



Fleet Pond Society –on NW Path planning application dated Dec 2020

I am Chairman of the Fleet Pond Society, a charity with many members who live in Fleet and Hart and/or visit Fleet Pond.

Fleet Pond Society would like to register its opposition to application 20/03004/FUL to Hart District Council for the widening of the north-west path at Fleet Pond in Hampshire on the following grounds.

1) The timing of the proposed works is unacceptable.

The proposed HDC Construction Environmental Plan (Section 4) Indicative Construction Programme suggests works will be carried out between March and July 2021. This is the breeding season for fish and birds in and around the lake. Disturbing them would be in breach of the Wildlife and Countryside Act 1981.

2) The ecological mitigation proposed for the path works is not sufficient and is unacceptable.

Natural England's response makes reference for the need to protect wet woodland, a UK BAP priority habitat. The Habitat and Botanical Baseline survey carried out in July 2020 identifies wet woodland habitat in areas 2 and 4 of the scheme. These areas should be protected. Under the Natural Environment and Rural Communities (NERC) Act 2006 all local authorities have a statutory duty to conserve biodiversity. Wet woodland is a key habitat type included in the Fleet Pond SSSI. The site is currently in *unfavourable recovering* condition. Damage to wet woodland will adversely affect its progress towards favourable status.

3) The edging design for the path is unacceptable for Fleet Pond SSSI and badly thought out.

Natural England's letter to Paul Howe of HDC (23 April 2020) states *'The use of hard engineering is generally advised against by Natural England. The ideal outcome for us is that the site remains as natural as possible, with as little impact both physically and visually.'* The plans show sheet piling will replace the existing wooden sleeper bank protection. This measure should only be used as a last resort if an appropriate soft engineering alternative is not available. There are well-established methods to get a much better ecological solution. Sheet piling is ugly and not in keeping with the character of where the footpath runs. It is also ecologically unsuitable for use on a SSSI. It can be mitigated to some extent by the use of bioengineering techniques such as shoreline terracing created by wood faggots or coir backfilled with natural materials. Alternatives such as brash bales could also be investigated.

4) The general design of the footpath is poor and could be made more acceptable for visitors.

The existing footpath is popular with local residents and many visitors to the site. The barren and uniform construction of the proposed footpath shows a lack of creativity and sensitivity by its designers. The new footpath should attempt to mimic the semi-wild character of the existing path and protect the priority BAP habitat identified in the habitat and botanical baseline survey. This could include cantilevered sections.

5) No control of the loss of trees is being offered.

The trees along the existing path do add value to its ambience and amenity. The application refers to the loss of trees to allow the proposed path to be built and made wider than the existing one. Whilst some loss seems to be inevitable the application does not give any real detail of the scale of loss or how this will be controlled to avoid excess tree removal.

6) The application does not comply with planning policy.

Fleet Pond is a Site of Special Scientific Interest and a Local Nature Reserve. The principle of Biodiversity Net Gain is part of the National Planning Policy Framework. The latest update to the forthcoming Environment Bill includes a requirement for all future schemes including the development of land to deliver a mandatory 10% biodiversity net gain. No information is provided in this application to demonstrate any Biodiversity Net Gain. Indeed, the only conclusion that can be drawn from the information provided is that there will be a net loss of biodiversity as the plans currently stand. This is unacceptable for a nationally important site such as Fleet Pond.

Jim Storey
FPS Chair
9/1/21