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By email only

Dear Hampshire County Council,

Hampshire & Isle of Wight Wildlife Trust is an independent charity founded in 1961 and together with 46 others we are part of The Wildlife Trusts, the largest grass roots nature conservation federation in the UK with 900,000 members. Locally across Hampshire and the Isle of Wight we have over 28,000 members and we currently manage 5,000 hectares of land for wildlife, primarily nature reserves of local, national, and international importance.

Hampshire is rich in beautiful and rare wildlife, including the Duke of Burgundy butterfly and internationally important populations of Brent geese. Our county is also home to spectacular habitats such as the internationally renowned lowland heath of the New Forest, vital seagrass beds in Portsmouth and chalk rivers such as the Itchen that support an abundance of wildlife including otters, water crowfoot and crayfish.

These vital ecosystems - our natural capital – support every aspect of life and work in the county, enabling our communities to flourish. They protect us from floods and droughts, support our health, and underpin the entire economy.

However, 48% of Hampshire's 50 most 'notable species' are in trouble¹. With just a few more years to reach national legal targets of halting wildlife decline and protecting 30% of land and sea by 2030, the Local Nature Recovery Strategy (LNRS) has an essential and urgent role to play. Hampshire's LNRS must now drive tangible action on the ground to ensure that we have a healthy natural environment, now and in the future.

Hampshire & Isle of Wight Wildlife Trust has contributed to the development of the Local Nature Recovery Strategy – both on the steering group and through participation in a number of workshops. We recognise and applaud the huge effort that has gone into the creation of this strategy and the wealth of data and evidence that has been brought together. We are pleased to see the identification of priority outcomes and potential measures for key habitats across the county and we are not including detailed comments on these in this response. The focus of our feedback - in line with the principles we published early in the development of the strategy – is on the lack of specific targets, mechanisms for delivery and accountability frameworks.

¹ [StateofNaturalEnvironmentReport.pdf](#)

Whilst we acknowledge the specific guidance set out by the Government, we would like to see Hampshire's LNRS go beyond the minimum requirements, towards creating a robust and ambitious roadmap for nature's recovery.

Key asks:

1. **Prioritise improvement of existing protected and important sites that are in poor condition:** Despite having a high percentage of land and coast designated for its importance for wildlife, less than half of our Sites of Special Scientific Importance (SSSIs) are in good condition². As discussed within the LNRS (pg. 20), the designation of areas does not guarantee that they are well managed for nature or that nature is recovering. For example, only 10% of river SSSIs and associated wetland habitats are in favourable condition.

These are the critical nodes in our Nature Recovery Network and should be restored as a priority.

The Environmental Improvement Plan identifies the restoration of SSSIs to a favourable condition as a key interim target for nature's recovery. By 2028 actions must be on-track to achieve favourable condition on 50% of SSSI features by 2028³. The Hampshire LNRS must prioritise the improvement of important wildlife sites (including SSSIs) across the county – setting out ambitious targets, delivery mechanisms and accountability measures to achieve this.

2. **Incorporate climate mitigation and adaptation:**

Natures recovery is vital for tackling climate change. Research suggests that nature-based solutions, such as rewilding and restoring damaged ecosystems, can provide over one-third of the cost-effective climate mitigation needed by 2030 under the Paris Agreement⁴.

The LNRS must include proper consideration of climate change uncertainties and adaptation, taking into account projected changes in habitats and distributions of species. The strategy currently lacks robust measures to combat or mitigate climate impacts, including the vital need for adaptation to reduce the pressures of sea level rise on the protection and restoration of coastal wetlands.

3. **Set targets and track progress:**

The LNRS must be a living strategy, with utility and teeth. At present, the LNRS fails to set out specific, measurable targets or mechanisms for monitoring progress. While the strategy mentions a review every 3-10 years, there is no further detail on monitoring or accountability frameworks to ensure the LNRS is effective in delivering for nature. To be effective, the LNRS must provide further detail on how monitoring will be conducted, who will be responsible and what indicators will be used to

² [2022_04_natural-wealth_lnp_final-1.pdf](#)

³ [Investing in Sites of Special Scientific Interest \(SSSIs\) – Natural England](#)

⁴ [Natural climate solutions | PNAS](#)



measure success. In addition, a clear mechanism for course correction should be prepared to address the risk of stalled progress.

Proper governance and leadership are essential. The creation of a combined Mayoral Authority with responsibility for the natural environment, provides a timely opportunity to embed nature recovery targets to underpin effective spatial and economic planning. To harness the opportunity of devolution, the LNRS must set ambitious targets, clear delivery plans and mechanisms for accountability, which can be adopted by the combined Mayoral Authority to drive progress.

4. Embed LNRS in policy, with mechanisms to ensure flow of funds for nature's recovery:

The LNRS must be embedded into decision-making and policy, including those relating to land use, planning and development and economic strategies. Implementation plans must set out the mechanisms to drive investment into nature restoration. This will include statutory requirements, such as BNG, but should also harness emerging private sector nature markets.

Devolution offers a powerful opportunity for our region to champion a nature-positive future.

We look forward to continuing to work with the Responsible Authority and other partners to ensure that the LNRS plays a pivotal role in driving nature's recovery in the coming years – helping to create a stronger, healthier future for our county.

We hope that you will find our comments helpful and, if you have any questions or wish to discuss these matters further, please do not hesitate to contact us.

For more information, please contact:

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