

Date: 07 April 2022
Our ref: 383351



Graham Smith
Test Valley Borough Council

BY EMAIL ONLY

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Dear Graham,

Test Valley Borough Council Local Plan 2040 Regulation 18 Stage 1 Consultation

Thank you for your consultation on the above dated 11 February 2022 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 have welcomed the early engagement on the development of this Local Plan and have been pleased to provide advice on early draft policy documents, including the draft Strategic Policy 1: Countering Climate Change.

It is understood that this Regulation 18 Stage 1 sets out strategic policies for the Borough, while more detailed Development Management policies are to be drafted at a later date for inclusion in the Stage 2 consultation. Stage 2 will include the Habitats Regulations Assessment and an updated Sustainability Appraisal. Evolving issues such as Biodiversity Net Gain, and the provision of Green Infrastructure (GI) will be outlined within Stage 2.

Local Plan Vision and Objectives

Natural England welcome the emphasis placed on safeguarding natural resources within the Borough, conserving and enhancing biodiversity and the positive approach outlined to mitigate and adapt to climate change.

Alongside its housing delivery targets, the Plan should have a clear aim to significantly and demonstrably improve the natural environment to ensure housing and infrastructure needs are met sustainably.

Strategic Policy 1: Countering Climate Change

It is acknowledged that Test Valley Borough Council declared a climate emergency in 2020. Natural England welcomes the inclusion of this Climate Change Strategic Policy within the emerging Local Plan.

Nature-Based Solutions & Local Targets

It is noted that Section E of the draft policy wording states that development would be permitted provided that "it conserves and enhances coherent and resilient ecological networks and green

infrastructure networks, while delivering net gains for biodiversity". It would also be positive to incorporate nature-based solutions to achieve multiple policy benefits, including to help build resilience to the impacts of climate change. Suitable ecological targets could be set to allow such a policy to be monitored. Further details are below:

Nature-based solutions involve the restoration of ecosystems for the long-term benefit of people and nature. Examples include:

- Expansion of tree and woodland cover - to strengthen woodland habitat networks, protect soils, provide shade whilst capturing additional carbon from the atmosphere.
- Restoration and creation of [priority habitats](#) such as lowland meadows, lowland fens and rush pastures. This improves places where people live and recreate, protecting carbon stores and strengthening the nature recovery network.
- Natural floodplain management, through the use of tree planting, habitat creation and restoration, to alleviate flooding further downstream.
- Retrofitting of green and blue infrastructure such as trees and sustainable urban drainage systems (SuDS) in urban localities to address flood risk and heat island effects

The following are suggested for inclusion within the Local Plan:

1. Set an ambitious climate-specific target within the Policy for reducing greenhouse gas emissions that can be monitored over the Plan period, in line with the national commitment to achieving the national statutory target of net zero emissions by 2050;
2. Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional benefits. Planting on peatlands and other open priority habitats must be avoided.
3. Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment.
4. Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities.

We advise that these actions are integrated into a strategic approach alongside green infrastructure, health and wellbeing, biodiversity net gain, natural flood management, air and water quality to deliver multifunctional benefits to people and wildlife. The Plan should make clear that development will be consistent with these policies, to ensure sustainable development is properly achieved across the Plan period. Meaningful targets should be set that can be appropriately monitored over the Plan period to demonstrate the effectiveness of the Plan/Policy in addressing climate change and to ensure appropriate remedial action can be taken as necessary.

The long term-protection of non-woodland priority habitats, for example within country parks, would be encouraged as soils can store large amounts of carbon. Tree planting should be avoided on these types of habitats although would be welcomed in appropriate locations.

Natural England has published a range of resources to help with the recommended actions; please see links listed under Annex 1 of this letter. Natural England would be happy to advise further on this aspect of the Local Plan development.

Strategic Policy 6: Housing Provision

It is understood that the distribution of future housing allocation sites will be addressed at the next stage of the Local Plan 2040, which will set out draft site allocations.

This policy sets out the housing requirement across the Borough as a minimum of 10,820 homes to be delivered over the plan period of 2020 to 2040, with a higher number of new homes required in the northern Test Valley area.

Natural England will be happy to provide further advice on specific housing allocation sites once these are outlined at Regulation 18 Stage 2.

