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To: [REDACTED]
Subject: Natural England Comments Main Modifications LP 2022-2039
Date: 31 January 2025 12:14:44
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Dear Sir/Madam

Our Ref: 496159

Your Ref: West Berkshire Local Plan 2022-2039 Main Modifications

Please find the attached consultation response from Natural England.

Best wishes

Laura Elphick - Higher Officer
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Thames Solent Team
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Date: 30 January 2025
Our ref: 496159
Your ref: West Berkshire Local Plan Review Main Modifications



West Berkshire Council

BY EMAIL ONLY- PlanningPolicy@westberks.gov.uk

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Dear Sir or Madam,

Planning consultation: West Berkshire Local Plan 2022-2039 Proposed Main Modifications.

Thank you for your consultation on the above dated 06 December 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.

Please note that our comments raised below relate to the proposed Main Modifications only, as detailed within the Schedule of Proposed Main Modifications to the West Berkshire Local Plan Review 2022-2039 (dated November 2024). Natural England did not provide comment on the Regulation 18 and Regulation 19 emerging Local Plan consultations.

Policy SP17- Land at North East Thatcham

North Wessex Downs National Landscape

Main Modification 25 (MM25) increases the number of dwellings at SP17 to up to 2,500 homes, which represents a significant increase in the number proposed in the local plan submission at Regulation 18/19 stage. Natural England refer your authority to the Landscape Sensitivity and Capacity Study 2021, Land at North East Thatcham, which advises that the site has 'medium capacity' providing it has regard to the setting and form of existing settlement and the character and sensitivity of adjacent landscape character areas.

Natural England advise that great weight is given to advice provided by the North Wessex Downs National Landscape (NWDNL) Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, is a valuable contribution to the planning decision.

The statutory purpose of the National Landscape is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose.

Furthermore, [Section 245](#) (Protected Landscapes) of the Levelling Up and Regeneration Act (LURA) 2023 places a duty on relevant authorities (which includes local 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 in England, to seek to further the statutory purposes of the

area. This duty also applies to proposals outside the designated area but impacting on its natural beauty. Further information on the Section 245 of the LURA can be found in Annex 1.

Natural England provide our advice below regarding MM25 considering the sensitive location of SP17 within the setting of the NWDNL and the landscape and visual constraints identified within the Capacity Study 2021. We advise you to consider impacts to both the landscape character and the visual amenity of the NWDNL as a result of the plan and set out our advice to your authority below.

Character Areas

The NWDNL is a high quality landscape comprising vast, dramatic, undeveloped and distinct chalk downlands, wooded plateaux, arable lands and intimate and secluded valleys. Within the landscape are many distinct character areas and SP17 is located adjacent to and within the setting of character area 8A- Hermitage Wooded Commons, as described within the North Wessex Downs Landscape Character Assessment 2002.

Character area 8A exhibits many distinctive landscape characteristics which include a lowland mosaic of ancient and semi-natural woodlands, hedgerows, open farmland, heathland and historic parkland. SP17, comprising open farmland, woodland, hedgerows and small streams, contributes to the setting of this character area. A similar geographical area is also identified within the West Berkshire Landscape Character Assessment 2019 as Local Character Area WH4: Cold Ash Woodland and Heathland Mosaic. The assessment recognises the varied land cover and important priority habitats which add to the ecological importance and landscape interest in the area. It also notes areas of open access land such as Bucklebury Common, a remnant heathland and priority habitat, that give the character area a high recreational value.

Visual Amenity

A number of viewpoints from within SP17 and the setting of the NWDPL are included within the Landscape Sensitivity and Capacity Study 2021, Land at North East Thatcham. Several of these were assessed as having a high value, of particular note are viewpoints 1, 8, 12 and 13 which have been taken from Public Rights of Way (PRoWs) or in the case of viewpoint 13, a public highway. The Landscape Character Assessment for Area WH4 describes how 'open locations provide views south to similar woodland and heathland mosaic forming the southern side of the Kennet valley'. Viewpoints 1, 8, 12 and 13 are of particular note because they are all sensitive tracts of landscape which are taken from elevated, open locations and 'contribute to valley-side visual character at the edge of the AONB' as described within the Landscape Sensitivity and Capacity Study 2021. The assessment also notes that at these viewpoints 'extensive structural planting works could change historic structure of the landscape, such as field patterns and woodland shapes, and could obstruct views towards the distant horizon and that 'extensive mitigation works' could impact in a similar way.

