Hampshire & Isle of Wight Wildlife Trust

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Consultation response re: Southampton City Council Local Plan Strategic Environmental Assessment / Sustainability Appraisal Scoping Report

Hampshire & Isle of Wight Wildlife Trust welcomes the opportunity to respond to Southampton City 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.

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.

In order to align with this ambition and with the UK's endorsement of the Kunming-Montreal Global Biodiversity Framework, we call on Southampton City 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.

Southampton City Council declared a climate emergency in 2019 and a Rights of Rivers motion in 2025. 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

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creating high quality, sustainable places, delivering homes and supporting growth. Achieving these development principles will require nature at its core, which is supported by evidence, best practice and national policies.

Hampshire & Isle of Wight Wildlife Trust's position is that nature should be recognised as critical infrastructure that underpins housing delivery, economic prosperity, public health, water security, climate resilience and community wellbeing. Environmental capacity, natural capital and ecosystem resilience should be considered before preferred growth options are selected, rather than being addressed retrospectively through mitigation. Nature recovery should be a central strategic priority within the Southampton's Local Plan, embedded throughout the plan's vision, objectives, spatial strategy, site allocations and development management policies. Rather than nature seen as a barrier to development, it must be recognised as the foundation upon sustainable development which successful and resilient communities depend. Such an approach would better reflect the reality that environmental decline, water stress, flooding, habitat loss and climate impacts are not separate environmental concerns but interconnected with growth and development.

The Trust recommends that the SA/SEA Framework adopts the principles of a Natural Capital Framework, whereby an infrastructure and natural capital-led growth approach, it applied, complementary to the Hampshire Local Nature Recovery Strategy. This would provide an overarching framework through which environmental capacity, natural capital, ecosystem resilience, water security, climate adaptation and nature recovery can be considered alongside conventional infrastructure requirements when assessing strategic options, site allocations and development policies.

Such an approach would not require the creation of additional SA/SEA objectives. Rather, it would strengthen the application of existing objectives and improve the framework's ability to assess whether growth can be accommodated sustainably within the capacity of both natural and built systems. This would help ensure that housing and employment growth contribute positively to nature recovery, climate resilience, healthy communities and long-term economic prosperity.

SA/SEA themes

The Trust welcomes the SA/SEA themes: Historic environment; Economic factors; Soil; Green infrastructure and ecosystems services; Landscape and townscape Health; Accessibility and transportation; Housing; Air quality; Material assets; Biodiversity and geodiversity; Population and quality of life; Climate change and Water. However, the Trust recommends that greater measures are in place to incorporate nature as critical infrastructure that underpins and interrelates with each of the SA/SEA.

Across the SA/SEA themes, the Trust recognises that nature recovery, natural capital, resource security and environmental limits are missing or underrepresented.

1. **Nature recovery and natural capital**

The Trust wants to see councils embed nature's recovery as part of the core objectives and ambitions of local plans.

Would like to see the following targets embedded within local plans:

- Manage and protect 30% of land for nature's recovery by 2030, in line with international commitments
- Halt the decline of nature by 2030

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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.

NPPF paragraph 3 states that planning decisions must reflect international obligations, so we would welcome Southampton City Council in joining this ambition and putting in place a clear target for nature's recovery by 2030 backed by mapping and appropriate policy mechanisms to ensure that the state of nature is turned around and wildlife starts to recover during this decade.

Nature recovery is a strategic outcome that cuts across all SA/SEA themes and natural capital should be recognised for the multiple benefits it offers whilst delivering against objectives for multifunctional use of land. Nature is critical and strategic infrastructure that underpins housing delivery, economic prosperity, public health, water security, climate resilience and community wellbeing. Nature's recovery and the multiple cross-cutting benefits of natural capital should be recognised beyond a subset of biodiversity and geodiversity and green infrastructure & ecosystems services. Policy needs to move beyond protection towards active recovery and enhancement.

Nature recovery and natural capital are distinct from biodiversity, green infrastructure and ecosystem services because they underpin each theme. Nature is economic infrastructure, ecosystems underpin prosperity, environmental assets support housing, transport, health and growth. Nature recovery focuses on restoring ecological function, increasing habitat extent, quality and connectivity, delivering Local Nature Recovery Strategies and achieving measurable recovery of species and ecosystems that in turn support enhanced biodiversity, green infrastructure and ecosystem services, alongside delivering multiple benefits across themes, as detailed below.

