quiet’ (42%), ‘good for walking’ (32%), ease of accessibility (29%) and wildlife (29%).”

7.10 Taking these factors into consideration, a good alternative to the New Forest for recreational visitors should seek to provide easily accessible land with ‘good scenery’ that is ‘good for walking’ with ‘peace and quiet’, ‘wildlife’ and ability ‘to see the animals’ i.e. New Forest livestock.

7.11 The approach to developing alternative green space to offset the impact of the new residents of Fawley on the New Forest is to provide

⁵ The figure combines answers for the top two stated purposes (i.e. rather than main purpose as for the other two areas)

⁶ The first figure given is derived from visitor interviews, the second (in parentheses) from household interviews.

access to countryside that has characteristics that meet these criteria or 'appeal factors'.

- 7.12 A network of SANGs have been proposed that extend from the north of Fawley around its western side to meet with Calshot to the south. This area has been split into a number of sub-divisions that will be provided progressively as the development is completed. They will link with the network of existing and new public rights of way extending to over 33 kilometres between the villages of Fawley, Blackfield and Calshot.

Exxon Laydown Land (14.0 ha)

- 7.13 To the north Fawley is the former Exxon Laydown Land. This area of dense scrub, secondary woodland and open grassland glades borders Southampton Water and provides views and vistas across saltmarshes and intertidal flats. It is linked with an extensive footpath network to the north around Ashlett, to the south east to the seaward side of the Power Station and to the south west around the western side of the Power Station.
- 7.14 The area and associated coastal and intertidal habitats are currently grazed by New Forest ponies. The coastal fringe is ecologically sensitive supporting populations of a number of uncommon coastal plants. The existing public footpath will be directed inland around the edge of the new development to limit access to the intertidal and associated coastal grasslands fronting the Power Station.

Fawley Ponds (14.5 ha)

- 7.15 To the north west of the Power Station is an area of active mineral workings with associated part restored settlement lagoons and ponds. This area provides a contrast in landscape and habitat type to the Exxon Laydown land with areas of reed bed, ponds and grasslands. It also contains an area of ancient semi-natural woodland known as Chambers Copse. This will be specifically excluded from the SANGS as it contains a rich woodland ground flora and wet easily eroded soils.
- 7.16 Restoration of the Fawley Ponds mineral workings will create a series of landscape ponds with fringing reed beds and associated areas of scrub and open grassland. These will sit within a newly created ridge running down the western side of the Power Station from where there will be far reaching views across the surrounding landscape and through the new settlement to the Solent and Southampton Water. The whole area of this SANGS will also be open to livestock grazing.

Fawley Park (12.5 ha)

- 7.17 To the west of Fawley Ponds is a further area of mineral workings. The intention would be to develop this area as a wood pasture or parkland with large open glades of flower rich grassland set within areas of grazed woodland with clumps of open grown trees and thickets of scrub. This will create a landscape similar to some of the woodland glades within the ancient and ornamental woodlands of the New Forest.

Tom Tiddlers Valley (8.9 ha)

- 7.18 A drainage channel runs along the western side of the Power Station with associated areas of reedbed, woodland and willow scrub. This will be widened with fringing grasslands glades to create a linear SANGS that links the villages of Calshot in the south with Fawley in the north.
- 7.19 It will have a landscape appearance of other wet woodland stream valleys in the New Forest. For example, the valley of the Darkwater through Blackwell Common (west of Langley) or the valley of the Crockford Stream south of Norley Inclosure. Boardwalks and bridges will be provided where necessary to facilitate public access to and through this wetland and to provide visitors access to reedbeds and wetland habitat along the western edge of Tom Tiddlers Ground.
- 7.20 The SANGS includes the Solent View Valley SINC through which a public footpath currently passes. The SINC includes former grazing marsh habitats of high nature conservation value that would be vulnerable to heavy trampling pressure. However, habitat such as this is a feature of the New Forest wetlands and it is unlikely that it will be damaged by public access due to the wet nature of the ground.
- 7.21 Most of this SANGS will also be grazed by free roaming livestock, the timing and density of grazing animals will be adjusted to create the desired mosaic of wetland, grassland, scrub and woodland habitats.

