

Date: 23 July 2026
Our ref: 549664
Your ref: Luton Local Plan – Scoping Consultation



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Dear Local Plans Team

Thank you for your consultation on the [Luton Local Plan Scoping Consultation](#), in your email of 28 May 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes this opportunity to provide comments. We have divided our response into four sections: Scoping Themes, Evidence Documents, Strategic Policies, and the Strategic Environmental Assessment (SEA) Scoping Report. Our advice below is focused on the highest priority matters within our statutory natural environment remit, including designated sites, water resources / quality and green infrastructure. Further general advice is provided in Annex A, whilst detailed air quality guidance is in Annex B, and examples relating to Biodiversity Net Gain is in Annex C.

Summary of Natural England's advice

Our advice below is focused on the following key considerations and evidence requirements for the preparation of the Luton Local Plan:

Application of the ecological mitigation hierarchy prioritising the avoidance of impacts on statutorily designated sites. Where impacts cannot be avoided the Plan must commit to setting robust strategic and site-specific policy requirements around the delivery of appropriate mitigation through development. This should include any measures required to address the adverse effects of increased recreational pressure.

An updated Green Infrastructure Strategy focused on up-to-date mapping of the existing ecological network and setting out clear options for delivery of enhancements through Plan development, aligned with nature recovery opportunities identified in the [LNRS](#) and Natural England's [Green Infrastructure Framework: Principles and Standards](#).

Inclusion of strategic policies on:

- Designated sites
- National Landscape
- Chilterns Beechwoods SAC / SANG
- Biodiversity Net Gain
- Green and Blue Infrastructure
- LNRS
- Water Quality and Resources and Flood Risk Management

Scoping Themes

We note that the Engagement Strategy indicates that Natural England will be consulted on the following themes:

- Mitigating the impact of development on Chilterns Beechwoods SAC
- Conservation and enhancement of the natural and historic environment including landscape and visual impact
- Green and Blue Infrastructure
- Flood risk
- Climate change mitigation and adaptation
- Provision of utilities infrastructure (including telecoms, wastewater capacity, water supply, energy)
- Provision of health infrastructure and local facilities
- Provision of security, community and cultural infrastructure and other local facilities (including burial capacity)
- Provision of infrastructure for transport
- Luton Airport and other airport/airspace impacts

We agree with these themes and most of our comments in this letter will align with the above.

Our general feedback on the relevant themes and questions:

Luton Context

- Question 1 Is there anything you consider important we have not mentioned about Luton and its surroundings?

Super National Nature Reserve (sNNR)

The Local Authority should be aware of the intent to declare a super National Nature Reserve within the North Chilterns. Whilst this has not been declared yet, the LPA should be mindful of plans within this area with the understanding that sNNR status would be a material planning consideration for any planning applications that are submitted within its boundary. Status-dependent, we would like to see reference to this within emerging policies, with a particular focus on partnership working and landscape-scale green space and green infrastructure linked to nature-driven growth in the area.

Vision and Objectives

- Question 2 What do you think of our draft Vision?

We welcome the mention of enhancing Luton's environmental assets, and that the vision includes accessible open space provision alongside the conservation and enhancement of natural and historic environments.

- Question 3 What do you think of our draft Objectives?

We particularly welcome that objectives refer both to the protection of the natural environment, and the enhancement opportunities that the Local Plan can bring. It is good to see the link between improving health and provision of new open space recognised, along with the objective to provide a linear park for the town, and to minimise pollution. We agree with the need to deliver well designed, resource efficient and climate resilient development with minimal impacts.

Strategy, and Providing Suitable and Sustainable homes

- Question 5 Do you have any views on what our future strategy should look like, where we should identify new sites for development and what factors and information we should consider?

In accordance with paragraph 188 of the NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SEA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

When assessing Site Allocations we would urge your authority to use Natural England's [Impact Risk Zones](#). These are available for your authority to download or view through www.magic.gov.uk, to identify where development may pose a potential risk to designated sites. Potential effects and mitigation measures to address adverse impacts should be addressed through the Strategic Environmental Assessment. The delivery of mitigation measures will need to be secured through relevant Plan policies.

Supporting Economic Development

- Question 20 Are there any Issues, Priorities or Options you think we have not considered in this Chapter?

We strongly recommend embedding climate sensitive, green, circular-economy practices in delivery of both employment and leisure initiatives within the town centre. Cross-referencing should be made between sustainable work and travel choices within Luton allowing active travel within and between employment sites. Employment spaces have the potential to deliver both green and blue infrastructure as well as integrate efficient water standards/infrastructure which will need to be considered as part of the Local Plan and HRA in-combination assessment to ensure impacts to environmental sites are avoided and/or mitigated.

Town Centre and Retail

- Question 24 How can Luton town centre be improved and what retail, leisure and employment opportunities should we encourage?

We acknowledge and welcome the strong sense of place that Luton has, particularly in regard to historic areas such as the Hat district. We encourage continued celebration of these areas and local character through sensitive design of retail, leisure and employment within the town centre, embedding greenspaces and green infrastructure within plans. With this in mind, we encourage your authority to consider connections to the wider landscape, sustainability and heritage as part of this theme i.e. ensuring greenspace within the centre is connected with green links (or blue links i.e. the River Lea) out into the countryside and other greenspaces. This can be done alongside habitat delivery to create thriving biodiverse corridors which will enhance the character of the area as well as provide ecosystem services.

Luton should continue working closely with local communities in development of these spaces. Showcasing local craftsmanship in key public spaces and buildings (through design of infrastructure/public artwork), as well as providing spaces for and promoting farmers markets to facilitate the sale of sustainable local produce is encouraged.

Linked to this, as well as providing space for and encouraging the development of farmer's markets, your authority could explore opportunities for establishing community farms or growing spaces alongside developments. This approach is gaining popularity in the Netherlands, see [Herenboeren | European Social Fund Plus](#).

Regarding enhancing unique local character/individual identities of towns, we advise using the National Character Areas (NCAs) to inform this theme of your local plan and also explore how heritage can link people to places. New developments could provide signage to help local residents engage with the history of their local area, including Historic Environment Record (HER) features.

Informing people of NCAs can also help them identify more with their local area and how the landscape makes it a unique place.

Daylighting of the River Lea

We welcome mention in paragraph 5.69 of proposals for the opening up of the River Lea and the establishment of a green corridor with waterside spaces across the town centre. Natural England would like to see reference within the Local Plan's policies to the ongoing works aimed at daylighting the River Lea. This is a live project closely linked to the Luton Nature Towns and Cities work as well as the North Chilterns Local Partnership with the aim to increase understanding of the importance of the river to local residents as well as improve its ecological status. It would be beneficial to highlight the importance of daylighting the river where developments have the opportunity to do so, with up-to-date mapping of current and future opportunities captured within the green and blue infrastructure study/evidence base.

Health and Wellbeing

- Question 27 What should we do to address deprivation and improve life outcomes in Luton and what health facilities are required?

We welcome that the Scoping Document has referenced health and wellbeing strategies and notes the area's key health priorities and inequalities.

The plan should highlight the wide range public health and wellbeing benefits of access to green and blue spaces and connection to nature. These include: mitigating urban heat and flood risk; improving air quality; providing opportunities for recreation and physical activity as well as social connection and cohesion; active travel routes; places for community activities, communal food growing and Green Social Prescribing; and fostering civic pride in public green spaces which are also of high nature value. The Local Authority could refer to [NEER030 A narrative review of reviews of nature exposure and human health and well-being in the UK - NEER030](#) and also to [People and Nature Survey Evidence from Natural England](#) which gathers evidence and trend data about people's access, understanding and enjoyment of nature and how it contributes to wellbeing.

We would recommend that the Local Authority continues to engage with a range of health-focused stakeholders, such as the [Luton Health and Nature Partnership](#), throughout the development of the plan, to maximise the public health benefits to be derived from Green and Blue infrastructure spatial planning.

Equitable access of public green spaces is a consideration of the local plan and we advise that this should also be factored into greenspace planning. The plan should reference targeting GI in areas of greatest need. These areas can be identified using Environmental Justice mapping or Indices of Multiple Deprivation (IMD) data. Specific tools to map Indices of Multiple Environmental Deprivation (IMED) and Environmental Equity Index (EEI) are provided on the [GI Framework](#). IMED maps cumulative environmental pressures (air pollution, flood risk, noise, green space, climate). EEI builds on IMED for urban areas, adding heat island effects, tree cover, health, and socio-economic data to identify locations where environmental, health and social pressures converge.