Neighbourhood Plans

It is recommended that any future Neighbourhood Plans which allocate housing should also identify spaces for environmental enhancement, for the purpose of offsetting environmental impacts, e.g. through the designation of Local Green Spaces. Such a local approach could give communities more ownership over such green spaces and provide a more strategic route to addressing common environmental impacts from development in that area, such as air and water pollution, habitat and species loss and increased carbon emissions, and could deliver biodiversity net gain and nutrient offsetting.

Such spaces could include the development of community orchards and play areas, woodlands and nature reserves, and serve a variety of functions that benefit both nature and the local community, for example providing benefits to health and wellbeing, offsetting nutrient discharges from allocated development and providing further scope for carbon sequestration.

Nutrients in the Solent

On the 16th March 2022 Natural England released updated guidance with regards to the impacts of increased nutrient loads on certain designated sites. Test Valley Borough Council is one of the Local Planning Authorities affected by this guidance, and we have written to your authority about the availability of an updated package of tools and guidance in relation to nutrient impacts.

There is existing evidence of high levels of nitrogen and phosphorus in the Solent water environment with evidence of eutrophication at some designated sites. New development within the Test and Itchen catchment area has the potential to detrimentally affect designated sites in the Solent including the Solent and Southampton Water Special Protection Area (SPA) and Solent Maritime Special Area of Conservation (SAC) sites through the associated increases in nitrogen in the water environment. Please also note that some limited development in Test Valley borough that drains to Chickenhall sewage treatment works may need to consider phosphorus loading on the River Itchen SAC. Natural England will continue to engage with your authority on these matters.

The Plan will comprise new housing development (to be detailed within the Regulation 18 Stage 2 consultation) which will have inevitable waste water implications. It is Natural England's view that these implications, and all other matters capable of having a significant effect on designated sites in the Solent, must be addressed in the ways required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). Natural England strongly recommends that a nutrient management plan or similar strategy is produced to offset the delivery of increased nutrients from local plan development and to achieve nutrient neutrality. We recommend that the Local Plan includes a policy to support this strategy. Natural England has written advice on calculating nutrient budgets and will continue to work with all affected local planning authorities to help address this issue.

As your authority is aware, mitigation can come forward via several different options including on-site provision by larger development sites through green infrastructure/open space, or by a local authority-led scheme for the smaller or windfall development (or where any top-up is required from larger developments). Other wider strategic schemes approved by the local authority and Natural England may also be available. Where these are relied upon it is advised that credits are secured/reserved to ensure that there is adequate supply available for the local plan growth. Bespoke solutions at Neighbourhood plan or development level can also come forward.

In line with the updated nutrients guidance, it is our advice that the nutrient strategy aligns itself with the standard to which water efficiency for a new development will be secured at planning permission, plus 10l/pp/day, to incorporate a level of precaution.

Water Resource

- Target 100

Southern Water's Water Resources Management Plan (WRMP) 2019, that covers the planning period 2020-2070, projects a significant supply demand deficit during periods of drought in the Western Area, and commits to implementing a long term water resources scheme to restore the supply demand balance whilst avoiding and/or mitigating impacts on European sites, including the River Itchen Special Area of Conservation (SAC). Natural England strongly advise all new development within the Southern Water supply area adopt a higher standard of water efficiency of 100 litres/per person/day in line with Southern Water's Target 100 demand reduction programme which is committed to within their WRMP19. Natural England also recommends that the local plan policy encourages the wise use of water in conjunction with the water companies, for example by developments incorporating grey water recycling systems and efficient appliances.

Recreational disturbance - New Forest designated sites

Test Valley Borough Council currently implements an Interim Strategy to address recreational impacts to the New Forest designated sites arising from new developments.

Part of the Local Plan area falls within the 13.8km zone of influence within which new overnight accommodation (including residential and hotel/touristic development) is likely to have a significant effect on the New Forest designated sites. It is therefore advised this impact pathway is considered within the Local Plan Appropriate Assessment including consideration of suitable and proportionate mitigation. We are aware that the Test Valley Borough Council adopted an interim strategy in 2014 to mitigate against adverse effects from recreational disturbance on European sites, and that a draft Supplementary Planning Document on this issue recently went through public consultation.

