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Our ref: [REDACTED]



Graham Smith – Head of Planning Policy and Economic Development

Test Valley Borough Council –
Beech Hurst
Weyhill Road
Andover
SP10 3AJ
planningpolicy@testvalley.gov.uk

Customer Services
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

BY EMAIL ONLY

Dear Graham,

Test Valley Borough Council Local Plan 2040 Regulation 18 Stage 2 Consultation

Thank you for your consultation on the above dated 06 February 2024 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 methodology for the air quality assessment and the draft residential site allocation policies and the draft employment site allocation policies for the Local Plan.

Test Valley Borough Council have split their Local Plan Regulation 18 into two separate stages. The consultation on Stage 1 of the Local Plan which set out strategic policies in the Borough took place in 2022 and Natural England provided our formal response letter on 7 April 2022 (ref: 383351). Detailed Development Management policies have been submitted as part of Stage 2 of the Regulation 18 consultation, and these policies are accompanied by the Habitats Regulations Assessment and Sustainability Appraisal.

Local Plan Vision, Key Challenges and Objectives

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

Natural England welcome the fact that tackling climate change is a key objective for the Local Plan. Since declaring a climate emergency in 2019 a Climate Emergency Action Plan has been approved and the Council have taken a number of steps to help address this issue. Whilst the Climate Emergency Action Plan will remain a 'living document' we advise that this Local Plan makes the most of the opportunity to embed actions, best practise and goals from this ongoing work into the overarching Local Plan framework for the Borough. We advise that the climate emergency sits at the heart of the new Local Plan, strengthening and providing further context for the actions arising from the Climate Emergency Action Plan. Measures to tackle climate change and increase resilience should recognise the important role of the natural environment to deliver measures that

reduce the effects of climate change and enable nature recovery.

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, in line with overarching legislation such as the Environment Improvement Plan 2023.

Comments on the Habitats Regulations Assessment (HRA)

The Test Valley Borough Council Habitats Regulations Assessment (HRA) (AECOM, January 2024) identifies significant effects that are likely to occur as a result of this Local Plan, proceeding to an appropriate assessment where the significant effects cannot be ruled out. Natural England concur with the impact pathways screened into the assessment.

However, **Natural England advise that further evidence is needed to assess the overall impacts of the Local Plan on the qualifying features of designated sites.** The key issues listed below are discussed in greater detail through the following Appropriate Assessment section.

- Water quality
- Water quantity, level and flow
- Air quality
- Recreational pressure
- Functionally-linked land

Appropriate Assessment

- *Water quality – Nutrient Neutrality*

Solent designated sites, River Itchen Special Area of Conservation (SAC) & River Avon SAC

A large part of the Borough sits within catchments of designated sites sensitive to increased nutrient loading (from either nitrogen and/or phosphorus). The concept of 'nutrient neutrality' for developments proposing an increase in overnight accommodation within these catchments is well established, and Natural England will continue to work with the Council and potential mitigation providers to support an ongoing pipeline of existing and emerging strategic mitigation options.

It is welcomed that the HRA includes a plan-level nutrients budget to estimate the additional nutrient load entering the designated sites, and therefore requiring mitigation during the plan period. The budget estimates a Total Nitrogen (TN) load from the relevant residential site allocations to be 14,792.63 kg TN/year discharging to the Solent designated sites. In addition, a phosphorus budget has been calculated for two residential site allocations at Valley Park (*Policy 6 [SA6]*) and Ampfield (*Policy 7 [SA7]*) as these are expected to discharge their wastewater effluent to the river Itchen SAC via Chickenhall Wastewater Treatment Works (WwTWs). These allocations will therefore need to mitigate for both nitrogen and phosphorus. The budget calculates that 139.98 kg Total Phosphorus (TP)/year would arise from these developments.

It is noted that part of the Borough falls within the River Avon catchment which is sensitive to increases in phosphorus. However, the Local Plan does not allocate any residential development within this catchment and has therefore not considered the River Avon SAC within a plan-level nutrient budget.

Natural England recognise that a plan-level budget has been completed to support the list of identified site allocations that have been screened in with relation to demonstrating nutrient neutrality on the Solent designated sites and the River Itchen SAC. It is our understanding that the nutrient calculators have not been submitted to demonstrate the calculations behind each site allocation. We recommend that the [latest update on the supply and demand analysis](#) by the Partnership for South Hampshire (PfSH) could help inform your budget and nutrient neutrality mitigation forecast under this Local Plan. An example of this can be found here, [Joint Committee -](#)

We note that Table 8 and Table 9 of the HRA includes a breakdown of the site allocations and number of dwellings likely to come forward to calculate the nutrient budget for the Local Plan. We would advise that the table includes further information on the figures informing these calculations. For example, the occupancy figure and the water consumption value used, if these were to differ from the default values within the nutrient calculator tool. In addition, estimated land use and soil drainage will have inputted to these calculations. We therefore advise that the Council is satisfied that these estimations are reasonable, and a precautionary approach has been taken in light of any uncertainty, recognising that detailed budgets will be produced at the project stage. We would advise that a precautionary approach is taken when finalising the nutrient budgets underpinning this Local Plan.

The HRA notes that the Levelling Up and Regeneration Act (LURA) 2023 may have implications for the calculation of nutrient budgets due to planning upgrades for some Wastewater Treatment Works (WWTWs). We therefore recognise that the calculated nutrient loads may be subject to change as the Plan considers these implications and guidance, or whether this latest guidance has already been applied. We advise that you make clear use of [Natural England's latest guidance on achieving nutrient neutrality](#) for new housing development. This guidance has been published alongside the latest version of the nutrient calculators (January 2024) which considers the discharge concentration permit limits for relevant wastewater treatment works both prior to the implementation of the Technically Achievable Limit (TAL) for discharge concentrations from 2030, and post-TAL. We advise that where allocations are likely to be occupied pre-TAL, any requirement for temporary mitigation (required up until TAL at 2030) are considered, alongside any requirement for in-perpetuity mitigation provision.

Please also make appropriate use of our latest [tools and resources for calculating nutrient neutrality](#) (February 2024).

The emerging Test Valley Local Plan refers to water quality in the Solent, Itchen and Avon designated sites and the concept of nutrient neutrality in *Policy BIO2: International Nature Conservation Designations*. The appropriate assessment concludes that the text underpinning *Policy BIO2* aligns the Plan with Natural England's requirement and places the onus on developers to ensure that there will be no net nutrient input to the designated sites. The HRA continues to conclude that adverse effects of the Plan on the integrity of the Solent and Itchen designated sites cannot be ruled out, unless the Plan sets out the intended mitigation solutions for at least the first five years of the plan period.

Natural England advise that, particularly during the initial five-year Plan period, the Plan should demonstrate how the plan-level budget is likely to be offset, in order to provide increased certainty of the Plan's viability. Potential mitigation could include the provision of credits from agreed strategic mitigation schemes (as listed on the [PfSH webpages](#)), and/or provision of onsite mitigation for larger development sites where appropriate. Where onsite or offsite mitigation is considered at this Plan stage, we would recommend consideration is given to how these sites could generate maximum gains for both people and nature. For example, consideration of the most appropriate measures in light of the emerging Local Nature Recovery Strategy (LNRS) and potential provision of Biodiversity Net Gain (BNG) units, and/or provision of Suitable Alternative Natural Greenspace (SANG), as appropriate for individual allocations.

In addition, the latest calculator enables the inclusion of Sustainable Urban Drainage systems (SuDs), when designed in line with relevant CIRIA guidance and appropriately sited within development red-line boundaries, to generate a reduction in the amount of mitigation required. The Plan may wish to consider how any policies related to surface water drainage may promote the effective installation of onsite SuDs, recognising the additional benefits these can provide, for example by reducing flood risk whilst providing part of an attractive Green Infrastructure offer to local residents and visitors.

Natural England concurs with the recommendation set out in the HRA (*paragraph 5.12*) that the Plan cannot rule out adverse effects on the integrity of the Solent or River Itchen designated sites until suitable nutrient mitigation options for both Nitrogen and Phosphorus nutrients have been identified and demonstrated. We also advise that consideration of increased phosphorus inputs to the River Avon SAC is considered.

Further assessment of this impact pathway through Appropriate Assessment will be required to demonstrate that any potential adverse impacts can be appropriately avoided or mitigated.

Natural England welcome the opportunity to continue working with the Council on this.

- *Water quantity, level and flow*

Natural England recognise that 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. This Plan therefore commits to implementing a long-term water resources scheme to restore the supply and demand balance whilst avoiding, mitigating and/or compensating for impacts on European sites, including the River Itchen SAC.

It is Natural England's advice that in advance of any permitting of such a suitable long-term scheme, uncertainty remains with regards to water resources and the impacts of abstraction on protected sites

We recognise that your appropriate assessment largely relies on the Southern Water's WRMP and Drought Plan HRAs for covering the intended Test Valley Local Plan period (2040), given that its long-term scheme extends far beyond this, for managing any potential impacts of water quantity, level and flow on designated sites.

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, including external water use and re-use, in line with Southern Water's Target 100 demand reduction programme which is committed to within their WRMP19. Natural England also recommends that the Policy encourages the wise use of water in conjunction with the water companies, for example by promoting the implementation of grey water recycling systems and more efficient water appliances in new development and raising awareness of responsible water use.

Compensatory habitat for the River Itchen SAC

Natural England would advise that the appropriate assessment also considers compensatory habitat for the River Itchen SAC.

At the Test and Itchen Public Inquiry it was identified that enhancement measures on the river Test SSSI and river Meon could be undertaken to compensate for abstraction on the river Itchen SAC if this were to exceed safe environmental limits. This requirement could be called upon in times of drought and is an interim measure until new drinking water supplies are available (likely around 2035).

Southern Water have agreed a package of compensation measures with the EA and NE which identifies stretches of the river Test SSSI and the river Meon as the compensatory habitat for the river Itchen SAC. Measures on the River Test include river restoration of the chalk stream habitat and Southern Damselfly habitat, and on the river Meon it is tackling barriers to salmon migration through the removal of weirs and creation of fish channels and river restoration projects for fish spawning. Compensatory measures will ensure the overall coherence of the Natura 2000 network is maintained.