As part of equitable access to green space, the plan should seek to develop access to communal food growing opportunities through provision of allotments and community gardens or orchards. Opportunities for community food growing offer multiple benefits: promoting local sustainable food systems, healthy eating, physical activity, improving mental health and opportunities for social connection.

The plan should aim to develop more clarity on active travel routes and consider the multifunctional possibilities that they offer: for enhanced mobility, improving physical activity, reducing air pollution and as wildlife corridors and connections between green and blue space.

The Local Authority could embed, reference and utilise Natural England's [Green Infrastructure Principles](#) within the plan or strategy, for example, the Accessible Greenspace Standard, the Urban

Greening Factor and the Urban Tree Canopy Cover Standard by referring to chapter 2 of [Natural England Green Infrastructure Planning and Design Guide 2023](#).

- Question 29 How can we improve air quality and mitigate against poor air quality?

See the *Air quality impact study and Traffic modelling* topic of this letter, under the *Evidence Documents* section. Please also refer to Annex B - the first link, to NECR199, may be of relevance to this question.

Addressing and adapting to climate change

- Question 31 How can we adapt to and mitigate against the impacts of climate change? This includes flooding from rivers and rainfall and temperature extremes.

The strong consideration of Climate Change factors within the Scoping Document is welcomed. Tree canopy cover and Urban Greening can reduce the heat island effect and help with climate adaptation. We encourage your authority to consider opportunities for incorporating these greening measures into existing areas as well as new developments, as discussed during Nature Towns and Cities meetings with your authority.

In addition to agreeing with the suggested options relating to this question, we would also support the setting of water efficiency standards over and above current regulations – see our response to question 33.

- Question 32 How can the Local Plan help Luton be more resilient and adaptive to flood risk?

We welcome the opportunities identified in 5.125 and would support the options of a multi-functional approach to drainage and the requirement for developments to slow the flow of surface water, which we agree should be separated from foul flows. The [Enabling Water Smart Communities](#) provides an exemplar of how this can be done. Retrofitting Sustainable Urban Drainage Systems (SuDS) would also help regarding flood prevention and alleviation.

- Question 33 How can we improve water quality in Luton's rivers and improve water efficiency in new developments?

We welcome considerations of how water quality and efficiency can be improved within the Local Plan.

We would support the setting of water efficiency standards over and above current regulations – the [Shared Standards for Water Efficiency for Local Plans](#) (first published June 2025) evidence how this can be applied practically. Promotion of rainwater harvesting and grey water recycling would be supported.

We would agree that a policy containing stronger wording ensuring development must provide for the satisfactory disposal of surface water to deliver water quality improvements to receiving water courses and aquifers. This would be *one* way to contribute towards meeting good ecological status.

It should be noted that Protected Sites targets, in terms of water quality, are often more stringent than Water Framework Directive targets and policies should also take this into account. Hydrological connectivity to protected sites can extend outside of the Local Plan boundary, consideration must be given to this, and sites should not be scoped out based on distance. A detailed Water Cycle Study at an early stage will provide an evidence base to develop policies further – see our advice in the *Water cycle study / Integrated Water Management Plan* topic of the *Evidence Documents* section below.

It should be ensured that there is capacity at Waste Water Treatment works (in respect to both treatment and environmental capacity) before development takes place. We advise that policy wording includes the requirement that prior to development taking place there must be agreement with the Environment Agency and relevant water company that there is guaranteed sufficient hydraulic and environmental capacity for waste water flows from the proposal to be accommodated. Where capacity or mitigation cannot be demonstrated with certainty, development should be appropriately phased, conditioned, or refused.

We also advise looking at the phasing of allocated developments in relation to the capacity and predicted upgrade schedules of wastewater infrastructure (based on your discussions with water companies) to ensure your housing targets are deliverable in light of the above. It would be a good idea to specify that this should be monitored and revisited over time.

SuDS, rainwater harvesting and re-use should be planned in at the earliest stage of development.

Protecting and enhancing the natural environment

Biodiversity Net Gain (BNG)

- Question 35 How should a new Local Plan approach biodiversity net gain?

In answer to the first 'Options' question, we would welcome a more ambitious BNG target if a viability assessment shows this to be feasible (see further comment on this in the *Biodiversity Net Gain* topic of the *Strategic Policy* section below, and in Annex C).

Regarding point 2, we would support this idea, however it would need to be distinct and separate from Biodiversity Net Gain under the formal regulations as this states that BNG cannot be required on exempt sites. We instead advise that environmental improvements on these types of sites could be covered in a broader natural environment policy, i.e. around the need for all developments to deliver 'net gains for biodiversity' in line with the current NPPF paragraph 187(d) requirements. This could be proportionate to the scale of development, and could be supported by guidance on the types of enhancements your authority would like to see. Additionally, the Urban Greening Factor, described in the [Green Infrastructure Framework](#), would help to address the points made in 5.140 and 5.144, and could be adopted as part of your Green Infrastructure (GI) policy. This is not tied to a biodiversity baseline, but sets a target, so ensures all sites provide some greening or environmental benefit. You could then have a separate BNG policy for sites that do fall under the formal legislation, which, as you say in 5.143, could set out strategic BNG priorities.

For 'Options' question 3, we advise that the Local Nature Recovery Strategy (LNRS) is a key document that can guide BNG, but agree that you could set up habitat banks within Luton if you wish to keep BNG local (as has been done in Plymouth, for example). Nature Towns and Cities have developed a guide on [how to set up an urban habitat bank](#), and you may be able to locate or align your habitat banks with LNRS priority areas. BNG can also support GI delivery, and could perhaps help to deliver actions identified in your GI study, such as the improvements along the River Lea noted in paragraph 5.151.

See 'Strategic Policy' section below for further comments related to Biodiversity Net Gain.

Green and Blue Infrastructure

- Question 36 How can green and blue infrastructure in Luton be improved and enhanced?

We are pleased to see mention of the [Local Nature Recovery Strategy \(LNRS\)](#) within this topic and recommend that the Local Plan promotes the use of the LNRS to guide decisions on appropriate, desirable and more ambitious habitat types to be provided, for example, alongside developments.

We support the policy intentions set out in paragraph 5.154, and the aims to embed the Green

Infrastructure (GI) standards into the Local Plan, tailoring them to Luton's circumstances as needed. We also welcome that GI will be "woven" through the Local Plan, recognising it has links to other policy areas and can achieve widespread benefits. These points will be key to demonstrate that Nature Towns and Cities (NTC) accreditation criteria have been met, and we therefore encourage joint working with Luton's NTC team on the GI strategy, to ensure a joined up approach is being taken. Natural England are also happy to continue supporting Luton's NTC accreditation journey (see below, in response to question 39).

As mentioned above, in our response to question 24 in the *Town Centre and Retail* topic, we would support a policy relating to improvements around the River Lea, and policy wording for specific site allocations where there are opportunities to contribute to this project.

Natural England strongly supports the need for GI to be multifunctional, and this is a key principle of the GI Framework. As identified, the constraints on space in Luton make this even more important. The Local Plan should still seek to secure sufficient high quality / nature rich greenspace to benefit people and nature (e.g. through climate alleviation, water management, improved air quality and health outcomes). Good quality greenspace will support the delivery of other themes – e.g. health and wellbeing, provision of local facilities and infrastructure, transport (providing active travel options), and creating high quality homes / places.

To help make best use of the space that is available, you could consider setting up a list of strategic greenspace projects (new or improvements to existing spaces) for smaller sites, and developments unable to fit meaningful green infrastructure on-site, to contribute towards/invest in and create links to. Greenspace enhancement projects could also be considered and captured in the GI study and Infrastructure Delivery Plan (e.g. any spaces where improvements could bring them more in line with the Green Flag criteria and make them more welcoming / accessible to people). Greenspaces in Luton should also be encouraged, through the Local Plan, to contribute towards Local Nature Recovery Strategy actions – e.g. the LNRS highlights the need for nature-friendly management in parks / gardens to support ecosystem services and priority species (e.g. bats).

See the 'Strategic Policy' and 'Evidence Documents' sections below for more comments related to Green and Blue Infrastructure.

Green Belt and Protected Landscapes

- Question 37 Are there any local Green Belt or Chilterns National Landscape matters that we need to consider?

