Hampshire & Isle of Wight Wildlife Trust

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Consultation: Draft Building a Better Future Plan Regulation 19, Havant Borough 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 29,500 members and we currently manage 5,000 hectares of land for wildlife, primarily nature reserves of local, national, and international importance.

We welcome the opportunity to comment on the Regulation 19 Local Plan consultation. While we are pleased to see the environment as a key issue in the draft, we consider that the document in its current form suffers from a lack of development of key policies; it does not represent current best practice in policy, clarity and ambition, as based on robust evidence, to put nature into recovery across the district.

The Wildlife Trusts are calling for at least 30% of land and sea to be restored for nature and climate by 2030, in line with national and international commitments.

We welcome the commitment to embed nature recovery, adopting nature-based solutions where viable, supporting habitat restoration, improving river health, promoting best practice and expanding opportunities for residents to access the borough's natural assets as part of the Nature emergency declared by Havant Borough Council in 2025.

In order to align with this ambition and with the UK's endorsement of the Kunming-Montreal Global Biodiversity Framework, we call on Havant Borough Council to fully embed and reflect this goal, and our legal target for nature's recovery by 2030 in its local plan, backed by mapping and sufficient, evidence-based policy mechanisms to ensure that the state of nature is turned around and wildlife starts to recover during this decade.

The Local Plan should be strengthened to ensure that nature, its recovery and climate adaptation are integrated across all policies and allocations and make a measurable contribution to the delivery of the Hampshire Local Nature Recovery Strategy, as part of the Environment Act 2021 and section 40 of the NERC Act 2006, as amended by Section 102 of the Environment Act 2021, which places a duty on public authorities to conserve and enhance biodiversity through the exercise of their functions. The NPPF is clear that meeting the challenge of climate change is an essential component of achieving sustainable development and that conserving and enhancing the natural environment, must be achieved alongside creating high quality, sustainable places, delivering homes and supporting growth. Achieving these

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development principles will require nature at its core, which is supported by evidence, best practice and national policies.

Corporate strategy themes

We recommend embedding nature across all strategic themes to help ensure Havant Borough Council remains responsive to existing and future needs of residents in the face of climate change. There is a strong evidence-based justification for strengthening references to the natural environment within Local Plan corporate strategy themes ensuring that nature is recognised not as a standalone consideration but as a fundamental component of healthy, prosperous, attractive and climate-resilient places.

Local Plan Objective 1: Wellbeing

Nature supports physical and mental health, reduces pressure on public services and helps communities adapt to rising heat and climate risk. There is £2.1bn NHS savings from green space access[1], an estimated £6.2–£8.4bn health benefits from recreation[2] and 20m people who gain health benefits from nature annually.[3] This evidence supports nature being embedded in this corporate strategy theme, alongside NPPF policy HC1: Planning for healthy communities, paragraph 1.e. identify wider opportunities to promote good health and chapter 19. conserving and enhancing the natural environment. Access to nature is preventative public service infrastructure, which should be planned for to support healthy communities. This addition will strengthen the policy, improve the soundness by ensuring the evidence of nature benefits on wellbeing is conveyed, and better align with national policy.

Local Plan Objective 2: Pride in place

We welcome the inclusion of improvements to open and green spaces, climate change adaptation and biodiversity improvements. Green spaces are Britons' biggest source of pride in their local areas[4] and, as evidenced above, nature offers huge benefits to health and wellbeing. We recommend the LNRS is referenced within this corporate strategy theme, alongside acknowledgement of the multifunctional benefits of ecosystem services, nature-based solutions and green and blue infrastructure, which address challenges covered in this corporate theme, such as flooding, climate change and coastal defence. NPPF chapter 5, policy CC1, 1.d. discusses the challenges of climate change, which can be addressed by identifying green infrastructure provision and nature-based solutions in alignment with the LNRS. We recommend that this evidence and policy wording is reflected in this corporate theme to improve soundness and reflect national policy.

Local Plan Objective 3: Growth

Healthy ecosystems and economic development are mutually reinforcing, with nature serving as essential national infrastructure that underpins long-term prosperity. Natural systems manage climate impacts like flooding, extreme heat, and drought while securing food and water supplies. There is £41bn annual economic value from UK nature[5] and, as outlined in Natural England's strategy, Recovering Nature for Growth, Health and Security 2025,[6] nature is critical infrastructure and the vital foundation upon which economic prosperity depends. This reflects the findings of the 2021, Dasgupta Review[7] that economies, livelihoods and wellbeing depend upon nature and that economic prosperity is embedded within nature. We recommend that Havant Borough Council includes this rhetoric within this corporate strategy theme to convey the evidence and importance of nature-positive growth and a planning system that drives nature recovery alongside housing and economic development.

Local Plan Objective 4: A responsive Council

Havant Borough Council declared a climate emergency in 2024, a nature emergency in 2025, has a duty to conserve and enhance biodiversity through the exercise of its functions and in 2026, has faced devastating impacts of wildfires and drought within its borough because of climate change. The NPPF is clear that sustainable development must meet the challenge of climate change and achieve environmental

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objectives, as well as social and economic. The Government recognises the risks biodiversity loss and critical ecosystems collapse could have on the UK's resilience, security and prosperity[8] and Natural England's 2025 Strategy and the 2021 Dasgupta Review identify nature's vital role as the foundation of economic growth. As part of being a responsive council, Havant must incorporate climate and nature within this corporate strategy theme to reflect the reality of the crises for generations now and in the future.