In line with the Conservation of Habitats and Species Regulations 2017 (as amended), it is a legal requirement for the compensation package to be in place prior to the deleterious effects of the drought order's impact on the SAC. Should the drought order be relied upon, the compensatory habitats on the river Test will need to be in such an environmental condition that can be considered, beyond reasonable scientific doubt, capable of maintaining the overall coherence of the N2K network. Any compensatory measure for a European designated site must aim to deliver the same ecological value or compensate for the loss of the same feature, habitat or species. Based on this, it is our view that before the drought order can be used, Southern Water are required to ensure the compensatory habitat on the river Test delivers the same ecological value as that of the river Itchen. We advise that the timely implementation of the identified compensatory habitat is key to maintaining the overall coherence of the N2K network.

Both the Test and Itchen rivers are due a condition assessment and are the highest priority for Natural England, with assessments due to take place in June 2024. This will help inform future management actions within these catchments including those regarding nutrients.

Natural England are in discussions with Defra about who will write to Competent Authorities to confirm the status and locations of these compensatory habitats.

Once the sections of the river Test SSSI compensatory habitat is being implemented on, and the non-designated tributaries of the River Test also selected for compensatory measures, have been declared compensatory habitat for an SAC they will be granted the highest status of international importance for nature conservation. Natural England would advise your authority that any plan or project likely to have significant effects on the river Itchen SAC's compensatory habitat will need to complete a Habitats Regulations Assessment (HRA). We would advise that your authority's HRA for the Plan considers the River Test as though it were a SAC, to ensure the compensation delivers the same ecological value as the river Itchen SAC. Therefore, where likely significant effects resulting from the Plan on the Test cannot be ruled out, we advise your assessment should proceed to the appropriate assessment stage.

Natural England cannot currently agree with the conclusions that there will be no adverse effects on integrity of designated sites from the Reg.18 Local Plan regarding water quality, level and flow. We advise that further assessment of this impact pathway through the Appropriate Assessment will be required, considering the above comments.

Natural England welcome the opportunity to continue working with the Council on this.

Emer Bog SAC

It is recognised that the employment allocation at Land East of Test Valley Business Park (*Policy 11 [SA11]*) has the potential to adversely affect Emer Bog SAC through hydrological impacts. The appropriate assessment refers to *Policy 11 [SA11]* of the draft Local Plan whereby this employment site should be able to utilise the existing public drainage network to prevent changes to ground water. Natural England welcome that the guidance note underpinned by existing Policy E5 of the adopted Local Plan has been referred to again here. We agree with your recommendation that greater emphasis should be made to surface water drainage and Sustainable Drainage Systems (SuDs) to ensure any such impacts from site allocations under this draft Plan on Emer Bog SAC are properly considered. *Policy BIO2* would be most appropriate for further information to inform this SuDs guidance and could be linked to under this part of the appropriate assessment for addressing hydrological impacts at Emer Bog SAC from the relevant site allocations under this Plan. SuDs

should be designed in accordance with the CIRIA C753 SuDs Manual.

Therefore, we recommend that any assessment of impacts to Emer Bog SAC are made with due consideration to relevant local plan policy.

Natural England recommend that measures are put in place to monitor Emer Bog SAC for any additional sensitivities, such as increased recreational pressure and changes to water quantity, level and flow. The Council may wish to consider this through the Plan.

- *Air Quality*

Natural England concur with the list of housing and employment sites which have been screened into the appropriate assessment for potential air quality impacts on statutory designated sites. It is recognised that the Council has completed a supporting Air Quality Modelling report (January 2024).

It is acknowledged that [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001](#) guidance has been appropriately considered through the supporting Air Quality Modelling report. We recognise that all European designated sites that may be impacted by the affected road network within a reasonable buffer zone (200m) have been screened in for consideration under the draft Local Plan appropriate assessment. These sites are as follows:

- New Forest SAC, SPA and Ramsar
- Salisbury Plain SAC
- Solent Maritime SAC
- Solent and Southampton Water SPA and Ramsar
- Mottisfont Bats SAC
- Emer Bog SAC

Natural England are pleased to note that the Air Quality Modelling report covers NO_x, Nitrogen deposition and also ammonia (NH₃) from traffic emissions since the latter's impact from this source on designated sites is currently unclear. The modelling has been produced across 16 Transects (T1-16) across the affected road network.

It is understood that the forecast concentrations of NO_x are demonstrated to fall below the critical level across all transects by 2041. The HRA and supporting modelling also exhibit that forecast concentrations of ammonia (NH₃) are demonstrated to fall below the upper critical level across all transects by 2041. Natural England agree in principle with the conclusions of no adverse effects on designated sites from NO_x and NH₃ in the atmosphere from this draft Plan.

Natural England recognise that the HRA identifies nitrogen deposition contributions that exceed the critical loads for transects T10 and T11 at the roadside of the A303 W passing by Salisbury Plain SAC, and for transect T12 at the roadside of the B3084 passing by Mottisfont Bats SAC. The assessment demonstrates that these forecast exceedances are in combination with existing traffic pollution and various other emitters. We would therefore expect further work to be undertaken to address these issues.

Salisbury Plain SAC

It is understood that the Air Quality Modelling Report has identified that 'with development' scenarios (DS1 and DS2) of this Plan will contribute to Annual Average Daily Traffic (AADT) increases of over 1000 AADT 'in combination' with other plans, upon the A303 W. Natural England also acknowledge the contribution of the Local Plan 'with development' scenario is below 1% of the critical load at the A303 passing Salisbury Plain SAC, whereby the in combination levels exceed 1% of the critical load.

Natural England note the appropriate air quality modelling has been demonstrated for nitrogen deposition contributions to Salisbury Plain SAC. We acknowledge that the 'in combination' nitrogen deposition is forecast to drop to 1% of the critical load by 30 meters from the roadside of A303 at transects T10 and T11.

We welcome the opportunity to continue working with the council on this.

Mottisfont Bats SAC

It is understood that the nitrogen deposition contribution of this draft Plan at transect T12 is forecast to be 10% of the critical level at the roadside of the B3084 passing through the Mottisfont Bats SAC sites. The modelling demonstrates that this exceedance will fall to 1% of the critical load by 40 meters from the roadside. The HRA concludes that the foraging woodland habitats of vital importance to the designated Barbastelle bats species of Mottisfont Bats SAC are unlikely to be materially affected by the modelled increases in nitrogen deposition.

Natural England advise that any conclusions such as this made through appropriate assessment are supported by appropriate evidence. We advise that further information to justify the conclusions of no adverse effects on Mottisfont Bats SAC from atmospheric pollution proposed under this draft Plan be provided.

We expect further work to be done to address these issues through Appropriate Assessment. Natural England welcome the opportunity to continue working with the Council on this as the Plan progresses.

It is advised that air quality impacts on interest features of nationally and locally designated sites should also be carried out under this Local Plan as part of an assessment of impacts on SSSIs and wider biodiversity. Most notably for this Local Plan would be the importance to consider Test Valley SSSI under any future assessment.

- *Recreational pressure*

Salisbury Plain SAC and SPA

Two strategic housing allocations – Land East of Ludgershall (*Policy 7 [NA7]*) and Land South East of Ludgershall (*Policy 8 [NA8]*) – fall within the identified Zone of Influence (Zoi) of the Salisbury Plain SAC and SPA and therefore will require mitigation for increased recreational pressure.

Natural England recognise that the two aforementioned housing allocations are for 350 dwellings and 1150 dwellings respectively and therefore present a significant scale of residential development.

The appropriate assessment does not clearly acknowledge the 6.4km Zone of Influence (Zoi) for the Salisbury Plain SAC and SPA sites, within which recreational pressure from increased housing development should provide suitable mitigation to offset any additional impacts. Natural England advise that the appropriate assessment should specify the housing allocations in which lie within this 6.4km buffer zone and then provide details on how the mitigation will be secured to ensure that no adverse effects on integrity of the designated sites can be achieved.

To mitigate for impacts to the Salisbury Plain SAC and SPA sites the HRA indicates that the most appropriate form of mitigation would be via contributions to Wiltshire Council's strategic mitigation strategy. It should therefore be confirmed whether this strategic scheme has capacity to accept these contributions, and whether these will be sufficient to fully offset any impacts arising from development within Test Valley Borough. If not, further mitigation measures should be explored. We advise that potential mitigation measures are confirmed and that a requirement to provide adequate mitigation is clearly set out within appropriate Local Plan policy, likely to be *Policy BIO2*.

The appropriate assessment is thus unable to provide certainty in how these two strategic site allocations under this draft Plan will provide sufficient mitigation in order to conclude no adverse effects on integrity of the Salisbury Plain SAC and SPA from recreational disturbance.

We cannot currently conclude on the outcome of the Appropriate Assessment on Salisbury Plain SAC and SPA regarding recreational pressure, due to a lack of information regarding proposed mitigation measures. We advise that further information is provided to demonstrate that any adverse effects from the specified allocated developments can be suitably avoided or mitigated.

Natural England welcome the opportunity to work with the Council on this.

New Forest SAC, SPA and Ramsar

Natural England agree with the identification of the housing allocations under this draft Plan which if left unmitigated would cause increased recreational disturbance on the New Forest SAC, SPA and Ramsar sites. The appropriate assessment does not explicitly acknowledge the 13.8km Zol for the New Forest SAC, SPA and Ramsar whereby recreational pressure from increased housing development within this buffer zone is recognised, requiring mitigation. It also does not acknowledge the wider 15km Zol for the New Forest SAC, SPA and Ramsar in which large housing allocations (c.150 homes or more, and/or developments requiring an Environmental Impact Assessment) should consider recreational impacts on these sites. Natural England advise that the appropriate assessment is incomplete for this impact pathway and does not demonstrate the impact of this draft Local plan on the named designated sites from increased recreational pressure.