Through the development of the local plan Luton Borough Council (LBC) should proactively identify opportunities to contribute towards delivery of objectives contained within:

- the Chilterns Management Plan [The Management Plan for the Chilterns National Landscape | Chilterns National Landscape](#)
- and
- the Chilterns Nature Recovery Plan and Protected Landscape Targets and Outcomes Framework (PLTOF) [Nature Recovery Plan | Chilterns National Landscape](#)

Your authority should refer to [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK](#) for more on this. We provide the following suggestions but these are not exhaustive.

Page 26 of the Nature Recovery plan references PLTOF Target 1 to create or restore wildlife rich habitat, spatially targeted at areas of 'good quality semi-improved grassland' and 'no main priority habitat' indicated on [MAGIC maps](#). A practical action LBC could take around this would be to map these areas as part of the Green Infrastructure mapping study and consider the management actions that could be taken to contribute towards the delivery of PLTOF Target 1. Proactive discussions with staff at Chilterns National Landscape (CNL) will help to identify the key opportunities to contribute to management plan and nature recovery plan delivery and we would encourage your authority to reach out to CNL to discuss this.

Section 8.4 of the Chilterns Management Plan, linked to PLTOF Target 9 highlights specific challenges around low uptake of engagement with greenspaces and surrounding countryside in the Luton and Dunstable area. Several initiatives are working to increase access e.g. Nature Towns and Cities and Nature Calling / Luton Henge. However, working to make the countryside more welcoming and inclusive is a key priority for the Chilterns and one that Luton is well placed to continue to work collaboratively with the national landscape on, given that the boundary of the National Landscape directly adjoins the peri urban edge of Luton around Galley and Warden Hills to the north and Chaul End to the south. There are opportunities to collaborate, looking at how access and understanding might be improved, and how to spread recreation across a range of sites in order to protect sensitive sites from pressures, potentially through a wider visitor management strategy for the Chilterns.

See 'Strategic Policy' section below for comments related to the National Landscape.

Natural Capital

- Question 38 How can the Local Plan help to conserve and enhance Luton's natural environment?

We agree with the options identified under this question, and strongly support all the opportunities identified in 5.182 for Local Plan policies, which, along with our recommendations in the above sections (particularly including our response to question 5), will help to answer the 'Options' question 3.

See additional comments on this in the 'Strategic Policy' section below, particularly under the *Designated sites* and *Chilterns Beechwoods* topics.

- Question 39 a) Are there any Issues, Priorities or Options you think we have not considered in this Chapter?

Nature Towns and Cities

Luton has received a grant from the Nature Towns and Cities (NTC) programme for its Roots To Healthy Places project. As part of this project Luton will be applying for Nature Towns and Cities accreditation in recognition of its commitment to transforming the urban landscapes for people and nature to create a greener, healthier, thriving future for everybody. The accreditation scheme has two levels; Foundation and Advanced. Foundation level accreditation must be obtained first, with advanced accreditation open to places that have already gained foundation level accreditation. We believe Luton is a very strong candidate for NTC accreditation and strongly encourage you to apply for foundation and then subsequently, advanced accreditation. We would like to offer our support to you with this accreditation process. NTC accreditation involves collation of evidence required to support your application to demonstrate you have build strong partnerships that work towards a shared vision, and have a strategy and improvement plan to deliver you long term ambitions. For foundation level accreditation, evidence is collated across the main areas:

- 1 - Setting your vision
- 2 - Building strong cross-sector partnerships
- 3 - Thinking strategically about green infrastructure

Advanced level accreditation applications must submit supporting evidence to demonstrate that the following criterion have been met:

- Developing your case for change
- Building your prospectus
- Securing wide-spread buy-in at strategic level

Full details of the accreditation application process along with evidence requirements and application forms for both foundation and advanced level can be found here: [Become a Nature Town or Nature City - Nature Towns and Cities](#)

The local plan review process provides a **key opportunity** for local authorities to carry out the community consultation, GI planning (through your GI strategy) and to use these to inform the overarching vision for Luton such that more people can enjoy time in nature close to home in a greener Luton. We would strongly advise you to review the Nature Towns and Cities accreditation criterion for both foundation and advanced level as part of the local plan process in discussion with LBC colleagues leading on the Nature Towns and Cities programme. We would be happy to confirm the correct contacts at LBC, if required.

Now is the opportune moment to consider what evidence generated by the local plan process can feed into your accreditation application. We strongly advise you also consider what your current evidence gaps against the various accreditation criterion are, and where relevant, take steps to address these evidence gaps through planning activities and engagement as part of the local plan making process in conversation with Nature Towns and Cities programme colleagues.

Community Facilities, Indoor Sport and Recreation

- Question 42 How can the Local Plan help to ensure access to a network of high-quality open spaces?

We are pleased to note the intention to produce a more up to date study to understand open space requirements, and recommend using the [Green Infrastructure Framework mapping tool](#) to help with this (although it is not guaranteed that all green spaces are mapped and local knowledge should still be used to add to this information).

Please see our comments in other parts of this letter for more advice on Green Infrastructure and topics related to this question.

The Historic Environment

- Question 46 a) Are there any Issues, Priorities or Options you think we have not considered in this Chapter?

We advise using National Character Areas (NCAs) to inform this theme of your Local Plan, and also exploring how heritage can link people to places. New developments could provide signage to help local residents engage with the history of their local area, including Historic Environment Record (HER) features. Informing people of NCAs can also help them to identify more with their local area and how the landscape makes it a unique place.

Placemaking and Design

- Question 47 How can we improve the public realm and the design of buildings in Luton and where should this be focussed?

We advise that any design of buildings and improvements to the public realm are underpinned by sustainable, climate-resilient practices taking into account urban heat island effects and water scarcity. The LPA should look for opportunities to retrofit SuDS and supplementary habitats (bat and bird boxes) in existing buildings as well as look to embed [Green Infrastructure principles](#) not only to provide beautification of the urban landscape but also contribute to passive cooling of urban areas and provide for biodiversity e.g. through planting of more trees, pocket parks, introduction of green walls/roofs, and green corridors. We highly recommend adoption of the Green Infrastructure principles and utilizing of the [mapping tool](#) to identify areas of 'green deprivation' and increase access to green spaces for residents by, for example, delivering 'green in 15'. Natural England understands that a green infrastructure study is underway and we would be highly supportive of ambitious GI measures introduced as a result of this evidence.

We recommend including daylighting of the River Lea as part of this theme to strengthen policy wording and highlight the ecological and social benefits of this project. Please refer to question 24 for further comments on this matter.

Beyond this we would expect all buildings to be of the highest water efficiency and direct you to the section 'Water cycle study / Integrated Water Management Plan' for further details.

Connectivity and Transport

- Question 51 How do you think we can encourage more walking and cycling in Luton?

We welcome the aims of this question, and advise that it is important to ensure join up between policy areas, such as health, active travel planning and green infrastructure provision and connectivity – e.g. by providing green corridors and cycleways. The River Lea corridor could provide good opportunities for this. Green Infrastructure has a critical role to play in our health and wellbeing. The Local Plan should ensure that new development contributes to the delivery of the government's target that every household is within 15 minutes of good quality green infrastructure, as outlined in the Environmental Improvement Plan 2023. Provision of connected nature-rich routes to green infrastructure (excluding SSSIs) is encouraged, from both new developments and existing communities.

Sustainable Infrastructure and Funding

- Question 55 What infrastructure is required in Luton and how should this be provided for?

Question 55 asks about infrastructure priorities. Green space provision and connecting people with nature are key for us, as expanded upon in other sections of this response.

In addition to green and blue infrastructure, we would advise that water infrastructure is of high importance to upgrade and improve. This is in relation to water quantity - slowing and storing water to prevent the flooding of developments and downstream protected sites, and securing water resources for both people and nature; and water quality - sewage treatment works will need to have agreed environmental capacity before being allocated new development (we recommend this is written into Local Plan policy).

Evidence Documents

We note that the current list of evidence studies planned, as provided in Appendix 2 of the Community Involvement Paper, includes:

- Climate Change Study
- Housing and Economic Needs Assessment
- Employment Land Review
- Retail and Town Centre Study
- Green Belt Assessment
- Transport Assessment
- Viability Assessment
- Infrastructure Assessment
- Green and Blue Infrastructure Study
- Strategic Flood Risk Assessment
- Sequential and Exceptions Test
- Gypsy and Traveller Accommodation Assessment
- Water Cycle Study
- Open space, sport and recreation study
- Habitats Regulations Assessment
- Landscape and Visual Impact Assessment
- Historic Environment Assessment
- Biodiversity Study
- Design Code and Capacity Assessment
- Site Options Assessment

We welcome the above. In answer to **Question 58**, we offer the following comments on the assessments and studies listed, in addition to other evidence studies / additional assessments which we recommend are also carried out to inform the Local Plan:

Habitats Regulations Assessment (HRA)

We note in section 2.8 of the Community Involvement Paper that your authority intends to prepare a Habitats Regulations Assessment at later stages in the Plan making process.