Decreasing separation/coalescence between settlements

MM25 includes wording that the settlement boundary for Thatcham will be revised through a future plan and consideration will be given as to whether it is appropriate to designate a gap between Thatcham and Upper Bucklebury once the settlement boundary has been redrawn.

We advise your authority to consider the impact of revising the settlement boundary of Thatcham on the setting of the NWDPL. West Berks Landscape Character Assessment 2019 notes that '*the expansion of Thatcham and Newbury since the mid-20th century, and also of villages within the character area, has reduced the physical and perceptual separation between settlements. This is particularly evident at the western end of the character area, where there is near coalescence along the main connecting roads between Newbury and Thatcham, Cold Ash, Ashmore Green, Curridge and Hermitage*'.

The Landscape Character Assessment for Area WH4 describes how 'open farmland on the lower slopes contributes to a sense of separation between the elevated character area and the towns of

Thatcham and Newbury in the valley below'. We do however welcome the inclusion within MM25 to policy SP17 to restrict development to below the 95M AOD contour to confine built development to the lower slopes.

River Kennet Site of Special Scientific Interest (SSSI)

SP17 is in hydrological connectivity with the River Kennet SSSI via an ordinary watercourse to the north west of the site. Best practice SuDS should be designed and installed in accordance with the requirements in the CIRIA SuDS Manual (C753).

Step 3 under Section 26.7.1 of the SuDS manual outlines that the requirement for extra treatment should be considered in relation to discharge to environmentally protected sites. It states that 'an additional treatment component (i.e. over and above that required for standard discharges), or other equivalent protection, is required that provides environmental protection in the event of an unexpected pollution event or poor system performance'.

Green Infrastructure

We welcome the inclusion of 50% green infrastructure as set out in MM25. We note that MM15 makes provision for buffer zones of vegetation alongside watercourses in accordance with policy SP6 . Policy SP10 requires an undeveloped 10 metre buffer zone alongside main rivers and, where practicable and appropriate, ordinary watercourses. We advise that provision for buffers be detailed within policy SP17 and included within the indicative GI provision at the site. There are several ordinary watercourses running north to south across the site which this will apply to including those emerging from Park Copse, Long Grove Copse and Ouzel Gully.

Whilst we acknowledge that the policy includes provision for a band of green infrastructure/country park which will act as a buffer to the north of the development and provide green space for recreation, we note that the SP17 site is well connected to the existing public footpath network to the north and is a short distance from the NWDNL. We advise your authority to consider the impact of additional recreational pressure on open access sites such as Bucklebury Common which contribute to the landscape character of the NWDNL.

Ancient Woodland

SP17 is adjacent to several areas of ancient woodland. It is our advice that due to the close proximity of the development to irreplaceable ancient woodland habitat, the large scale of the proposal, and the urban character of the surrounding area, it cannot be certain that the proposals will avoid a long-term gradual decline in the habitat due to recreation (e.g. trampling), fly-tipping, noise disturbance and other degrading effects on woodland fauna and flora. Therefore, the proposed buffer width should be revised to adequately address the direct and indirect effects of the proposed development on the ancient woodland. We recommend consideration is given to each of the following issues associated with new development adjacent to ancient woodland to determine the appropriate width of buffer around the ancient woodland.

- Fly tipping
- Edge effects
- Noise disturbance
- Anthropogenic lighting
- Vegetation clearance
- Deadwood collection
- Pet predation
- Chemical effects
- Recruitment of non-native plants
- Increasing safety concerns
- Cumulative effect

Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions) (standing advice) for planning authorities.

Supplementary Planning Document (SPD)

Policy SP17 requires the production of an SPD to guide development at the site which will be prepared and led by your authority with input from key stakeholders. Natural England would welcome involvement with development of the SPD and look forward to working with you. However, we advise your authority to provide further detail regarding the key spatial aspects of the development within policy SP17 relating to green infrastructure and landscape mitigation to further strengthen the policy as outlined in our comments above.

Other Main Modifications

Land at Pincents Lane, Tilehurst MM45

The site lies within the setting of the NWDNL, therefore we encourage your authority to develop the scheme in accordance with the requirements set out in policy SP2.

We note that there are veteran trees present within the site and ancient woodland lies adjacent to it, therefore we encourage your authority to consider the advice provided above in relation to impacts to this irreplaceable habitat.