Summary

- 7.22 The SANGS will form the core of the public access strategy for the development. These will be linked by and link with the extensive existing and proposed public access network of paths. These in turn will also link with very extensive areas of Access Land (designated under CROW), mostly on restored former mineral workings, that extend to the west of Fawley to Fields Heath, Badminton Common and Toms Down and to the north to Ashlett Green, covering an area of some 70 ha. These areas of Access Land include additional SINC with populations of Annex 1 birds such as Dartford warbler and nightjar. Public access to these areas will need to be managed to ensure it is compatible to with nature conservation management objectives. However, these additional areas of accessible land provide landscape scale opportunities for public access extending from the New Forest to the coast.

8 The Proposed Ecological Enhancement of Tom Tiddlers Ground

- 8.1 This section of the report describes the measures to be implemented to enhance the ecological value of Tom Tiddlers Ground and mitigate the loss of habitats as part of the proposed development.
- 8.2 Management is required to maintain the nature conservation value of Tom Tiddlers Ground. The objective is to restore the coastal character of the SINC that has been lost since reclamation in the 1960s. This will contribute to and enhance the value of the adjacent coastal SPA, SAC and Ramsar site.
- 8.3 The biodiversity enhancement plan involves the re-excavation of part of the original intertidal area to create a saline lagoon with fringing saltmarsh and coastal grassland. The plan is to use the line of the old sea wall to form the western boundary of the new saline lagoon. The eastern side of the lagoon will be set back from the current coastline to leave a wide margin for saltmarsh to migrate landwards over time in the face of sea level rise. The lagoon will be designed and managed to provide:
- Feeding habitat for migrant wildfowl and wading birds (SPA, Ramsar species)
 - Secure and undisturbed roost habitat for migrant wildfowl and wading birds (SPA, Ramsar species)
 - Breeding habitat for coastal birds including Annex 1 listed birds such as terns, gulls and avocet and saltmarsh nesting species such as redshank and lapwing. (SPA, Ramsar species)
 - Saline lagoon habitat (an Annex 1 priority habitat type for which the Solent SAC has been designated)
 - Fringing saltmarsh vegetation (Annex 1 habitat types for which the Solent SAC has been designated).
- 8.4 Extensive livestock grazing will be restored to the whole of Tom Tiddlers including the saltmarsh fringe (characteristic of the national park landscape). This will increase species diversity and condition to the upper saltmarsh that is currently dominated by rank sea-couch grass saltmarsh (not an Annex 1 saltmarsh habitat type). The grazed saltmarsh is likely to develop into species rich upper saltmarsh similar to that fronting the power station to the north of the marine access channel. This conforms to the Annex 1 saltmarsh habitat type

referred to as Atlantic saltmeadow – a habitat for which the Solent has been designated a SAC.

- 8.5 Scrub will be removed from large areas of Tom Tiddlers ground to restore open conditions that will attract wintering wildfowl and wading birds. Scrub nesting birds will be displaced as a consequence of this habitat change. However, this habitat can be replaced within the restored mineral workings to the west of the power station, as a coastal location is not required for this habitat or the species that utilise it.
- 8.6 Livestock grazing will also reduce the extent of reedbed and revert this to species rich open wet grassland. This will provide wintering habitat for wildfowl such as dark bellied brent geese, teal, wigeon and pintail and waders such as black-tailed godwit, lapwing, curlew and redshank and breeding habitat for redshank, lapwing and other grassland nesting birds such as skylark. The intensity and period of grazing can be manipulated to allow for some reed fringes and clumps to be retained within the Tom Tiddlers SINC. Further areas of reedbed will be created within the restored mineral workings to offset the loss of this habitat from Tom Tiddlers, as it does not require a coastal location.
- 8.7 The saline ditch that currently runs along the southern side of Tom Tiddlers will be naturalised and re-profiled to create a tidal creek with further areas of tidally inundated fringing saltmarsh. This will be connected to the SPA via the intertidal creek that currently runs along the inside of Calshot Spit. This new saltmarsh and that which will develop to the east of the lagoon will offset losses of this habitat both locally and more widely within the Solent resulting from sea level rise, Spartina die-back and coastal squeeze.