We advise that the Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.

Natural England would welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.

The Local Plan's Habitats Regulations Assessment (HRA) should be started as early as possible and follow an iterative process as further details and information becomes available.

We anticipate that key topics to cover will be hydrology, recreation and air quality. The in-combination assessment should factor in large scale development proposals, infrastructure projects and NSIPs outside the plan area, and these should also be considered during the evidence gathering studies.

The studies listed in the sections below will help to inform the HRA, and we advise starting them as soon as possible.

Please note that consideration should be given to all potential pathways, regardless of distance, in the case of hydrology. As such, the Lea Valley catchment should be scoped into upcoming water cycle studies, and related Habitats Sites included within the HRA (see below).

Water cycle study / Integrated Water Management Plan

The [Water cycle study](#) / Integrated water management plan should be carried out as early as possible in the plan making process. It will act as a key evidence base to inform site allocations, particularly in relation to sewage treatment works' capacity and water supply areas. As above, this will also be important information for the HRA.

When preparing your Water cycle study and related policies, please make reference to the [Shared Standards in Water Efficiency for Local Plans](#) (first published June 2025) which provides advice and evidence to support LPAs to adopt policy requirements to achieve tighter water efficiency standards. For support with this, you should contact the Environment Agency and Anglian Water. You may also find [Enabling Water Smart Communities \(EWSC\)](#) to be helpful.

The Local Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available [here](#)) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must, in exercising their functions, have regard to these plans.

Please note that meeting Water Framework Directive targets does not necessarily meet protected sites targets. Where both exist the most stringent target should be applied. Current protected sites targets and conservation advice can be found on [Designated Sites View](#).

Scoping of environmental features, such as designated sites (both SSSIs and Habitats Sites), should be decided based on hydrological connectivity (e.g. to sewage treatment works) rather than distance. We advise that the Lee Valley SPA will need to be scoped in, for example, in relation to both water quantity and water quality. This advice also applies to the Local Plan's Habitats Regulations Assessment (HRA).

Natural England would also like to see consideration of chalk streams included within assessments (including in relation to abstraction), and that potential LNRS measures relating to water and hydrological features should be taken account of. We recommend speaking to North Hertfordshire about the chalk stream watercourse surveys they are already carrying out, and collaborating if possible.

Green and Blue Infrastructure study

Natural England would like to see a comprehensive study and up-to-date mapping of existing greenspaces and ecological networks, along with protected sites, that can be incorporated into landscape-scale recovery in the form of LNRS delivery/habitat banks. Through this work, your authority should also look for opportunities to enhance the environment and connect people with nature, especially where there are areas of social deprivation and lower tree equity (being mindful to divert people away from, rather than increasing pressures on SSSIs).

This, or a separate study, should identify and map the protected sites in and around your authority area, and include consideration of pressures and potential impacts from Local Plan policies (or lack of policy). Your authority will need to apply the ecological mitigation hierarchy, particularly when deciding on allocations, prioritising the avoidance of impacts on statutorily designated sites. Where impacts cannot be avoided the Plan must commit to setting robust strategic and site-specific policy requirements around the delivery of appropriate mitigation through development. This should include any measures required to address the adverse effects of increased recreational pressure.

The [GI mapping tool](#) can help to identify priority areas for greenspace provision in Luton, allowing you to plan GI strategically and identify where there are deficiencies and inequalities in green space access that need to be prioritised, e.g. through the Infrastructure Delivery Plan (IDP). Planning for new green spaces should consider local capacity and typology needs to ensure that a good range of green infrastructure is available across Luton.

The study should also refer to and join up with the health and wellbeing plan, which defines the health inequalities that your authority has identified as particularly notable, to maximise the opportunities for health benefits of greenspace. We also recommend engaging with a range of health stakeholders such as the Public Health, NHS, Voluntary, Community and Social Enterprise (VCSE) organisations etc, as the plan is developed to ensure that it supports the achievement of local health priorities.

At this early stage, it would be beneficial to look at the five Green Infrastructure Standards and consider how they might be applied in Luton in practice. This would enable your authority to shape your GI policy with meaningful and achievable targets, using evidence that reflects the specific opportunities, challenges, and viability constraints of your area. This could be informed by green infrastructure that has already been implemented in existing sites, but we also recommend exploring pilot studies to trial all 5 of the GI framework standards in practice, e.g. trialling Urban Greening Factor (UGF) on sites in Luton. Greater Cambridge have recently undertaken similar work for their Local Plan and may be able to share advice on their approach.

Air quality impact study and Traffic modelling

Please ensure that protected sites are scoped into your Air quality assessment, in addition to human health.

Your authority will need to follow the guidance provided in Annex B of this letter in order to fulfil your duties in relation to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981. Annex B should also be taken as Natural England's formal representation about air quality under the Town & Country Planning (Local Planning) Regulations 2012, and we are unlikely to be able to offer further bespoke comments about this.

The standard advice provided is applicable to all stages of the Local Plan process and covers both Habitats Sites and SSSIs. Habitats Sites and SSSIs at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition and/or acidification. Traffic modelling relating to the Local Plan will therefore be needed to inform the Air quality assessment.

Strategic Policies

We offer the following recommendations for inclusion as strategic policies in relation to our remit:

Designated sites policy

The Local Plan should set criteria-based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites¹. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites² should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites and/or large proposals, or their zones of influence, cover more than one Local Planning Authority boundary.

The scale of regeneration in the wider area, including associated transport and energy infrastructure, could create cumulative pressures on water quality, hydrology and sensitive habitats if not considered strategically.

Natural England expect the scale of growth and cumulative wider development pressures in the area such as the OxCam corridor and several Local Plans, to increase recreational pressure of several designated sites already experiencing negative impacts.

To address cumulative impacts, mitigation should consider:

- Water-positive design to reduce pressure on water stressed resources
- Phasing development to align with environmental capacity
- Integrate landscape, soils and historic features to enhance place and character
- Use adaptive monitoring with clear triggers for additional mitigation

¹ International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites. National sites include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs). Local sites include wildlife Sites or geological sites (a variety of terms are in use for local sites).

² The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites

National Landscape policy

The plan area includes a National Landscape (formerly Area of Outstanding Natural Beauty), namely the Chilterns National Landscape. We advise the LPA to take into account the relevant Management Plan for the area and would like to see a strongly worded policy aimed at furthering the aims of the National Landscape. We also advise that you consult the Chilterns Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the area's statutory management plan, will be a valuable contribution in developing your policy. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 183 of the National Planning Policy Framework (NPPF).

We would like to see reference to the requirement under the [Section 245](#) (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 which places a duty on relevant authorities (which includes local authorities) in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty in England, to seek to further the statutory purposes of the area. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

Chilterns Beechwoods Strategic SANG policy

Footprint Ecology carried out surveys assessing the impacts of recreational pressure at Chilterns Beechwoods SAC to inform the Habitats Regulations Assessment (HRA) of Dacorum Borough Council's Emerging Local Plan. The report concluded that there are likely significant effects upon the integrity of the SAC from the upcoming Local Plan and future Local Plans from LPAs surrounding the SAC and subsequently identified a 12.6km Zone of Influence (ZOI) around the site. The evidence suggested that Luton Borough Council contributed less than 2% of visits to the SAC. As a result, they were not included as part of the strategic solution (where mitigation is required for all developments resulting in a net increase in dwellings).

It should be noted that for larger developments that fall within the ZOI and result in a net increase of more than 100 dwellings Natural England recommend further consultation. Where SANG is proposed, this should be delivered at a minimum standard of 8 ha / 1000 population, secured in perpetuity and agreed with the respective Local Planning Authority and Natural England. We would like to see this reflected in a strategic SANG policy

It would be beneficial if, in addition to outlining SANG requirements, details of SANG guidelines/principles are included in any chapters or policies pertaining to the Chilterns Beechwoods SAC strategic solution. This should include expectations for third party developers in securing and designing SANG as well as requirements to consult Natural England on proposals.

We suggest looking at Dacorum's approach, which links allocations to specific SANG sites, to demonstrate the strategic solution's requirements can be met for allocations within the ZOI. Your authority will also need to factor in the minimum quantity of on-site greenspace each allocation would need to deliver before deciding on numbers of dwellings and setting red-line boundaries. If there is uncertainty that the Local Plan can comply with the strategic solution, it may be judged unsound.

