

23<sup>rd</sup> June 2025



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**Representations to the Hampshire Local Nature Recovery Strategy on behalf of Church Commissions for England (June 2025).**

Dear Sir/Madam,

We write on behalf of our client, Church Commissioners for England (hereafter referred to as 'our Client') to respond to the draft Hampshire Local Nature Recovery Strategy consultation (June 2025).

For context, Church Commissioners for England have significant landholdings across Hampshire, including in Chilbolton, Wonston and Winchester including the employment-led allocation at Bushfield Camp. Our client, therefore, has an interest in the formulation and delivery of the Hampshire LNRS. We consider that our client's landholdings present an opportunity to assist the Responsible Authority in achieving their ambitions to 'create, restore and enhance habitats' across Hampshire. Once published, the Hampshire LNRS will assist our client and their farm tenants in identifying habitat opportunities and implementing measures to transition towards more sustainable farming practices. The LNRS also represents an opportunity to strategically deliver biodiversity net gain in order to unlock development sites. The LNRS therefore provides an exciting opportunity to facilitate meeting the government target of delivering 1.5 million homes nationwide within the next 5 years.

Whilst these responses are made in light of the draft strategy as it has been presented as part of the consultation, our Client would also like to ensure that any revisions to the strategy made as part of the consultation feedback and 'finalisation' of the strategy are re-consulted. Church Commissioners for England would want to reserve their right to be re-consulted on the strategy before it is finalised to make any additional comments on the appropriateness of the strategy.

- 1. Is this a personal response, or are you responding on behalf of an organisation, group or business or as a democratically Elected Representative?**

*I am providing the official response of an organisation, group or business.*

- 2. Please provide details about the organisation, group or business that you represent**

*Church Commissioners for England c/o Savills*

*Savills, The Lumen, Newcastle Helix, Newcastle-upon-Tyne, NE4 5BZ*

*Sophie Watson*

*Senior Planner at Savills*

- 3. Which of these best describes the industry or function of your organisation, group or business?**

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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*Land ownership*

4. **Which of these strategy areas would you like to answer about?**

**Rivers and wetlands**

5. **Which, if any, do you think are important issues for rivers and wetlands in Hampshire?**

*Water quantity (eg. low water levels or risk of flooding)*

6. **Which, if any, do you think are important to protect or improve rivers and wetlands?**

*Providing riparian buffer strips and tree planting*

*Countryside Stewardship and other funding (eg. incentive schemes for land managers to look after and improve river and wetland habitats)*

*Collaboration and landowner liaison*

7. **If there is anything you would like to expand on about issues or opportunities affecting rivers and wetlands in Hampshire, please use the box below.**

*Church Commissioners for England own landholdings to the north of Chilbolton, which is located directly adjacent to the River Test. As such, they understand that as their landholdings are located adjacent to the river, they could play a crucial role in mitigating the effects of flooding. Church Commissioners for England are therefore supportive of the opportunities for nature recovery identified on page 25, including tree planting and the provision of riparian buffer strips, provided it aligns with their agricultural objectives. Our client is also supportive of paragraph 2.28, which links development to the BNG credits. As previously mentioned, once published, the Hampshire LNRS will aid in unlocking development sites by strategically locating BNG sites.*

*Our client is of the view that enhancing funding is critical to successful nature recovery. However, due to the changes in the Countryside Stewardship Scheme in 2024 and awaited guidance on Sustainable Farming Incentives (SFIs), it is considered that there may be limited access to funding in the short-term.*

*We are supportive of the identification of 'collaboration and landowner liaison' as an opportunity for the LNRS to harness. Our client considers that a joined-up approach between landowners is critical to ensuring the success of the LNRS. We are therefore supportive of the inclusion of platforms to encourage collaboration, such as the Hampshire Biodiversity Information Centre.*

**Woodland**

8. **Which, if any, do you think are important issues for woodland in Hampshire?**