Policy 1: Development Strategy

Evidence strongly supports that nature offers multiple benefits and should be considered a cross-cutting priority that underpins wellbeing, sustainable growth, pride in place and the ability to respond to future challenges, as outlined in Natural England's 2025 Strategy and the Dasgupta Review. Nature is critical infrastructure that underpins our economy, societies and our environment, that support the NPPF's economic, social and environmental objectives to achieve sustainable development.

Policy 1 treats the environment as a constraint, protecting designated sites and planning within environmental limits. Whilst we welcome these environmental considerations, we recommend that policy wording reflect this evidence alongside the ambition of the NPPF, to conserve and enhance the natural environment, the Hampshire LNRS ambition to put nature into recovery, the Land Use Framework and to reflect the Council's biodiversity duty. Under each heading we recommend nature is embedded to reflect policy and best practice.

Sustainable growth

Sustainable growth should incorporate nature recovery to reflect Natural England's evidence for its role in supporting growth, health and security. There is £41bn annual economic value from UK nature[9]. Nature and its recovery are critical to sustainable growth, green and blue infrastructure, nature-based solutions, climate resilience and adaptation and other policy areas reflected in the local plan. We recommend nature and its recovery is reflected in policy wording to convey how it supports development needs and is an enabler for growth.

Making efficient use of land

The Land Use Framework[10] discusses how we can use our land more effectively to increase the resilience of our homes, communities, infrastructure, and food systems, while speeding up development and restoring nature, stressing the importance of multifunctional use of land and NPPF policy L1: Planning for an effective use of land, paragraph 1.b.ii. states that opportunities to secure multiple benefits should be taken, including securing environmental gains. Nature offers multiple benefits through ecosystem services, nature-based solutions and green and blue infrastructure. Strategic frameworks like the Green Infrastructure Framework[11] and the Environmental Improvement Plan[12] outline the role nature can play to confront challenges of today and the future.

We recommend the Hampshire LNRS is referenced here to support the spatial mapping data that outlines areas important for biodiversity and areas that could be important for biodiversity. This data will be imperative for making efficient use of land, it should support in both plan making and development management, ensuring that the location of new development avoids the best areas for nature and associated action makes a positive contribution to nature recovery. It should also be used as a key spatial foundation for directing investment and delivery of Biodiversity Net Gain, Green and Blue Infrastructure, Green SuDS, other ecosystem services and nature-based solutions, supporting efficient use of land.

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Enabling well-connected communities
This section should incorporate the Government's 15-minute commitment, to ensure that everyone has access to a green or blue space within 15 minutes of their home as part of the Access to nature chapter of the Environmental Improvement Plan 2025.

Protecting our most special environments
To best reflect the NPPF policy wording, this section should refer to conserving and enhancing the natural environment, as per policy N1 and reference ambition for nature recovery to align with the LNRS objectives. Moving from "protection" to proactive restoration, recovery and enhancement of our natural environment best reflects these policies alongside the local authority's biodiversity duty and protected site strategies, section 110 of the Environment Act 2021.

A coastal borough in a changing climate
We welcome the inclusion of protecting and enhancing the coastline and harbours for wildlife within this section. We would recommend the inclusion of natural flood management and coastal defences, as per NPPF policy F2, paragraph 1.c. which recommends using natural flood management techniques to support an integrated approach to flood management. The Environment Agency references the role of nature-based solutions to increase resilience to floods and coastal erosion.[13] Integrating these natural solutions supports climate adaptation and resilience but also supports nature recovery, protection for communities and the visitor economy. Referencing nature-based solutions will improve the soundness of this policy, reflecting the multifunctionality of land use of the Land Use Framework and NPPF policy L1: Planning for an effective use of land, paragraph 1.b.ii. taking opportunities to secure multiple benefits including securing environmental gains. Additionally, it will address chapters 18 and 19 of the NPPF managing flood risk and coastal change and conserving and enhancing the natural environment, alongside supporting the ambition of the LNRS.

Policy 2: Defined Settlement Boundary
Development outside the defined settlement boundary should protect and safeguard environmental impacts and biodiversity loss. We recommend that development outside of the settlement boundary should only be permitted where it adheres to the mitigation hierarchy, uses the LNRS to direct development away from identified areas for biodiversity and offers Biodiversity Net Gain, where impacts occur. This reflects the NPPF policy N2, paragraph 2. that stipulates that harm to biodiversity should be avoided, adequately mitigated against or as a last resort compensated for. If this cannot be achieved, then development should be refused. HO4: Land for strategic site development paragraph 1.c. states that strategic environmental opportunities and safeguards, including those in the LNRS should be addressed. Policy N1, paragraph 1. states that development should safeguard and enhance the natural environment. To best align with national policy, we recommend that the mitigation hierarchy and opportunities for conserving and enhancing nature, alongside the LNRS and BNG should be incorporated into policy wording.