Historic environment
Natural England identifies what the historic environment can offer for nature recovery objectives, providing case 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. [1]

Economic factors
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[2] and, as outlined in Natural England's strategy, Recovering Nature for Growth, Health and Security 2025,[3] nature is critical infrastructure and the vital foundation upon which economic prosperity depends. This reflects the findings of the 2021, Dasgupta Review[4] that economies, livelihoods and wellbeing depend upon nature and that economic prosperity is embedded within nature. We recommend that Southampton City Council includes this rhetoric to convey the evidence and importance of nature-positive growth and a planning system that drives nature recovery, places value on

[1] https://historicengland.org.uk/content/docs/advice/nature-recovery-historic-environment/

[2] https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalaccounts/2025/pdf

[3] https://www.gov.uk/government/publications/natural-englands-strategy-recovering-nature-for-growth-health-and-security/natural-englands-strategy-recovering-nature-for-growth-health-and-security

[4] https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review

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natural capital as critical infrastructure, alongside housing and economic development within environmental limits.

Soil
Healthy soils are fundamental natural capital, supporting nature recovery, climate resilience and ecosystem services. This relationship is also mutually reinforcing, healthy soils sustain habitats, species and ecological connectivity, while nature-rich habitats improve soil structure, fertility and nutrient cycling. Degraded soils increase biodiversity loss, pollution and flood risk, whereas healthy soils regulate water, store carbon and filter pollutants. The Local Plan should therefore recognise soil as part of natural capital and critical natural infrastructure for biodiversity, climate adaptation, water management, food production and wider ecosystem services.

Green infrastructure and ecosystems services
Nature recovery and natural capital underpin green and blue infrastructure. They connect habitats and provide essential services while strategic delivery through the LNRS strengthens ecological resilience.

Landscape and townscape
Nature recovery and natural capital underpin resilient landscapes and townscapes. Restoring habitats and ecological connectivity strengthens local character, climate resilience, multifunctional land use and access to nature.

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[5], an estimated £6.2–£8.4bn health benefits from recreation[6] and 20m people who gain health benefits from nature annually.[7] 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.
Extensive evidence indicates contact with nature is associated with good social, mental, and physical health. These potential benefits include favourable pregnancy outcomes and improve mental health to reduced risks of cardiometabolic and neurodegenerative diseases in older adults[8]. 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.

Accessibility and transportation
Green corridors can support walking and cycling promoting active travel, alongside ecological connectivity, enhancing natural capital alongside delivering nature recovery objectives set out in the LNRS.

Housing
Nature-positive housing should be planned within environmental limits, with green infrastructure, ecological connectivity and strategic biodiversity gains helping to create healthy, climate-resilient places.

[5] https://sustainablehealthcare.org.uk/activity/nhs-forest/

[6] https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/healthbenefitsfromrecreationnaturalcapitaluk/2022

[7] https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalaccounts/2024

[8] https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(23)00025-6/fulltext

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Protecting and enhancing natural capital also supports water management, cooling and residents' wellbeing.

Air quality
Healthy ecosystems improve air quality by capturing pollutants, reducing dust and cooling urban areas. Nature recovery and investment in natural capital should therefore form part of an integrated approach to cleaner air and climate resilience.

Material assets
Natural capital should be recognised as strategic and critical infrastructure alongside traditionally recognised built infrastructure because of the essential services nature proves across health, the economy, resilient communities and climate resilience. Maintaining and restoring this natural capital reduces infrastructure pressures and supports long-term resource security.

Biodiversity and geodiversity
This theme should move beyond avoiding harm to actively restoring habitats, species and ecological networks in line with Local Nature Recovery Strategy priorities. Biodiversity is both a core component of natural capital and the foundation of resilient ecosystem services.

Population and quality of life
Access to healthy, nature-rich places supports physical and mental health, community cohesion and quality of life. Nature recovery can also reduce inequalities by improving access to green space and the benefits provided by natural capital.

Climate change
Restored ecosystems help mitigate and adapt to climate change by storing carbon, reducing flood risk, cooling urban areas and strengthening resilience to drought and extreme weather. Protecting natural capital is therefore essential to both emissions' reduction and climate adaptation.