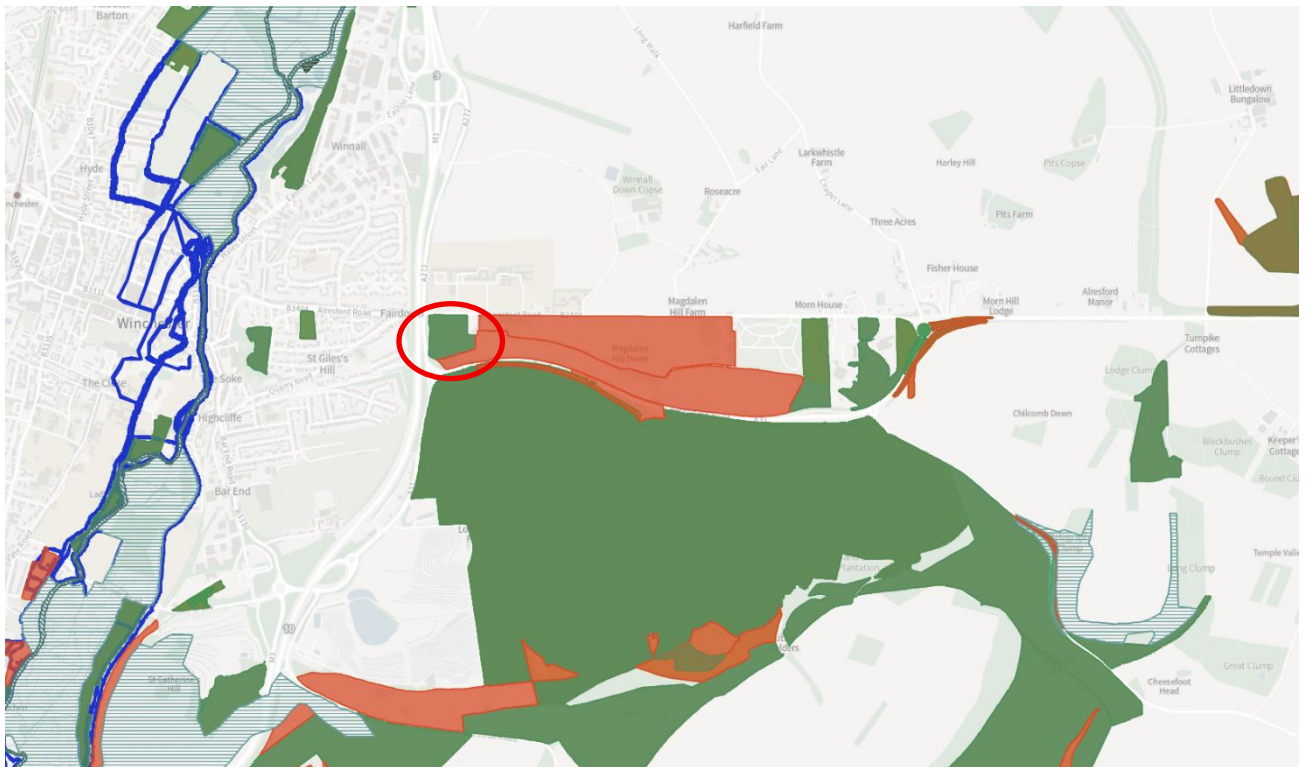
*Tree pests and pathogens (eg. their threat to the sustainability of woodlands)*

9. **Which, if any, do you think are important to protect or improve woodland?**

*Improving connectivity between habitats (eg. through hedgerow planting, strategic land purchase, woodland restoration)*

10. **Is there anything you would like to expand on about issues or opportunities affecting woodland in Hampshire, please use the box below.**

*We consider that improving the connectivity between habitats is vital for nature recovery. We are therefore supportive of the identification of connectivity as an opportunity for the LNRS to harness. We are supportive of the Responsible Authority's identification of our client's landholdings as an Area That Could Become of Particular Importance for Biodiversity (ACB) near Magdalen Hill Down. We consider that the identification of their landholdings as an ACB would improve connectivity between existing woodland and the Local Wildlife Site. The identification of our client's landholdings as an ACB also assists the Responsible Authority in enhancing the connectivity of urban areas, due to the site's close proximity to Winchester.*



*Figure 1- Extract of the draft LNRS Map (Source: Hampshire County Council)*

*Part of our client's landholdings near Chilbolton contains Ancient Woodland, however no measures are proposed on the surrounding land to connect this habitat with the surrounding area. As such, our client is open to discussions with the Responsible Authority to identify if there are opportunities to propose measures on their surrounding landholdings to ensure that the connectivity of woodland can be enhanced.*

