Hampshire & Isle of Wight Wildlife Trust

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Hampshire & Isle of Wight Wildlife Trust Response to Rushmoor Borough Council Local Plan Scoping Consultation

Hampshire & Isle of Wight Wildlife Trust welcomes the opportunity to respond to Rushmoor Borough Council's Local Plan Scoping Consultation.

The Trust is an independent charity founded in 1961 and part of The Wildlife Trusts movement. Locally, we have more than 29,500 members and manage around 5,000 hectares of land for wildlife across Hampshire and the Isle of Wight.

We have been a key partner in the development of the Hampshire and Isle of Wight Local Nature Recovery Strategies (LNRSs), providing ecological evidence, mapping opportunities for nature-based solutions and supporting community engagement. We are now helping to drive implementation through local restoration projects, partnership working and ambitious place-based programmes. Our Wilder 2030 strategy can be found here: https://www.hiwwt.org.uk/our-strategy.

Nature recovery should be a central strategic priority within the Rushmoor Local Plan. It should be embedded throughout the plan's vision, objectives, spatial strategy, site allocations and development management policies, helping to meet housing, infrastructure and economic needs while strengthening climate resilience, public health, ecological networks and local prosperity.

Strategic Planning Context
Planning is one of the most important tools available to shape the future of places and communities. To achieve truly sustainable development, nature must be recognised as critical infrastructure that underpins healthy communities, climate resilience, economic prosperity and quality of life.

The preparation of a new Local Plan comes at a pivotal time, alongside Local Government Reorganisation, planning reform, devolution and the implementation of Local Nature Recovery Strategies. Together, these changes create a significant opportunity to align growth with environmental capacity, ensuring that development contributes positively to nature recovery and long-term resilience across Hampshire and the Solent.

We are keen to work constructively with Rushmoor Borough Council throughout the plan-making process by providing ecological expertise, supporting stakeholder engagement and helping to identify practical solutions that deliver benefits for both people and nature.

A strong Local Plan should treat nature recovery and climate resilience as cross-cutting themes that underpin housing, health, economic growth, transport, heritage and infrastructure. The following recommendations seek to embed these principles consistently across the proposed strategic priorities.

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Housing
Housing should do more than meet quantitative need. Well-designed neighbourhoods can improve health and wellbeing, support climate resilience and contribute to nature recovery. Embedding green and blue infrastructure into new development from the outset will help create places that are healthier, more attractive and more resilient for current and future generations.

We recommend the following additional priorities:

- To direct housing away from LNRS APIB and ACB areas, avoiding nature-rich and biodiverse areas to allow for nature's recovery in alignment with the Government's 30x30 commitments.
- For housing to follow the mitigation hierarchy to safeguard habitats and species from impact with a primary objective of avoidance, followed by mitigation then compensation as a last resort.
- To ensure that new housing development delivers nature-positive, climate-resilient neighbourhoods through the integration of green and blue infrastructure, urban greening, sustainable drainage, tree planting and measures that support biodiversity and healthy living.
- To locate and design new housing so that residents have access to high-quality natural green spaces, active travel routes and connected green and blue infrastructure networks, supporting access to nature and outdoor recreation opportunities.

Economy and Employment
A healthy natural environment is fundamental to a thriving economy. Nature supports workforce wellbeing, attracts investment, provides opportunities for innovation and underpins the transition to a low-carbon economy. The Local Plan should recognise these links and support economic growth that is environmentally sustainable and resilient.

We recommend the following additional priorities:

- To support the growth of the green economy, including low-carbon industries, nature-based solutions, ecosystem services, environmental technologies and skills that contribute to climate resilience and nature recovery.
- To ensure employment areas and business parks incorporate green and blue infrastructure, urban greening and climate adaptation measures that create attractive, healthy and resilient places to work.
- To encourage businesses and development that contribute positively to environmental sustainability, biodiversity enhancement and the transition to a net zero and climate-resilient economy.

Town and District Centres and Local Shops
Town centres play an important role in supporting economic vitality and community wellbeing. Integrating nature into urban environments can improve air quality, reduce urban heat, encourage healthier lifestyles and create more attractive places to live, work and visit.

We recommend the following additional priorities:

- To 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.
- To create attractive, climate-resilient centres that encourage people to spend time, work, visit and live in them, whilst supporting health, wellbeing and access to nature.

Heritage
Historic and natural environments are often closely connected. Parks, landscapes, woodland and other green spaces contribute significantly to local character, biodiversity and climate resilience. The Local Plan should seek outcomes that benefit both heritage and nature.

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We recommend the following additional priorities:

- To recognise and enhance the contribution of historic landscapes, parks, woodland and green spaces to the borough's natural environment, climate resilience and local character.
- To secure positive outcomes for both heritage and nature through the sensitive management, restoration and reuse of historic assets and landscapes.