Water
Healthy catchments, wetlands, rivers and soils regulate water flow, improve water quality and increase resilience to flood and drought. Nature recovery protects this natural capital, while water security is fundamental to functioning ecosystems and sustainable growth.

2. Resource security and environmental limits

The Local Plan evidence base should appropriately address natural capital, water resilience, nature recovery and climate adaptation within its growth plans, Sustainability Appraisal and Strategic Environmental Assessment. A Natural Capital Framework has the potential to provide a shared strategic evidence base linking the emerging Spatial Development Strategy (SDS), Local Plans, infrastructure planning and the Hampshire Local Nature Recovery Strategy (LNRS). Such a framework should complement, rather than duplicate, the Hampshire Local Nature Recovery Strategy (LNRS). Whilst the LNRS identifies priorities and opportunities for nature recovery, a Natural Capital Framework could provide a broader assessment of the natural assets, nature-based solutions/ ecosystem services and environmental systems upon which communities and sustainable development depend, such as water availability, energy demand, long-term environmental carrying capacity and development pressures such as data centres. This would enable natural capital to be considered alongside more conventional infrastructure requirements when assessing the suitability and sustainability of growth options.

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Development should be towards locations where sufficient built infrastructure, environmental capacity, natural capital resilience and ecosystem functionality can be demonstrated, whilst avoiding or reducing growth pressures in locations where critical natural assets, ecological networks, water resources or environmental systems are already constrained or would be significantly harmed. This should include consideration of:

- Water availability and long-term water security;
- Wastewater treatment and environmental capacity;
- Flood risk, drainage and catchment resilience;
- Access to nature re: recreation, transport, health and education infrastructure;
- Biodiversity, ecological connectivity and habitat networks;
- Landscape character and natural capital assets;
- Climate adaptation and resilience;
- Carbon sequestration and wider nature-based solutions and ecosystem services.

In summary, housing and employment growth should be directed towards locations where sufficient built and natural infrastructure capacity and environmental resilience can be demonstrated. Growth should be aligned with the capacity of both natural and built systems to support sustainable development, ensuring that new housing and employment contribute positively to nature recovery, climate resilience, healthy communities and long-term economic prosperity.

SA/ SEA objectives

The proposed SEA framework does not adequately assess whether the Local Plan contributes to nature recovery, natural capital, resource security, and environmental limits. Hampshire & Isle of Wight Wildlife Trust recommends strengthening the objectives to reflect these priority areas.

Whilst Objective 8 references biodiversity and green infrastructure, the objectives as a whole do not adequately reflect the role of nature recovery, natural capital, and nature as strategic infrastructure in delivering sustainable development within environmental limits. The framework should recognise that healthy ecosystems are foundational assets which support climate resilience, resource security, economic prosperity, public health and environmental quality. Nature should therefore be treated as a cross-cutting consideration throughout the assessment framework, rather than being confined primarily to biodiversity objectives. In particular:

- **Objective 3** should refer to conserving, enhancing and restoring landscapes, ecological networks and natural capital assets, recognising their contribution to nature recovery, climate resilience and place-making.
- **Objective 6** should explicitly support climate mitigation and resilience referencing nature-based solutions such as natural flood management, sustainable drainage, urban cooling, coastal adaptation, drought resilience and water security.
- **Objective 8** should move beyond conservation to explicitly promote nature recovery through habitat restoration, creation and connectivity, alongside delivery of Local Nature Recovery Strategy priorities.

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- **Objective 9** should recognise natural capital and environmental limits ensuring development remains within environmental carrying capacity and supports the sustainable management and recovery of water, land and ecosystem assets.
- **Objective 10** should acknowledge that nature and natural capital are strategic economic assets, and that long-term prosperity depends upon resilient ecosystems, resource security and development operating within environmental limits.
- **Objective 12** should recognise the contribution of nature to physical and mental health, climate resilience, access to green space and overall quality of life.

Collectively, these changes would provide a more robust framework for assessing whether growth can be accommodated within environmental limits whilst securing nature recovery, climate resilience and long-term resource security.