We recommend the Council works with the New Forest National Park Authority and the other partner authorities to develop a strategic approach to addressing recreational impacts from new development on the New Forest designated sites. Such an approach should include in-borough measures such as SANG provision as well as measures at the designated sites themselves to address the residual impact, e.g. via contributions to a suitable scheme such as the New Forest National Park Authority's [Habitat Mitigation Scheme](#). Natural England is aware that your authority, in partnership with other local authorities within and surrounding the New Forest designated sites are committed to help prepare a more strategic, cross-boundary approach to habitat mitigation for the New Forest SPA/SAC/Ramsar. This will ensure a proportionate and co-ordinated approach to address this issue and enable a robust means for forthcoming development to avoid and/or mitigate its impacts over the long term.

Recreational disturbance - Solent Special Protection Areas (SPAs)

Research has shown that new housing around the Solent will lead to more people visiting the coast for leisure, potentially causing additional disturbance to bird species such as dark-bellied brent geese and wader species protected under the Solent and Southampton Water SPA, Portsmouth Harbour SPA and Chichester and Langstone Harbours SPA.

The Solent Recreation Mitigation Partnership (SRMP), now known as Bird Aware Solent, is made up of fifteen local councils (including the Test Valley Borough Council), Natural England, the Royal Society for the Protection of Birds, Hampshire & Isle of Wight Wildlife Trust, and Chichester Harbour Conservancy. The partnership prepared a strategy that was published in 2017 that aims to prevent bird disturbance from recreational activities. It seeks to do this through a series of management measures which actively encourage all coastal visitors to enjoy their visits in a responsible manner rather than restricting access to the coast or preventing activities that take place there.

Part of the southern area covered by this local plan lies within 5.6km of Solent and Southampton Water SPA and as the Local Plan will result in a net increase in dwellings it will be required to address its impact on the SPA from recreational pressure. Mitigation guidance is set out in the strategy and includes payment towards strategic solutions and bespoke onsite mitigation where necessary. We recommend that the Local Plan includes a policy to cover this strategic solution.

Construction Disturbance

The policy should seek to ensure development avoids noise and visual impacts from construction on SPA birds at the SPA sites or at identified terrestrial SPA supporting habitat sites. Regarding noise, Natural England advise percussive piling or works with heavy machinery (i.e. plant resulting in a noise level in excess of 69dbAmax – measured at the sensitive receptor) should be avoided during the bird overwintering period (i.e. October to March inclusive).

Vibrational impacts on species (e.g. from percussive piling) should also be considered for developments close to the Test estuary or the River Test itself, particularly on migratory Atlantic salmon, a qualifying feature of the River Itchen SAC and a feature of the River Test Site of Special Scientific Interest (SSSI), travelling up the Test estuary and river.

Where disturbance may occur as a result of construction activities, an assessment of impacts must be undertaken and mitigation measures outlined as part of a Construction Environmental Management Plan (CEMP) or similar.

Emer Bog Special Area of Conservation (SAC)

We are aware that the council have been working with Natural England and the Hampshire and Isle of Wight Wildlife Trust to update evidence relating to the Emer Bog SAC. The guidance note available for developers is underpinned by Policy E5 of the adopted Local Plan. The council may wish to incorporate this guidance within its updated Local Plan policies, or produce updated guidance (such as a Supplementary Planning Document) at a later date.

Surface Water Drainage

It is advised consideration is given to impacts on the Borough's important chalk rivers via surface water drainage, in particular the River Test SSSI and its tributaries. Surface drainage can contain hydrocarbons and chemical pollutants associated with traffic (e.g. heavy metals, grit salts, particulates, oils), garden chemicals (enriching fertilisers or herbicides/ insecticides), household detergents etc. These may have considerable cumulative impacts on water quality with other local factors.

Additionally, the urbanisation of land within or close to the floodplain may affect water flow rates with consequential detrimental impacts on important river habitats, and/or they may exacerbate negative impacts from existing development. The Local Plan should ensure such impacts on protected sites and other important habitats are properly considered, particularly where allocating sites. Sustainable Drainage Systems (SuDS) should be designed in accordance with CIRIA C753 SuDS Manual, to be as 'natural' as possible. It is advised that local plan policy makes clear that where a development drains to a protected site(s), an additional treatment component (i.e. over and above that required for standard discharges), or other equivalent protection may be required to ensure water quality impacts are avoided.