Natural Environment

The natural environment should be recognised as a strategic asset that supports the borough's environmental, social and economic objectives. The Local Plan should move beyond protecting important assets and actively support the recovery, restoration and expansion of nature across Rushmoor.

We recommend the following additional priorities:

- To support the recovery of nature through the enhancement, restoration and creation of habitats, contributing to the Local Nature Recovery Strategy and a connected Nature Recovery Network.
- To recognise nature as critical infrastructure that supports climate resilience, health and wellbeing, economic prosperity and the delivery of sustainable communities.
- To achieve measurable improvements in biodiversity and ecological connectivity that go beyond mitigating harm and seek to restore nature across the borough.

We also recommend strengthening Priority 1 as follows:

- To protect, enhance and expand the borough's natural environment and green and blue infrastructure through the creation of a connected Nature Recovery Network and multifunctional greenspace.

Infrastructure and Community Facilities

This section provides an important opportunity to recognise green and blue infrastructure as essential infrastructure. Nature-rich spaces deliver a wide range of benefits, including flood management, climate adaptation, recreation, health and wellbeing, and should be planned, funded and managed alongside other forms of infrastructure.

We recommend the following additional priorities:

- To recognise green and blue infrastructure as essential infrastructure and secure its protection, enhancement and long-term management alongside other infrastructure requirements.
- To improve access to high-quality natural green spaces, waterways and multifunctional green infrastructure for all communities.
- To ensure infrastructure delivery contributes to nature recovery, climate resilience, flood mitigation and improved health outcomes.

We recommend strengthening Priority 4 as follows:

- To protect, enhance and expand existing open space, sport and recreation facilities, natural green spaces, playing fields and children's play spaces, and prevent their unnecessary loss.

Climate Change and Flooding

Nature-based solutions will be critical to addressing the climate and ecological emergencies. The Local Plan should ensure that climate adaptation, flood resilience and nature recovery are delivered together through integrated and multifunctional approaches.

We recommend the following additional priorities:

- To maximise the role of nature-based solutions in adapting to climate change, including habitat creation, urban greening, river restoration, sustainable drainage and increased tree canopy cover.

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- To ensure development contributes to both climate resilience and nature recovery by delivering multifunctional green and blue infrastructure that provides biodiversity, cooling, carbon storage and flood management benefits.
- To increase the resilience of communities, infrastructure and ecosystems to the impacts of climate change, including extreme heat, drought and flooding.

Additional Strategic Recommendations
In addition to the proposed priorities above, we recommend the following strategic measures to strengthen the Local Plan's contribution to nature recovery, climate resilience and sustainable development. These recommendations will help ensure the plan is future-proofed, aligned with national and regional policy, and capable of delivering lasting environmental and community benefits.

1. **Nature Recovery and Spatial Strategy**

Make Nature Recovery a Strategic Objective of the Local Plan
The Local Plan should include nature recovery as a strategic objective and use the Hampshire Local Nature Recovery Strategy (LNRS) as a core spatial framework for plan-making, site selection and development management.

This will help the Council meet its biodiversity duty, support delivery of Biodiversity Net Gain, avoid harm to priority habitats and strengthen ecological connectivity across Rushmoor and neighbouring authority areas. It will also help align the Local Plan with wider strategic planning, including emerging Spatial Development Strategies for Hampshire and the Solent.

The guiding principle should be that development gives back more to nature than it takes away.
Nature-based solutions should be embedded throughout the Local Plan, ensuring they contribute to:

- Adapting to the impacts of climate change.
- Preventing the loss of biodiversity and protecting natural capital.
- Improving health and wellbeing and reducing health inequalities.
- Building stronger and more resilient communities.

Support Delivery of 30x30 and the Nature Recovery Network
The UK has committed to protect and conserve at least 30% of land and sea for nature by 2030 and to halt the decline of species abundance by 2030. Local Plans are an important mechanism for translating these national commitments into local delivery.

Rushmoor should set clear, measurable targets for nature recovery and report progress transparently, including the proportion of land protected and managed for nature. Current LG Inform data indicates that 12.1% of Rushmoor's total land area is protected, including Green Belt land. The Local Plan should set out how this will increase and how LNRS priorities will be delivered.

The Hampshire LNRS identifies Areas of Particular Importance for Biodiversity (APIB) and Areas that Could Become of Particular Importance for Biodiversity (ACB). These should directly inform the spatial strategy, site allocations and mitigation requirements.

Use the LNRS to Guide Development and Avoid Harm
The Nature Recovery Network is based on the Lawton principles of making habitats bigger, better, more numerous and more joined up. Rushmoor's Local Plan should strengthen ecological networks both within the borough and across administrative boundaries.

