



Planning Policy Team
Test Valley Borough Council

BY EMAIL ONLY

Dear Planning Policy Team

**Test Valley Borough Council Issues & Options Consultation
(Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations)**

Thank you for your consultation on the above dated which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has reviewed Test Valley's: Issues and Options for the Test Valley Local Plan our advice on these documents is provided below. Please note that we have not provided comments on all documents submitted as part of this consultation but those which have most influence on environmental issues.

Vision and objectives

Natural England advises that the Plan's vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including developing a strategic approach to nitrogen neutrality for new housing development; providing a net gain for biodiversity; considering opportunities to enhance and improve ecological connectivity and considering nature based solutions for climate change adaptation. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, National Park/Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans, Green Infrastructure Strategies and Nature Recovery Network.

Environment and Quality of Life

Landscape

Natural England supports policies to protect and enhance designated landscapes and their setting. Policies and plans for development should consider the purposes of designation of the New Forest National Park and North Wessex Downs Area of Outstanding Natural Beauty (AONB) and should adhere to the aims, objectives and requirements of the National Park and AONB management plans. Reference to National and Local Landscape Character Assessments, together with local landscape capacity and sensitivity studies will also be helpful in understanding how the plan can avoid inappropriate development in relation to the National Park and AONB.

For Areas of Outstanding Natural Beauty, the LPA should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on

protected landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 172 of the National Planning Policy Framework (NPPF).

Landscape features can make an important contribution to the built environment and wider countryside. For example trees and hedgerows can be important not just aesthetically but for the contribution they make to biodiversity and ensuring that ecological networks can be maintained (and enhanced), and this includes the urban environment. Landscaping in development design should be reflective of local landscape character and where required, compliment the character and special qualities of the National Park and AONB in accordance with their management plans.

Housing

You may wish to include a requirement that development needs to ensure provision of net gains for biodiversity.

Climate Change

We welcome the intention for climate change to be embedded in all policy areas in the next Local Plan. The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. There should be a recognition that habitats and species are likely to be affected by climate change. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.

We advise that a distinction should be made between climate change mitigation and adaptation in particular where references are made to emissions and energy production. Natural England have specific definitions for these, which are as follows:

- Adaptation: preparing for and dealing with the consequences of climate change
- Mitigation: minimising climate change by reducing greenhouse gas emissions (e.g. re-establish/enhance carbon sinks)

We would encourage you to refer to the Climate Change Adaptation Manual and look at the step by step approach to identifying the climate resilience of habitats that occur in the District. It is also advised you look at the Climate Change Committee's Net-Zero Report, where you haven't already, to inform the process of developing an action plan.

Regarding reduction of carbon emissions and increasing use of renewable energy sources, we advise consideration is also given to including the role of wood fuels to domestic heating and the need to ensure sustainable supplies in the long term through the promotion of appropriate broad leaved woodland planting / management (e.g. through the clearance of pine plantation and restoration of traditional coppice woodlands).

Oxfordshire County Council has devised a 2050 plan which looks at environmental improvements/NRN across the county and does take climate change into account. This may be a useful resource to get an idea of the scope of climate change adaptation and mitigation that Oxfordshire is proposing.

Biodiversity

Natural England welcomes the inclusion of net gain within the forthcoming local plan, in response to the upcoming mandate for net gain. We would be happy to advise further on the development of a strategy which provides measureable net gains through development as your local plan progresses.

A Practical Guide with good practice principles for biodiversity net gain (jointly produced by CIEEM, CIRIA and IEMA) includes advice to support local authorities' with evidence gathering and provides further detail on good practice principles for securing measurable net gains. In particular, we highlight the 10 good practice principles which are contained within this document, and Chapter 4 which focuses on plan making.

In order to develop your authority's approach to securing biodiversity net gain and to target delivery, it is important to develop a robust evidence base. This can often include collation of existing information, although additional information sources may be used to inform your strategy. For example, relevant sources of information may include online resources such as [MAGIC](#), Hampshire Biodiversity Information Centre's ecological network mapping as well as existing environmental assessments for recent developments. Pooling this information can help to understand where evidence gaps exist, and where delivery/opportunity areas may be located.

Finally, it is considered that the most effective way of delivering biodiversity net gain is through a partnership approach. Engagement with the community and local stakeholders is key to understanding what is important locally to the people who work, live and visit within the district. It is also an important step in establishing local aspirations and priorities and identifying potential delivery areas. Partnership working and local engagement is particularly useful at the evidence gathering and mapping stage but should also be maintained throughout plan making to inform consistent policies and develop monitoring and reviewing approaches.