Where SuDS are proposed serving as mitigation for protected sites, development should ensure that appropriate resources are put in place to ensure their long-term (in perpetuity) monitoring, maintenance/replacement, and funding.

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 (sustainability appraisal 'SA' and Habitats Regulations Assessment '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 that should be considered in the plan and the SA/HRA are proposals that 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 traffic, 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.

It is advised that assessment, alone and in combination with other plans and projects, should be carried out in line with Natural England [guidance](#) that provides a simple step by step approach to assessing road traffic emissions under the Habitats Regulations. All designated sites that may be impacted by the affected road network within a reasonable buffer zone should be screened in for consideration under the Local Plan appropriate assessment. Please note that the method for assessing in combination effects has changed in the past few years due to a number of high profile appeal decisions. They include the following: The Wealden Judgement; The People Over Wind Case; and CJEU Ruling In The Netherlands Nitrogen And Agriculture Cases C-293/17 and C-294/17. As such we would be looking for a more detailed in-combination assessment with other plans/projects in the area and with Local Plans.

It is advised air quality impacts on interest features of nationally and locally designated sites is also carried out as part of an assessment of impacts on SSSIs and wider biodiversity.

- Ammonia (NH₃)

Please note that ammonia (NH₃) from traffic emissions should also be assessed as the impact from this source on designated sites is currently unclear.

Ammonia, along with nitrous oxides (NO_x), can contribute to N-deposition in the soil and potential eutrophication of habitats. Whereas background levels of nitrous oxides have shown a steady decline over time due to reduced emissions from vehicles and other sources, levels of ammonia have remained relatively stable over the last 30 years.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NO_x emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this [report](#) from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current Calculator for Road Emissions of Ammonia (CREAM) model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Natural England will be happy to advise further as the Plan progresses.

Local Nature Recovery Strategies (LNRS)

Work is underway within Natural England and with partners on several of the key elements of the Environment Act, including Nature Recovery Networks and Local Nature Recovery Strategies.

It should be noted that the term Nature Recovery Network (NRN) is used to refer to a single, growing national network of improved joined-up, wildlife rich places which will benefit people and wildlife. Local Nature Recovery Strategies (LNRSs) will be the key mechanism for planning and mapping local delivery of the NRN. LNRSs will form a new system of spatial strategies for nature that will be mandated by the Environment Act. They will cover the whole of England and will be developed by Responsible Authorities (RAs) appointed by the Secretary of State, usually at a county scale. Each strategy will:

- Map the most valuable existing habitat for nature
- Map specific proposals for creating or improving habitat for nature and wider environment goals
- Agree priorities for nature's recovery

It is the government's intention that mandatory biodiversity net gain will provide a financial incentive for development to support the delivery of LNRSs through an uplift in the calculation of biodiversity units created at sites identified by the strategy. LNRSs have also been designed to help local planning authorities deliver existing policy on conserving and enhancing biodiversity and to reflect this in the land use plans for their area.

Five LNRS pilots across the country ran from August 2020 until May 2021. Please see this [report](#) that shares the main lessons and findings. This report will inform the development of the LNRS policy for the rollout of the strategies across England. According to the [current timetable](#) LNRSs should be rolled out to a limited number of people in 2023, with rollout across the country by the end of 2024.

Given that national guidance on LNRSs and their relationship to strategic planning is still in development, it is recommended that Local Plan policy recognises and references its support to the delivery of the emerging NRN and LNRS covering the area.

Green Infrastructure

We recommend the Plan outlines the need for securing the long term management of new and existing green infrastructure (GI) and for protecting it from future development. Options could include the use of [conservation covenant agreements](#), [LNR declaration](#), [Fields in Trust](#) designation, [green space designation](#) in neighbourhood plans or [Town and Village Green](#) registration. Alternatively land can be passed on to a suitable NGO, or to your Council, or a Town or Parish Council.

A number of SSSI sites within the Test Valley area are designated in part for their lowland grassland habitats and associated flora and fauna. These habitats are sensitive to recreational pressure which has the potential to damage vegetation and soils. As such, recreational activity is included on the ORNEC list (Operations Requiring Natural England's Consent) for several of these SSSI sites. These lists can be viewed on [designated sites viewer](#) and detail activities that could damage the features of interest at a SSSI site in certain circumstances. We recommend that the GI strategy for this borough considers the potential for impact on these sites and access availability to GI across the borough. Further assessment of this issue could be brought forward as part of the Local Plan's open space needs assessment.