Policy 3: Regeneration
Integrating nature into regeneration plans has multiple benefits meeting the economic, social and environmental objectives of sustainable development set out in the NPPF. Natural England's Nature Towns and Cities initiative outlines how neighbourhoods can be renewed through green infrastructure, supporting health and wellbeing benefits, cutting healthcare costs and boosting economic growth. They outline that:

- Urban green spaces protect communities from climate threats, cooling air by 2-8°C[14] and cutting pollution by up to 22%[15]
- Natural flood management solutions save millions in potential damage costs

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- Beyond environmental benefits, these spaces create essential social hubs for connection and recreation
- They revitalise neighbourhoods, attract investment, and build communities that people take pride in.[16]

We recommend that section c) and d) include reference to nature, green infrastructure, urban greening and nature-based solutions, as these align with policies set out in the various policies in the NPPF including:

- HC1: Planning for healthy communities, paragraph 1.e. identify wider opportunities to promote good health
- DP3: Key principles for well-designed places, paragraph 2.c. the nature principle, incorporating multifunctional green infrastructure provide opportunities for recreation and healthy living, strengthen habitats, improve climate change resilience and improve air and water quality. This should include maintaining and enhancing tree cover and incorporating sustainable drainage systems in accordance with policies N3 and F8
- CC1: Planning for climate change, paragraph 1.e. identifying opportunities for green infrastructure provision and nature-based solutions which can safeguard and improve carbon storage, support nature recovery and resilience, and which take account of Local Nature Recovery Strategies in accordance with policy N1
- F2: Planning for effective flood risk management, paragraph 1.c. maximising natural flood managing techniques flood risk
- N1: Identifying environmental opportunities and safeguards

Within the regeneration area is a large greenspace, which should also be protected and safeguarded. Incorporating nature into regeneration areas offer multiple benefits across health, wellbeing, nature recovery, climate resilience and delivering well designed places. To adhere to the NPPF policies, alongside best practice we recommend these integral elements to sustainable development are incorporated into policy wording and delivered in the regeneration areas.

Policy 4: Infrastructure and environmental mitigation to support development
Nature should be reflected as critical infrastructure that underpins sustainable development. Nature-based solutions offer multiple benefits, including flood mitigation and natural flood management, sustainable drainage systems, urban cooling, coastal defences, nutrient neutrality, health and wellbeing and as part of strategic accessible natural greenspace. Nature should be incorporated into this section through the ambition of the green infrastructure strategy and the LNRS to support natural and nature-positive infrastructure provision.

In reference to the multifunctional uses of facilities, environmental benefits should be included alongside community and economic benefits. Likewise, nature recovery should sit within this policy as part of the NPPF's ambition in conserving and enhancing the natural environment rather than only have reference to the environmental mitigation to address the effects of development.

Environmental mitigation should prioritise areas identified in the LNRS, improve ecological connectivity, support biodiversity, align with the green infrastructure strategy and BNG wherever possible.

Supporting the integration of natural/ nature-positive infrastructure with this policy aligns with the NPPF policies:

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- F8: Sustainable drainage systems and watercourses, paragraph 1. Development proposals should incorporate sustainable drainage systems and provide multifunctional benefits where possible, facilitating improvements in water quality, biodiversity and amenity.
- DP3: Key principles for well-designed places, paragraph 2.c. the nature principle, incorporating multifunctional green infrastructure provide opportunities for recreation and healthy living, strengthen habitats, improve climate change resilience and improve air and water quality.
- CC1: Planning for climate change, paragraph 1.e. identifying opportunities for green infrastructure provision and nature-based solutions which can safeguard and improve carbon storage, support nature recovery and resilience, and which take account of Local Nature Recovery Strategies in accordance with policy N1
- F2: Planning for effective flood risk management, paragraph 1.c. maximising natural flood managing techniques flood risk
- N1: Identifying environmental opportunities and safeguards

Policy 5: Green and Blue Infrastructure

We welcome the policy's integration of nature-based solutions, health and wellbeing benefits and the role of green and blue infrastructure in addressing climate change impacts. However, as there are no quantitative standards, canopy cover targets, natural greenspace standards, ecological connectivity requirements, multifunctional SuDS and urban greening standards. Without measurable requirements developers can argue compliance with minimal provision, which poses a soundness concern.

Alongside Green Infrastructure Planning and Design Guide, we recommend including the wider Green Infrastructure Framework including mapping and standards. These cover green infrastructure strategy standard, accessible greenspace standard, urban nature recovery standard, urban greening factor standard and urban tree canopy standard[17]. We recommend that this guidance and best practice is followed and reflected in policy wording to ensure the policy is sound and based on the best available guidance and best practice.

An exemplary approach to green infrastructure would be the Building with Nature Standard[18], which brings together existing guidance and good practice to recognise high-quality quality green infrastructure where wellbeing, biodiversity and water are core foundations. We recommend that all proposals for green infrastructure will be expected to be designed with the Building with Nature standards, or an equivalent standard set by the Council. This will ensure that all green infrastructure delivers maximum benefits for the health and wellbeing of residents, and for nature's recovery.

Green infrastructure can also support natural flood management, which aligns with NPPF policy F2: Planning for effective flood risk management, paragraph 1.c. maximising natural flood management techniques. UK flood risk and drainage consultancy, Unda outline that under the NPPF, local authorities expect SuDS to manage water quantity and to improve water quality, amenity and biodiversity.[19] Green SuDS deliver against all four, which is why Local Planning Authorities and Lead Local Flood Authorities increasingly apply a "green first" principle. Green SuDS manage water above ground using planting, soil and surface flow, adding amenity and biodiversity. This approach supports NPPF policies F8: Sustainable drainage systems and watercourses, paragraph 1, facilitating improvements in water quality, biodiversity and amenity and chapter 19 conserving and enhancing the natural environment.