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Development should be directed away from APIB areas. Development affecting ACB areas should only be considered where it avoids undermining LNRS objectives and delivers enhanced mitigation, including higher Biodiversity Net Gain and high-quality green infrastructure.

Plan Strategically Across Boundaries
The Local Plan should support a coherent cross-boundary approach to nature recovery, climate resilience, river catchments, nutrient neutrality, coastal systems and green and blue infrastructure.

We recommend that Rushmoor works with neighbouring authorities, Hampshire County Council, the Hampshire and Solent Combined County Authority and environmental partners to ensure future strategic planning aligns growth with environmental capacity and LNRS priorities.

2. Reflect the Council's Biodiversity Duty Through Strong Nature-Based Policies
The Local Plan should translate the Council's biodiversity duty into clear, deliverable policy requirements. These should be robust, measurable and capable of monitoring and reporting, while going beyond minimum national requirements where local evidence justifies higher ambition.

Biodiversity
Policy should protect and enhance designated and non-designated wildlife sites, embed the mitigation hierarchy, safeguard protected species and require development to contribute to the LNRS and wider Nature Recovery Network.

Biodiversity Net Gain
The Local Plan should encourage, and where justified by evidence require, Biodiversity Net Gain above the statutory 10% minimum.

We recommend that Rushmoor assesses the viability of a minimum 20% BNG requirement, particularly for strategic sites and development affecting LNRS opportunity areas.

A higher BNG target would better reflect the scale of the ecological crisis, support the Council's biodiversity duty and help ensure development contributes meaningfully to nature recovery rather than simply meeting a minimum threshold.

Rushmoor should also ensure that BNG delivery is secured, monitored and enforced effectively over the long term, with preference given to measures that align with LNRS priorities and deliver multiple benefits for people and nature.

Green and Blue Infrastructure
The Local Plan should include a strong green and blue infrastructure policy that supports biodiversity, climate adaptation, flood resilience, water management, public health and access to nature.

New development should provide high-quality, multifunctional green infrastructure designed from the outset rather than added as residual landscaping. Existing communities should also benefit from improved access to nature-rich spaces.

We recommend that the Council uses Building with Nature, or an equivalent local standard, to secure consistent quality across wellbeing, biodiversity and water outcomes.

Nutrient Neutrality
Policy should prioritise nutrient mitigation schemes that also deliver wider environmental benefits. Where possible, nutrient neutrality, Biodiversity Net Gain and habitat creation should be integrated and aligned with LNRS priorities.

The Trust is experienced in delivering nitrates mitigation and wider nature-based solutions and would welcome further discussion with the Council on delivery opportunities.

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Water and water efficiency
Water scarcity is a growing strategic risk. Development should anticipate water demand and supply and effectively mitigate impacts favouring ambitious nature-based solutions that deliver multiple benefits, including flood mitigation, nutrient neutrality, nature recovery and climate resilience.

The Local Plan should require ambitious water efficiency standards for new development, particularly given water stress across much of southern England. We recommend that the Local Plan includes a target of 90 litres per person per day or less for new homes, supported by water reuse, sustainable drainage and nature-based approaches to water management.

Recreational Disturbance
The Local Plan should include clear policy 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.

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.

Key Recommendations

- Include nature recovery as a strategic priority within the Local Plan vision, objectives and spatial strategy.
- Commit to increasing the area of land protected and managed for nature, contributing to the national 30x30 target and the objective to halt nature's decline by 2030.
- Use the Hampshire LNRS, including APIB and ACB mapping, to inform the spatial strategy, site allocations and mitigation priorities.
- Run a Call for Nature Sites alongside any Call for Sites to identify local opportunities for restoration, protection and community-led nature recovery.
- Avoid allocating development in APIB areas and apply a strong nature-positive test to any proposals affecting ACB areas.
- Require high-quality design standards, such as Building with Nature or an equivalent Council standard, where development interacts with strategic nature recovery opportunities.
- Strengthen ecological connectivity across Rushmoor and neighbouring authority areas to support a coherent Nature Recovery Network.
- Reflect the Council's biodiversity duty through strong policies, raising the ambition beyond minimum requirements on nature recovery, Biodiversity Net Gain, green and blue infrastructure, nutrient neutrality, water efficiency and recreational disturbance.

We welcome the opportunity to continue working with Rushmoor Borough Council as the Local Plan progresses. Through our ecological expertise, restoration experience and extensive community networks, we can help identify practical opportunities for nature recovery, Biodiversity Net Gain, nutrient neutrality and wider nature-based solutions.

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We would also be pleased to support community engagement activities, including a Call for Nature Sites and other approaches that help identify locations of ecological, environmental and community value.

We look forward to continuing constructive dialogue with the Council and would welcome the opportunity to discuss how the Trust can help deliver a nature-positive, climate-resilient and sustainable Local Plan for Rushmoor.

For more information, please contact:

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