9 Impact on Landscape Value and Visual Appearance

- 9.1 This section of the report explains the potential impact on the landscape arising from the proposed development on Tom Tiddlers Ground based on the emerging illustrative masterplan assumptions.

Landscape Impact

- 9.2 The proposals will see the wholesale change for a small part of the Tom Tiddlers land. In excess of 80% of the SINC will not be developed and subject to ecological improvements.
- 9.3 As set out in Section 6, the presence of the identified special qualities of the National Park within the site are limited. Where development occurs the landscape will change from that of an atypical New Forest Landscape to typical, and high quality New Forest dwellings with associated greens and grazing streets.
- 9.4 The balance of the Tom Tiddlers land will also be enhanced through the creation of the lagoon and improvement ecological management.
- 9.5 Additionally the scheme proposes access to be created for forest ponies so that grazing management can be brought back to this area.

Visual Impact

- 9.6 Whilst visual impact will be fully assessed through the preparation of an LVIA ES chapter with associated VVMs it is anticipated that the outcomes will be as below (based on the illustrative masterplan assumptions). The height of the existing vegetation is to be verified in the field and therefore a worst case scenario is being considered for the purposes of this statement based on available information.

Local Receptors from the West

- 9.7 From the eastern edge of Calshot little of the proposed change will be experienced due to the intervening mature tree canopy. As the land rises to the west, views of the Solent to the east appear over the woodland. The Power Station is apparent obliquely in these views. It is anticipated that the ridgeline of the house on the Tom Tiddlers land may be apparent as a very small element of this view.
- 9.8 From Ower Farm and the B3053, between the Farm and Calshot there will be partial, distant views of the changes as the proposals, over the hedgerows that line the road to the west of the proposed development, but the proposed continuation of the woodland belt to

the east of the road, on the arable field that falls gently towards the site. As the tree planting matures, it will truncate views to the proposed development on the Tom Tiddlers land.

- 9.9 From the northwest, views to this land parcel are truncated by existing woodland and built form and that will continue to be the case with the development proposals in place.

Local Receptors from the South

- 9.10 Receptors using Jack Maynard Road will see new built form brought further forward in the view. This new built form, characteristic of the Forest and of high quality, will provide a positive residential edge and relationship with the landscape with the heart of the new development apparent behind it. In the foreground of this view the ecological enhancement works to the balance of the Tom Tiddlers lane will be apparent, notably the creation of the lagoon.
- 9.11 From the spit, the biggest change will be the enhancement to the view arising from the removal of the large scale Power Station buildings and their replacement with a high quality townscape and landscape. The built form on the Tom Tiddlers land will be apparent as the lowest and most visually porous new component in this view, characteristic of a low density settlement edge. It is anticipated that the combination of existing and proposed woodland planting will make up the backdrop of this view as it matures.

Local Receptors from the North

- 9.12 Views from the north are currently limited due to the intervening Power Station and will continue to be limited with the bulk of the proposed scheme beyond the Tom Tiddlers land occupying land to the north.

Local Receptors from the East

- 9.13 In close proximity, from the Definitive Right of Way Footpath no. 46, to the southeast of the Power Station, the view will change from open greenspace to high quality townscape with associated green and grazing streets.
- 9.14 South of the proposed development on the Tom Tiddlers land the outlook will change from that over an unmanaged landscape, to that over the new lagoon and enhanced natural landscape which reflects features of priority habitats as described Section 8.
- 9.15 To the north of the Tom Tiddlers land, the outlook to the west, currently occupied by the large scale Power Station buildings will change to that over the heart of the scheme, of varying heights, its high quality built form, quay side and public realm. This is a positive change.

Receptors from the wider landscape context

West

- 9.16 From further to the west, Badminton Drove and Lane and footpaths in that vicinity, topography and vegetation will truncate views of the built form on the Tom Tiddlers land.

South

- 9.17 In views further to the south, from transient receptors on the Solent the development of the Tom Tiddlers land will be masked by the landform of the spit and the existing built form upon it.