We recommend that the policy wording better reflect NPPF policies: DP3: Key principles for well-designed places, paragraph 2.c. the nature principle, incorporating multifunctional green infrastructure provide opportunities for recreation and healthy living, strengthen habitats, improve climate change resilience and improve air and water quality, the Land Use Framework and policy L1: Planning for an effective use of land, paragraph 1.b.ii. taking opportunities to secure multiple benefits, including securing net environmental

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gains. Additionally, we recommend that policy reflects chapters 18 and 19 of the NPPF managing flood risk and coastal change and conserving and enhancing the natural environment, alongside supporting the ambition of the LNRS and BNG delivery.

A requirement for all major developments to submit a Green Infrastructure Strategy should also be considered to support delivery of BNG, the LNRS and achieve other multiple benefits set out in NPPF policy N2, paragraph 1.e. such as for biodiversity; surface water and pollution management (including maintaining flow rates and water quality); climate change mitigation and adaptation, and recreation. The approach of integrating nature into building design and infrastructure to maximise the multiple benefits that nature offers should also be applied to **Policy 13: High-quality Design.** This will ensure the plan is sound, justified and effective, applying best practice that will support nature recovery, alongside wider social and economic benefits.

Policy 9: New Homes for Sustainable Communities
We recommend that the policy incorporates access to green and blue space, as part of the government's ambition that 80% of households in England have access to at least one green or blue space within a 15-minute walk.[20] We also recommend that the health benefits of community access to nature and urban greening is reflected, including reference to Policy 50: Air Quality and Policy 5: Green and Blue Infrastructure. We recommend that this policy also encompasses homes that are climate resilient, avoiding flood risk areas and ensuring appropriate infrastructure. This will better align with NPPF policies HC1: Planning for healthy communities, paragraph 1.e. identify wider opportunities to promote good health, chapter 5 meeting the challenge of climate change, chapter 18 managing flood risk and coastal change and chapter 19 conserving and enhancing the natural environment. These amendments will better reflect national policy, ambition and best practice.

Policy 10: Supporting a Strong and Prosperous Economy
As outlined in Natural England's 2025 Strategy: Recovering Nature for Growth, Health and Security and the Dasgupta Review, nature plays a vital role as the foundation of economic growth.

- Nature loss could put up to 12% of GDP at risk [21]
- Investing in nature can deliver up to £34 for every £1 spent [22]
- Closing the UK nature finance gap requires £5–6bn investment per year[23]
- Investment could unlock £80bn in economic activity and 80,000 jobs[24]

To ensure soundness, the policy should reflect evidence and inclusion of nature, nature recovery and nature-based solutions as part of its economic strategy and policy-wording, recognising nature as a foundation for growth and supporting its integration across policy mechanisms.

We welcome **Policy 11: Climate Change,** especially in reference to water resource conservation, Sustainable Drainage Systems, green and blue infrastructure and wildlife habitat and species conservation. We recommend that this policy aligns with the LNRS, nature-based solutions and mitigation alongside adaptation.

Nature-based solutions should be prioritised where capable of delivering multifunctional benefits, climate adaptation, climate mitigation and biodiversity benefits. The plan should require habitat-based flood management, urban tree cover expansion for urban cooling, river restoration, blue-green corridors, multifunctional blue and green infrastructure, green roofs and walls and climate adaptation through nature recovery. This would also support Section 40 of the NERC Act 2006, as amended by Section 102 of the Environment Act 2021, which places a duty on public authorities to conserve and enhance biodiversity through the exercise of their functions.

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Integrating nature-based solutions will improve the soundness of this policy, reflecting the multifunctionality of land use of the Land Use Framework and NPPF policy L1: Planning for an effective use of land, paragraph 1.b.ii. taking opportunities to secure multiple benefits including securing environmental gains. Additionally, it will address chapters 18 and 19 of the NPPF managing flood risk and coastal change and conserving and enhancing the natural environment, alongside supporting the ambition of the LNRS.

Policy 12: Health
Nature supports physical and mental health, reduces pressure on public services and helps communities adapt to rising heat and climate risk. There is £2.1bn NHS savings from green space access[25], an estimated £6.2–£8.4bn health benefits from recreation[26] and 20m people who gain health benefits from nature annually.[27] This evidence supports nature being embedded in policy wording, supports NPPF policy HC1: Planning for healthy communities, paragraph 1.e. identify wider opportunities to promote good health and chapter 19. conserving and enhancing the natural environment. Access to nature is preventative public service infrastructure, which should be planned for to support healthy communities.

The policy largely focuses on recreation and active travel. Extensive evidence indicates contact with nature is associated with good social, mental, and physical health. These potential benefits include favourable pregnancy outcomes and improved mental health to reduced risks of cardiometabolic and neurodegenerative diseases in older adults[28]. Nature recovery supports a healthy natural environment, such as cleaner air, cleaner water and cooling, which support health and wellbeing, alongside offer a variety of other multiple benefits outlined in this response. Including nature-based health interventions and benefits in policy wording will improve its soundness.

We welcome the chapter on Climate Change policies **Policy 16: Low Carbon Development** and **Policy 17: Preventing Overheating**

Policy 19: Water Efficiency
Efficiency standards of 110 litres per person per day are already being noted as insufficient. The Government in its Plan for Water indicated plans "to consider mandating a new minimum water efficiency standard for new homes in England of 105 litres per person per day and 100 litres per person per day where there is a clear local need, such as in areas of serious water stress."