We recognise the Plan identifies that further work is to be done to the mitigation framework for the New Forest designated sites, which is welcome. *Policy BIO2* refers to a potential coordinated strategic approach emerging for the New Forest, with input from affected Councils, Natural England and various partners to shape this. Your draft Plan and appropriate assessment refers to New Forest mitigation in the form of a package of measures including Suitable Alternative Natural Greenspace (SANG) and on-designation mitigation and monitoring. We welcome the opportunity to continue working with the Council towards securing this, and to better shape the policy and mitigation requirements. We understand that an interim strategy, referred to as your Interim Mitigation Framework within your HRA, will be necessary for the Council to demonstrate that a mitigation framework is in place while the strategic solution for the New Forest is embedded. We would expect clarity on this interim approach to be demonstrated through *Policy BIO2* of this draft Local Plan, and to be agreed with Natural England to ensure it does not undermine the parameters of any emerging strategic solution.

We are currently content with the conclusion of the Appropriate Assessment that an interim mitigation strategy is in place to ensure that any adverse effects from increased recreational pressure on the New Forest SAC, SPA and Ramsar from site allocations under this draft Plan can be suitably avoided or mitigated.

Natural England welcome the opportunity to work with the Council on the strategic approach to addressing recreational pressures on the New Forest SAC, SPA and Ramsar.

Solent European/ SPA sites

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.

Natural England are satisfied that the appropriate assessment identifies housing allocations that propose a net gain in residential dwellings that fall within the 5.6km catchment of the Solent SPA sites. These sites must therefore secure adequate mitigation in accordance with the Solent

Recreation Mitigation Partnership (SRMP), delivered by Bird Aware Solent, for the protection of overwintering wading bird species on the Solent and Southampton Water SPA, Portsmouth Harbour SPA and Chichester and Langstone Harbours SPA sites. This mitigation strategy aims to address the in-combination effects arising from additional housing via increased recreational pressure on the SPA sites.

Natural England are pleased to see reference to *Policy BIO2* in which aims to set out the mitigation requirements for new housing development which fall in proximity to a variety of international nature conservation sites. However, it is our view that for the appropriate assessment to be able to conclude no adverse effects on the Solent SPA sites from increased recreational pressure by referring to *Policy BIO2*, the detail within *Policy BIO2* must provide complete clarity on what is required for new housing to mitigate in line with Bird Aware Solent. It is our understanding that this policy does not yet specify the 5.6km recreational Zol buffer and provides limited detail on the strategic solution. It also does not provide details about how mitigation contributions are calculated and secured.

We currently agree in principle with the conclusion of the Appropriate Assessment that any adverse effects from increased recreational pressure on the Solent SPA sites from site allocations under this draft Plan can be suitably avoided or mitigated, in line with the Bird Aware Solent strategy.

- *Functionally-linked land*

Mottisfont Bats SAC

Natural England are pleased that the appropriate assessment identifies the allocated sites that fall within the 7.5km Zol to the Mottisfont Bats SAC site. This 7.5km buffer has been established to identify the developments which could potentially impact the foraging habitats of the protected bats inhabiting the SAC. It is recognised that these foraging habitats are understood to be found within areas considered to be functionally-linked land to the Mottisfont Bats SAC.

Natural England note that the appropriate assessment refers largely to the site-specific details and mitigation requirements provided under *Policy 4 [SA4]*, *Policy 5 [SA5]* and *Policy 8 [HOU8]* of the draft Local Plan. Each policy has considered this functional linkage to the SAC to some degree, with detail included that mitigation measures must be secured that are appropriate to protect the SAC.

The appropriate assessment refers to securing this mitigation in accordance with *Policy BIO2*, yet the detail within *Policy BIO2* remains limited on what specific mitigation measures would look like. It is our understanding that the more specific details have been included within policy detail for each site allocation. In particular, *Policy 4 [SA4]* provides good detail of the site and realistic measures to protect the functionally-linked land and foraging habitats, such as the presence of significant Ancient & Semi-Natural Woodland and measures to protect it with a necessary development buffer.

Natural England recommend that further detail is included into *Policy BIO2* to make clear the requirements of development allocated within the 7.5km Zol of Mottisfont Bats SAC.

- *Appropriate Assessment – Summary*

Natural England recognise that the draft Local Plan Reg.18 (stage 2) Appropriate Assessment is not yet satisfactory to be able to conclude no adverse effects on a series of designates sites from this Plan. Natural England understand that further assessment and refined detail is to be provided in the coming stages on the Local Plan process.

Natural England welcome the opportunities ahead to continue working with the Council on this as the Plan progresses.

Please find below our comments on the draft Test Valley Local Plan Regulation 18 (stage 2) submission.

Comments on the draft Local Plan Reg.18 Stage 2

Local Plan Site Allocations

Natural England have assessed the proposed site allocations under this Reg.18 Local Plan. We have grouped our comments by environmental considerations, please see below. We have provided additional comment only on those specific allocations that require a bespoke input.

Natural England would like to guide you to refer to our previous comments issued to Test Valley on the draft site allocations, prior to this Reg.18 Stage 2 consultation, dated 30th October 2023 (ref. 453301) and also dated 24th November 2023 (ref. 455921). These comments add additional context on potential environmental impacts from the site allocations brought forward into this draft Local Plan. These should be considered alongside our comments below on the key ecological considerations.

Green Infrastructure

Natural England advise that all allocated site policies under this draft Plan should make clear demonstration for enhancing ecological connectivity, considering how Green Infrastructure can be a tool to facilitate this.

Natural England welcome the following policy and guide you to consider our additional comments on Green Infrastructure under *Policy BIO4* for further information that may be useful.

- ***Policy 16 [SA16]: Forest Park***

- *Nutrient Neutrality*

Solent designated sites (SPA/SAC/Ramsar)

Natural England advise that **all** site allocations under this draft Local Plan that propose an increase in overnight accommodation must comply with emerging *Policy BIO2* in achieving nutrient neutrality as to not adversely affect the Solent designated sites from increased nutrient discharges. Natural England advise that this is made explicitly clear under *Policy BIO2* whereby allowing allocations proposing an increased in overnight accommodation to refer to the Plan to ensure compliance.

River Itchen SAC

The following allocations would likely discharge wastewater to Chickenhall WwTWs, which itself discharges to the River Itchen SAC which drains into the Solent. These allocations will therefore need to consider nutrient neutrality for both increased Nitrogen and Phosphorus.

- ***Policy 6 [SA6]: Land at Velmore Farm, Valley Park (1070 dwellings)***
- ***Policy 7 [SA7]: Land at King Edwards Park, Ampfield (44 units of extra care accommodation – C2 use)***

Surface water drainage

Where developments are within a nutrient neutrality catchment, but discharge wastewater outside of the catchment, we advise that a nutrient budget calculation is not required for the surface water element as long as a SuDS scheme (as defined in CIRIA guidance) forms part of the development proposal. We recognise that the size of a development proposal will influence the scale of nutrient export from surface water as a result of the change in use of the land, and we therefore recommend that this approach is only taken for development proposals below the EIA threshold. For example, this might apply to a development located within the River Avon catchment if it were discharging its waste to one of the wastewater treatment works draining to the Solent.

For developments within Test Valley that drain to Chickenhall, mitigation for phosphorus draining to the River Itchen via wastewater would be required.

It is advised that best practice SuDS should be designed and installed in accordance with the requirements in the CIRIA SuDS Manual (C753). Please refer to our later advice in this letter on surface water drainage for more information on relevant guidance.

- *Recreational pressure*

Solent SPA sites

Natural England advise that the following site allocations all fall within/partially within 5.6km of the Solent SPA sites. It is therefore necessary that these developments address impacts on the SPA sites from increased recreational pressure in accordance with emerging *Policy BIO2*.

Natural England would expect contributions to the Solent Recreation Mitigation Partnership (SRMP), now known as Bird Aware Solent to be secured for the following:

- ***Policy 5 [SA5]: Land South of the Bypass, Romsey (110 dwellings)***
- ***Policy 6 [SA6]: Land at Velmore Farm, Valley Park (1070 dwellings)***
- ***Policy 8 [SA8]: Land at Upton Lane (80 dwellings)***

New Forest SAC, SPA and Ramsar sites

The following site allocations fall within 13.8km of the New Forest SAC, SPA and Ramsar sites, or within the wider 15km catchment. It is therefore necessary that these developments address impacts on the SAC, SPA and Ramsar sites from increased recreational pressure in accordance with emerging *Policy BIO2*. We recognise, as advised above, that mitigation will be expected to satisfy your Interim Strategy for the New Forest designated sites, or mitigation will be required to comply with the emerging joint Strategic Solution for the New Forest designated sites.

Natural England expect mitigation to be provided for the following:

- ***Policy 4 [SA4]: Land South of Ganger Farm, Romsey (340 dwellings)***
- ***Policy 5 [SA5]: Land South of the Bypass, Romsey (110 dwellings)***
- ***Policy 6 [SA6]: Land at Velmore Farm, Valley Park (1070 dwellings)***
- ***Policy 7 [SA7]: Land at King Edwards Park, Ampfield (44 units of extra care accommodation – C2 use) - it is agreed that mitigation may be subject to the specific type/level of care facility, but potential impacts and compliance with Policy BIO2 should still be considered necessary at this stage.***
- ***Policy 8 [SA8]: Land at Upton Lane (80 dwellings)***
- ***Policy HOU8: Land at Bunny Lane, Timsbury (4 Gypsy and Traveller pitches)***

Salisbury Plain SPA

The following site allocations fall within 6.4km of the Salisbury Plain SPA sites. It is therefore necessary that these developments address impacts on the SPA sites from increased recreational pressure in accordance with emerging *Policy BIO2*. We recognise that the local authority is working with Wiltshire Council to establish whether mitigation can be secured towards the existing mitigation strategy for the Salisbury Plain SPA sites.

Natural England expect evidenced mitigation to be provided for the following:

- ***Policy 7 [NA7]: Land to the East of Ludgershall (350 dwellings)***
- ***Policy 8 [NA8]: Land to the South East of Ludgershall (1150 dwellings)***
- ***Policy HOU8: Land at Bunny Lane, Timsbury (4 Gypsy and Traveller pitches)***

- *Functionally-linked land*

Mottisfont Bats SAC

Natural England advise that the following site allocation falls within 7.5km of the Mottisfont Bats SAC and should address potential impacts to habitats which could be functionally-linked to

Mottisfont Bats SAC, and in which are used by the designated Barbastelle bat species for foraging. These allocations should be in compliance with emerging *Policy BIO2* whereby we would expect demonstration of the necessary mitigation measures to be secured.