North

- 9.18 Views from the north are currently limited due to the Power Station and mature vegetation at the Northern extent of the Power station.
- 9.19 Views will be truncated by the proposed heart of the scheme occupying land to the north of the Tom Tiddlers Ground.

East

- 9.20 From transient receptors on the Solent, and further to the East, on School Lane, Hamble-le-Rice (some 2.6km from the site) the development on the Tom Tiddlers land will be a very small component of a very wide panorama.
- 9.21 The proposed development of Tom Tiddlers will be the lowest and least dense element of the Fawley Waterside regeneration. Overall, visual enhancement will be achieved as the dominant scale and massing of the Power Station will be removed from the views from this location and replaced with high quality, domestic scale built development and landscapes.

Landscape and Visual Summary Impact Summary

- 9.22 The Tom Tiddlers land is not typical of the wider Forest and its special qualities (refer to Section 6) and as such its value is lower.
- 9.23 The scheme proposals place high quality, development upon a small part of the land, well related to the heart of the regeneration and reflecting New Forest vernacular. Grazing streets and greens further articulate the new place.
- 9.24 Additionally, the balance of Tom Tiddlers is enhanced through the creation of the lagoon, planting of appropriate grassland and wetland species and the commencement of proactive management.
- 9.25 All of this change will be perceived but where the change to the character and amenity of the view will, in the main, be limited to the local level where views will generally be enhanced due to the removal of the dominant and intrusive built form of the Power Station and replaced with a built form that is more domestic in scale.

10 NPPF and Development in National Parks

10.1 This section responds to the tests for major development in National Parks contained within the NPPF.

National Planning Policy Framework

10.2 Paragraph 115 of the NPPF sets out the importance of National Parks stating that *"great weight should be given to conserving landscape and scenic beauty"*. They have the highest status of protection in relation to landscape and scenic beauty.

10.3 Paragraph 116 sets out the tests for major developments in National Parks and states that:

"Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;**
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and**
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."**

10.4 The response of the scheme to these tests is set out below.

The need for the development, including in terms of any national considerations, and the impact of permitting, or refusing it upon the local economy

10.5 There are no viable options to retain, convert and refurbish the Power Station. Equally, there are no viable options to comprehensively regenerate the Fawley Power Station site without limited encroachment into the National Park.

10.6 There is a significant need to secure the regeneration of this major brownfield site to support housing and economic growth, and to improve the visual appearance of the site.

- 10.7 Without the development of the previously developed land at Fawley Power Station, there would be greater pressure to release further greenfield and Green Belt land to meet development needs.
- 10.8 The proposed provision of new employment space at Fawley Waterside is of significant importance and makes use of the existing dock infrastructure for marine industry uses. The job opportunities that will be created will also be very important for the wider Waterside in helping to reverse the decline of jobs in the area.
- 10.9 Without the proposed development in NFNPA, the redevelopment of Fawley Waterside would not be viable and the significant economic, social and environmental benefits could not be achieved.

The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way

- 10.10 The constraints on the power Station site have been identified in Section 3 and the limitations on the amount of development that can be accommodated.
- 10.11 As previously identified, the development of the Power Station site in isolation is not viable. Viability Assessments are being undertaken to demonstrate this position.
- 10.12 NFNPA and NFDC cannot meet their full objectively assessed housing needs, even with the inclusion of Fawley Waterside.
- 10.13 Therefore, without the comprehensive proposals for Fawley Waterside there would be a greater pressure for development to take place on greenfield or Green Belt land within both authority areas.

Any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that could be moderated

- 10.14 As set out in Sections 7, 8 and 9 the proposed Fawley Waterside development, including the proposed construction of new homes in the National Park, has emerged to ensure that there is an overall benefit to the environment, improvement for recreation and impacts on the landscape are minimised.

Environment

- 10.15 The proposals include the creation of a new saline lagoon and grazing marsh to support the coastal habitats and environment for SPA, Ramsar and priority habitats for the Solent SAC. This helps to restore habitats that were lost following the construction of the Power Station.
- 10.16 Where important habitats would be lost through the development proposals, the strategy is to recreate or translocate these habitats to other suitable areas within the scheme.
- 10.17 The proposals also include creating environments that will support and encourage grazing livestock and ponies into parts of the development and through the open spaces and SANGs.

