

EXAMINATION IN PUBLIC (EIP) OF THE BASINGSTOKE & DEANE LOCAL PLAN

Hearing Statement On Behalf of Natural Basingstoke (NB)

Addressing: Issue 2 Sustainability Appraisal and Habitats Regulations Assessment

3. Sustainability Appraisal and Habitats Regulations Assessment:

*3.1 Is the **spatial strategy** supported by the SA and the HRA?*

*3.2 Have **reasonable alternatives** been considered in the SA? Is there a clear audit trail from the consideration of option to the preferred strategy in the Plan?*

*3.3 Which **adverse effects** identified by the SA require significant mitigation, and how is the Council addressing these issues?*

QUESTION 3.1, 3.2, 3.3

1. The Spatial Strategy environmental requirements¹ are expressed in general terms that from the outset takes no account we believe of NPPF requirements, nor the Council Plan 2013 – 2017² nor the community strategy, Pride in Our Place³. In addition inadequate base data results in flawed environmental appraisals.
2. NPPF omission has resulted in inadequately prepared planning policies for landscape, biodiversity and green infrastructure and probably strategic gaps that are therefore not consistent with NPPF requirements omitting for example, NPPF requirements and precise terminology for planning and delivering ecological networks, wildlife corridors, priority habitats, priority species and target setting NPPF117. Development policies, site policies and the supplementary Landscape and Biodiversity SPD are not consistent with NPPF requirements or terminology and will not be effective in delivering the ecological benefits that the NPPF expects to be delivered by proper implementation.

¹ CD03 Submission Local Plan Spatial Strategy page 22 paras 3.6, 3.9, 3.10, 3.11

² OT01 Council Plan

³ BD04 Pride In Our Place

3. We note that integration of the NPPF throughout the whole of the Sustainability Appraisal is absent until SA Appendix 17 Initial policy option appraisals⁸ when some NPPF influence seems to be evident but this postdates as far as we can tell any of the site appraisals and subsequently has only a limited influence on policy preparation. Even then there was a lack of clarity about how the policies should be framed and what they should deliver. Natural Basingstoke take the view that the natural environment elements of the spatial strategy are only very loosely supported by the SA process. The resulting policies do not integrate NPPF requirements or terminologies, which are important, and lack the rigour. They cannot be considered to meet the soundness tests of being consistent with national policy, effective in delivering what national policy expects. In addition NB take the view that in some cases appraisal processes for proposed sites were simply not robust enough for the environmental attributes of the sites or their relationship with their surroundings to justify being deemed to be positively prepared or justified.

4. The SA mostly uses generalisations¹⁰ to describe; the developed area of the Borough, the NWAONB, SSSI's. These statements presented even at a high level an overly optimistic and misleading picture of the extent and condition of the natural environment to policy makers that was unhelpful for useful conclusions to have been drawn. A meaningful synthesis was available from the outset in SA Appendix 2⁹ NPPF 165 requires planning policies and decisions to use up-to-date information about the environment and that should be done with as much rigour as possible.

⁹ Sustainability Appraisal Appendix 2 Baseline Data Biodiversity page 15 SA09

¹⁰ Sustainability Appraisal Ch. 4 Setting the Context para 4.2 page 10. SA01 – 09

5. Data from Hampshire Biodiversity Information Centre (HBIC) using the correct terminology reveals habitat extent and condition where they can and the extent of fragmentation⁴. Although the SA states that **90%** of the Borough is undeveloped, HBIC report only **806** hectares or **1.27%** of the Borough are statutorily designated as of high value for wildlife⁴. The NWAONB reports that all but **16%** of its land area is farmland¹¹ and that just **2%** or **3,330** hectares are SSSI's¹⁸. Of the "many" Borough SSSI's (20), several are small¹⁹. SINC's are spread across **783**²⁰ sites indicating the degree of fragmentation. The Borough has **819** Priority and Notable Species needing special conservation effort²¹.

6. NB do not view the resulting environmental policies, site policies or supplementary policies to be positively prepared or consistent with the NPPF and they will not be effective in securing the planning outcomes that the NPPF envisages.

7. Development policies do not specify or adequately specify NPPF requirements or use consistent terminology to make clear planning tasks and what information about networks, habitats and biodiversity will be available as it is for other infrastructure. Measurable policy targets must be set but are not present.

8. Site development policies do not profile the landscape habitat framework around the site and what net gains should be sought, how and where, these should be incorporated into site development profiles (similar to roads and schools etc). In the view of NB the Borough should have a plan for the location and function of green space on designated sites and reserve that as a development condition and not leave it to a developer to propose. The role of the authority under the NPPF 117 is to promote actions to secure net gains.

11 Appendix 3 North Wessex AONB – State of the North Wessex Downs 2012 page 9

18 Appendix 4 North Wessex AONB Management Plan - Biodiversity page 43

19 Appendix 5 HBIC Monitoring Change in Priority Habitats, Species and Designated Areas Report
2011-12 para 9.2 Table 9c page 32

20 Appendix 6 HBIC Map of SINC's in B&DBC

21 Sustainability Appraisal Appendix 2 Baseline Data, Biodiversity page 15 SA01

9. The Local Plan does not appear to explain what its strategic priorities are. Although it is known that local river restoration is a priority, housing and infrastructure development must surely mean habitats and biodiversity on land must be just as much a priority.
10. Policies lack targets and measures of gain or loss that are needed to incentivise the planning system to plan positively or to promote the restoration of habitats, networks and biodiversity. The Local Plan cannot be effective without these parameters and in any event makes the plan inconsistent with national policy that has national targets arising out of Biodiversity 2020 that local authorities are expected to contribute to.