- ***Policy 4 [SA4]: Land South of Ganger Farm, Romsey (340 dwellings)***
- ***Policy 5 [SA5]: Land South of the Bypass, Romsey (110 dwellings)***

- *Landscape – North Wessex Downs National Landscape*

The following sites fall within close enough proximity to the boundary of the North Wessex Downs National Landscape that they could have potential negative impacts to its landscape features and special qualities and must therefore consider *Policy ENV3*. We advise that you seek the views of the landscape advisor/ planner for the National Landscape for their knowledge of these sites and the wider setting, together with the aims and objectives of the park's management plan and how this can be considered through the Local Plan.

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 183 of the National Planning Policy Framework (NPPF).

Natural England advise that the Council need to demonstrate that these site allocations are deliverable in their current locations. Natural England recognise reference to the authority's Landscape Character Assessment (2018) the recent Test Valley Landscape Sensitivity Study (Stephenson Halliday, January 2024) which has been completed across all the allocated housing and employment sites. It is understood that where allocations that are located on land scored as 'high' landscape sensitivity, there are specific recommendations for landscaping and scheme design to lessen the potential for impacts on the nationally designated landscapes. **Natural England advise that greater emphasis of these considerations to nationally protected landscapes should be made in all three of the below allocated site policies.** We would expect appropriate consideration through the Plan to further the purposes of the North Wessex Downs National Landscape and New Forest National Park's protected landscape features, characteristics and special qualities.

- ***Policy 5 [NA5]: Land at Manor Farm, North Andover (800 dwellings)***
- ***Policy 7 [NA7]: Land to the East of Ludgershall (350 dwellings)***
- ***Policy 8 [NA8]: Land to the South East of Ludgershall (1150 dwellings)***

- *Hydrological impacts*

Emer Bog SAC & Baddesley Common SSSI

Natural England advise that allocations in close proximity will need to consider hydrological impacts to Emer Bog SAC and Baddesley Common SSSI and demonstrate that any changes to groundwater or surface water would not adversely affect the hydrology of the nearby designated sites. We advise that the following allocated employment site will need to demonstrate this:

- ***Policy 11 [SA11]: Land East of Test Vallet Business Park (employment)***

Solent Maritime SAC and Solent and Southampton Waters SPA and Ramsar sites

Natural England advise that the following strategic employment sites are within close proximity to the above designated sites and will therefore need to consider potential hydrological impacts, and direct impacts from any construction activities.

- ***Policy 14 [SA14]: Land at Adanac Park, Nursling (employment)***
- ***Policy 15 [SA15]: Nursling Estate (employment)***

These site allocations will need to demonstrate that any changes to groundwater or surface water would not adversely affect the hydrology of the designated site. It will be necessary for measures to

be secured to carefully manage and monitor any construction activities through a Construction Environmental Management Plan (CEMP) to mitigate any potential adverse effects on the named designated sites.

River Test SSSI

Natural England advise that the following site allocations may need to consider hydrological impacts to the River Test SSSI and demonstrate that changes to groundwater would not adversely affect the designated site, due to its proximity:

- ***Policy 5 [SA5]: Land South of the Bypass, Romsey (110 dwellings)***
- ***Policy HOU8: Land at Bunny Lane, Timsbury (4 Gypsy and Traveller pitches)***

Trodds Copse SSSI

Natural England recognise that the following site allocation will need to consider an appropriate buffer to Trodds Copse SSSI, along with clear consideration of potential hydrological impacts. Trodds Copse is also designated as Ancient & Semi-Natural Woodland, so please refer to our standing advice provided in the next section.

- ***Policy 7 [SA7]: Land at King Edwards Park, Ampfield (44 units of extra care accommodation – C2 use)***

It is advised that best practice SuDS in accordance with the requirements in the CIRIA SuDS Manual (C753) should be considered as tools to manage these allocations potential hydrological impacts to designated sites.

- *Ancient woodland, ancient and veteran trees*

It is understood that the following allocation sites are proposed directly adjacent to areas classified as Ancient Replanted Woodland and/or Ancient & Semi-Natural Woodland.

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 186 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. Please refer to our standard advice and further guidance discussed later in this letter.

- ***Policy 7 [NA7]: Land to the East of Ludgershall (350 dwellings)***
- ***Policy 8 [NA8]: Land to the South East of Ludgershall (1150 dwellings)***
- ***Policy 4 [SA4]: Land South of Ganger Farm, Romsey (340 dwellings)***
- ***Policy 7 [SA7]: Land at King Edwards Park, Ampfield (44 units of extra care accommodation – C2 use)***
- ***Policy 12 [SA12]: Kennels Fam, University of Southampton Science Park (employment)***

Local Plan Policies

Natural England welcome the provision of policies under this draft Plan aimed to protect and enhance the natural environment, whilst maximising benefits to people and nature.

Policy BIO1: Conservation and Enhancement of Biodiversity and Geological Interest

Natural England welcome the incorporation of this policy to guide development to conserve, enhance and restore the biodiversity and geological interests within the Local Plan Area. We welcome the opportunity to work further with the Council on this policy.

River Test SSSI

The River Test SSSI is an important natural feature within the Test Valley Local Plan area. Natural England recommend that this site be given greater emphasis within this plan policy, especially as two allocations will need to consider impacts to this important designated site, and measures are being implemented as part of a compensatory package for the River Itchen SAC (please see sections above).

It is advised that this policy gives particular consideration to potential impacts on the Borough's important chalk rivers via surface water drainage. 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. Some development may also result in additional inputs of phosphorus to the river systems with negative effects on chalk river habitats and species via eutrophication.

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 Update should ensure such impacts on protected sites and other important habitats are properly considered, particularly where allocating sites.

Recreational Pressure on SSSIs in the Borough

Natural England advise that the Plan should consider monitoring of recreational disturbance on nationally designated sites in the Borough. There are several SSSIs within the Local Plan Area which may be showing signs of disturbance due to increased recreational pressure. *Policy BIO1* would be most appropriate to make clear reference to this, embedding it as a necessary policy consideration throughout the Plan period. Please find below a list of SSSI sites which may require consideration:

- Stockbridge Downs SSSI
- Trodds Copse SSSI
- Broughton Down SSSI
- Baddesley Common and Emer Bog SSSI

Local Nature Recovery Strategy

Natural England welcome the clear reference to the Local Nature Recovery Strategy (LNRS) that is made within this policy. We recommend that further emphasis is placed on how the wider ecological network of the Local Plan Area could link to the Local Nature Recovery Strategy and reference to any associated mapping the Council may be using.

The Plan should therefore make clear that development proposals should demonstrate how they have considered the ecological network across the Test Valley BC area (as shown on the supporting Northern and Southern Policies Maps) and are required to align with the emerging Local Nature Recovery Strategy (LNRS).

Policy BIO2: International Nature Conservation Designation

Natural England advise that *Policy BIO2* requires considerable further work to act as a core overarching policy for all of the European designated sites that fall within the Test Valley Borough Council Local Plan area.

This policy is set to cover potential impacts on designated sites from nutrient neutrality, recreational disturbance, hydrology and functionally-linked land. It is our advice that further information is necessary to provide the correct level of detail and direction through this policy, across these multiple impact pathways, for new development to comply with.

Please see our further advice on this policy below.

a) Nutrient Neutrality

Natural England welcome this policy that will require new development involving a net increase in overnight accommodation to address in-combination effects on the Solent designated sites, River Itchen SAC and River Avon SAC via eutrophication from nutrients in wastewater.

The Local Plan under *Policy BIO2* could make the scope of the requirement for nutrient neutrality explicitly clear (i.e. including all development proposing an increase in overnight accommodation).

It is understood that the Council is working in collaboration with partner authorities including the Partnership for South Hampshire (PfSH) to provide an ongoing pipeline of strategic mitigation sites and to balance supply and demand for nutrient credits across the plan period.

The Plan comprises new housing development and has inevitable wastewater 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). As advised above under our comments relating to the Local Plan HRA, Natural England strongly recommends that the Council includes a nutrient management plan or similar strategy 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 the potential mitigation solutions 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. It is understood that this has not currently been demonstrated through this draft Plan. Bespoke solutions at Neighbourhood plan or development level can also come forward.

It is advised that onsite SuDs can result in reductions to a development's nutrient burden, provided the SuDs are designed in line with relevant CIRIA C753 SuDs Manual and management is secured for the lifetime of the development. Wetland proposals can provide multiple benefits to biodiversity and visitors' wellbeing, although in order to generate nutrient credits these should be designed in line with the Wetland Framework, available to download [here](#).

It is understood that a small area to the west of the Local Plan Area falls within the catchment for the River Avon SAC. The Plan does not allocate development within this catchment for consideration, however the supporting text under *Policy BIO2* should outline that necessary mitigation will be required for any relevant proposals coming forwards in this catchment.

Please note that the term 'nutrient' or 'nitrogen' should be used when discussing eutrophication of the marine Solent designated sites ('nitrates' specifically is a component of total nitrogen). When discussing eutrophication of riverine systems (the River Itchen or River Avon), 'phosphorus' should be the term used rather than 'phosphates'.

b) Recreational pressure

New Forest SAC, SPA and Ramsar

Test Valley Borough Council currently implements an Interim Strategy to address recreational

impacts to the New Forest designated sites arising from new developments. It is understood that the Council is working with partners and Natural England towards a joint strategic approach for the New Forest. While this is mentioned within the supporting text of *Policy BIO2*, Natural England would expect the further details of the current interim approach to be demonstrated in the meantime to ensure that development and housing allocations have the correct policy direction for securing necessary New Forest mitigation. This could include any overarching principles for mitigation which are unlikely to change upon adoption of a longer-term strategy.