Biodiversity Net Gain (BNG)

We would like to see a specific BNG policy which takes into account the [Bedfordshire Local Nature Recovery Strategy](#) (LNRS). At this early stage in the plan making process, it would be beneficial to identify strategic opportunities for habitat banks which can assist in connecting sensitive sites or priority species/habitats. This should clearly demonstrate compliance with the mitigation hierarchy, with policies and decisions first considering options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. BNG should be additional to any habitat creation required to mitigate or compensate for impacts. Mitigation for protected species or designated site impacts (including SANG) can contribute up to "no net loss" but at least 10% of BNG needs to be through additional measures.

Furthermore, we would like to see a more ambitious BNG target in order to further the aims of nature recovery and habitat connectivity within Luton. We advise that any target over the mandatory 10% should be underpinned by a viability study, including evidence regarding local ecological need for higher targets, available supply and demand of biodiversity units in the area and financial impact to developers. Examples and viability studies where higher targets are under consideration are in Annex C.

Beyond this, as part of a Green and Blue Infrastructure (GBI) study, we strongly encourage exploration of both the Urban Greening Factor (UGF) and Environmental Net Gain in achieving environmental targets. The UGF can be a valuable tool in enhancing habitats in cities and towns as well as increasing access for people to nature, whilst the Environmental Net Gain Metric goes beyond BNG in enhancing Ecological services and increase natural capital. Trial studies on viability can be conducted as part of your GBI evidence base.

Green and Blue Infrastructure (GBI) policy

Given the Plan is at a very early stage, there is a significant opportunity to embed the [GI Principles and Standards](#) into policy. The Standards can help to benchmark what 'good' Green Infrastructure (GI) looks like, and can support the delivery of other strategies / ambitions, e.g. the Urban Greening Factor / Urban Nature Recovery standards would contribute towards LNRS objective U2 - "there are more nature-rich areas in urban greenspaces for communities to enjoy".

We would encourage the inclusion of an [Accessible Greenspace Standard \(AGS\)](#) within the Local Plan. An AGS can help to ensure the right GI is provided in the right places, and at the right quantity to meet local needs. The AGS is based on a range of size and proximity criteria and aims to ensure that everyone has access to high quality green and blue spaces close to home for the health and wellbeing benefits this can provide.

Policies should ensure that sufficient accessible greenspace is provided alongside development, and we recommend including requirements for major developments to provide a Green Infrastructure plan and to integrate Green and Blue Infrastructure early in the design process. This is particularly important where housing is located close to sensitive sites at risk of recreational pressure (e.g. SSSIs). Development close to protected sites will also need to consider the design of greenspace. For example, a development close to a SSSI may need to consider a higher quantum of a semi-natural typology and ensure there is a sufficient buffer to the protected site. The delivery of GI should also be front-loaded and appropriately phased so that it has chance to establish prior to occupation, in order to function as mitigation.

The Plan should set clear targets and capacity criteria for the provision of greenspace, based on local needs, opportunities and constraints. The AGS recommends at least 3 Hectares of publicly accessible greenspace is provided per 1000 population, for all major developments (10+ dwellings), and that there is no net loss or reduction in capacity of accessible greenspace per 1000 population at an area-wide scale. We recommend that this is reflected in Local Plan policy, although you may wish to set a higher AGS target for some or all areas/development types depending on the findings of your Green and Blue Infrastructure study.

Explore Framework

As a way of informing the Green and Blue Infrastructure study Natural England highly recommend implementation of the [Explore Framework](#). Launched in March 2026, this framework is design to support Local Authorities in bringing outcomes for health and wellbeing, nature, and sustainability together at the outset of planning by presenting high-level indicators of existing infrastructure, health, and environmental impacts at authority level. This framework has already assisted authorities in developing new regional Green Infrastructure strategies as well as addressing peri-urban planning and development challenges. For more information we recommend accessing the [facilitated workshops](#) for greater support.

LNRS policy

In addition to a GBI policy, we would like to see a standalone policy detailing the requirements for developments in relation to the [Bedfordshire Local Nature Recovery Strategy](#) (LNRS) and for the plan to be ambitious in delivering its aims. LNRSs will provide valuable evidence for developing policies, and local planning authorities must take account of LNRSs in the plan making process.

The [Levelling-up and Regeneration Act 2023](#) states in Schedule 7 15C [\(7\)](#):

The local plan must take account of any local nature recovery strategy that relates to all or part of the local planning authority's area, including in particular—

(a) the areas identified in the strategy as areas which—

(i) are, or could become, of particular importance for biodiversity, or

(ii) are areas where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits,

(b) the priorities set out in the strategy for recovering or enhancing biodiversity, and

(c) the proposals set out in the strategy as to potential measures relating to those priorities.

Town and borough-wide planning should have a cohesive/complementary approach to ensure greater connectivity for species. We would like to see this ambition included within this policy linking into potential strategic habitat bank opportunities.

Water Quality and Resources and Flood Risk Management policies

Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 187 of the NPPF. We would also expect the plan to address flood risk management in line with the relevant paragraphs in the NPPF.

The Local Plan should contain policies which protect habitats from water related impacts, including nutrient mitigation, and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.

Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SuDS to achieve this.

This should be informed by the findings and recommendations of the Water Cycle Study mentioned above.

Strategic Environmental Assessment (SEA) Scoping Report

Natural England have been requested to consider the following:

- Whether the scope of the SEA is appropriate as set out considering the role of the Luton Local Plan to help meet and manage Luton's needs.
- Whether there are any additional plans, policies or programmes that are relevant to the SEA that should be included.
- Whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SEA of the new Local Plan.
- Whether there are any additional key sustainability issues relevant to the new Local Plan that should be included.
- Whether the SEA framework (Chapter 5) is appropriate and includes a suitable set of SEA objectives for assessing the effects of the options included within the new Local Plan as well as reasonable alternatives.

Natural England currently considers the scope of the SEA to be appropriate, agree with the sustainability issues identified, and welcome the SEA Framework questions for assessing the new Local Plan's options and alternatives.

We have not reviewed the plans, policies and programmes listed, or analysed the baseline information. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;

- Green infrastructure strategies
- Biodiversity plans
- Rights of Way Improvement Plans
- River basin management plans
- National Landscape management plans.
- Relevant landscape plans and strategies.

Please also see attached Annex D for our advice on sources of local plan evidence on the natural environment.

We hope that you will find our comments helpful and look forward to continued engagement with the Council as the plan progresses.

If you have any queries relating to the advice in this letter, and/or to request further engagement, please contact consultations@naturalengland.org.uk

Yours sincerely

West Anglia Sustainable Development Team

Annex A: Natural England's General Advice for Local Plans

The Plan's vision and strategy

Natural England advises that the Plan's vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, National Park/Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies, Nature Recovery Network (amend as appropriate to the local area).

Sites of Least Environmental Value

In accordance with the paragraph 188 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

Landscape

Natural England expects the Plan to include strategic policies to protect and enhance valued landscapes, as well criteria based policies to guide development.

Designated sites

The Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites³. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites⁴ should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.

Natural England would welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.

Biodiversity and Geodiversity

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below). Planning policies and decisions should contribute and enhance the

³ International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites³. National sites include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) Local sites include wildlife Sites or geological sites (a variety of terms are in use for local sites).

⁴ The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites

natural and local environment, as outlined in para 187 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.

Priority habitats, ecological networks and priority and/or legally protected species populations

The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: [Habitats and species of principal importance in England](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan and Environmental Improvement Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 181 of the NPPF.

Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced [standing advice](#) on ancient woodland, ancient and veteran trees.

Green Infrastructure

Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 188 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green

space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

Access and Rights of Way

Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 105 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 103 of the NPPF.

The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 103 of the NPPF. Natural England's work on [Green Infrastructure](https://designatedsites.naturalengland.org.uk/GreenInfrastructure/GIStandards.aspx) <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/GIStandards.aspx> may be of use in assessing current level of accessible greenspace and planning improved provision.

Soils

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 187.

Air pollution

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from *local impacts* are those within 200m of a road with increased traffic⁵, which feature habitats that are vulnerable to nitrogen deposition/acidification. [APIS](#) provides a searchable database and **information on pollutants and their impacts on habitats and species**.

Tranquillity

The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 107 and 192 of the NPPF.

Tranquillity is an important landscape attribute in certain areas e.g. within National Parks/AONBs, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity which are available [here](#) and are a helpful source of evidence for the Local Plan and SEA/SA.