To compliment the Government's commitment to review Building Regulations in order to prevent new development causing issues with water supply, the Future Homes Hub conducted a review of the options and feasibility of tightening water efficiency regulations with wide-ranging input from across the industry. Its final report recommends a target of 100 litres per person per day by 2030, and 90 in water stressed areas.[29] This would be tightened to 90 as standard by 2035 and 80 litres per person per day in water stressed areas. The feasibility of building to these standards is evidenced in detail, building on previous research and evidence behind such specifications in the former Code for Sustainable Homes.[30]

NPPF policy PM13: Setting standards, paragraph 1.b.ii. states that water efficiency standards may be tighter than building regulations where justified and set more stringent local standards in areas of serious water stress, which applies to Havant. Most of England is already classified as seriously water stressed[31], and as such, urgent action must be taken. We recommend that the Council amend the draft policy to 90 litres or less per person per day to support this evidence.

Policy 20: Biodiversity Net Gain
Councils have an enhanced biodiversity duty, as per section 40 of the NERC Act 2006, as amended by Section 102 of the Environment Act 2021, placing a duty on public authorities to conserve and enhance

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biodiversity through the exercise of their functions, alongside responsibility to have regard of the LNRS and adhere to national policy, NPPF chapter 19, conserving and enhancing the natural environment.

Within chapter 19, policy N1, paragraph 2 the NPPF states that development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations and is fully justified and deliverable. Local standards should not extend to categories of development which are exempt from statutory biodiversity net gain.

To support Havant's biodiversity duty, the ambitions of the LNRS and objectives to conserve and enhance the natural environment, we recommend that policy wording adopted by Guildford be applied requiring all development proposals, including those exempt from minimum biodiversity net gain standards, to seek maximum biodiversity gain[32].

We recommend Havant council set 20% BNG requirements for their site allocations and undertake a viability assessment to justify deliverability. Kent County Council has undertaken a viability assessment for 20% BNG across all developments.[33] In summary a shift from 10% to 15% or 20% Biodiversity Net Gain did not materially affect viability in the majority of instances when delivered onsite or offsite. The biggest cost in most cases is to get to the mandatory, minimum 10% Biodiversity Net Gain. The increase to 15% or 20% Biodiversity Net Gain in most cases costs much less and is generally negligible and because the Biodiversity Net Gain costs are low when compared to other policy costs, in no cases are they likely to be what renders development unviable.

A 10% minimum gain has been set by the Environment Act, as this is the lowest level that Defra consider would actually deliver biodiversity gains. But we consider that given the pressures facing the borough's biodiversity, a greater ambition of 20% should be set to provide greater confidence in genuine gains for biodiversity and ensure the successful recovery for nature in the allocated sites within the Local Plan. We believe at least 20% net gain should be achieved, and that any offsite gains should be strategically targeted through Local Nature Recovery Strategies, secured in perpetuity and be additional to other commitments and initiatives to recover nature. LNRS should be the spatial foundation for directing delivery of BNG and the wording of the policy should reflect this to ensure effective nature recovery and halting the decline in nature as per international commitments. We recommend that when allocating off site BNG delivery the land within the LNRS and NRN is preferred.

Concerning research cited by the Green Finance Institute has indicated that as low as 0.5% of applications could be delivering Biodiversity Net Gain due to abuse of the exemptions.[34] Significant non-compliance and failure to deliver Biodiversity Net Gain represents a serious risk to the environmental credentials of the Local Plan and its compliance with the provisions of the Environment Act 2021. To address this abuse, we recommend that the Council follow the example of Guildford in its local plan policy and insert wording to prevent the abuse of exemptions.[35]

We welcome that BNG delivery aligns with LNRS priorities, but recommend it is delivered on-site first, offers long-term habitat management, enhancement of ecological connectivity and a measurable contribution to species recovery. This would make the policy far more strategic and ensure it does not undermine nature recovery objectives nor compromise soundness of the local plan. Planning policy requirements that provide biodiversity net gains and resilient ecological networks help meet current and future pressures. The plan cannot be considered effective without demonstrating that BNG delivery will contribute to local ecological recovery, rather than simply meeting minimum statutory requirements.

We welcome **Policy 21: International and National Nature Conservation Sites.** We recommend that development is directed away from LNRS APIB and ACB areas to give regard to support international

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and national nature conservation sites, adherence to the mitigation hierarchy, as per NPPF policy N2, paragraph 2, to improve ecological connectivity and nature recovery. This will support the council's biodiversity duty and having regard to the LNRS within planning, alongside supporting NPPF chapter 19.

We also welcome **Policy 22: The Local Ecological Network** and its integration with the LNRS. We recommend strengthening the wording to reflect that national and internationally designated sites also form part of the local ecological network. Additionally, that the mitigation hierarchy is reflected in the policy wording, as per NPPF policy N2, paragraph 2. We recommend strengthening the section from '*Where impacts to the Local Ecological Network are likely'* to *'Where impacts to the Local Ecological Network are unable to be avoided'.*

To minimise impacts to the Local Ecological Network, we would recommend that development uses the Building with Nature standards[36] or a similar accreditation, that development seeks to contribute to the green and blue strategy to enhance ecological connectivity using Natural England's Green Infrastructure Planning and Design Guide[37] and that onsite mitigation and onsite BNG is prioritised.