A Natural Capital Framework delivering infrastructure and natural capital-led growth across the SA/SEA objectives would provide a stronger framework for securing the multiple benefits that nature delivers for people, places and the economy. Nature should be recognised within the objectives as strategic infrastructure, alongside other essential forms of infrastructure, reflecting its critical role in enabling sustainable growth within environmental limits and delivering long-term environmental, social and economic outcomes.

This approach would assess not only the avoidance of environmental harm, but also the extent to which policies and proposals contribute to nature recovery, ecological connectivity, habitat enhancement and the delivery of Local Nature Recovery Strategy priorities. It would identify whether the scale and location of development are compatible with environmental capacity, natural capital, water availability and ecosystem resilience. It would evaluate the contribution of policies and proposals towards climate resilience and adaptation, including resilience to flooding, drought, overheating and other climate-related risks. Additionally, it would recognise the role of healthy ecosystems in delivering multiple environmental, social and economic benefits, including public health, economic resilience, water security, carbon storage and community wellbeing. The Trust recommends that Southampton City Council's SA/SEA adopts an approach where growth is delivered within environmental limits, assessing the essential services nature provides across themes as critical infrastructure.

Key principles of the assessment approach

2.1.6 Baseline assessments

The council should undertake or incorporate a natural capital assessment to better understand ecosystem service provision and environmental capacity to economic prosperity, climate resilience, public health and quality of life and include this within the baseline assessments.

2.5. Mitigation Measures

The NPPF policy N1 paragraph 1.c. states the 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. To adhere to national policy, the council's biodiversity duty and the objectives of the LNRS, we recommend evidence is provided to demonstrate that no less damaging alternatives exist to site allocations, compensatory habitat is deliverable, mitigation land is secured before impacts occur to demonstrate that allocations are justified and effective.

The Trust recommends that in order to invest in nature as critical infrastructure and meaningfully mitigate against harm, Southampton City Council should set 20% BNG requirements for their site allocations and

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undertake a viability assessment to justify deliverability. The NPPF states that higher than 10% statutory requirement cannot be a blanket policy but can apply to specific allocations. We therefore recommend that any allocations in the Local Plan deliver 20% BNG and that all development is required to deliver maximum gains for biodiversity.

Kent County Council has undertaken a viability assessment for 20% BNG across all developments.[9] 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.[10] 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.[11]

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.

3.1. Receptor Themes

The Trust welcomes the recognition of health and green infrastructure as cross-cutting receptor themes. Although the proposed themes broadly reflect Schedule 2 of the SEA Regulations, the framework remains focused on protecting environmental assets rather than enabling nature recovery or assessing natural capital, nature as critical infrastructure and environmental limits. The framework should be strengthened to address these priorities.

The SA/SEA should recognise nature and natural capital as critical infrastructure underpinning every strategic theme and as the foundation of sustainable development and growth. It should assess how

[9] https://kentnature.org.uk/wp-content/uploads/2022/07/Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf

[10] https://legacy.greenfinanceinstitute.com/wp-content/uploads/2024/07/GFI-BNG-ROADMAP.pdf

[11] https://intercom.help/joes-blooms/en/articles/9281447-lpa-guide-guildford

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policies support nature recovery, resilient ecosystems secure water and resources, climate resilience, public health, community resilience and economic outcomes. A Natural Capital Framework applied alongside the LNRS would support infrastructure- and natural capital-led growth across the SEA framework.

The assessment criteria should therefore consider how policies and proposals address the below as part of the social, economic and environmental objectives of sustainable development:

- Water availability and long-term water security;
- Wastewater treatment and environmental capacity;
- Flood risk, drainage and catchment resilience;
- Access to nature re: recreation, tourism, transport, health and education infrastructure;
- Biodiversity, ecological connectivity and habitat networks;
- Landscape character and natural capital assets;
- Climate adaptation and resilience;
- Carbon sequestration and wider nature-based solutions and ecosystem services.

Section 4 Key sustainability issues

The identified sustainability issues are currently framed largely around the protection of environmental assets and the mitigation of adverse effects. Whilst these are important considerations, the framework would be strengthened by adopting a more ambitious approach that reflects the need for nature recovery, environmental resilience, resource security and sustainable growth within environmental limits. A natural capital and infrastructure-led approach would better recognise the role of natural assets in supporting economic prosperity, public health, climate adaptation, water security and quality of life. However, a natural capital approach alone is unlikely to fully capture the need for nature recovery and should therefore be complemented by explicit recognition of habitat restoration, ecological connectivity, ecosystem resilience and delivery of Local Nature Recovery Strategy (LNRS) priorities.