⁵ The ecological effects of diffuse air pollution (2004) English Nature Research Report 580
Design Manual for Roads and Bridges LA105: Air Quality (2019), Highways England

Water Quality and Resources and Flood Risk Management

Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 187 of the NPPF. We would also expect the plan to address flood risk management in line with the relevant paragraphs in the NPPF.

The Local Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available [here](#)) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.

The Local Plan should contain policies which protect habitats from water related impacts, including nutrient mitigation, and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.

Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.

Climate change adaptation

The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.

Annex B: Natural England's Standard Advice for Air Quality Impacts for Local Plans

Local Plans are likely to generate increased emissions of nitrogen oxides (NO_x) and ammonia, and additional nitrogen deposition as a result of increased traffic generation associated with new development. As impacts from individual development management proposals would be difficult to quantify without an overarching assessment of the cumulative impacts from Local Plan development, it is necessary for this to be considered strategically at plan level. Natural England would expect the environmental assessment of the plan including the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) to consider any detrimental impacts on the natural environment from these emissions. It should also suggest appropriate avoidance or mitigation measures where applicable. Technical guidance about the ecological impacts from road transport can also be found in the [Natural England research report 'The ecological effects of air pollution from road transport: an updated review' \(NECR199\)](#).

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.

Habitats Sites and SSSIs at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition and/or acidification. Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should also be taken as Natural England's formal representation under the Town & Country Planning (Local Planning) Regulations 2012. This standard advice is applicable to all stages of the Local Plan process.

This includes advice on information that is required to assess air quality and how to interpret the results of air quality modelling for your LPA to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. Detailed guidance on how to undertake a Habitats Regulations Assessment for air pollution impacts generated from traffic can be found here [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations \(NEA001\)](#).

You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants:

- ammonia (NH₃)
- nitrogen oxides (NO, NO₂ or NO_x)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO₂)

Standing advice on air pollution and development is also available here:

<https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

Whilst the standing advice does not cover Local Plans, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken by local planning authorities.

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
Initial screening for credible risk of an effect	1	Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features. For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered. Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.
	2	Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/src1 Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature. The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View, alongside Conservation Objectives and Supplementary Advice for Habitats Sites. The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads). If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.
Detailed AQ modelling	3	Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) - Roads Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced. Air Quality modelling for Local Plans should include relevant scenarios that are clearly identified. We advise an allowance is also made for windfall development. One such example of scenarios is a baseline plus future forecasts as follows: Baseline, future baseline (at end of plan period taking into account background trends for each pollutant), do nothing (without plan), do something (with plan). The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf
Applying screening thresholds	4a	Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5 Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the <u>annual averages</u>.

			If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.
	4b	Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5	Use information from competent authorities (Planning Portal or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination for emission from roads/ increase in traffic. For example, add emissions & deposition from other Local Plans together and apply 1% to that sum. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.
Detailed Assessment of ecological impacts	5	This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures. If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this. For SSSIs, this step should provide all the information necessary, including any required mitigation, for the LPA to determine if there would be an adverse effect on a SSSI. Should an adverse effect not be ruled out, this will need consideration within the Local Plan Sustainability Appraisal and consideration of the tests of the NPPF (para 193b). If Habitats Sites are impacted by the proposals, move to Step 6.	The following information is likely to be helpful for the LPA: Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there? Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not. Assess likely scale and duration of impacts on habitats from emissions. Check whether any strategic initiatives in the area (such as shared nitrogen action plans) would be compromised by the proposals.
Appropriate Assessment (AA) for habitats sites	6	LPA to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed by the applicant should also be assessed at this point. Should the AA conclude that the Local Plan would have an AEOI that cannot be excluded with mitigation measures, consider derogation route of the HRA process. Should compensation measures be required under derogation, please contact Natural England for specific advice.	Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the plan. To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient duration. The assessment of such measures should be supported by evidence. When deciding on whether the proposals set out in the plan will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.

		Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects	
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Additional advice

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. the main source of background exceedance is due to agriculture, but the proposal is a road scheme). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

Where an air quality report concludes that only a very small area of the site will be impacted, the assessment of effects on integrity or damage to the site, should take into account the interest features of the site, their distribution and how they will be impacted by proposals rather than on specific percentages of site. Dependent on features being present in the area to be impacted, this could have a disproportionate impact on the site if an area of a rare habitat type were lost rather than a judgement just on the percentages of habitat.

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and Nitrogen Oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a "restore" objective, this should be noted as a "retardation" of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Common Standards Monitoring^[1] is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

Defra Emissions Factor Toolkit

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that Local Plans should be using (which we advise should also consider ammonia emissions as well as NOx – using one of three sets of emission factors available). The User Guide to the EFT highlights that calculation tools only support assessment years up to a certain date, reflecting that predictions and assumptions beyond then become less certain. If the Defra EFT is used, any future assumptions of fleet composition must not be made further into the future than specified in the version used.

We therefore advise that emission factors no later than 2030 are used for HRAs– which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create 'ammonia slip' over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NOx in exhaust gases.

Motorways within the affected road network

There is potentially an added complexity to the need for in-combination assessments when

considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models.

The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided.

The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the local plan.

How to Use this Advice in Decision Making

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with the conclusions of your HRA in relation to air quality impacts and that the Local Plan is sound in this regard.

Local Plan Policy Advice:

Natural England would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on protected sites. If the Local Plan would result in other air quality impacts apart from traffic, then this will also need to be addressed.

Local authorities should consider including a local plan policy based on the suggestion below to address air pollution impacts on Habitats Sites and SSSIs. The local plan policy could include the following:

1. *Proposals should not significantly delay the date for compliance with environmental thresholds for air pollutants for Habitats Sites or SSSIs that are currently in exceedance of environmental benchmarks (critical levels and loads).*
2. *Proposals emitting air pollutants which impact Habitats Sites must rule out adverse effects on the integrity of such sites. Where this is not possible the derogations route of the Habitats Regulations should be followed.*
3. *To avoid and minimise air pollution impacts any development requiring Habitats Regulations Assessment, Environmental Impact Assessment (EIA) or impacts to SSSIs unrelated to EIA development should consider:*
 - *the measures included which will minimise air pollution impacts on SSSIs and Habitats Sites and SSSIs during the design process of the development; and*
 - *how air quality improvements have informed the design choices made about the location of the development, its layout, and distribution of buildings, on-site activities, amenity spaces and infrastructure.*

A local plan could go on to set out what would be required for different development types in more detail. This may be important where there is strong evidence that particular sources of air pollution are preventing nature recovery. For example, where agricultural development is known to be one of the main sources of air pollution, a policy could specify a buffer around a protected site within which new or intensified agricultural proposals would not be permitted, apart from in exceptional circumstances.^[2]

^[1] [Common Standards Monitoring | JNCC - Adviser to Government on Nature Conservation](#)

^[2] Joint Nature Conservation Committee's (JNCC) Nitrogen Futures Project, available at: <https://jncc.gov.uk/our-work/nitrogen-futures/>

Annex C: Biodiversity Net Gain (BNG)

Increased Biodiversity Net Gain (BNG) considerations

Some examples below where 20% net gain is being considered:

- Greater Cambridge have produced an SPD that sets a target for 20% BNG: [GCSP Biodiversity Supplementary Planning Document](#)
- Lichfield DC have a 20% BNG requirement in an SPD [Lichfield Supplementary Planning Document: Biodiversity & Development](#)
- Surrey Nature Partnership – [Recommendation For 20% BNG In Surrey](#)
- Guildford Borough Council have adopted 20% BNG in policy: [Guildford Local Plan – Guildford Borough Council](#)

This link from the Planning Advisory Service also provides additional resources including best practice policy examples in local plans, as well as other authorities considering higher targets: [Biodiversity Net Gain in Local Plans and Strategic Planning | Local Government Association](#)

Viability studies

The following reports may be used as precedent where case studies exist for councils currently adopting a BNG strategy above the mandatory 10%:

- This report details biodiversity net gain and local nature recovery strategies: [Net Gain Impact Assessment](#)
- This Vivid economics study was commissioned a few years ago but may still be of use. It looks into the impact of BNG on housing viability and can be found here: [Biodiversity Net Gain: Preliminary Housing Viability Analysis](#)
- Swale Borough Council in Kent commissioned a study on the effects of 20% BNG on local viability and found this would result in negligible extra cost. They have used this study as part of their Local Plan evidence base, published for their Reg 19 Local Plan Review (consultation now closed and they are considering comments): [Local Plan Review Evidence – Viability](#) – see pages 78-79 showing minimal extra cost for 20%.
- Kent County-wide Viability Assessment for 20% [Kent Net Gain Viability Assessment](#). Kent are currently progressing with Local Planning Authorities for the adoption of a 20% target for BNG and in order to assist this have undertaken a strategic level viability assessment of 15% and 20% net gain. A summary of key findings from this are:

- I. A shift from 10% to 15% or 20% BNG will not materially affect viability in the majority of instances when delivered onsite or offsite.
- II. The biggest cost in most cases is to get to mandatory, minimum 10% BNG. The increase to 15% or 20% BNG in most cases costs much less and is generally negligible.
- III. Because the BNG costs are low when compared to other policy costs, in no cases are they likely to be what renders development unviable.
- IV. Local Authorities who wish to pursue BNG in excess of 10% will need a local viability assessment to support it. However, this study shows an assessment is likely to demonstrate viability will not be negatively impacted (to a material extent) for BNG increases of up to 20%. Because costs are small BNG is unlikely to impact the viability threshold significantly.
- V. If onsite provision is how the majority of BNG is delivered, this could have implications on land take as a result of lowering of average housing densities. However, as the majority of this burden relates to the mandatory 10% BNG, and the increase to get to 15% and 20% BNG are comparably small, this should not be seen as a reason for not going beyond the 10% but is a consideration for LPAs.

Annex D: Sources of evidence on the natural environment

Contents

- ACCESS
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- Marine / coast
- NATURAL CAPITAL
- NET GAIN
- Soils including peat
- Water

SD: Spatial data layer available for download from link provided (unless otherwise indicated)

M: indicates also available to view on MAGIC mapper (<https://magic.defra.gov.uk>)

Key evidence sources	Data Published by	Link to open data or information	SD
ACCESS			
National Trails	Natural England	https://data.gov.uk/dataset/ac8c851c-99a0-4488-8973-6c8863529c45/national-trails	✓ M
Public Rights of Way (on the Ordnance Survey base map) and Rights of Way Improvement Plans	Local Planning Authorities		
Countryside and Rights of Way Act 2000 – Section 15 land (England)	Natural England	https://www.data.gov.uk/dataset/f7255820-97d1-4891-aa7c-b6a2baa1e2b6/crow-act-2000-section-15-land	✓ M
Countryside and Rights of Way Act 2000 – Access Layer (England)		https://www.data.gov.uk/dataset/05fa192a-06ba-4b2b-b98c-5b6bec5ff638/crow-act-2000-access-layer	✓ M
Local Nature Reserves	Local Planning Authorities and Local Wildlife Organisations – published by Natural England	https://www.data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england	✓ M
National Nature Reserves (England)	Natural England	https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england	✓ M
Country Parks	Local Planning Authorities	Natural England have mapped Country Parks using data from Local Planning Authority data https://www.data.gov.uk/dataset/e729abb9-aa6c-42c5-baec-b6673e2b3a62/country-parks-england	✓ M

People and Nature Survey	Natural England	People and Nature Survey since 2019 https://people-and-nature-survey-defra.hub.arcgis.com/ Replaced the Monitoring Engagement with the Natural Environment (MENE) survey dashboard – replaced by The MENE survey dashboard https://defra.maps.arcgis.com/apps/MapSeries/index.html?appid=2f24d6c942d44e81821c3ed2d4ab2ada	
AIR QUALITY			
Nitrogen Decision Framework	Joint Nature Conservation Committee (JNCC)	A decision framework to attribute atmospheric nitrogen deposition as a threat to or cause of unfavourable habitat condition on protected sites JNCC Resource Hub	
Air Pollution Information System (Data on air pollution related to designated sites)	Various including Natural England	https://www.apis.ac.uk/ (data not downloadable)	✓
CLIMATE CHANGE			
'Climate Change Adaptation Manual' Second Edition 2020 (NE751)	Natural England	http://publications.naturalengland.org.uk/publication/5679197848862720	
The National Biodiversity Climate Change Vulnerability Model	Natural England	Report: https://publications.naturalengland.org.uk/publication/5069081749225472#:~:text=The%20National%20Biodiversity%20Climate%20Change,be%20used%20(in%20conjunction%20with (data not downloadable)	✓ M
Species Risks and Opportunities Maps	Natural England	http://publications.naturalengland.org.uk/publication/4674414199177216 (pdf maps, data not downloadable)	✓
DESIGNATED SITES			
Boundaries of Sites of Special Scientific Interest (SSSIs)	Natural England	https://data.gov.uk/dataset/5b632bd7-9838-4ef2-9101-ea9384421b0d/sites-of-special-scientific-interest-england	✓ M
Boundaries of Special Protection Areas (SPAs)	Natural England	https://data.gov.uk/dataset/174f4e23-acb6-4305-9365-1e33c8d0e455/special-protection-areas-england	✓ M
Boundaries of Special Areas of Conservation (SACs)	Natural England	https://data.gov.uk/dataset/a85e64d9-d0f1-4500-9080-b0e29b81fbc8/special-areas-of-conservation-england	✓ M
Boundaries of Ramsar Sites	Natural England	https://data.gov.uk/dataset/67b4ef48-d0b2-4b6f-b659-4efa33469889/ramsar-england	✓ M
Boundaries of Marine Conservation Zones	Joint Nature Conservation Committee (JNCC) (published by Natural England)	https://www.data.gov.uk/dataset/80c075c3-1880-44a0-bffc-69e20f307c21/marine-conservation-zones-england	✓ M
SSSI Impact Risk Zones	Natural England	Full details: https://naturalengland-	✓ M

		defra.opendata.arcgis.com/datasets/Defra::sssi-impact-risk-zones-england/about Data: https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sssi-impact-risk-zones-england	
SSSI, SAC and Conservation Objectives	Natural England	SSSI: https://designatedsites.naturalengland.org.uk/ SAC/SPA: https://publications.naturalengland.org.uk/category/6490068894089216	
SAC, SPA, Site Improvement Plans (SIPS)	Natural England	https://designatedsites.naturalengland.org.uk/	
Local Wildlife Sites and Local Geological Sites	Local Planning Authority and/or Local Environmental Records Centre and/or Local Wildlife Trust		
Potential Special Protection Areas	Natural England	https://www.data.gov.uk/dataset/f97c82eafe9a-4281-b9f6-08694a7d65b5/potential-special-protection-areas-england	✓ M
Possible Special Areas of Conservation	Natural England	https://www.data.gov.uk/dataset/be02be84-201e-4293-bf1f-0c2c296be5ad/possible-special-areas-of-conservation-england	✓ M
Existing HRA compensation sites	Local Planning Authority and Natural England		
Details and locations of existing strategic solutions	Local Planning Authority and Natural England		
GREEN INFRASTRUCTURE			
Green Infrastructure Map	Natural England	https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Map.aspx National Green Infrastructure mapping database, with Links to data sources used in GI mapping: http://publications.naturalengland.org.uk/publication/4635531295326208	
Green Infrastructure Framework – Principles and Standards for England, including Accessible Greenspace Standard (AGS) and Urban Greening Factor (UGF)	Natural England	https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx	
Green Belt boundaries	Ministry of Housing, Communities and Local Government	https://www.data.gov.uk/dataset/ccb505e0-67a8-4ace-b294-19a3cbff4861/english-local-authority-green-belt-dataset	✓ M

