Beechcroft House
Vicarage Lane
Curdridge
Hampshire
SO32 2DP

01489 774400

27 October 2026

Environmental Delivery Plan consultation response

By email only: NRFconsultation@naturalengland.org.uk

1. Would you like your response to be confidential?

No.

2. Key information

Organisation: Hampshire & Isle of Wight Wildlife Trust
Address: Beechcroft House, Vicarage Lane, Curdridge, Hampshire, SO32 2DP

3. What best describes your interest in this consultation?

Other

Hampshire & Isle of Wight Wildlife Trust is responding because this is the first Environmental Delivery Plan to be brought forward under the new framework and is therefore likely to influence the design of future EDPs, including any developed for the Solent.

We have direct experience of establishing and delivering nutrient mitigation schemes in the Solent that enable development while securing measurable nutrient reductions and wider benefits for nature. Our comments therefore focus on the design of the EDP mechanism, the application of the Overall Improvement Test, the relationship between EDPs and existing mitigation markets, and the implications for future plans.

We recognise that Norfolk Wildlife Trust and other local organisations are better placed to comment on detailed local priorities, individual sites and the suitability of particular measures within the Norfolk catchments. We only answered the questions relevant to our expertise and experience.

6. To what extent do you think the overall purpose of the EDP is sufficiently clear?

Not very clear

The broad purpose of the EDP is understandable: to facilitate development while funding conservation measures intended to improve the conservation status of the affected protected sites.

However, its environmental objective is insufficiently precise. The EDP identifies nutrient pollution as a principal cause of the poor condition of the protected sites, but it does not clearly

Registered Office: Beechcroft House, Vicarage Lane Curdridge, Hampshire, SO32 2DP. Registered Charity Number: 201081. Registered Charity Name: Hampshire and Isle of Wight Wildlife Trust. A company limited by guarantee and registered in England and Wales Number: 676313.

establish how the additional nutrient loading attributable to development will first be avoided or reduced.

The Overall Improvement Test appears to allow wider ecological benefits to outweigh additional nutrient loading without first demonstrating that reasonable opportunities to address that loading directly have been exhausted. The EDP should state clearly that measures addressing the primary cause of harm will be prioritised, with wider nature-recovery benefits delivered in addition to, rather than instead of, direct nutrient reduction.

7. To what extent do the Executive Summary and Introduction clearly set out how the EDP will deliver a material improvement that outweighs the negative effect of development?

Not very clear

The Executive Summary and Introduction explain the structure of the EDP and the proposed programme of conservation measures. However, they do not sufficiently demonstrate how those measures will deliver a material improvement that outweighs the additional nutrient pollution arising from development.

Many of the proposed measures focus on habitat restoration, habitat management and wider ecological enhancement. These may deliver important benefits, but the EDP does not clearly explain how benefits that do not directly reduce nutrient pollution can be compared with additional nutrient loading in already stressed rivers and wetlands.

The EDP should demonstrate that all reasonable opportunities to avoid and reduce development-related nutrient pollution have been exhausted before broader compensatory benefits are used to satisfy the Overall Improvement Test. It should also explain more transparently how different environmental effects have been compared and how uncertainty, ecological thresholds and the risk of under-delivery have been addressed.

18. To what extent do you agree that the proposed programme of conservation measures is appropriate to outweigh the negative effect of development?

Disagree

The Trust does not consider that the proposed programme of conservation measures has been sufficiently demonstrated to outweigh the negative effects of development.

The EDP identifies nutrient pollution as a principal pressure affecting the protected sites and acknowledges that substantial reductions in nutrient inputs are required. However, much of the proposed programme relies on compensation and wider habitat improvement rather than avoiding or directly reducing the additional nutrient loading attributable to development.

Wetland restoration, river restoration, habitat management and species-focused measures may deliver significant ecological benefits. We strongly support such action, but it should complement rather than substitute for measures addressing the environmental pressure caused by development.