The framework should also recognise nature as critical infrastructure that underpins economic prosperity, climate resilience, public health, water security and community wellbeing. Sustainability issues should therefore consider not only the protection of environmental assets but the recovery and enhancement of the natural systems upon which sustainable development depends.

Historic Environment

The historic environment should not be considered in isolation from the natural environment, as many heritage assets are also natural assets too. Opportunities to enhance heritage assets through nature recovery, landscape restoration and multifunctional green infrastructure should be recognised. Nature-based solutions can contribute to the conservation of historic settings whilst delivering wider benefits for climate resilience, biodiversity and public wellbeing.

Natural England identifies what the historic environment can offer for nature recovery objectives, providing case 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

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networks, connecting people to nature and support actions taken to mitigate against climate change and improve soil, water and air quality. [12]

Economic Factors
The economic theme should better recognise nature as a strategic asset and critical infrastructure that underpins long-term prosperity. The economy is dependent upon healthy natural systems that support water security, food production, climate resilience and public health. Sustainability issues should therefore consider the economic costs of environmental degradation, the benefits of investing in nature recovery and nature-based solutions, and the need to ensure growth occurs within environmental capacity. Sustainability issues should also consider whether proposed levels of growth can be accommodated within environmental capacity, including water resources, wastewater infrastructure, ecosystem capacity and climate resilience. Economic growth should not be considered separately from the natural systems that support it.

Soil
The soil theme should place greater emphasis on soil health, restoration and resilience. Healthy soils are fundamental to nature recovery, carbon storage, flood management, food production and ecosystem function. Sustainability issues should recognise the links between soil degradation, biodiversity decline, nutrient pollution, climate change and development pressures.

Green Infrastructure and Ecosystem Services
Green infrastructure should be recognised as essential infrastructure and planned strategically alongside transport, water and other infrastructure networks, reflecting its role in supporting climate adaptation, biodiversity recovery, public health and sustainable growth. The Green Infrastructure theme should move beyond access and provision to recognise the full range of ecosystem services and natural capital benefits delivered by green infrastructure. This should include ecosystem services for climate resilience, including urban cooling, carbon sequestration, flood risk mitigation, drought and wildfire risk mitigation, air quality regulation and water regulation. The framework should also recognise the role of green infrastructure in delivering LNRS priorities, Biodiversity Net Gain, ecological connectivity and bolstering natural capital. Green corridors can support walking and cycling, while access to nature should be treated as preventative health infrastructure because of its benefits for physical and mental wellbeing.

Green infrastructure should deliver 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.

The Trust recommends using the Green Infrastructure Planning and Design Guide and 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[13].

An exemplary approach to green infrastructure would be the Building with Nature Standard[14], which brings together existing guidance and good practice to recognise high-quality quality green infrastructure where

[12] https://historicengland.org.uk/content/docs/advice/nature-recovery-historic-environment/

[13] https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Standards%20for%20England%20Summary%20v1.1.pdf

[14] https://sintali.com/about-building-with-nature

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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.

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.[15] 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.

Green infrastructure should 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 gains.
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.

Landscape and Townscape
The landscape theme should include the need for landscape-scale nature recovery, ecological network restoration and multifunctional land use. Landscapes should be recognised not only for their visual qualities but also for their role in supporting biodiversity, climate adaptation, natural flood management and ecosystem resilience.

Health
The health theme should place greater emphasis on nature as preventative health infrastructure. Access to high-quality natural environments is associated with improved physical health, mental wellbeing, active lifestyles and reduced health inequalities. Sustainability issues should therefore recognise both the health benefits of access to nature and the risks arising from unequal access to high-quality green space.

Accessibility and Transportation
The transport theme should better recognise the role of green infrastructure in supporting active travel and sustainable movement networks. Opportunities to integrate ecological corridors, green routes and nature-based solutions alongside transport infrastructure should be identified as sustainability considerations, delivering benefits for biodiversity, health and climate resilience.
Green corridors can support walking and cycling, while access to nature should be treated as preventative health infrastructure because of its benefits for physical and mental wellbeing.