As a trust we recognise chalk streams as irreplaceable habitats due to their rare, unique and irreplaceable features. We would recommend the protection of chalk streams within policy wording to safeguard these rare habitats.

We welcome **Policy 23: Recreation Disturbance on International Sites** to address recreational disturbance on areas with international designations. However, we are concerned that these do not go far enough to fully integrate relevant mitigation, alternative green space provision, management and monitoring best practice in line with the obligations of relevant policy and legislation. The plan recognises recreational impacts on SPA/Ramsar sites, yet substantial housing growth is proposed and reliance appears to remain on mitigation schemes and there is limited evidence in policies requiring strategic alternative natural greenspace (SANG provision). The plan should demonstrate sufficient alternative natural greenspace capacity before allocating major housing growth to ensure this policy is effective and should provide clarity regarding recreational disturbance mitigation and compensatory habitat delivery.

We recommend that this policy is extended across designated and non-designated wildlife sites, as part of the NPPF chapter 19, conserving and enhancing the natural environment policy N1, paragraph 1.b. which refers to identifying opportunities for the conservation, enhancement and recovery of landscapes and improving resilience to current and future pressures. Policy should clearly outline adherence to the mitigation hierarchy to avoid, mitigate and monitor recreational pressure on designated and non-designated wildlife sites.

On-site provision should be the first preference. Where this is not possible, alternative greenspace should be nearby, accessible, attractive and capable of genuinely diverting pressure from sensitive sites for this policy to be sound.

Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) requirements should be clearly set out where relevant. The Council should also assess impacts on local nature reserves and other non-designated sites that contribute to the ecological network. Monitoring and review mechanisms should be included to ensure mitigation remains effective over time.

Natural England's Compilation and Review of Evidence Leading to SANG and SAMM Provision[38] outlines best practice including bespoke mitigation options and exploring links between mitigation solutions and Green Infrastructure, Local Nature Recovery Networks and BNG to achieve multifunctional benefits for ecosystem services for effective planning and implementation.

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We welcome **Policy 24: Water Quality Effects on International Sites** and recommendation for a nutrient budget. We recommend that mitigation proposals incorporate opportunities for creating and improving habitats to best align with the LNRS objectives and NPPF chapter 19, policy N1, paragraph 1.b. which refers to identifying opportunities for the conservation, enhancement and recovery of landscapes and improving resilience to current and future pressures. Mitigation and avoidance of harm is welcome, but to best align with national policy, nutrient neutrality delivery schemes should be encouraged to go beyond offsetting and secure nutrient reduction. This will also support objectives for multifunctional use of land set out in the NPPF and Land Use Framework, improving adherence to national policy and best practice.

We welcome **Policy 25: Protected and Notable Species,** the protection and conservation of species and the inclusion of swift bricks, bat roosting features and the Bechstein's bat zone of influence. We recommend that this policy aligns with the LNRS policy wording to ensure that where compensation is required, it provides net gains for wildlife and supports nature recovery to support the council's biodiversity duty and LNRS obligations. We welcome the inclusion of **Policy 26: Solent Wader and Brent Goose Strategy Sites** to support sensitive bird populations and their habitats.

We welcome **Policy 27: Flood Risk** reference to nature-based solutions and taking into account climate change. Natural flood risk management provides multiple benefits, including nature recovery, green and blue infrastructure, climate resilience.

UK flood risk and drainage consultancy, Unda, outline that under the NPPF, local authorities expect SuDS to manage water quantity and to improve water quality, amenity and biodiversity.[39] Green SuDS deliver against all four, which is why Local Planning Authorities and Lead Local Flood Authorities increasingly apply a "green first" principle. Green SuDS manage water above ground using planting, soil and surface flow, adding amenity and biodiversity.

Policy 28: Drainage should apply a "green first" approach policy due to the multiple benefits they deliver across flood and climate resilience, water quality and pollution control, amenity and biodiversity and policy and practice alignment. Developers should be expected to show that green SuDS have been considered and included wherever feasible providing justification where they are not. Cost alone cannot justify avoiding a green first approach, as considering the multiple benefits this approach offers, it is a much higher priority destination for runoff[40]. A green first approach will improve the soundness of this policy, reflecting the multifunctionality of land use of the Land Use Framework and NPPF policy L1: Planning for an effective use of land, paragraph 1.b.ii. taking opportunities to secure multiple benefits including securing environmental gains. Additionally, it will address chapters 18 and 19 of the NPPF managing flood risk and coastal change and conserving and enhancing the natural environment, alongside supporting the ambition of the LNRS.

Policy 29: Development on the Coast would be strengthened by placing greater emphasis on environmental enhancement alongside the existing focus on protecting the coast from inappropriate development. This could include requiring development proposals to conserve, restore and enhance coastal habitats and ecological networks, deliver biodiversity net gain, protect water quality, maintain natural coastal processes, and support Local Nature Recovery Strategy objectives. The policy would also benefit from explicitly applying the mitigation hierarchy, addressing the impacts of coastal squeeze, safeguarding blue carbon habitats such as saltmarsh and seagrass, and prioritising nature-based solutions for coastal management and climate adaptation. This would support policy objectives within the NPPF regarding multifunctional use of land, chapters 18 and 19 of the NPPF managing flood risk and coastal change and conserving and enhancing the natural environment, alongside supporting the ambition of the LNRS.