Registered Office: Beechcroft House, Vicarage Lane Curdridge, Hampshire, SO32 2DP. Registered Charity Number: 201081. Registered Charity Name: Hampshire and Isle of Wight Wildlife Trust. A company limited by guarantee and registered in England and Wales Number: 676313.

The EDP should demonstrate that all reasonable opportunities to avoid and reduce additional nutrient loading have been exhausted before broader compensatory benefits are used to satisfy the Overall Improvement Test. This would provide a clearer and more credible application of the mitigation hierarchy.

Greater assurance is also needed about deliverability. The EDP should identify the delivery risks associated with each measure, the consequences of delay or underperformance and the action that will be taken if anticipated outcomes are not achieved.

Monitoring must distinguish between delivery outputs, such as hectares managed or interventions completed, and ecological outcomes, including nutrient-load reductions and changes in the condition and future prospects of designated features. Completion of a measure cannot, by itself, demonstrate that the Overall Improvement Test has been achieved.

19. Do you have any comments on the conservation measures considered but not included, or are there additional measures that should have been considered?

We welcome the consideration of a wide range of potential conservation measures. However, Natural England should explain whether potentially direct nutrient-reduction measures, including treatment upgrades, appropriately designed sustainable drainage systems, nutrient-interception wetlands and targeted land-use change, have been fully assessed and, where discounted, publish the evidence and reasoning.

We do not seek to prescribe the measures that are appropriate in particular Norfolk locations. However, the EDP should demonstrate that reasonable opportunities to avoid or reduce nutrient pollution have been exhausted before reliance is placed on compensation.

Our experience in the Solent demonstrates that direct nutrient reduction, habitat restoration and sustainable development can be delivered together. Future EDPs should seek to secure this combination rather than treating nutrient reduction and wider nature recovery as alternative objectives.

24. To what extent do you agree with the proposed approach to sequencing conservation measures?

Disagree

The Trust supports the principle of phasing conservation measures and recognises the practical constraints associated with delivery. However, nutrient-reduction measures should be front-loaded and operational before, or at least keep pace with, the environmental effects of development.

The protected sites already require substantial nutrient reductions. Allowing additional loading to occur before measures become effective would increase ecological risk and could delay recovery.

Sequencing should follow the mitigation hierarchy: avoid harm first, then mitigate unavoidable effects, with compensation used only for residual impacts. The EDP should set out clear

Registered Office: Beechcroft House, Vicarage Lane Curdridge, Hampshire, SO32 2DP. Registered Charity Number: 201081. Registered Charity Name: Hampshire and Isle of Wight Wildlife Trust. A company limited by guarantee and registered in England and Wales Number: 676313.

safeguards to prevent development from outpacing the delivery and effectiveness of the conservation measures on which the Overall Improvement Test depends.

25. To what extent do you agree with the proposed approach for the delivery, including procurement, of conservation measures?

Neither agree nor disagree

The Trust supports the intention to work with local partners and use a range of delivery mechanisms, including land agreements, conservation covenants and partnerships.

However, EDP delivery and procurement arrangements should complement rather than displace effective local mitigation schemes, delivery partnerships and existing investment.

In the Solent, locally developed nutrient mitigation schemes have demonstrated that nutrient reductions, habitat restoration and sustainable development can be delivered together. Any future Solent EDP should build on this expertise, capacity and investment rather than replacing functioning local arrangements with a centrally designed model.

Natural England should commit to early and meaningful engagement with local environmental organisations, mitigation providers, planning authorities, land managers and catchment partnerships when future EDPs are designed. Procurement should recognise environmental expertise, local knowledge, long-term stewardship and proven delivery capability, rather than being driven primarily by price or administrative simplicity.

26. To what extent do you agree with the methodology for assessing the Overall Improvement Test?

Disagree

We welcome the intention to assess the effects of development and conservation measures against the conservation status of protected features. However, we do not consider the current methodology sufficiently robust or transparent.