Housing
The housing theme should recognise that growth must be planned within environmental limits and supported by sufficient natural and built infrastructure. Sustainability issues should consider water availability, wastewater treatment capacity, ecosystem capacity and the role of nature in creating healthy, resilient places. Greater emphasis should be placed on Building with Nature principles, strategic Biodiversity Net Gain delivery and alignment with LNRS priorities.

[15] https://www.unda.co.uk/news/green-suds-nature-based-drainage-in-modern-planning/

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Air Quality
The air quality theme would benefit from greater recognition of ecosystem services and nature-based solutions. Trees, habitats and green infrastructure can play an important role in regulating air quality, reducing urban heat and improving environmental conditions for communities.

Material Assets
The material assets theme should explicitly recognise natural capital as a material asset. Natural assets provide essential ecosystem services and infrastructure functions that support economic activity, climate resilience and community wellbeing. Consideration should also be given to the biodiversity value of previously developed land, recognising that some brownfield sites can support significant ecological interest.

Biodiversity and Geodiversity
The framework should recognise that, despite existing protections, many habitats and species remain in decline. Sustainability issues should therefore focus on addressing the nature recovery deficit through habitat restoration, ecological network recovery, improved habitat condition and delivery of LNRS priorities. Ecosystem resilience should be recognised as a sustainability issue, reflecting the need for ecological networks to follow the Lawton principles to be bigger, better, more numerous and joined up and resilient to support adaptation to climate change. The focus should move beyond biodiversity loss and protection towards addressing the wider nature recovery deficit. Sustainability issues should explicitly recognise

- fragmented ecological networks;
- declining habitat condition;
- ecosystem resilience;
- loss of ecosystem services;
- delivery of LNRS priorities;
- species recovery;
- pressures on internationally important sites and overwintering bird populations; and
- the role of nature as critical infrastructure supporting climate resilience, health, economic prosperity and environmental security.

As a trust we recognise chalk streams as irreplaceable habitats due to their globally rare, unique and irreplaceable features. Chalk streams are often referred to as ‘England’s rainforests’ because they support exceptionally rich, specialised and vibrant ecosystem, akin to a tropical rainforest’s biodiversity. The River Itchen and River Test are world-famous chalk streams; that’s ecological integrity should be safeguarded and protected.

The Council should first identify areas that must be avoided or safeguarded, including designated sites, irreplaceable habitats, LNRS Areas of Particular Importance for Biodiversity, ecological corridors, flood-risk areas and land needed for climate adaptation. The mitigation hierarchy should be applied at the plan-making and site-selection stages, with development directed to land of least environmental value. Appropriate buffers should protect the River Itchen, River Test and the Solent, nature reserves and local wildlife sites from direct and recreational impacts. Drought and wildfire risk areas should also be mapped

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and considered for habitat restoration and nature-based solutions that retain water, restore catchments and reduce climate risk.

Population and Quality of Life
The population theme should recognise inequalities in access to nature and the implications this can have for health, wellbeing and quality of life. Access to high-quality natural environments should be considered an essential component of healthy, resilient communities.

Climate Change
The climate change theme should place equal emphasis on mitigation, adaptation and resilience. Whilst reducing emissions is essential, the framework should also recognise increasing risks associated with flooding, drought, overheating, wildfire, sea level rise, coastal squeeze, water scarcity and ecosystem degradation. Delaying action will deepen environmental decline, increase future adaptation costs and reduce the capacity of natural systems to protect communities.

Nature recovery, natural capital and nature as critical strategic infrastructure should be referenced as key mechanisms for addressing climate challenges. Nature must therefore be protected and restored as critical infrastructure. Healthy soils, rivers, wetlands, woodlands, coastal habitats and connected green spaces store carbon, regulate water, cool urban areas, reduce flood and erosion risk, and provide refuges for wildlife as conditions change. Safeguarding this natural capital now will strengthen long-term resilience, protect essential services and help Southampton adapt safely and equitably to a changing climate.