Landscape

- 10.18 From a landscape perspective the key improvement will be the removal of the dominant Power Station buildings and their replacement with a high quality built environment.
- 10.19 There will be encroachment of development into what is currently a natural habitat on Tom Tiddlers Ground. However, the proposals in this location will be for relatively low density housing with grazing streets and greens, reflecting a traditional New Forest village.
- 10.20 Whilst this is a change to the current landscape, it is considered that when viewed in the round with the wider development and the habitat enhancement measures that are proposed the appearance of this area of the coastline can be improved through the development proposals.

Recreation

- 10.21 The proposals include the creation of extensive areas of SANGs. This will create a high quality network of spaces that provide residents with access to the appeal factors that are noted from visitors to the New Forest.
- 10.22 The SANGs will also connect to the 33 km of existing public rights of way in the local area, as well as Access Land (designated under CROW).

11 Conclusion

11.1 This section draws together the information in this representations and responds the criteria set out in the NFNPA Alternative Housing Sites consultation for the land south of Fawley Power Station.

NFNPA Alternative Housing Sites Criteria	Fawley Waterside Conclusions
For residential development to be supported on land within the National Park, it would be important that new housing provision contributed towards meeting the identified housing needs arising from within the National Park	Fawley Waterside will provide 1,500 homes, of which 35% are proposed to be affordable tenures. This will make a significant contribution to meeting the identified housing need for both NFDC and NFNPA. The housing proposed for Tom Tiddlers Ground is proposed to be larger, private sale dwellings. However the housing on the Power Station site will provide a significant amount of smaller unit sizes and affordable tenures. Given the unique location of the Power Station this will clearly allow need in the National Park to be met.
The need to ensure the loss of SINC land is fully compensated through significant enhancements to the remaining SINC habitat	The proposals to create a saline lagoon and coastal grazing marsh on the remaining SINC land will be a significant improvement to the coastal environment supporting SPA, Ramsar and Solent SAC priority species and habitats. The loss of the acidic grassland and scrub habitats will be mitigated by recreating and relocating these habitats to other suitable areas within the proposals.
The need to ensure that any greenfield development in the Park is only supported as part of the comprehensive regeneration of the wider brownfield Power Station site	The proposals for Tom Tiddlers Ground only work as part of a comprehensive regeneration of the Fawley Power Station site. The current phasing shows the commencement of construction on Tom Tiddlers Ground after a significant amount of development has taken place on the Power Station site. The phasing of development in the National Park could be controlled via condition or legal agreement, if necessary.
Redevelopment of the Power Station site should reduce the overall visual and landscape impact of the site to benefit the surrounding National Park landscape	The proposals will remove the large, dominant Power Station buildings and replace this with high quality built and natural environments. There will be extensive habitat creation through the provision of SANGs and the enhancement of the remaining Tom Tiddlers Ground. A Landscape and Visual Impact Assessment will be undertaken as part of the Environmental Statement supporting the planning application for the Fawley Waterside proposals.
Ensuring that the design of any SANG provision within the National Park reflects its status as a nationally protected landscape and strengthens the landscape character of the New Forest.	Care has been taken to understand what the key uses and features are that attract visitors to the New Forest. The proposals for SANGs seek to recreate high quality New Forest environments and experiences that will prove to be attractive to visitors. The intention is to create a new natural landscape that builds on the existing positive features and significantly enhances other areas, including the proposed plans to restore the nearby quarry.

Table 2: Summary Table of Responses to NFNPA Alternative Housing Sites Criteria for land south of Fawley Power Station

Appendix 1: Fawley Waterside Illustrative Masterplan

Appendix 2: Historic Photographs and Images



Figure 1: Extract of surveyors drawing of 1790s showing the coastline of the New Forest between Beaulieu and Calshot