Policy and supporting text should set minimum accessibility, quantitative and quality requirements for new green infrastructure. Natural England recommends this is achieved by adopting [Accessible Natural Greenspace Standards](#) (ANGSt) or replacement standards if revised, as a minimum requirement for new housing development. ANGSt includes the quantity, accessibility, quality and services standards for accessible greenspaces. Natural England is currently leading national work on a [Green Infrastructure Framework project](#). This will be a vital contribution to delivery of the 25

Year Environment Plan. We will be happy to continue to advise your authority as this work progresses.

The Local Plan should also reference the following green infrastructure policy standards:

- Keep Britain Tidy runs the [Green Flag Award](#) scheme on behalf of Government. Anyone can apply to have their greenspace assessed against the Green Flag Award Quality standard, for payment of a fee. The Award is adaptable to a range of types of greenspace including parks, gardens, social housing, etc.
- The Sensory Trust published '[By All reasonable Means](#)' which sets good practice guidance on providing access to the natural environment for people of all abilities. Although not all areas will be able to provide this (such as some wildlife areas), the aim is to get the majority of areas accessible to all at least in part.
- The Forestry Commission has developed guidelines for [Tree canopy cover](#), to be set for a local area, based on evidence showing that 20% is a good aspiration, depending on the current level.
- The Woodland Trust recommend [woodland access standards](#). Accessible woodland of at least 2 ha should be available with 500 m of new homes and woodland of at least 20 ha within 4 km.

The plan should ensure new green infrastructure and habitat creation is monitored to ensure that it develops in accordance with its stated intention.

New development located in easy walking distance from existing natural greenspace and publicly accessible nature reserves will benefit substantially by the presence of such facilities in the locality and will through an increase in visitors, inevitably increase ongoing visitor management costs. Where the management of the green infrastructure is not already secured (e.g. through SANG payments), local plan policy should require development to make a financial contribution appropriate to the scale of the development to the managers of the reserve / greenspace to cover these additional costs. This is particularly important where the nature reserves, or nature parks, are run by charities that do not have secured income to cover the in perpetuity management costs associated with new housing development.

The Plan should commit the authority to developing a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (as required by NPPF paragraph 175). This should include detailed requirements for new areas of green infrastructure along with a review of existing to ensure that they are meeting the multifunctional benefits and thereby maximising their Natural Capital.

Health & Wellbeing - Green Infrastructure

There is increasing recognition of the importance of nature and place as a determinant of individuals' mental and physical health. Existing evidence¹ shows that access to natural green spaces can help reduce stress, fatigue, anxiety and depression, and boost immune systems and encourage physical activity. The risk of chronic diseases such as asthma may also be reduced.

The [Defra 25 Year Plan](#) outlines nature-based actions that can be taken to help people connect to the natural environment to improve health and wellbeing. Such actions can include 'greening' our towns and cities, planting urban trees, encouraging children to access nature in and out of school and improving access for all in local green spaces.

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 GPs², and their improved availability can help reduce health inequalities across society³.

¹ [Evidence Statement on the links between natural environments and human health](#), University of Exeter and Defra, 2017; [Urban Green Spaces and Health](#), World Health Organisation Regional Office for Europe, 2016, 9-10.

² [Revaluing Parks and Green Spaces Measuring their economic and wellbeing value to individuals](#), Fields In Trust, 2018

³ Marmot, M. Fair society, healthy lives : the Marmot Review : strategic review of health inequalities in England post-2010. (2010) ISBN 9780956487001

The provision of enhanced green infrastructure and sites of nature conservation value can not only help address some of the mental and physical health problems experienced in the borough's population, but can also benefit society in other ways including improvements to local air and water quality, reducing the risk of flooding, alleviating noise levels and aiding climate change adaptation.

Natural England recommend the Local Plan sets out policy that links public health and wellbeing to the natural environment, and seeks to enhance green infrastructure and ecological connectivity across the borough that is managed for people and nature.