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We welcome **Policy 30: Nationally Protected Landscapes**, conserving and enhancing the natural beauty and special qualities of the National Landscape, including reference to the mitigation hierarchy. We recommend this policy should be strengthened to reflect the Council's biodiversity duty, supporting wildlife and conservation within the protected landscapes, which also supports chapter 19 of the NPPF. To support the objectives of the national park, the South Downs draft local plan centres nature recovery within its permissions for development proposal requiring proposals to conserve and enhance biodiversity, geodiversity and soils, have particular regard for ecological networks and high potential for priority habitat restoration or creation and demonstrate they achieve a minimum of 20% BNG or a minimum of 33% BNG on strategic greenfield sites[41]. We recommend that Havant local plan policy reflect this ambition within National Landscapes supporting best practice and enables a framework for specific site allocations to deliver higher than statutory levels of BNG. This would ensure appropriate ambition within protected landscapes and policy cohesion with the South Downs National Park Local Planning Authority.

Policy 31: Trees, Hedgerows and Woodland, urban tree coverage will be vital for delivering key ecosystem services, such as enhancing local climate resilience through helping to mitigate the urban heat island effect. Seeking to maximise the ecosystem services delivered by trees and green infrastructure is essential for meeting legal air quality targets under the Environment Act, obligations and national policy direction to consider climate adaptation in planning and aligning with the key missions and associated obligations under the Levelling Up and Regeneration Act 2023 - notably the missions to improve local health outcomes and pride of place.

Research, notably from Wycombe, has indicated a good level of ecosystem services is likely to be delivered at 25% canopy cover.[42] Testing shows that it should be possible for developments of around 35% (dependent upon development form). The CABE publication 'What makes an eco-town?' suggested canopy cover of at least 25% in residential areas in order to deliver the associated ecosystem service benefits.[43] We therefore recommend that the policy is amended to follow best practice and require 25% tree canopy coverage.[44]

Compliance with best practise guidance and assessment procedure, should also be integrated, including British Standard 5837:2012 Trees – in relation to design, demolition and construction (or subsequent revisions), with the use of buffers which exclude damaging activity or other suitable protective measures. The Council should require a tree survey and an Arboricultural Impact Assessment (AIA) to be submitted. Where special techniques and tree protection methods will be necessary for successful implementation, details of them must also be included in the form of a Tree Protection Plan (TPP) and Arboricultural Method Statement (AMS).

Planning policy should seek to maximise the multifunctional benefits of tree planting, including for nature recovery, drawing on relevant species and planting guidance, as per the Land Use Framework and NPPF policy L1: paragraph 1.b.ii taking opportunities to secure multiple benefits including securing environmental gains and NPPF policy regarding health, HC1: paragraph 1.e. identify wider opportunities to promote good health. We advise that these recommendations are included in the local plan to improve the soundness of the local plan, relying on best practice guidance and evidence, and for future-proofing the local area in a changing climate, where trees, hedgerows and woodlands will be essential for health, wellbeing, alongside climate resilience and pride of place.

Policy 32: The historic environment, **Policy 33: Conservation Areas**, **Policy 34: Listed Buildings**, **Policy 35: Archaeology** and **Policy 36: Locally Listed Buildings and Non-Designated Heritage Assets** should include more nature and wildlife characteristics and protections to support NPPF policy N1 paragraph 1.b. Natural England identifies what the historic environment can offer for nature recovery objectives, providing case

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studies and examples of where historic assets, archaeology sites and landscapes are also natural assets, habitats, often wildlife rich places that can facilitate nature corridors and ecological networks, connecting people to nature and support actions taken to mitigate against climate change and improve soil, water and air quality. [45] Following this advice, we recommend that ambition for nature recovery is included within these policies, as an integral part of historic assets and their conservation and to best adhere to national policy.

Town centres play an important role in supporting economic vitality and community wellbeing. **Policy 45: Town, District and Local Centres** should integrate nature into urban environments to improve air quality, reduce urban heat, encourage healthier lifestyles and create more attractive places to live, work and visit. Natural assets enhance town and district centres through urban greening, tree planting, green infrastructure and public realm improvements that support biodiversity, improve air quality and reduce urban heat. Green and blue infrastructure also creates attractive, climate-resilient centres that encourage people to spend time, work, visit and live in them, whilst supporting health, wellbeing and access to nature. This evidence is set out in Natural England's Green Infrastructure Planning and Design Guide[46] and supports evidence referenced earlier regarding Green and Blue Infrastructure and as part of conservation and enhancement of the natural, built and historic environment.

We welcome **Policy 50: Air Quality,** however, to improve the soundness of this policy we recommend the inclusion of nature-based solutions to offset emissions. This would fulfil various national policies such as:

- The Land Use Framework and NPPF policy L1: paragraph 1.b.ii, taking opportunities to secure multiple benefits including securing environmental gains.
- NPPF policy CC1, paragraph 1.d. Identifying opportunities for green infrastructure provision and nature-based solutions which can safeguard and improve carbon storage, support nature recovery and resilience, and which take account of Local Nature Recovery Strategies in accordance with policy N1.
- NPPF policy P1, paragraph 1.b. considering wider opportunities to reduce air pollution and contribute to compliance with national and local environmental targets and identifying strategic nature-based solutions.
- NPPF policy N1, paragraph 1.b. opportunities for conservation, enhancement and recovery of nature including habitat restoration and nature-based solutions.