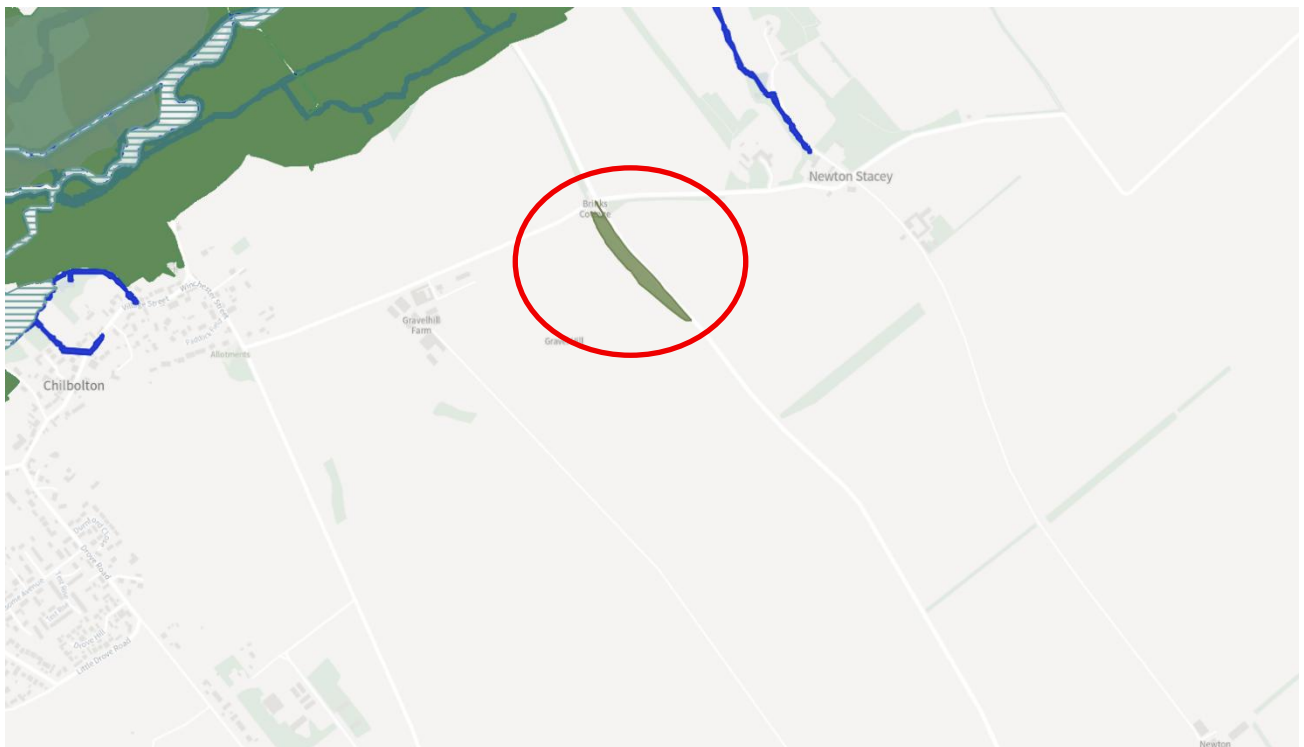


Figure 2 – Extract of the draft LNRS Map (Source: Hampshire County Council)

**11. Which of these priority areas would you like to answer about?**

**Chalk streams, other watercourses, headwaters and groundwater protection zones**

**12. Which, if any, of the following outcomes would you like to see achieved for chalk streams, other watercourses, headwaters and groundwater protection zones in Hampshire?**

*The area's watercourses and headwaters are protected to reduce the amount of nutrients and pollutants entering the watercourses and groundwaters*

**13. Do you think these are the right measures to achieve these outcomes for chalk streams, other watercourses, headwaters and groundwater protection zones?**

*Riparian buffer strips are created and managed on land next to water courses – Yes*

*Arable land is reverted grassland and intensive grassland is managed, which reduces the need for fertiliser – Yes*

*Intercept and slow surface run-off from rainfall events and make space on permanent grassland for water from rivers and streams to be stored during a flood event – Yes*

*Application of very low nitrogen input to slow or reverse nutrient levels in groundwater – No*

*In-channel improvements such as gravel cleaning and restoration of lost or relic meanders – Yes*