Biodiversity Net Gain- General advice and benefits of embedding biodiversity net gain

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. The National Planning Policy Framework (NPPF) states that '*planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity*' (para 174).

Planning Practice Guidance describes net gain as an '*approach to development that leaves the natural environment in a measurably better state than it was beforehand*' and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, the [Biodiversity Metric 3.0](#), can be used to measure gains and losses to biodiversity resulting from development. We advise you to use this metric to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

The Chartered Institute of Ecology and Environmental Management, along with partners, has developed '[good practice principles](#)' for biodiversity net gain, which can assist plan-making authorities in gathering evidence and developing policy.

Advice on wider environmental gains

Natural England focusses our advice on embedding biodiversity net gain in development plans, since the approach is better developed than for wider environmental gains. However your authority should consider the requirements of the NPPF (paragraphs 74, 106, 122 and 179) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space or biodiversity strategies. Opportunities for environmental gains, including nature based solutions to help adapt to climate change, might include:

- Identifying opportunities for new multi-functional green and blue infrastructure.
- Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) and climate resilient
- Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape.
- Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links.
- Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore)
- Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habitats.

Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.

Evidence gathering

Existing environmental evidence can be gathered from various sources including online data sources like [MAGIC](#), [Local Environmental Record Centres](#) (LERCs) and strategies for green infrastructure, open space provision, landscape character, climate and ecosystem services and biodiversity opportunity mapping. Biodiversity data can also be obtained from developments that were subject to Environmental Impact Assessment (EIA) Monitoring, the discharge of conditions or monitoring information from legal agreements with a biodiversity element. This can help establish a baseline to understand what assets exist and how they may relate to wider objectives in the plan area. Cross boundary environmental opportunities can also be considered by working with neighbouring authorities and/or local nature partnership. The relationship between environmental assets and key strategic growth areas may help to highlight potential opportunities that development could bring for the natural environment. The following may also be useful when considering biodiversity priorities in your plan area:

- What biodiversity currently exists, what is vulnerable or declining?
- How are existing assets connected, are there opportunities to fill gaps and improve connectivity?
- How does the above relate to neighbouring authority areas, can you work collaboratively to improve links between assets or take strategic approaches to address issues or opportunities?

Sustainability Appraisal

This appraisal, dated February 2022, has been produced for the Regulation 18 Stage 1 consultation process. As the Local Plan is still in draft format the Appraisal does not establish a framework for monitoring the likely significant effects of the plan (paragraph 2.14). This will come forward at the Regulation 18 Stage 2 consultation, when this Appraisal will be updated and Natural England will be happy to provide more detailed comments at that time.

If you have any queries relating to the advice in this letter please contact me on 07552 268094.

Yours sincerely

Mary Andrew
Senior Adviser Sustainable Development
Thames Solent Team

Annex 1

Climate change – further resources

Please see below links to further resources that may be useful in developing local policy to address climate change within the local authority area.

- [The Climate Change Adaptation Manual](#) - provides extensive information on climate change adaptation for the natural environment. It considers the potential impacts of climate change on individual priority habitats and outlines possible adaptation responses. It includes the Landscape Scale Adaptation Assessment Method to assist those wanting to undertake a climate change vulnerability assessment for an area larger than an individual site or specific environmental feature, focussing on identifying vulnerabilities to climate change.
- [The National Biodiversity Climate Change Vulnerability Model](#) is a mapping tool that helps identify areas likely to be more vulnerable to the impacts of climate change.
- [Carbon Storage and Sequestration by Habitat 2021 \(NERR094\)](#) – a recently updated report that reviews and summarises the carbon storage and sequestration rates of different semi-natural habitats that can inform the design of nature-based solutions to achieve climate mitigation and adaptation.
- [The Nature Networks Evidence Handbook](#) – aims to help the designers of nature networks by identifying the principles of network design and describing the evidence that underpins the desirable features of nature networks. It builds on the Making Space for Nature report of Lawton et al. 2010), outlining some of the practical aspects of implementing a nature network plan, as well as describing the tools that are available to help in decision making.
- [Natural England Climate Change webinars](#) - a range of introductory climate change webinars available on YouTube.
- [England Trees Action Plan 2021- 2024](#) – a plan to deliver a more joined up approach to land use management, recognising the value of woodland planting across the UK to meet net zero.