A substantial area of the Local Plan 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. We recognise that *Policy BIO2* does not include any information on the wider 15km catchment of the New Forest designated sites, whereby larger developments should consider impacts from increased recreational pressure.

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 will be happy to provide further advice to the Council on this aspect.

Natural England advise that there is insufficient information under *Policy BIO2* to provide clarity on what mitigation measures are expected for development that fall within the 13.8km or 15km buffers from the New Forest SAC, SPA and Ramsar. We advise that this policy requires further information on mitigation parameters to be able to act as an overarching policy for the New Forest designated sites.

Solent SPA sites

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.

Natural England advise that there is insufficient information under *Policy BIO2* to provide clarity on what mitigation is expected for residential development that falls within 5.6km of the Solent SPA sites. The policy does not include any information to set out how contributions towards Bird Aware Solent are calculated or secured, nor does the policy correctly specify the 5.6km ZoI whereby any net gain in residential development must comply.

Solent and Southampton Water SPA

Natural England note that part of the Solent and Southampton Water SPA lies within Test Valley Borough's area, at the Lower Test Marshes in Southampton. This site is also part of the Solent Wader and Brent Goose Strategy (SWBGS) network of sites, named as NF157. We advise that any development coming forwards likely to impact on this site duly considers this designated site.

Salisbury Plain SPA

Natural England recognise that Wiltshire Council have an established 6.4km Zol for the Salisbury Plain SPA sites whereby recreational pressure from increased housing development within this zone is assessed and may be likely to require mitigation. The supporting information under *Policy BIO2* does not highlight this 6.4km catchment and does not provide specific details on what mitigation measures are expected and how mitigation will be secured.

Natural England advise that there is currently insufficient information under *Policy BIO2* to provide the necessary clarity for housing allocations under this Plan, and any windfall development within this plan period, to know when mitigation for increased recreational pressures on Salisbury Plain SPA is necessary, and how to comply with these requirements.

c) Hydrology of Emer Bog 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.

Natural England advise that an important consideration for Emer Bog SAC should be Sustainable Drainage Systems (SuDS), where hydrological assessments demonstrate that there could be a hydrological link from a given site to the SAC. Sufficient detail should be provided so that surface drainage can be properly addressed, and that SuDS are designed in accordance with CIRIA C753 SuDS Manual.

Further information on SuDS is discussed later on in this letter.

d) Functionally-linked land

Mottisfont Bats SAC

Policy BIO2 recognises that the Mottisfont Bats SAC has a 7.5km Zol wherein developments could potentially impact the foraging habitats for protected bats inhabiting the SAC. It is understood that these developments must consider site-specific measures in order to mitigate any impacts.

Where direct or indirect impacts on suitable roosting, foraging, and commuting habitats for barbastelle bats are considered likely to occur, such impacts must be fully assessed, avoided and, where required, appropriately mitigated to prevent any adverse impacts on this internationally protected site at the planning application stage. This should be in full accordance with relevant best practice guidelines and must fully adhere to any updates to the guidance issued following the approval of this Plan. Such mitigation measures must be secured for the duration of the development's effects. Exterior lighting affecting roosting, foraging and/or commuting habitat for bats will need to conform with the latest best practice guidelines outlined by the Bat Conservation Trust and the Institute of Lighting Professionals (current guidelines being Guidance note 08/18 Bats and artificial lighting in the UK) due to the proximity to the Mottisfont Bats SAC.

Natural England recommends that potential impacts are avoided in the first instance, for example through the design of the scheme, such as a sensitive lighting strategy (during both the construction and operational phases). Where avoidance is not possible, measures for mitigating impacts on protected species and habitats and include biodiversity compensation measures for any residual

biodiversity losses that cannot be fully mitigated on site. This might include the provision of offsite replacement habitats, or an agreed financial contribution for biodiversity enhancements elsewhere calculated using a Biodiversity Compensation Framework, Environment Bank, or similar mechanism.

The proposed measures to enhance habitat corridors for bats via hedgerow planting are welcome, although any mitigation measures should be informed by the above additional survey efforts. Further mitigation measures, if required, could include planting or restoring native hedgerows, planting native trees, the creation of wildlife ponds and the provision of further foraging opportunities for bats.

Consideration should be given to any lighting proposed on site during the construction and operational phases of the development, which outlines how light spill will be prevented in the unlit bat buffers or other areas sensitive to light pollution. This strategy should be agreed by the Council's ecologist.

Policy BIO3: Biodiversity Net Gain

Natural England note this stand-alone policy for Biodiversity Net Gain (BNG), emphasising the requirement for development to demonstrate a measurable BNG uplift of at least 10%, in line with the requirements under the Environment Act 2021.

The [statutory BNG metric](#) can be used to measure gains and losses to biodiversity resulting from development. Natural England recognise that this has been incorporated into the policy, noting that versions of the BNG guidance and Metric may be updated over time.

Natural England recommend that clear reference is made through this policy for the requirement of development proposals to submit a costed 30-year management and maintenance plan detailing how the BNG values will be kept and achieved over the full time period. We advise that the council have appropriate measures and practices in place for agreeing BNG assessments, recording and monitoring any on-site or off-site BNG, and any strategic sites whereby BNG credits will be sold.

Local Nature Recovery Strategy (LNRS) & BNG

Natural England welcome the clear reference to the Local Nature Recovery Strategy under this policy, with emphasis on considering the wider ecological network for connecting net gains. The Local Nature Recovery Strategy will play a key role in biodiversity net gain by determining the 'strategic significance' multiplier within the statutory biodiversity metric. While the LNRS is being prepared, it is important that local authorities state which alternative strategy landowners and developers should refer to when planning for biodiversity net gain. This could include your draft LNRS, existing biodiversity action plans, local plans and neighbourhood plans. The [statutory Biodiversity Metric user guide](#) includes a full list of possible alternative strategies.

Please refer to Natural England's extensive further advice on embedding Biodiversity Net Gain in your Plan and further information on achieving net gains in Annex 1 of this letter. Please also see Annex 4 for a list of Local Plan evidence sources.

Policy BIO4: Green Infrastructure

Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands. 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.

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery.

Whilst we welcome the recognition of the multi-functional benefits of Green and Blue Infrastructure (GI) and inclusion of GI considerations within the draft local plan 2040 there is limited detail and clarity around what good GI provision looks like for TVBC in draft policy BI04: Green Infrastructure. We recommend this policy is expanded to support maximum benefits from GI provision and to meet TVBC Vision and aspirations set out within the draft local plan and the strategic priorities of the published Green Space Strategy 2021-2031.

Since the Test Valley Local Plan Regulation 18 Stage 1 consultation in April 2022 Natural England has produced the 'Green Infrastructure Framework - Principles and Standards for England' (GIF) as part of the Government's 25 Year Environment Plan to deliver more and better quality green and blue infrastructure to enhance towns and cities, and create attractive, healthy and investable places. The GIF helps local planning authorities meet requirements in the National Planning Policy Framework to consider GI in local plans and in new developments and can be utilised when updating local plans and formulating policy. The GIF and associated mapping, are available here: [Green Infrastructure Home \(naturalengland.org.uk\)](https://naturalengland.org.uk/green-infrastructure-home)

The GIF is intended to define what good green and blue infrastructure looks like in an area. It is not mandatory but the use of the GIF and accompanying standards in the development of local plans is supported by the Partnership for South Hampshire (PfSH) Spatial Position Statement Dec 2023.

We recommend that, as a minimum, local plans (or strategies with sufficient planning weight) set out policies to reflect the 5 headline Green Infrastructure Standards, summarised as:

- 1) Green Infrastructure Strategy Standard - Local Authorities produce a GI Strategy and Delivery Plan, and major developments provide a Green Infrastructure Plan including accounting for long-term management and maintenance of GI features.
- 2) Accessible Greenspace Standards – everyone has access to good quality greenspace close to home with a focus on access to natural greenspace within 15 minutes' walk, local authorities have at least 3ha per 1000 population of publicly accessible quality greenspace (as defined in the GIF) and set standards for provision on major developments.
- 3) Urban Nature Recovery Standard – Local Authorities increase the number and quality of Local Nature Reserves and Local Wildlife Sites, and major developments show how they contribute to nature recovery.
- 4) Urban Greening Factor – Local Authorities set a target for green cover in urban areas and utilise the National Urban Greening Factor to achieve this in new developments.
- 5) Urban Tree Canopy Cover – Tree Canopy Cover is increased by an agreed % with major developments designed to meet these targets, and new and existing trees incorporated into new developments.

Further evidence may be required. The GIF includes guidance to help local authorities integrate the GIF into local plans including the 'Process Journey for Local Authorities', the 'Green Infrastructure Planning and Design Guide' and evidence around the importance of GI for health and wellbeing and the use of the Urban Greening Factor. This is available on the website Green Infrastructure Home (naturalengland.org.uk), and downloadable from the 'Resources' section. The national [Green Infrastructure Map](https://naturalengland.org.uk/green-infrastructure-map) brings together data from around 50 sources of environmental and socio-economic data. It provides an England level baseline and assists local authorities and other stakeholders to assess green infrastructure provision against the GI Standards. The mapping is due to be updated in Summer 2024.

In further developing the GI requirements in the Plan the Council could consider:

- 1) Continue to integrate GI across policy areas and across directorates to gain maximum benefits from the multi-function aspect of GI.
- 2) Ensure the local plan is supporting the strategic priorities of the Green Space Strategy 2021-2031 by requiring appropriate on-site provision of GI and off-site contributions where appropriate from developments.
- 3) Require planning applications to clearly set out their contribution to and enhancement of the GI network, including benefits for access to nature, wildlife, climate change and other strategies such as the emerging Local Nature Recovery Strategy and PfSH GI Strategy and associated GI Implementation Plan. Management and long-term maintenance requirements must be considered from the outset.
- 4) Utilise the Urban Green Factor particularly on brownfield, town centre, employment and higher density development sites.
- 5) Ensure existing GI resource is strongly protected – it is providing benefit now and new/replacement GI can take time to achieve the same benefits.
- 6) Seek to cover the 5 main topics of the GIF standards in locally specific targets/policies where these are not already included. Retain existing targets/policies which set standards that are greater than the GIF standards and consider if TVBC standards that are lower than the GIF standards can be increased based on local needs, character and viability.
- 7) Consider the requirement to utilise other tools to aid good design of multifunctional GI such as the 'Building with Nature' standards ([Building with Nature](#)).