*Improve connectivity between river and floodplain – Yes*

- 14. If you think there are any priorities we have missed out, or have anything else to add about either the outcomes or potential measures for chalk streams, other watercourses, headwaters and groundwater protection zones in Hampshire, then please use the box below:**

*Our client is supportive of the priority outcome for 'Chalk Streams' to create riparian buffer strips. As previously mentioned in responses to earlier questions, due to our client's landholdings immediately adjacent to the River Test, they are supportive of creating riparian habitats where the land is not in an agricultural tenancy.*

*Church Commissioners for England are broadly supportive of the following measures:*

- *Measure R1 (Creation and management of buffer strips)*
- *Measure R3 (Reversion of arable land to grassland)*
- *Measure R4 (Flood mitigation on permanent grassland)*
- *Measure R7 (Reduce the impact of road and urban runoff)*

*Our client is broadly supportive of most of the proposed measures. Our principal concerns relate to the reference of 'very low nitrogen input'. It is assumed this relates to pesticide use. The Control of Pesticides Regulations 1986 (COPR) alongside the Food and Environment Protection Act 1985 (FEPA) primarily regulate pesticides. As pesticide use is controlled under separate legislation, this measure is not considered appropriate.*

**Species rich grasslands**

- 15. Which, if any, of the following outcomes would you like to see achieved for species rich grasslands?**

*Degraded species-rich grassland restored back to species rich grassland*

*New areas of species rich grassland created (including habitat expansion), linking existing areas of grassland*

- 16. Do you think these are the right measures to achieve these outcomes for species rich grasslands?**

*Appropriate grazing – Yes*

*Hay/hay cutting regimes – Yes*

*Little or no application of manure, fertiliser, pesticide or supplementary feed – No*

*Use of green haylage from local donor meadows – Yes*

*Remove or manage scrub – Yes*

*Revert arable land to grassland – Yes*

*Reduce stocking and fertiliser inputs - No*

*Manage grassland through grazing and/or hay cutting regimes – Yes*

*Maintain a range of plant heights – Yes*

- 17. If you think there are any priorities we have missed out, or have anything else to add about either the outcomes or potential measures for species rich grasslands in Hampshire, then please use the box below:**

*Our client is broadly supportive of most of the proposed measures. Our principal concerns are with the measures relating to pesticide use. The Control of Pesticides Regulations 1986 (COPR) alongside the Food and Environment Protection Act 1985 (FEPA) primarily regulate pesticides. As pesticide use is controlled under separate legislation, these measures are not considered appropriate.*

*Our client is supportive of the identification of their land near Magdalen Hill Down for grassland restoration (Measure G2). Restoring grassland on the site will improve the connectivity of existing habitats. Our client also notes that parts of their landholdings at Bushfield Camp is also identified as an ACB. It should be noted that Bushfield Camp is an existing allocated employment site in the Winchester Local Plan (policy W5). Paragraph 4.30 of the draft LNRS recognises that inclusion of ACB land 'does not automatically guarantee that it is possible to create that habitat in these areas'. However we feel this wording should be strengthened to give more clarity that the Hampshire LNRS will not prejudice the delivery of allocated sites in Local Plans.*

### **Woodlands**

**18. Which, if any, of the following outcomes would you like to see achieved for woodlands?**

*Existing woodlands enhanced through suitable active management*

*New woodlands created with native tree species linking existing areas of woodland*

**19. Do you think these are the right measures to achieve these outcomes for woodlands?**

*Woodland improvements such as thinning, selective felling, coppicing, natural regeneration and planting and managing water levels – Yes*

*Actively manage priority woodland species – Yes*

*Create new 'soft' woodland edges on arable land – Yes*

*Manage and control of deer populations – Yes*

*Improve access and educational opportunities within woodlands – Yes*

*Control of rhododendron, laurel and other invasive non-native woodland species – Yes*

*Raise awareness of and monitor tree pests and diseases – Yes*

*Create and maintain new diverse native woodland – Yes*

*Create or extend scrub or arable or improved permanent grassland on land next to existing scrub or woodland areas in areas particularly inhabited by target species – Yes*

*Manage and control of grey squirrel populations – Yes*

**20. If you think there are any priorities we have missed out, or have anything else to add about either the outcomes or potential measures for woodlands in Hampshire, then please use the box below:**