Policy 51: Aquifer Source Protection Zones

The policy provides a mitigation-based approach but contains no clear mechanism to refuse development where risks to groundwater remain unacceptable. Consequently, it may not fully accord with NPPF policy P1: Planning for clean and safe places - requiring planning decisions to prevent unacceptable levels of pollution. The policy is reactive rather than proactive, seeking only to minimise impacts rather than requiring protection and enhancement of groundwater resources consistent with NPPF environmental objectives. The policy requires minimisation of harm but does not require proposals to contribute positively to groundwater protection or improve environmental conditions. The policy should contain a clear test that development will only be permitted where it can be demonstrated that groundwater quality and aquifer resources will not be adversely affected, in line with the NPPF's requirement to prevent unacceptable water pollution and protect the natural environment.

Site allocations

Various site allocations in the local plan are of major concern due to large allocations being proposed on ecologically sensitive and greenfield land. The NPPF policy N1, paragraph 1.b states that opportunities for the conservation, enhancement and recovery of landscapes should be identified, including habitat restoration, nature-based solutions and strengthening ecological networks. Paragraph 1.c. states the

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location of development should be steered in ways which utilise land of least environmental value and the mitigation hierarchy is adhered to, as per policy N2 paragraph 2. We believe that site allocations aren't compliant with NPPF policy. To adhere to national policy, the council's biodiversity duty and the objectives of the LNRS, we recommend additional evidence is provided to demonstrate that no less damaging alternatives exist, compensatory habitat is deliverable, appropriate and adequate to address the overall housing allocation impacts, mitigation land is secured before impacts occur to demonstrate that these allocations are justified and effective. We also recommend Havant council set 20% BNG requirements for their site allocations and undertake a viability assessment to justify deliverability.

The plan acknowledges that many allocations affect Solent Wader and Brent Goose sites, SINCs, Local Nature Recovery Strategy opportunity areas, Bechstein's bat habitat, protected landscapes, floodplain and watercourse corridors. Examples include Allocation 23 Campdown, Allocation 6 Land East of Castle Avenue, Allocation 3 Horse's Field, Allocation 12 Portsmouth Water HQ and Allocation 13 Cabbagefield Row. In several cases the allocations require mitigation, habitat creation and compensatory habitat, rather than requiring avoidance first.

Allocation 23: Campdown is of strongest concern, as the allocation identifies Solent Wader and Brent Goose sites H02A, H106, H113, H125 and H02B; land of particular importance for Curlew; two SINCs; ancient woodland nearby; protected species including Bechstein's bat; LNRS habitat restoration opportunities and proposes 590 dwellings. The policy relies heavily on mitigation, habitat creation and compensatory habitat. However, we have concern over why a site of such ecological importance for has been allocated. This information raises concerns over the soundness of this allocation.

Allocation 6 Land East of Castle Avenue, is specifically identified as a Solent Wader and Brent Goose candidate site (H19); an LNRS grassland opportunity area; habitat with protected species interest. **Allocation 12 Portsmouth Water Headquarters,** whilst brownfield, contains a Brent Goose candidate site (H11); Brockhampton Spring; LNRS habitat opportunities for grassland/wet grassland and for protecting groundwater sources; protected trees; ecological interest associated with water features. Both **Allocation 6 Land East of Castle Avenue** and **Allocation 12 Portsmouth Water Headquarters** state to "Provide suitable mitigation for the loss of a Solent Wader and Brent Goose Strategy site". The plan appears in places to move straight to mitigation or compensation for habitat loss without demonstrating that avoidance has been exhausted. The policy should first demonstrate why loss is unavoidable before defaulting to mitigation.

Allocation 3: Horse's Field is of concern due to the cumulative impact. Whilst the site is only 85 dwellings, it sits immediately adjacent to a concentration of sensitive assets including Chichester Harbour National Landscape; Brent Goose sites adjacent; Brook Farm SINC adjacent; Conigar Point Meadows SINC adjacent; estuary buffer zone; significant archaeological interest. The policy relies on buffers and mitigation but does not adequately demonstrate that development in this location contributes positively to nature recovery.

Due to these conflicts in development, the mitigation hierarchy and nature recovery objectives, we do not believe the plan is justified because it allocates development on ecologically important sites whilst relying on future mitigation rather than demonstrating that less harmful alternatives are unavailable. There is also inadequate evidence from a Habitats Regulations Assessment for impacts on these ecologically sensitive sites and any in-combination effects. In addition, we recommend Havant council set 20% BNG requirements for their site allocations and undertake a viability assessment to justify deliverability.
The plan is not sound unless it is strengthened to demonstrate that the mitigation hierarchy has been applied at the plan making and site selection stage with avoidance considered before mitigation and compensation.

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For all major allocations the Trust requests additional wording requiring:

Nature recovery
Development shall contribute to the enhancement, restoration and expansion of the Local Ecological Network and identified LNRS priorities.

Biodiversity Net Gain
20% Biodiversity Net Gain shall be delivered wherever possible, especially where development proposals are on greenfield sites or areas identified within the LNRS.

Mitigation hierarchy
Applicants must demonstrate application of the mitigation hierarchy by avoiding impacts before minimising, restoring and compensating.

Green Infrastructure
Strategic green and blue infrastructure shall form the primary structure of development layouts.

Access to Nature
Development shall provide accessible nature-rich greenspace connected to wider ecological networks.

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. I also ask that you keep the Trust informed of the progress and outcome of this plan.

Kind regards,
Niaṁ Tickner
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