The scoring framework appears to compare negative effects from additional nutrient pollution with positive effects from a wide range of conservation measures. It is not clear that fundamentally different environmental outcomes can be compared reliably in this way.

For example, additional nutrient loading affecting an already degraded water body may be offset within the assessment by habitat management, hydrological improvements or species measures that do not reduce the nutrient pollution in question. These measures may be beneficial, but they are not necessarily ecologically equivalent or interchangeable.

The methodology also relies heavily on expert judgement and is therefore not objective. Expert input is valuable, particularly in complex ecological systems, but the criteria used to assign scores, compare different benefits and determine whether improvement is “material” must be clear, transparent and reproducible.

The Overall Improvement Test should demonstrate that:

Registered Office: Beechcroft House, Vicarage Lane Curdridge, Hampshire, SO32 2DP. Registered Charity Number: 201081. Registered Charity Name: Hampshire and Isle of Wight Wildlife Trust. A company limited by guarantee and registered in England and Wales Number: 676313.

- reasonable opportunities to avoid environmental harm have been exhausted;
- unavoidable nutrient loading has been reduced as far as practicable;
- direct mitigation has been distinguished from wider compensation;
- cumulative effects and ecological thresholds have been assessed;
- uncertainty has been addressed precautionarily; and
- the claimed overall improvement does not depend excessively on unsecured or uncertain future action.

Without these safeguards, the methodology risks weakening the connection between the environmental impact of development and the measures used to address it.

27. What improvements would you suggest to strengthen the methodology for assessing the Overall Improvement Test?

We recommend that the methodology should:

- give priority to avoiding and directly reducing nutrient pollution where this is the identified environmental pressure;
- distinguish clearly between direct avoidance or mitigation and broader compensatory benefits;
- demonstrate that reasonable direct mitigation opportunities have been exhausted before relying on compensation;
- explain how different types of environmental harm and benefit are compared, including whether and where they are considered ecologically interchangeable;
- publish the criteria, assumptions and evidence used to assign scores;
- set out confidence levels, uncertainties, sensitivity testing and any material differences in expert judgement;
- assess cumulative impacts and the risk of ecological tipping points in ecosystems already in unfavourable condition;
- identify dependencies on external programmes and assess the consequences of delay or under-delivery;
- establish clear ecological thresholds, intervention triggers and contingency arrangements; and
- ensure monitoring tests whether environmental outcomes have been achieved, not simply whether measures have been delivered.

The methodology should also recognise that direct nutrient reduction and wider nature recovery can be delivered together. Our experience in the Solent demonstrates that addressing the environmental pressure caused by development need not prevent the delivery of broader strategic benefits for nature.

Registered Office: Beechcroft House, Vicarage Lane Curdridge, Hampshire, SO32 2DP. Registered Charity Number: 201081. Registered Charity Name: Hampshire and Isle of Wight Wildlife Trust. A company limited by guarantee and registered in England and Wales Number: 676313.

28. To what extent does the EDP clearly set out the evidence underpinning Natural England's assessment of the Overall Improvement Test?

Not very clear

The EDP contains an extensive evidence base, but the decisive judgements underpinning the Overall Improvement Test are insufficiently transparent.

In particular, it is unclear how the benefits of habitat management, hydrological restoration and species-focused measures have been compared with the effects of additional nutrient loading. The EDP should explain more clearly how these different effects have been assessed and on what basis one is judged to materially outweigh another.

Where expert judgement is used, Natural England should publish the assessment criteria, the relevant expertise represented, confidence levels, treatment of uncertainty, areas of disagreement and sensitivity testing. This is necessary to demonstrate that the Overall Improvement Test is being applied consistently, reproducibly and in accordance with the precautionary principle.

32. Do you agree with the approach of aggregating the costs of conservation measures at plan level and apportioning these evenly across all development?

Neither agree nor disagree

We recognise that aggregating costs and applying a standard levy may provide simplicity and predictability for applicants and planning authorities.