	(MHCLG)		
Open Space Assessments	Local Planning Authority		
Urban Forestry	Forestry Commission	How to protect and manage the urban forest https://www.gov.uk/guidance/how-to-protect-and-manage-the-urban-forest	
UK Ward Canopy Cover	Forestry Commission	Data set: https://www.data.gov.uk/dataset/43ca8e70-6cba-47a1-b3a8-c6b318862610/uk-ward-canopy-cover Viewer: https://forestry.maps.arcgis.com/apps/webappviewer/index.html?id=d8c253ab17e1412586d9774d1a09fa07	✓
HABITATS AND SPECIES			
Ancient Woodland	Natural England	https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdcd7e9df7d3/ancient-woodland-england	✓ M
Ancient and Veteran Trees	The Ancient Tree Inventory Woodland Trust and Natural England	The Ancient Tree Inventory https://ati.woodlandtrust.org.uk/ (data not downloadable)	✓
	Natural England	The wood pasture and parkland inventory https://data.gov.uk/dataset/bac6feb6-8222-4665-8abe-8774829ea623/wood-pasture-and-parkland-england	✓ M
Priority Habitat Inventory s41 habitats	Natural England	https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england https://www.arcgis.com/home/item.html?id=39403df11c8044d998772db5b54ad86c#overview	✓ M
Priority Habitat Creation and Restoration by the Environment Agency	Environment Agency	https://data.gov.uk/dataset/e0165747-8368-4ff7-a644-df9aeb27bb0b/priority-habitat-creation-and-restoration	✓
Open Mosaic Habitat on Previously Developed Land Inventory (draft)	Natural England	https://data.gov.uk/dataset/8509c11a-de20-42e8-9ce4-b47e0ba47481/open-mosaic-habitat-draft	✓ M
Local Biodiversity Action Plans (LBAPs) and Local Geodiversity Action Plans (LGAPS)	Local Planning Authority		
Priority habitats and species as listed under Section 41 of the NERC Act, 2006 and UK Biodiversity Action Plan (UK BAP).	Local Environmental Record Centres		
National Forest Inventory on Trees and Woodland 2020	Forestry Commission	https://www.data.gov.uk/dataset/6e3126bd-fb2c-4cac-b2c4-d521f006b87a/national-forest-inventory-woodland-england-2020 (check for later releases)	✓ M
Local Nature Recovery Strategies (NB a few are yet to be completed)	County Authorities / Responsible Authorities	Nature Recovery Network Evidence Handbook: http://publications.naturalengland.org.uk/publication/6105140258144256	

		Data viewer: https://experience.arcgis.com/experience/7c5242fdec7f433aa4ee4510383e3909/page/Home/ (collection of data)	✓
HERITAGE and HISTORIC ENVIRONMENT			
National Heritage Register including scheduled monuments, listed buildings, Conservation Areas, registered parks and gardens, registered battlefields and protected wrecks	Historic England	https://opendata-historicengland.hub.arcgis.com/maps/historicengland::national-heritage-list-for-england-nhle/about and search on data.gov.uk (not all on magic.gov.uk)	✓ M
World Heritage Sites	Historic England	https://data.gov.uk/dataset/3ac5c299-6805-476b-af9b-90aadc5e7b4/world-heritage-sites-gis-data	✓ M
National Historic Landscape Characterisation 250m and 500m grid	Natural England	500m grid: https://www.data.gov.uk/dataset/3fd13432-eee3-43d4-8bd0-e00a0bbc688f/national-historic-landscape-characterisation-500m-grid-england 250m grid: https://www.data.gov.uk/dataset/8b8c5df3-d7e3-484c-89d8-c7b819205002/national-historic-landscape-characterisation-250m-grid-england	✓ M
Heritage Coasts	Natural England	https://data.gov.uk/dataset/79b3515f-b00e-419a-9c7e-1d3163555886/heritage-coasts	✓
Heritage Coast Management Plans	Local Planning Authority		
LANDSCAPE			
Areas of Outstanding Natural Beauty (National Landscape) boundaries	Natural England	https://data.gov.uk/dataset/8e3ae3b9-a827-47f1-b025-f08527a4e84e/areas-of-outstanding-natural-beauty-england	✓ M
National Park boundaries	Natural England	https://data.gov.uk/dataset/334e1b27-e193-4ef5-b14e-696b58bb7e95/national-parks-england	✓ M
National Park and National Landscape management plans	Conservation Boards/ National Landscape Partnerships and National Park Authorities		
Landscape National Character Areas (England)	Natural England	https://www.data.gov.uk/dataset/21104eeb-4a53-4e41-8ada-d2d442e416e0/national-character-areas-england https://publications.naturalengland.org.uk/category/587130	✓ M
All England Strategic Landscape Mapping Hub	Natural England	https://all-england-strategic-landscapes-mapping-hub-luc.hub.arcgis.com/ (not available for download)	✓
Local landscape character assessments	Local Planning Authority		
Landscape and Visual Impact Assessments	Local Planning Authority		

Landscape capacity and sensitivity assessments	Local Planning Authority		
Tranquillity and light pollution	Campaign to Protect Rural England (CPRE)	https://nightblight.cpre.org.uk/maps/ (not available for download)	✓
NATURAL CAPITAL			
Natural Capital Atlases: Mapping and Mapping Indicators for County and City Regions (NECR318)	Natural England	https://data.gov.uk/dataset/a9de8eaa-5424-40ac-b1b3-3e33e94e1648/natural-capital-county-atlas-mapping-england including link to full Evidence Catalogue http://publications.naturalengland.org.uk/publication/6672365834731520	✓
Nature Improvement Areas	Natural England	https://data.gov.uk/dataset/a19c95e3-9657-457d-825e-3d2f3993b653/nature-improvement-areas	✓ M
National Habitat Network (England)	Natural England	https://data.gov.uk/dataset/0ef2ed26-2f04-4e0f-9493-ffbdbfaeb159/habitat-networks-england	✓ M
Living England Habitat Map	Natural England	https://data.gov.uk/dataset/e207e1b3-72e2-4b6a-8aec-0c7b8bb9998c/living-england-habitat-map-phase-4	✓ M
Enabling a Natural Capital Approach	Defra	https://data.gov.uk/dataset/3930b9ca-26c3-489f-900f-6b9eec2602c6/enabling-a-natural-capital-approach	
Natural Capital Ecosystem Assessment (NCEA)	Natural England under development	In the long term, the NCEA will provide a comprehensive programme that will provide high quality (national and local) data to assess the state and condition of biodiversity, ecosystems, and natural capital assets in the terrestrial, aquatic & marine environment which will transform decision making for critical environmental policies and interventions to meet the 25 Year Environment Plan https://www.gov.uk/government/publications/natural-capital-and-ecosystem-assessment-programme/natural-capital-and-ecosystem-assessment-programme	
NET GAIN			
Biodiversity Net Gain guidance and metric	Defra and Natural England	Guidance: https://www.gov.uk/government/collections/biodiversity-net-gain Metric: https://www.gov.uk/guidance/biodiversity-metric-calculate-the-biodiversity-net-gain-of-a-project-or-development	
Environmental Benefits from Nature Tool (Beta Test Version)	Natural England	https://nepubprod.appspot.com/publication/6414097026646016	
SOILS and PEAT			
Provisional Agricultural Land Classification (ALC) Maps	Natural England	https://data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc	✓ M
Strategic mapping assigning the likelihood of BMV agricultural land (created as a companion to	Natural England	http://publications.naturalengland.org.uk/category/5208993007403008 (pdf only - data not downloadable)	

the Provisional ALC maps)			
Detailed ALC reports – post 1988 ALC survey	Natural England	https://www.data.gov.uk/dataset/c002ceea-d650-4408-b302-939e9b88eb0b/agricultural-land-classification-alc-grades-post-1988-survey-polygons http://publications.naturalengland.org.uk/category/6249382855835648 (limited national coverage)	✓ M
Peaty Soil Location	Natural England	https://www.data.gov.uk/dataset/c9eb1cd9-c254-4128-a18d-d368fbe6acf0/peaty-soils-location	✓
England Peat Status Green House Gas and Carbon Storage	Natural England	https://www.data.gov.uk/dataset/8ea9074e-bafc-4cc4-85dd-19cda1dfbfd5/england-peat-status-ghg-and-c-storage Report: https://publications.naturalengland.org.uk/publication/30021?category=24011	✓
General mapped information on soil types, including peaty soils, is available as 'Soilscapes'. This also includes a simple ecosystem services provision guide.	National Soil Resources Institute (NSRI)	https://www.landis.org.uk/soilscapes/ (not open data for free download)	✓ M
WATER			
Strategic Flood Risk Assessments	Local Planning Authority led		
Local Flood Risk Management Strategies	Lead Local Flood Authorities		
Water Resource Management Plans	Environment Agency / Water Authorities		
River Basin Management Plans	Environment Agency	https://www.gov.uk/guidance/river-basin-management-plans-updated-2022	
Catchment Flood Management Plans	Environment Agency	https://www.gov.uk/government/collections/catchment-flood-management-plans	
Nutrient Impacts	Natural England Local Planning Authority	A summary guide and frequently asked questions (NE776): https://publications.naturalengland.org.uk/publication/6248597523005440 Nutrient pollution: reducing the impact on protected sites - GOV.UK (www.gov.uk) Tools and resources for calculating nutrient neutrality. https://www.gov.uk/government/collections/tools-and-resources-for-calculating-nutrient-neutrality Information on Nature Based Solutions as Nutrient Mitigation (NBS2024) https://publications.naturalengland.org.uk/publication/6680815300509696	