Beyond gathering a robust evidence base and local input, it is important to identify appropriate targets and approaches for achieving biodiversity net gain. Whilst details on the mandatory approach are being finalised, it is indicated that use of the Biodiversity Metric will likely be mandated. Further information on the current realisation of the metric can be found [here](#). We also highlight the opportunity to provide feedback on your experience of the metric within your district.

Nutrient enrichment in the Solent is mentioned within this section, we advise that the water quality section should also make reference to this. Please see further comments under water supply and quality.

Public Openspace and Green Infrastructure

We support the early consideration of how multifunctional green infrastructure can be incorporated into development. Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

We would encourage the local plan to include a clear and robust policy on green infrastructure, which aims to identify and promote green infrastructure and seeks opportunities to establish, restore, enhance and maintain coherent ecological networks across the Borough. We advocate approaches to strengthen and expand resilient ecological networks, with strategic links to wider networks across the landscape and beyond the borough.

In addition to protecting and maintaining existing open spaces, we suggest the Local Plan ensures current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced (see NPPF paragraph 171). Consideration of impacts from development on existing green infrastructure should also be incorporated into the Local Plan Review. As part of your evidence gathering we recommend you seek to gather evidence on the use of existing green infrastructure. Any new development should seek to enhance local green infrastructure provision through a combination of providing high quality green infrastructure within the development site as well as contributing towards management of existing sites and features where these could be impacted as a result of increased development.

We encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

Water Supply and Quality

The Local Plan should seek to address all nutrient impacts from future developments on designated sites. Clear policies should set out the approach for developments within the Solent catchment in regards to nitrates and the River Avon catchment in regards to phosphates.

In relation to increased nutrients in the Solent designated sites the Local Plan should include objectives that seek to deliver nitrogen neutrality via strategic offsetting sites within the District as well as promoting the incorporation of substantial green infrastructure within new development. It is advised the Local Plan Review process identifies suitable strategic sites and provides clear criteria where other sites could be located within the plan area. This could include a SHLAA type process to identify suitable locations with interested parties.

When considering eutrophication, impacts to waterbodies within the borough should also be considered and assessed, for example phosphates are currently a limiting factor within the River Test. The SA should include objectives that seek to preserve water quality and flows on the Test and to ensure that local plan and windfall development within the District will not increase the phosphorus loading on the River Test SSSI.

The local plan should recognise the current uncertainty with regards to water resources and the impacts of abstraction and drought on protected sites including the River Test SSSI, River Itchen SAC & SSSI. The SA should ensure this issue is considered and include objectives for policy to set strict requirements for water consumption (we would advise all new development adopt a higher standard of water efficiency of 100 litres/per person/day including external water use and re-use in line with Southern Water's Target 100 demand reduction programme) and encourage use of greywater recycling and efficient appliances.

Air Quality

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from *local impacts* are those within 200m of a road with increased traffic¹, which feature habitats that are vulnerable to nitrogen deposition/acidification. [APIS](#) provides a searchable database and information on pollutants and their impacts on habitats **and** species.

Infrastructure and Community Facilities

Health

The Local Plan should include a policy to make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 96 of the NPPF. Natural England's work on [Accessible Natural Greenspace Standard \(ANGSt\)](#) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

We recommend the Local Plan explores the link between public health and wellbeing and access to the natural environment as well as the benefits of natural green space to the local economy and sets objectives which seek to enhance green infrastructure and ecological connectivity across the district that is managed for people and nature. You may find the supporting information/evidence useful to inform this aspect of the local plan process as it develops:

¹ The ecological effects of diffuse air pollution (2004) English Nature Research Report 580
Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency

Existing [evidence](#) shows that access to natural green spaces can help reduce stress, fatigue, anxiety and depression, and boost immune systems and encourage physical activity. It is estimated that the provision of parks and greenspaces across Britain [saves the NHS at least £110 million a year](#) solely through reduced visits to GPs, and their improved availability can help reduce health inequalities across society (reference Marmot, M. Fair society, healthy lives : the Marmot Review : strategic review of health inequalities in England post-2010. (2010) ISBN 9780956487001).

The Local Plan should include objectives to protect and enhance public rights of way (PROW) and access and recreation. The assessment should consider the value of local PROW to health and wellbeing, access to nature and the countryside.

Monitoring

Natural England would welcome working with you to develop monitoring criteria for the above policy areas. Historically policy monitoring for the natural environment has focused on habitat quality. In regards to the emerging Environment Bill and the requirement for biodiversity net gain we recommend that monitoring is developed to include amount, quality and connectivity of habitats.

I hope the advice and comments in this letter are useful. If you have any queries regarding this response please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me at
For any new consultations, or to provide further
information on this consultation please send your correspondences to