Land North of Pangbourne Hill, Pangbourne MM57

The site lies within the NWDNL, therefore we encourage your authority to develop the scheme in accordance with the requirements set out in policy SP2.

We refer you to the Landscape sensitivity and capacity assessment for PAN8: Land north of Pangbourne Hill, Pangbourne, November 2020 which concludes that a portion of the site is considered to be inappropriate for development as *“this site is within an elevated location, which could be visible from the opposite valley side within the Chilterns AONB. To maintain the open upper valley side, a special quality of this area of the AONB, only the lower parts of the site below 70m AOD could be developed without damaging the natural beauty of the AONB”*. Therefore we advise that the outline masterplan for this site reflect the findings of this assessment. The assessment notes that *“mitigation planting would change the open character of the landscape, but could reinforce the wooded character of the valley side”*. Therefore landscape mitigation should be carefully considered and fully informed by a Landscape and Visual Impact Assessment (LVIA).

Policy SP2: North Wessex Downs AONB

Natural England welcome MM4 to Policy SP2 to amend the policy by adding a new second paragraph as follows: *“Development in the setting of the AONB will be required to have regard to the interrelationship with the AONB and its landscape character and special qualities. Proposals will be required to be sensitively located and designed to avoid or minimise any adverse impacts on the AONB.”* We encourage your authority to apply the requirements of this policy to SP17.

Natural England welcome MM5 to policy SP2 to amend the supporting text after paragraph 4.24 as follows: *“The setting of the North Wessex Downs National Landscape (AONB) and the protected landscape of the AONB itself add value to each other as the landscape and landforms link visually and functionally. The policy recognises this important interrelationship and seeks to ensure that development in its setting does not cause significant harm to the AONB by being poorly located or*

designed. This is especially the case where long views from or to the AONB are identified as important, or where the landscape character of land within and adjoining the AONB is complementary.” We encourage your authority to apply the requirements of this policy to SP17.

Sites of Least Environmental Value

In accordance with the paragraph 188 of the National Planning Policy Framework (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.

Further general advice is provided in Annex 1 & 2.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only, please contact me at [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully,

Laura Elphick
Sustainable Development Higher Officer
Thames Solent Team

Annex 1 - 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 2 - Natural England's Local Plan Advice

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.

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.

Soil, Agricultural Land Quality and Reclamation

The Minerals and Waste 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.

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.

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.

All of the allocated sites contain BMV agricultural land. In line with the Planning Practice Guidance (PPG) to support the NPPF; we welcome that the allocated sites are all accompanied by a detailed ALC Survey (Post-1988), available on the [magic](#) website. Where minerals underlie BMV agricultural land, it is particularly important that restoration and aftercare preserve the long-term potential of the land as a national, high-quality resource. Where alternative after-uses (such as forestry and some forms of amenity, including nature conservation) are proposed on BMV agricultural land, the methods used in restoration and aftercare should enable the land to retain its longer-term agricultural capability, thus remaining a high-quality resource for the future.

Reclamation to non-agricultural uses does not mean that there can be any reduced commitment to high standards in the reclamation. Such reclamations require equal commitment by mineral operators, mineral planning authorities and any other parties involved to achieve high standards of implementation.

Sustainable soil management should aim to minimise risks to the ecosystem services which soils provide, through provision of suitable soil handling and management advice. The planning authority should ensure that sufficient site-specific soil survey data is available to inform decision making. To include, for example, assessment of soil properties to inform appropriate soil management, restoration and drainage, where required.

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.

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.

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

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

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.

Water Quality and Resources and Flood Risk Management

Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 180 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 166 and 167 of the NPPF.

The Plan should be based on an up-to-date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Plan.

These Plans implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Competent Authorities must in exercising their functions, have regard to these plans.

The Local Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.

Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.

Tranquillity

The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 106 and 191 of the NPPF.

Tranquillity is an important landscape attribute in certain areas e.g. within National Parks/ AONBs/National Landscapes, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity which are available [here](#) and are a helpful source of evidence for the Local Plan and SEA/SA.

Agri-environment schemes

Minerals sites may be under existing Higher Level Stewardship agreements before minerals are extracted and may be returned to agricultural use following landfilling. We advise early contact by agreement holders with the Rural Payments Agency to discuss individual cases so that any payments can be amended accordingly.