We welcome the inclusion of *Policy 16 [SA16]: Forest Park* and recommend further weighting is given within the local plan to the wider aspiration for a regional park for south Hampshire to come forward within the plan period, as set out in Part 1 Green Belt/Green Infrastructure Designation Study, LUC, 2023, and produced on behalf of PfSH. Justification for a regional park and recommended actions are included in Part 2 Strategic Green and Blue Infrastructure Opportunities in South Hampshire, LUC, 2023 (which includes key next steps for local authorities). We recommend that consideration is given to the proposal when considering development proposals within this area so these could form part of a future regional park, and at a minimum not preclude its creation.

We would recommend that Green Infrastructure also considers the provision of greener transport options across the Borough. We would advise that options for low carbon travel options such as walking routes and cycling infrastructure are incorporated into project proposals. The Natural England Green Infrastructure Planning and Design Guide contains further advice on integrating GI into travel networks to encourage active lifestyles and improve air quality: GI Design Guide (naturalengland.org.uk).

Policy BIO5: Trees and Hedgerows

Ancient woodland, ancient and veteran trees

It is welcome that this policy makes clear reference to the protection of Ancient Replanted Woodland and/or Ancient & Semi-Natural Woodland. The Plan should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 186 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. Please refer to our [standard advice](#) and further guidance discussed later in this letter.

We would advise that this policy could make a clear connection to *Policy BIO2* for the protection of functionally-linked land of protected bats species which are key to Mottisfont Bats SAC.

Policy CL1: Countering Climate Change

Natural England welcome the incorporation of nature-based solutions into *Policy CL1* of your draft

Local Plan. We would like to refer you back to the advice in our previous letter (ref. 383351) issued at the Local Plan Reg 18, Stage 1 consultation for additional advice on this which could be due further review.

Natural England has published a range of resources to help with the recommended actions; please see links listed under Annex 2 of this letter. Natural England would be happy to advise further on this aspect of the Local Plan development.

Policy CL2: Flood Risk

Natural England welcome this Policy that requires development ensures flood and surface drainage are properly addressed, and that Sustainable Drainage Systems (SuDS) are designed in accordance with CIRIA C753 SuDs Manual, to be as 'natural' as possible.

It is advised that the 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.

Policy CL4: Water Use and Management

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, mitigating and/or compensating for impacts on European sites, including the River Itchen SAC.

It is Natural England's advice that in advance of any permitting of such a suitable long-term scheme, uncertainty remains with regards to water resources and impacts of abstraction on protected sites.

It is welcomed that *Policy CL4* requires all new homes (including replacement dwellings) to be designed and built to achieve a water consumption standard of no more than 100 litres per person per day. Natural England advise that the higher standard of water efficiency of 100 litres per person per day should include external water use and re-use, in line with Southern Water's Target 100 demand reduction programme which is committed to within their WRMP19. Natural England also recommends that the Policy encourages the wise use of water in conjunction with the water companies, for example by promoting the implementation of grey water recycling systems and more efficient water appliances in new development and raising awareness of responsible water use.

The Borough lies within an area classed to be seriously water stressed by the Environment Agency. Natural England strongly recommend that existing development in the Borough adopts greater water efficiency measures to offset the likely impact new development may have on the existing and depleting water supplies, despite the higher water efficiency standards new development will be required to satisfy under *Policy CL4*. Suitable measures would include improving the use of fixtures and fittings, water reuse and recycling, rainwater harvesting and greywater recycling.

Evidence on the impacts of climate change shows that the Borough is likely to experience hotter and drier summers, in keeping with trends across England (see Annex 1 for further information on this issue). This trend has the potential to further deteriorate existing water supplies and presents greater uncertainty over the plan period.

Policy ENV3: Landscape Character

Natural England welcome the clear reference to consideration of the wider ecological network under

this policy, taking into account the use of the Local Nature Recovery Strategy (LNRS) for greater landscape connectivity.

Natural England are pleased to see the Plan commit to conserve and enhance the landscape and setting of the New Forest National Park and the North Wessex Downs Area of Outstanding Natural Beauty (AONB)/ National Landscape.

It is welcomed that the Council has referred to their updated Landscape Character Assessment (2018), recognising the value of the designated landscapes across the Plan area. Natural England advise that the use of the Landscape Character Assessment and any further assessments by the Council should be suitably referred to for ensuring that none of the allocations under this Plan will negatively impact the protected landscapes.

It is welcomed that the emerging Plan will prioritise existing landscape features in decision making via *Policy ENV3*, ensuring any allocations will need to be designed and located sensitively to continue to protect and enhance these high-value and high-quality landscapes, and to give appropriate weight to the Management Plans and adopted Strategies for the relevant National Park and National Landscape. The Plan and emerging Policy should be guided by NPPF paragraphs 180, 182 and 183, in protecting and enhancing valued landscapes; conserving the scenic beauty of AONB/ National Landscape settings of which have the highest value; of which AONBs/ National Landscapes and National Parks are given the highest status of protection for their landscape and scenic beauty.

Please make note of Annex 1 and Annex 3 of this letter whereby [Section 245](#) (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty ("National Landscape") in England, to seek to further the statutory purposes of the area.

Policy ENV4: Local Gaps

We recommend that opportunities to maximise biodiversity in these strategic gaps are explored. For example, this may be through the Local Nature Recovery Strategy (LNRS) as applicable, or any sites' potential to generate Biodiversity Net Gain units. Some sites may be suitable to form nutrient mitigation sites. Any enhancements should be appropriately managed, secured and monitored.

Policy ENV5: Pollution

Air Pollution & Water Pollution

Natural England note that *Policy ENV5* does not recognise air pollution or water pollution in reference to specific Habitats sites or SSSIs. Whilst it is welcomed that the natural environment is considered, we recommend that a list of designated sites is included to give further clarity as to some of the ecological receptors.

Construction Pollution

Natural England are pleased to see mention of securing a Construction Environmental Management Plan (CEMP) where disturbance to designated sites may occur as a result of construction activities.

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.

Soils and Land Contamination

We advise the Local Plan should include a policy for the protection of Best and Most Versatile (BMV) agricultural land. Avoiding loss of BMV land is a priority as mitigation will not be possible on many development sites. Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a). This should be set out as policy and in land allocations and be informed by an up-to-date evidence base. The plan should recognise that development has an irreversible adverse impact on the finite national stock of BMV land. Any development on BMV should have a soil handling plan and sustainable soil management strategy based on detailed soils surveys.

The Local Plan should also include a policy for the protection and sustainable management of soils so that soil disturbance is minimised and to retain as many ecosystem services as possible through careful soil management during the construction process and appropriate soil re-use. It should be recognised that development (soil sealing) has a major and usually irreversible adverse impact on soils. Any soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should be considered for their role in ecological connectivity. Soil protection and sustainable management relates to other policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

Please refer to our further information and guidance on soils in Annex 1 of this letter.

Policy ENV6: Lighting

Natural England welcome this policy to minimise impacts from artificial light sources upon the skies, landscape and biodiversity.

We are pleased that clear reference is made to NPPF paragraph 191 for protecting the special landscape features and qualities of the North Wessex Downs National Landscape and the New Forest National Park. We advise that the supporting text of this policy as a minimum should make a clear connection to being considered in association with *Policy ENV3: Landscape Character*.

Policy HOU8: Meeting the Needs of Gypsies, Traveller and Travelling Showpeople & Policy HOU9: Gypsies, Travellers and Travelling Showpeople

Natural England recommend that these policies make clear reference to *Policy BIO2 and BIO1* in regard to provision of any required mitigation for impacts to designated sites.

Policy HOU10: Occupational Accommodation for Rural Workers in the Countryside, Policy HOU11: Existing Dwellings and Ancillary Residential Development in the Countryside & Policy HOU12: Replacement Dwellings in the Countryside

Natural England advise that this policy makes reference to, where relevant, the importance of having note of the North Wessex Downs National Landscape, and potential for additional consideration of the New Forest National Park. Their management plans could be key for assessing these development proposals or seeking the valued opinion of the landscape advisor/ planner for the National Landscape or National Park. It is our experience that these developments do come forward within a protected landscape and could have an impact on its setting. Reference to this would be recommended. It is recognised that this is touched on under *Policy HOU12* yet it could be equally important to consider under *Policy HOU10* and *Policy HOU11*.

Policy HE2: Existing Open Space

This policy recognises Local Green Spaces that have been recognised for their local significance. The importance of these sites could be strengthened to highlight opportunities to contribute to a wider ecological network, via Green Infrastructure and the Local Nature Recovery Strategy, and for health and wellbeing.

Comments on the Sustainability Appraisal (SA)

Baseline information

It is noted that there is some overlap between these assessments and the HRA, so please note our comments above which remain of relevance to this document and the additional 'associated documents'.

It is clear that the HRA will be carried out alongside the Sustainability Appraisal. We advise that this should be an iterative process where the findings of the HRA are fed into the assessment of sustainability.

Summary of Key Issues & Objectives

Natural England is content with the summary of key issues and objectives through this assessment.

We welcome the key focus placed around Climate Change, Ecology and Biodiversity as fundamental topics underpinning the SA, its issues and main objectives.

It is welcomed that most of the key Objectives of the SA framework are focussed on protecting and enhancing the environment of the Borough.

It is noted that the preferred option is to focus future development at Andover and Romsey, as the most sustainable locations for growth in the Borough, with some additional development growth at smaller settlements elsewhere.

European Sites are now referred to as 'Habitats sites' in the context of planning policy.

We would be pleased to advise on this further should any changes and updates be made to the report.

Please see our further advice on aspects such as water quality, air pollution, protected landscapes and climate change adaptation under Annex 1, 2, 3 and 4 below. We look forward to further collaboration with the Council as this Plan progresses.