However, a uniform charge may not fully reflect variations in environmental impact, local circumstances, wastewater infrastructure or the availability of existing mitigation mechanisms.

There is also a risk that a centrally administered levy could inadvertently displace functioning mitigation markets and local schemes that are already delivering nutrient reductions and wider benefits for nature. This could undermine existing investment, delivery capacity and stakeholder confidence without necessarily improving environmental outcomes.

Natural England should demonstrate how the charging framework will take account of local circumstances and interact with existing mitigation arrangements. Future EDPs should build on effective local systems rather than assuming that a uniform national model will always provide the best environmental or economic outcome.

33. To what extent do you agree with the proposed monitoring themes set out in Chapter 9?

Disagree

The proposed themes identify relevant areas, but they are not sufficiently developed to provide confidence that environmental underperformance will be detected and corrected in time.

The monitoring framework appears stronger on delivery outputs, such as levy collection, hectares managed and interventions completed, than on ecological outcomes. It should

Registered Office: Beechcroft House, Vicarage Lane Curdridge, Hampshire, SO32 2DP. Registered Charity Number: 201081. Registered Charity Name: Hampshire and Isle of Wight Wildlife Trust. A company limited by guarantee and registered in England and Wales Number: 676313.

include clear measures of nutrient-load reduction and changes in the condition, structure, function and future prospects of the affected designated features.

The framework should specify:

- the baseline against which improvement will be assessed;
- measurable indicators of environmental success or failure;
- ecological thresholds and early-warning indicators;
- the frequency of monitoring and public reporting;
- intervention triggers;
- responsibilities for corrective action; and
- timescales for deploying additional or alternative measures.

Where protected sites are already in unfavourable condition, monitoring must detect emerging problems early enough for corrective action to prevent further deterioration. Demonstrating that measures have been delivered is not sufficient if the expected ecological outcomes are not being achieved.

35. Do you have any additional comments?

Hampshire & Isle of Wight Wildlife Trust broadly supports the ambition to create a strategic mechanism that enables sustainable development while securing nature recovery. We also recognise the substantial technical work undertaken in preparing this first EDP.

However, we have substantial concerns that this EDP does not yet demonstrate that all reasonable opportunities to avoid and reduce development-related nutrient pollution have been exhausted before reliance is placed on broader compensatory benefits. Habitat restoration and landscape-scale recovery are essential, but they should complement rather than substitute for action addressing the environmental pressure caused by development.

Greater transparency is also needed around the Overall Improvement Test, including the treatment of uncertainty, cumulative impacts, ecological thresholds, dependencies on external programmes, delivery risks and contingency arrangements. Monitoring should establish whether environmental outcomes are being achieved, not simply whether conservation measures have been completed.

This first EDP is likely to influence future plans elsewhere, including in the Solent. It is therefore important that the framework establishes a robust and credible precedent. Future EDPs should build on effective local mitigation arrangements, expertise and investment rather than displacing them. The Solent's experience demonstrates that direct nutrient reduction, habitat restoration and sustainable development can be delivered together.

We offer these comments from our experience of developing and delivering nutrient mitigation in the Solent. We recognise that Norfolk Wildlife Trust and local partners are better placed to advise on detailed local ecological priorities and delivery choices.

Registered Office: Beechcroft House, Vicarage Lane Curdridge, Hampshire, SO32 2DP. Registered Charity Number: 201081. Registered Charity Name: Hampshire and Isle of Wight Wildlife Trust. A company limited by guarantee and registered in England and Wales Number: 676313.

We would welcome continued engagement with Natural England and Government as the EDP framework develops.

Registered Office: Beechcroft House, Vicarage Lane Curdridge, Hampshire, SO32 2DP. Registered Charity Number: 201081. Registered Charity Name: Hampshire and Isle of Wight Wildlife Trust. A company limited by guarantee and registered in England and Wales Number: 676313.