*Our client wishes to provide their general support for woodland enhancement and creation across Hampshire. Encouraging woodland creation and enhancements will deliver many environmental benefits, including carbon sequestration.*

### **Farming and nature**

**21. Would you like to see the following outcome achieved for farming and nature?**

*Nature friendly farming and protection of nature on arable land – Yes*

**22. Do you think these are the right measures to achieve this outcome for farming and nature>**

*Creation of skylark plots – Yes*

*Creation of nesting plots for lapwing and stone curlew- Yes*

*Targeting specific threatened species for reintroduction, re-colonisation or range extension – Yes*

*Management of grassland for target features such as feeding areas or over-wintering geese in locations that are free from disturbance – Yes*

*Provide cultivated areas and manage for rare arable plants – Yes*

*Provide unharvested cereal headlands, overwinter stubble and winter bird food – yes*

*Protection of in-field trees on intensive grassland or arable – Yes*

*Creation and management of 4-6m buffer strips on intensive grassland or cultivated land – Yes*

*Establishment of an agroforestry system where suitable – Yes*

*Pollinator strips – Yes*

**23. If you think there are any priorities we have missed out, or have anything else to add about either the outcomes or potential measures for farming and nature in Hampshire, then please use the box below.**

*Our client is broadly supportive of the above measures, however we request that the wording be amended. The measure relating to agroforestry includes an element of flexibility through the inclusion of 'where possible'. As such, we politely request that the same level of flexibility be applied to the remaining farmland measures.*

**24. Do you agree with the process that has been used to prioritise species for focus?**

*No comment.*

**25. Is there any species on the species priority lists that you think should not be included, please specify?**

*No comment.*

**26. If there are any species not on the species priority lists that you think should be included, please specify.**

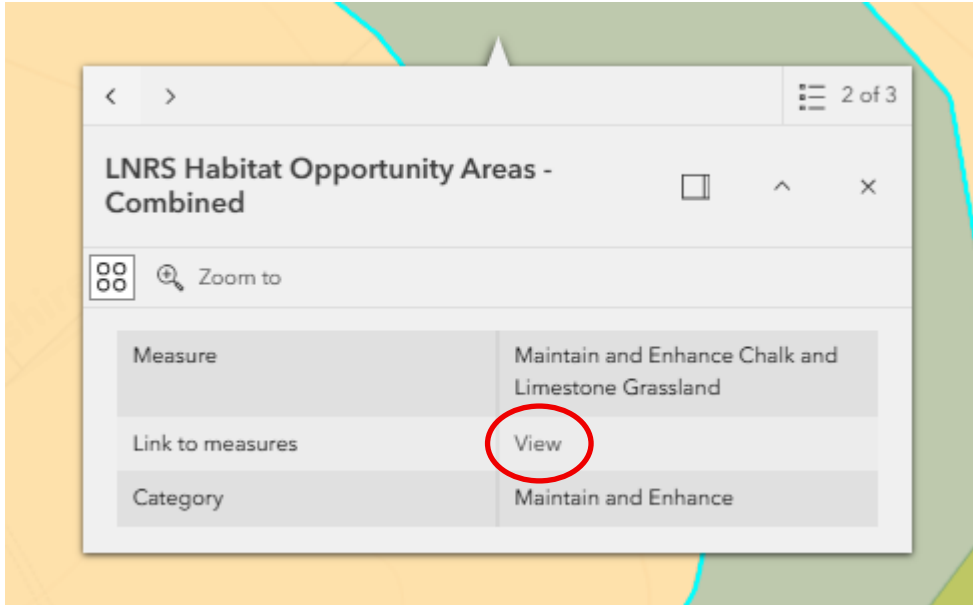
*No comment.*

**27. Please explain why you think that species should be included**

*No comment.*


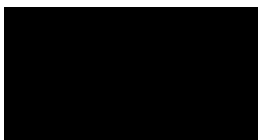
**28. If there is anything else you would like to tell us about the draft LNRS, including the appendices.**

*Whilst the map is easy to use, we consider it would be beneficial if additional features were added. For instance, the Wiltshire draft LNRS Map includes a link to the specific measures identified in their draft LNRS. We would therefore welcome the inclusion of a similar feature in the Hampshire LNRS.*



If you have any queries on any of the content included in these representations, please don't hesitate to get in touch.

Yours sincerely,

  
Director