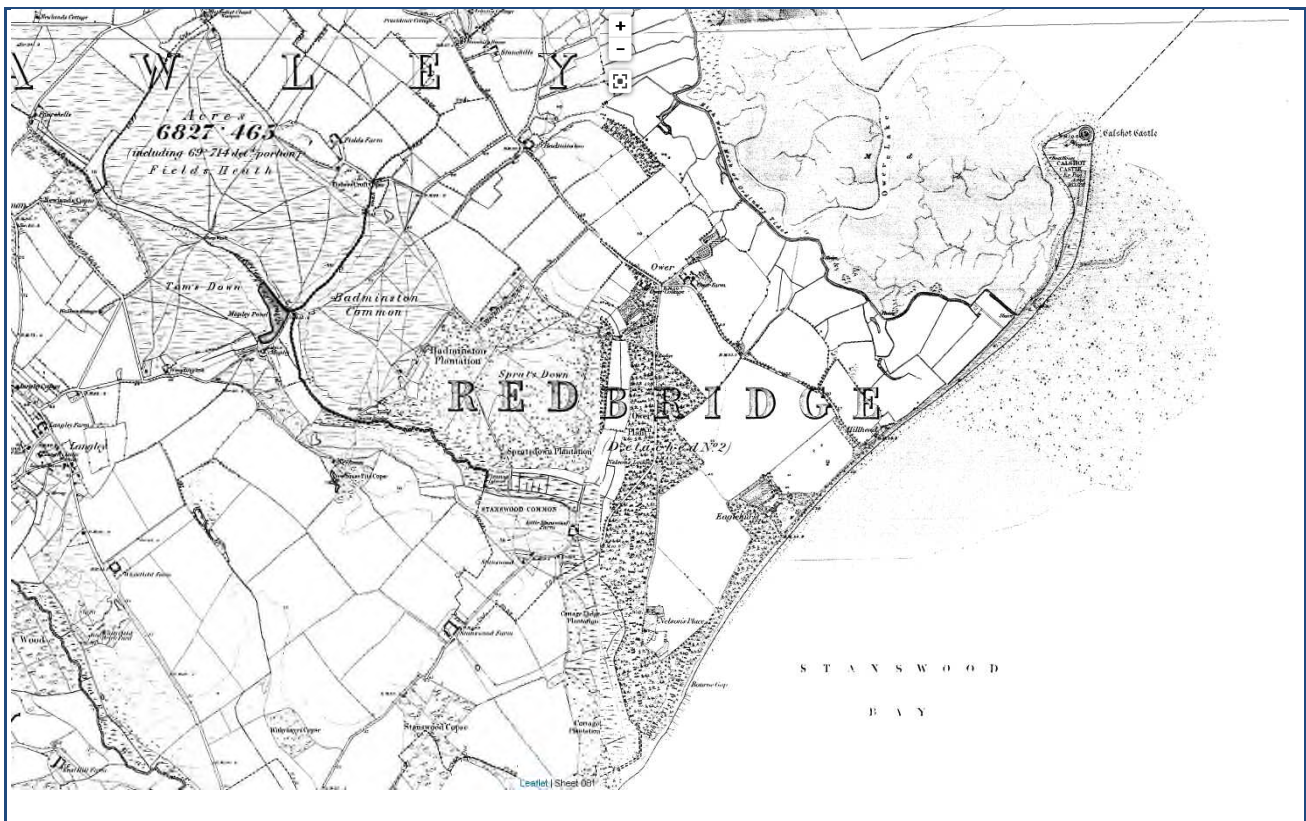


Figure 2: Extract of first edition OS map from the 1860s showing a similar area of the Hampshire coast. Note the location of Chambers Copse north of Ower Farm. This ancient woodland still persists, sandwiched between the Power Station and mineral workings



Figures 3 & 4: Air photographs of Calshot Spit and marsh from 1929 showing extensive areas of *Spartina* saltmarsh fronting the coastal grazing marshes and the well defined sea wall



Figure 5: OS 1:25000 scale map, published in 1951 showing the approximate outline of Tom Tiddlers Ground, Fawley Power Station and the Exxon Laydown land reclaimed during the construction of the power station. The access road to the power station is not shown.



Figure 6: Modern OS 1:25000 scale map of Fawley Power Station and Tom Tiddlers Ground showing the extent of 1960s infilling.