We would be very happy to comment further as the Plan process progresses. If you have any queries relating to this letter, please contact me on [REDACTED]

Yours faithfully

Jack Baribeau
Sustainable Development Lead Advisor
Thames Solent Team
Natural England

Annex 1 - Natural England's standard advice

Sites of Least Environmental Value

In accordance with the paragraph 181 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g., land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

Biodiversity and Geodiversity

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below). Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 180 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.

Health and Wellbeing (GI)

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.

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 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 Vision sets out policy that links public health and wellbeing to the natural environment and seeks to enhance green infrastructure and ecological connectivity across the district that is managed for people and nature. Please see relevant advice in this letter relating to green infrastructure, protection of natural assets and achieving biodiversity net gain to help maximise the benefits outlined in this section.

¹ [\[1\] 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 [\[2\] Revaluing Parks and Green Spaces Measuring their economic and wellbeing value to individuals](#), Fields In Trust, 2018

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

Priority habitats, ecological networks and priority and/or legally protected species populations

The Local Plan should be underpinned by up-to-date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: [Habitats and species of principal importance in England](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g., badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 181 of the NPPF.

Access and Rights of Way

Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 104 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 103 of the NPPF. The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 102 of the NPPF.

Soils

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver for example:

1. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The [Natural Environment White Paper](#) (NEWP) 'The Natural Choice: securing the value of nature' (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils, for example:
 - A Vision for Nature: 'We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely' (paragraph 2.5).

- Safeguarding our Soils: 'Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife' (paragraph 2.60).
 - 'Protect 'best and most versatile' agricultural land' (paragraph 2.35).
2. The conservation and sustainable management of soils also is reflected in the [National Planning Policy Framework](#) (NPPF), particularly in paragraph 180. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180 of the NPPF, for example to:
 - Safeguard the long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
 - To avoid development that would disturb or damage other soils of high environmental value (e.g., wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) and, where development is proposed.
 - Ensure soil resources are conserved and managed in a sustainable way.
 3. To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraph 180 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the www.magic.gov.uk website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey, for any sites they wished to put forward for consideration in the Local Plan.
 4. General mapped information on soil types is available as 'Soilscapes' on the www.magic.gov.uk and also from the LandIS website <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data.
 5. Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra's [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment, and we would advise that the Code be referred to where relevant in the development plan.

The [25 Year Environment Plan](#) (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land.
- put a value on [natural capital](#), including healthy soil.
- ensure all soils are managed sustainably by 2030.
- restore and protect peatland.

The conservation and sustainable management of soils is reflected in paragraph 180(a), 180(b) and 181 footnote 62 of the [National Planning Policy Framework](#) (NPPF). These state that 'Planning policies and decisions should contribute to and enhance the natural and local environment by; protecting and enhancing [...] soils (in a manner commensurate with their statutory status or

identified quality in the development plan); recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; distinguishing between the hierarchy of international, national and locally designated sites to allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.

Footnote [62](#) details that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.

Air pollution

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 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: <http://www.apis.ac.uk/>

It is advised that [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations](#) is followed when assessing impacts on protected sites.

Biodiversity Net Gain

Embedding biodiversity net gain

It is highly recommended that the Local Plan Update incorporates a policy for 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 NPPF highlights the role of policies and decision making to minimise impacts and provide net gains for biodiversity (para 180).

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, Natural England's [statutory metric](#), 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.

The following may also be useful considerations in developing plan policies:

- Use of a map within the plan. Mapping biodiversity assets and opportunity areas ensures compliance with national planning policy and helps to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain.
- Use of a biodiversity net gain target. Any target should be achievable, and evidence based and may be best placed in lower tier documents or a Supplementary Planning Document, or similar, to allow for regular updates in line with policy and legislation.
- Consideration should be given to thresholds for different development types, locations or scales of development proposals and the justification for this. Setting out the scope and scale of expected biodiversity net gains within Infrastructure Delivery Plans can help net gain to be factored into viability appraisals and land values. Natural England considers that all development, even small-scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to Technical Note 2 of the [CIEEM guide](#) which provide useful advice on how to incorporate biodiversity net gain into small scale developments.
- Policy should set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. The plan policy should set out the approach to onsite and offsite delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. Further detail could be set out in a supplementary planning document.
- The policy could also usefully link to any complementary strategies or objectives in the plan, such as green infrastructure and Local Nature Recovery Strategies.

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 (paragraph 180, 185 and 186) 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, changing cutting regime of open spaces and road verges*) 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

*Please see this [paper](#) regarding cost-effective and low-maintenance management for species-rich grassland on road verges and the value it can contribute to biodiversity and ecosystem services

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](#), the [Hampshire Biodiversity Information Centre](#) (HBIC), and strategies for green infrastructure, open space provision, landscape character, climate and ecosystem services and biodiversity opportunity mapping. We advise that reference is made to the **Hampshire Ecological Network Mapping** dataset – this comprises the Local Ecological Network mapping for Hampshire, prepared by HBIC. The network comprises statutory designations, non-statutory designated sites, ancient woodlands, and other non-designated priority habitat, and other ecological features such as undesignated water bodies. Usefully, the Hampshire network mapping also identifies areas where there is the greatest potential to enhance the network, referred to as the network opportunities layer, based on habitat suitability indices. This can be useful where deciding where to create or enhance habitat.

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, local nature partnership and/or the local enterprise 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?

Applying the mitigation hierarchy

The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 185 of the NPPF. The policy should ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for European sites should be dealt with **separately** from biodiversity net gain provision.

Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts. It is also important to note that net gains can be delivered even if there are no losses through development.

The policy for net gain, or its supporting text, should highlight how losses and gains will be measured. The [statutory metric](#) can be used for this purpose as a fully tested metric that will ensure consistency across the plan-area, and we would encourage its use. Alternatively, your authority may choose to develop a bespoke metric, provided this is evidenced based.

The following may also be useful considerations in developing plan policies:

- Use of a map within the plan. Mapping biodiversity assets and opportunity areas ensures

compliance with national planning policy and also helps to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain.

- ***NB: The Hampshire Ecological Network Mapping dataset would be ideally placed to provide this evidence base.***
- Use of a biodiversity net gain target. Any target should be achievable, and evidence based and may be best placed in lower tier documents or a Supplementary Planning Document, to allow for regular updates in line with policy and legislation.
- Consideration should be given to thresholds for different development types, locations or scales of development proposals and the justification for this. Setting out the scope and scale of expected biodiversity net gains within Infrastructure Delivery Plans can help net gain to be factored into viability appraisals and land values. Natural England considers that all development, even small-scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to Technical Note 2 of the CIEEM guide which provide useful advice on how to incorporate biodiversity net gain into small scale developments.
- Policy should set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. The plan policy should set out the approach to onsite and offsite delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. Further detail could be set out in a supplementary planning document.
- The policy could also usefully link to any complementary strategies or objectives in the plan, such as green infrastructure.

Monitoring

Your plan should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

LPAs should work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up-front information on monitoring will help to streamline the project stage.

Annex 2 - 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 (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.

Annex 3 - Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023

Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty (“National Landscape”) in England, to seek to further the statutory purposes of the area. The duty applies to local planning authorities and other decision makers in making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers.

It is anticipated that the government will provide guidance on how the duty should be applied in due course.

In the meantime, and without prejudicing that guidance, Natural England advises that:

- the duty to ‘seek to further’ is an active duty, not a passive one. Any relevant authority must take all reasonable steps to explore how the statutory purposes of the protected landscape (A National Park, the Broads, or an AONB) can be furthered.
- The new duty underlines the importance of avoiding harm to the statutory purposes of protected landscapes but also to seek to further the conservation and enhancement of a protected landscape. That goes beyond mitigation and like for like measures and replacement. A relevant authority must be able to demonstrate with reasoned evidence what measures can be taken to further the statutory purpose.
- The proposed measures to further the statutory purposes of a protected landscape, should explore what is possible in addition to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured. Natural England’s view is that the proposed measures should align with and help to deliver the aims and objectives of the designated landscape’s statutory management plan. The relevant protected landscape team/body should be consulted.

Annex 4 - Natural Environment Evidence for Local Plans

Available on MAGIC: <https://magic.defra.gov.uk/MagicMap.aspx>

Contents

- Access
- Air Quality
- Climate Change
- Designated Sites
- Green Infrastructure
- Habitats And Species
- Historic Environment
- Landscape

- Natural Capital
- Net Gain
- Soils

Water/Coast

Key evidence sources	Data Owner	Link to open data	*
ACCESS			
National Trails	Natural England	https://data.gov.uk/dataset/ac8c851c-99a0-4488-8973-6c8863529c45/national-trails	
Public Rights of Way (on the Ordnance Survey base map) and Rights of Way Improvement Plans	Local Planning Authorities		
Open Access Land (under The Countryside and Rights of Way Act 2000)	Natural England	https://naturalengland-defra.opendata.arcgis.com/datasets/bd7c45905b95457db29297bb4ecb8e89_0?geometry=-18.518%2C50.559%2C14.858%2C55.195	✓
Local Nature Reserves	Local Planning Authorities and Local Wildlife Organisations		
National Nature Reserves	Natural England	https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england	✓
Country Parks	Local Planning Authorities	Natural England have mapped Country Parks using data from Local Planning Authority data https://naturalengland-defra.opendata.arcgis.com/datasets/a11bafa8e6dc4227a7082d81bb1ddb_db_0?geometry=-18.367%2C50.437%2C15.010%2C55.085	✓
England Coast Path	Natural England	https://data.gov.uk/dataset/2cc04258-a5d4-4eea-823d-	✓