Water
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.
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.[16] 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. [17]

Southampton's residents, businesses, precious water resources and freshwater habitats, such as chalk streams are already facing impacts of water stress in the area. Hampshire's drought conditions in 2026, stringent hosepipe bans due to critically low levels in the River Test and River Itchen, alongside the Non-Essential Use Bans (NEUBs) imposed by Southern Water, which restricted non-critical business water use demonstrates these impacts. As a result of climate change, hotter summers will continue to be the norm,

[16] https://irp.cdn-website.com/bdbb2d99/files/uploaded/Water%20Ready_A%20report%20to%20inform%20HM%20Government-s%20roadmap%20for%20water%20efficient%20new%20homes.pdf

[17] https://database.waterwise.org.uk/wp-content/uploads/2019/10/Advice-on-water-efficient-homes-for-England061118.pdf

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impacting on water resources and water stress in the area having a knock-on impact on businesses, essential services, communities and globally rare and irreplaceable freshwater habitats, such as chalk streams and the wildlife they support. As such, we recommend an ambitious target of 90 litres per person aiming for 80 litres by 2035 to support the social, economic and environmental benefits of water resources in the area.

Introducing water meters into homes can also help reduce household consumption, support companies detect leaks and save households money.[18] Southern Water loses an average of 91 million to 98.5 million litres of water every day through leaking pipes across its network[19]. The introduction of smart water meters and improvements to water infrastructure will also help reduce water stress in the area, further alleviating social and environmental pressures of water stress.

Sustainability issues should extend beyond flood risk and water infrastructure to recognise long-term water scarcity, competition between growth and environmental water requirements, drought resilience, chalk stream protection, wastewater treatment capacity, nutrient pollution, concentration of pollutants during drought conditions, catchment resilience; and the role of wetlands and nature-based solutions in water management.

The framework should recognise that continued population and housing growth will place increasing pressure on water resources and that growth must be aligned with long-term water supply resilience, environmental capacity and ecosystem requirements. Wastewater infrastructure should be delivered in step with development to avoid adverse impacts on rivers, streams and internationally important habitats. Overall, the sustainability issues and challenges should be strengthened to move beyond a traditional focus on environmental protection and impact mitigation towards a framework that actively supports nature recovery, climate resilience and sustainable growth within environmental limits. The current approach does not fully recognise the extent to which nature underpins economic prosperity, public health, climate adaptation, water security and community wellbeing, nor the growing evidence that healthy ecosystems function as essential infrastructure.

The Trust considers three overarching themes to be insufficiently reflected throughout the identified issues:

- Nature as critical infrastructure: nature should be recognised as an essential asset that supports climate resilience, water management, economic productivity, public health, food security and quality of life, rather than being considered solely as an environmental constraint.

- Environmental capacity and sustainable growth within limits: the framework should explicitly consider whether proposed levels of growth can be accommodated within environmental carrying capacity, including water availability, wastewater infrastructure, ecosystem resilience, climate risks and natural resource constraints. Growth should be planned within the limits of the natural systems upon which communities and the economy depend.

- The distinction between biodiversity protection and nature recovery: whilst biodiversity protection remains important, the framework should also recognise the need for active nature recovery through habitat restoration, ecological network enhancement, improved habitat condition, species recovery

[18] https://www.ofwat.gov.uk/households/supply-and-standards/leakage/

[19] https://www.hampshirelive.news/news/hampshire-news/southern-waters-response-successful-hosepipe-7500301

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and delivery of Hampshire Local Nature Recovery Strategy priorities. The challenge is not simply preventing further decline but reversing it.

To address these issues, the Council should consider adopting a Natural Capital Framework and an infrastructure and natural capital-led growth approach, complementary to the Hampshire Local Nature Recovery Strategy. Such an approach would provide an overarching framework through which environmental capacity, natural capital, ecosystem resilience, water security, climate adaptation and nature recovery can be considered alongside conventional infrastructure requirements when assessing strategic options, site allocations and development policies. This would help ensure that decisions are informed not only by the need to avoid harm, but also by opportunities to enhance natural capital, deliver nature-based solutions, strengthen ecological networks and secure long-term environmental resilience.

Ultimately, the Sustainability Appraisal/ Strategic Environmental Assessment should test whether the Local Plan can deliver growth that is supported by sufficient natural and built infrastructure, contributes to nature recovery, strengthens resilience to climate change and water scarcity, and leaves the natural environment in a measurably better state for future generations.

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 of this plan.

Kind regards,
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