Document 2

APPENDIX B – UPDATE TO BASELINE SURVEY WORKS AND INVESTIGATIONS

BASELINE SURVEY REPORT	DATE
Traffic and Transport desk-study	Completed
Preliminary Transport Scoping Note	Completed
Preliminary Sustainable Modes Strategy	Initial works completed, with final strategy submitted as part of the Transport Assessment
Preliminary Parking Strategy	Initial works completed, with final strategy submitted as part of the Transport Assessment
Preliminary Cycle Strategy	Initial works completed, with final strategy submitted as part of the Transport Assessment
Transport Assessment and Sustainable Transport Access Strategy	Under preparation and will be submitted in conjunction with Planning Application.
Baseline Air Quality Monitoring	Completed (July 2017 – January 2018)
Designated Sites Assessment	Under preparation and will be submitted in conjunction with Environmental Statement
Baseline Noise Survey Report	Completed (October 2017)
Site Suitability Appraisal	Under preparation and will be submitted in conjunction with Environmental Statement
Breeding bird surveys (2015 & 2016): Fawley Power Station, Tom Tiddlers Ground, Exxon Laydown Land and Mineral Workings	Completed (2015 & 2016)
Winter Bird Surveys (2015/16 & 2016/17) of Power Station, Tom Tiddlers Ground, Intertidal, Calshot Spit and Beach	Completed (2015/16 & 2016/17)
Tom Tiddlers Ground & Solent View Valley SINC Vegetation Survey (2015)	Completed (2015)

Fawley Vegetation and Habitat Survey (Phase 2 survey, includes Power Station, Mineral Workings and Exxon Laydown Land (2015)	Completed (2015)
Botanical survey of Fawley Power Station (2016)	Completed (2016)
Tom Tiddlers Ground and Solent View Valley SINC Invertebrate Survey (2015-16)	Completed (2015 – 2016)
Notes of lichen records, Tom Tiddlers Ground Acid Grassland (2016)	Completed (2016)
Fawley and Calshot Draft Ecological Management Plan (2016)	Completed (2016)
Fawley Power Station Herpetofauna Survey Report (2017)	Completed (2017)
Fawley Bat Survey Report Fawley (2017)	Completed (2017)
Land at Calshot, near Fawley Bat Survey Report (2017)	Completed (2017)
Land at Calshot, near Fawley Reptile Survey Report (2017)	Completed (2017)
Bat Survey of Fawley Power Station including emergence surveys, activity surveys, trapping and radio tracking surveys (2016/2017)	Completed (2016 & 2017)
HBIC Review of Ecological Surveys and Species Records. All biosite and species data obtained (2017)	Completed (2017)
Extended Phase 1 Habitat Survey Report (2017)	Under preparation and will be submitted in conjunction with Environmental Statement
Breeding bird survey (survey - 2016): Calshot Village	Completed (2016)
Boat Disturbance Studies of Portsmouth Harbour, Hamble and Beaulieu River	Under preparation and will be submitted in conjunction with Environmental Statement
Fawley Waterside Access and Nature Conservation	Completed (May 2018)
Marine ecological survey and hydrological studies	Completed (September 2017)
Visitor Survey of coastal footpath, CROW Access Land and New Forest car parks	Completed (2017)

Draft Historic Environment Desk Based Assessment (HEDBA)	Completed (April 2017)
Geo-archaeological Deposit Model (GADM)	Completed (April 2018)
Final HEDBA (inclusive of assessment of setting of heritage assets)	Under preparation and will be submitted in conjunction with Environmental Statement.
Landscape and Visual Desk Study	Completed (February 2018)
Baseline Viewpoint Analysis	Completed (September 2017)
Winter Photography	Completed (March 2018)
Visually Verified Montage	Under preparation and will be submitted in conjunction with the Environmental Statement.
Arboriculture Survey	Completed (January 2018)
Coastal / Marine Environment Impact Modelling	Completed in tandem with the Environmental Statement. Methodology issued for information.
Preliminary Risk Assessment (PRA)	Draft completed, but will be updated in tandem with the Environmental Statement.
Baseline Lighting Survey	Completed (January 2018)
Social Infrastructure Study	Completed (February 2018)

Document 3



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