		bf493aa31eef/england-coast-path-route	
Accessible Natural Greenspace Standards (ANGSt)	This standard is currently being updated by NE.	The current NE Standard is here: http://publications.naturalengland.org.uk/publication/65021	
People and Nature Survey	Natural England	The MENE (Monitoring Engagement with the Natural Environment) dashboard https://defra.maps.arcgis.com/apps/MapSeries/index.html?appid=2f24d6c942d44e81821c3ed2d4ab2ada	
	Natural England	The MENE survey results https://www.gov.uk/government/collections/monitor-of-engagement-with-the-natural-environment-survey-purpose-and-results	
	Natural England	The People and Nature Survey https://www.gov.uk/government/collections/people-and-nature-survey-for-england The GIS User hub https://people-and-nature-survey-defra.hub.arcgis.com/	
AIR QUALITY			
Data on air pollution related to designated sites.	Centre for Ecology and Hydrology	The Air Pollution Information System http://www.apis.ac.uk/	
Nitrogen Decision Framework	Joint Nature Conservation Committee (JNCC)	A decision framework to attribute atmospheric nitrogen deposition as a threat to or cause of unfavourable habitat condition on protected sites JNCC Resource Hub	
CLIMATE CHANGE			
The Climate Change Adaptation Manual data	Natural England	http://publications.naturalengland.org.uk/publication/5679197848862720	
The National Biodiversity Climate Change Vulnerability Model	Natural England	http://publications.naturalengland.org.uk/publication/5069081749225472#:~:text=The%20National%20Biodiversity%20Climate%20Change,be%20used%20(in%20conjunction%20with	
DESIGNATED SITES			
Boundaries of Sites of Special Scientific Interest (SSSIs)	Natural England	https://data.gov.uk/dataset/5b632bd7-9838-4ef2-9101-ea9384421b0d/sites-of-special-scientific-interest-england	✓
Boundaries of Special Protection Areas (SPAs)	Natural England	https://data.gov.uk/dataset/174f4e23-acb6-4305-9365-1e33c8d0e455/special-protection-areas-england	✓
Boundaries of Special Areas of Conservation (SACs)	Natural England	https://data.gov.uk/dataset/a85e64d9-d0f1-4500-9080-b0e29b81fbc8/special-areas-of-conservation-england	✓

Boundaries of Ramsar Sites	Natural England	https://data.gov.uk/dataset/67b4ef48-d0b2-4b6f-b659-4efa33469889/ramsar-england	✓
Boundaries of Marine Conservation Zones	Joint Nature Conservation Committee (JNCC)	https://jncc.gov.uk/our-work/marine-protected-area-mapper/	✓
SSSI Impact Risk Zones	Natural England	https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sssi-impact-risk-zones-england	✓
SSSI Conservation Objectives	Natural England	https://designatedsites.naturalengland.org.uk/	
SAC, SPA, Ramsar and Marine equivalent Site Improvement Plans	Natural England	https://designatedsites.naturalengland.org.uk/	
Local Wildlife Sites and Local Geological Sites	Local Planning Authority and/or Local Environmental Records Centre and/or Local Wildlife Trust		
Potential Designated Sites	Natural England	Mapping of potential SPA's can be found on MAGIC https://magic.defra.gov.uk/DatasetDownload_Summary.htm	✓
Existing HRA compensation sites	Local Planning Authority and Natural England		
Data on existing strategic solutions	Local Planning Authority and Natural England		
GREEN INFRASTRUCTURE			
National Green Infrastructure mapping database	Natural England	http://publications.naturalengland.org.uk/publication/4635531295326208	
Green Infrastructure Framework – Principles and Standards for England	Natural England	https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx	
Green Belt boundaries	Ministry of Housing, Communities and Local Government (MHCLG)	https://data.gov.uk/dataset/ccb505e0-67a8-4ace-b294-19a3cbff4861/english-local-authority-green-belt-dataset	✓
Open Space Assessments	Local Planning Authority		
Tree Canopy Cover Standards	Forestry Commission	https://www.gov.uk/guidance/urban-forestry	
HABITATS AND SPECIES			
Ancient Woodland	Natural England	https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdcd7e9df7d3/ancient-woodland-england	✓

Ancient and Veteran Trees	The Ancient Tree Inventory and Natural England	The Ancient Tree Inventory https://ati.woodlandtrust.org.uk/	
	Natural England	The wood pasture and parkland inventory https://data.gov.uk/dataset/bac6feb6-8222-4665-8abe-8774829ea623/wood-pasture-and-parkland-england	✓
Priority Habitat Inventory s41 habitats	Natural England	https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england	✓
Priority Habitat Creation and Restoration	Environment Agency	https://data.gov.uk/dataset/e0165747-8368-4ff7-a644-df9aeb27bb0b/priority-habitat-creation-and-restoration	
Open Mosaic Habitat on Previously Developed Land Inventory (draft)	Natural England	https://data.gov.uk/dataset/8509c11a-de20-42e8-9ce4-b47e0ba47481/open-mosaic-habitat-draft	✓
Local Biodiversity Action Plans (LBAPs) and Local Geodiversity Action Plans (LGAPS)	Local Planning Authority		
Priority habitats and species as listed under Section 41 of the NERC Act, 2006 and UK Biodiversity Action Plan (UK BAP).	Local Environmental Record Centres		
National Forest Inventory on Trees and Woodland	Forest Research	https://data-forestry.opendata.arcgis.com/datasets/bcd6742a2add4b68962aec073ab44138_0?geometry=-35.371%2C51.075%2C31.382%2C59.761	✓
Species Risks and Opportunities Maps	Natural England	http://publications.naturalengland.org.uk/publication/4674414199177216	
HISTORIC ENVIRONMENT			
Designated Historic Environment Sites including scheduled monuments, listed buildings, registered parks and gardens, registered battlefields and protected wrecks	Historic England	The open data layers can be found on MAGIC https://magic.defra.gov.uk/DatasetDownload_Summary.htm	✓
World Heritage Sites	Historic England	https://data.gov.uk/dataset/3ac5c299-6805-476b-af9b-90aadc5e7b4/world-heritage-sites-gis-data	✓
National Historic Landscape Characterisation mapping	Natural England	https://naturalengland-defra.opendata.arcgis.com/datasets/624969d8bbc74c0abc2e6a277c986f74_0	✓

Heritage Coasts data	Natural England	https://data.gov.uk/dataset/79b3515f-b00e-419a-9c7e-1d3163555886/heritage-coasts	✓
LANDSCAPE			
Areas of Outstanding Natural Beauty boundaries	Natural England	https://data.gov.uk/dataset/8e3ae3b9-a827-47f1-b025-f08527a4e84e/areas-of-outstanding-natural-beauty-england	✓
National Park boundaries	Natural England	https://data.gov.uk/dataset/334e1b27-e193-4ef5-b14e-696b58bb7e95/national-parks-england	✓
National Park and Area of Outstanding Natural Beauty (AONB) management plans	Conservation Boards/ AONB Partnerships and National Park Authorities		
Local landscape character assessments	Local Planning Authority		
Landscape and Visual Impact Assessments	Local Planning Authority		
Landscape capacity and sensitivity assessments	Local Planning Authority		
Data on tranquillity and light pollution	Campaign to Protect Rural England (CPRE)	https://nightblight.cpre.org.uk/maps/	
NATURAL CAPITAL			
National Character Areas	Natural England	https://data.gov.uk/dataset/21104eeb-4a53-4e41-8ada-d2d442e416e0/national-character-areas-england	✓
Natural Capital Atlases: Mapping	Natural England	https://data.gov.uk/dataset/a9de8ea-a-5424-40ac-b1b3-3e33e94e1648/natural-capital-county-atlas-mapping-england	
Natural Capital Atlases: Mapping Indicators for County and City Regions	Natural England	http://publications.naturalengland.org.uk/publication/6672365834731520	
Nature Improvement Areas	Natural England	https://data.gov.uk/dataset/a19c95e3-9657-457d-825e-3d2f3993b653/nature-improvement-areas	✓
Nature Recovery Network data	Preliminary data from Local Nature Recovery Strategies should be available from the relevant Local Planning Authority		
Nature Networks Evidence Handbook	Natural England	http://publications.naturalengland.org.uk/publication/6105140258144256	
Habitat Networks	Natural England	https://data.gov.uk/dataset/0ef2ed26-2f04-4e0f-9493-	✓

		ffbdbfaeb159/habitat-networks-england	
Natural Capital Ecosystem Assessment (NCEA)	Natural England under development	https://www.gov.uk/government/publications/natural-capital-and-ecosystem-assessment-programme/natural-capital-and-ecosystem-assessment-programme	
Living England Habitat Map	Natural England	https://data.gov.uk/dataset/e207e1b3-72e2-4b6a-8aec-0c7b8bb9998c/living-england-habitat-map-phase-4	✓
Enabling a Natural Capital Approach	DEFRA	https://data.gov.uk/dataset/3930b9ca-26c3-489f-900f-6b9eec2602c6/enabling-a-natural-capital-approach	
NET GAIN			
Biodiversity Net Gain metric 3.1	Natural England	The Biodiversity Metric 3.1 - JP039 (nepubprod.appspot.com)	
Environmental Benefits from Nature Tool (Beta Test Version)	Natural England	The Environmental Benefits from Nature Tool - Beta Test Version - JP038 (nepubprod.appspot.com)	
SOILS			
Provisional Agricultural Land Classification Maps	Natural England	https://data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc	✓
Strategic mapping assigning the likelihood of BMV agricultural land (created as a companion to the Provisional ALC maps).	Natural England	http://publications.naturalengland.org.uk/category/5208993007403008	
Detailed ALC reports – post 1988 ALC survey	Natural England	http://publications.naturalengland.org.uk/category/6249382855835648	✓
General mapped information on soil types, including peaty soils, is available as 'Soilscape'. This also includes a simple ecosystem services provision guide.	National Soil Resources Institute (NSRI)	The open data layers can be found on MAGIC https://magic.defra.gov.uk/DatasetDownloadSummary.htm	✓
WATER/COAST			
Catchment Flood Management Plans	Environment Agency		
MMO marine planning evidence base	Marine Management Organisation (MMO)		
Shoreline Management Plans	Environment Agency		
Heritage Coast Management Plans	Local Planning Authority		
River Basin Management Plans	Environment Agency		
Water Resource Management Plans	Environment Agency / water authority		
Coastal erosion maps/ Coastal Change Management area data/strategies	Environment Agency / Local Planning Authority		

Shared Nitrogen Action Plans	Natural England - work ongoing	https://www.gov.uk/government/publications/clean-air-strategy-2019	
Strategic Flood Risk Assessments	Local Planning Authority led		