HOW TO MAKE PLAN SOUND

11. NB believe the Sustainability Appraisal (and the Local Plan) can only be made sound by complete re-appraisal and revision if it is to meet the requirements set out by the NPPF. Were the Inspector minded to approve the Local Plan we have proposed some changes to make the Sustainability Appraisal more sound but the task is too great for this document to attempt.
12. The Sustainability Appraisal, should be re-engineered to be made compliant with the NPPF in its requirements and terminology and, reflect the vision of the Council Plan 2013 – 2017 and the community Strategy Pride in Our Place. Site appraisals will need to be revisited and in particular site identifiable for having some habitats and biodiversity and their relationship with priority habitats and networks or corridors in the vicinity.
13. Measurable indicators of achievement compliant with the NPPF e.g. 117 to be incorporated including recognition for national and local targets for gains (and losses), the extent and condition of Priority Habitats restored , recreated and for populations of Priority (and notable) Species. Losses and declines of Priority Habitats and their Priority Species resulting from development or other factors to be aggregated with information from other sources including Hampshire Biodiversity Information Centre and reviewed with relevant local partners.

14. Policies EM1 Landscape, EM4 Biodiversity, Geodiversity and Nature Conservation, EM5 Green Infrastructure and probably EM2 Strategic Gaps to be consistent with NPPF requirements, terminology and definitions and to be revised together with site policies that are dependent on those policies and information required to plan them. The Landscape and Biodiversity SPD will also need to be made compliant with the NPPF.

ISSUE 3.2, 3.3 - SS3.11 Basingstoke Golf Course, SS3.10 Manydown.

15. NB view the SA for SS3.10 and SS3.11 to be not justified, not effective and not consistent because site selection and site policy are not compliant with NPPF guidance and include a non-compliant Core Strategy appraisal choice and attendant objectives and appraisal. The following sites are examples of where alternatives should be considered or where mitigation or compensation NPPF 152 might be greater than so far alluded to in site policies and where ecological network, wildlife corridor, stepping stone information and nearby land opportunities should be available and informing site policies together with better qualitative data about the priority species and assemblages than has been gathered.

16. **SS3.11 Basingstoke Golf Course.** The omission of NPPF rigour in the SA is demonstrated by the inclusion of Basingstoke Golf Course as a development site and as an example of the spatial strategy not being supported by the SA. The proposal for development is not positively prepared, not justified and not consistent with national policy and cannot be regarded as effective for the delivery of environmental sustainable development.

17. The limited and unrealistic analysis in the Golf Course Biodiversity Assessment does not appear to include any evidence of biodiversity or assessment of habitat to provide a proper assessment, including habitats and species, omissions even less acceptable in the context of this site. The Golf Course already hosts 2 priority habitats and probably 2 more, lowland meadow or possibly lowland calcareous grassland, also wood pasture, the loss of these would increase the Borough deficit in priority habitats whose loss would have to be compensated NPPF176 if there is to be a net gain. All these habitats host more biodiversity than found on an arable field so the opportunity for alternative sites justifies further appraisal utilising the rigour of NPPF requirements to arrive at a decision. It would take decades if not longer, or possibly if at all, to replace these habitats and species losses. Contrary to the BA fauna in the area include many priority species of birds, bats, lepidoptera and more that may even be there because of the Golf Course mixed grassland habitat and open tree scape. Biodiversity information about the area (not just the site) and not just the site is obtainable from Hampshire Biodiversity Information Centre (HBIC).
18. In a landscape of arable fields where 98% of herb rich grassland has been lost already ⁹ this further loss cannot be justified. Contrary to the BA the Golf course while bordered by the M3 provides an important corridor to the south where there are woodlands and another golf course that will allow many species of woodland and open ground species to be able to move freely. To the north are Beggarwood and Old Down Woodland Parks with Old Down in particular a grassland SINC having good numbers of mobile priority species that may use all the areas mentioned here. Over time connection could and should be improved, to the north and to the south across the M3 putting in place green bridges or underpasses and into urban areas.
19. The grassland and woodland habitats provides ecosystem services, water filtering and filling of aquifers, slowing runoff, extracting and storing pollutants, releasing oxygen, feeding wildlife in support of many declining populations, feeding foraging birds, bees and other pollinators, bats and more – services people need, and also making people feel better. Benefits to society and the environment and to wildlife that have not had any value placed on them as part of the SA and another NPPF requirement not met.

⁹ Sustainability Appraisal Appendix 2 Baseline Data, Biodiversity page 15 SA01

20. The BA also notes the adjacent Peak Copse SINC with opportunities for it to be made even better. Placing this site next to around 1000 houses will inevitably lead to further decline of that site from human disturbance, light, dumping of refuse and pet predation. Losses will not be just the Golf Course and separately and together development would represent a significant adverse outcome not justified by the Sustainability Appraisal and deserving of a reassessment against other candidates.
21. NPPF 157 allows the authority to identify areas of land it regards as inappropriate for development when of environmental (or historical) significance. If the Borough is serious about rebuilding biodiversity from its low point then it should consider making such decisions.
22. **SS3.10 Manydown.** Adverse effects requiring significant mitigation could include; loss of rare arable plants of at least national importance and possibly international importance. Impacts too on priority species of which require areas of undisturbed space. The site should be planned for its integration with ecological networks and wildlife corridors including into sub-regional networks as well as urban areas.
23. The inclusion of a policy statement for a western bypass highlights, along with ecological and other aspects of infrastructure provision for rail; the need for green bridges and underpasses to facilitate network connections. Neighbouring communities and the town will become increasingly isolated from open countryside. Development plans to the south increase the urgency for ecological planning and NB believe that master planning for the whole of Manydown and adjacent areas should be included in this Local Plan before SS3.10 is approved.

HOW TO MAKE PLAN SOUND

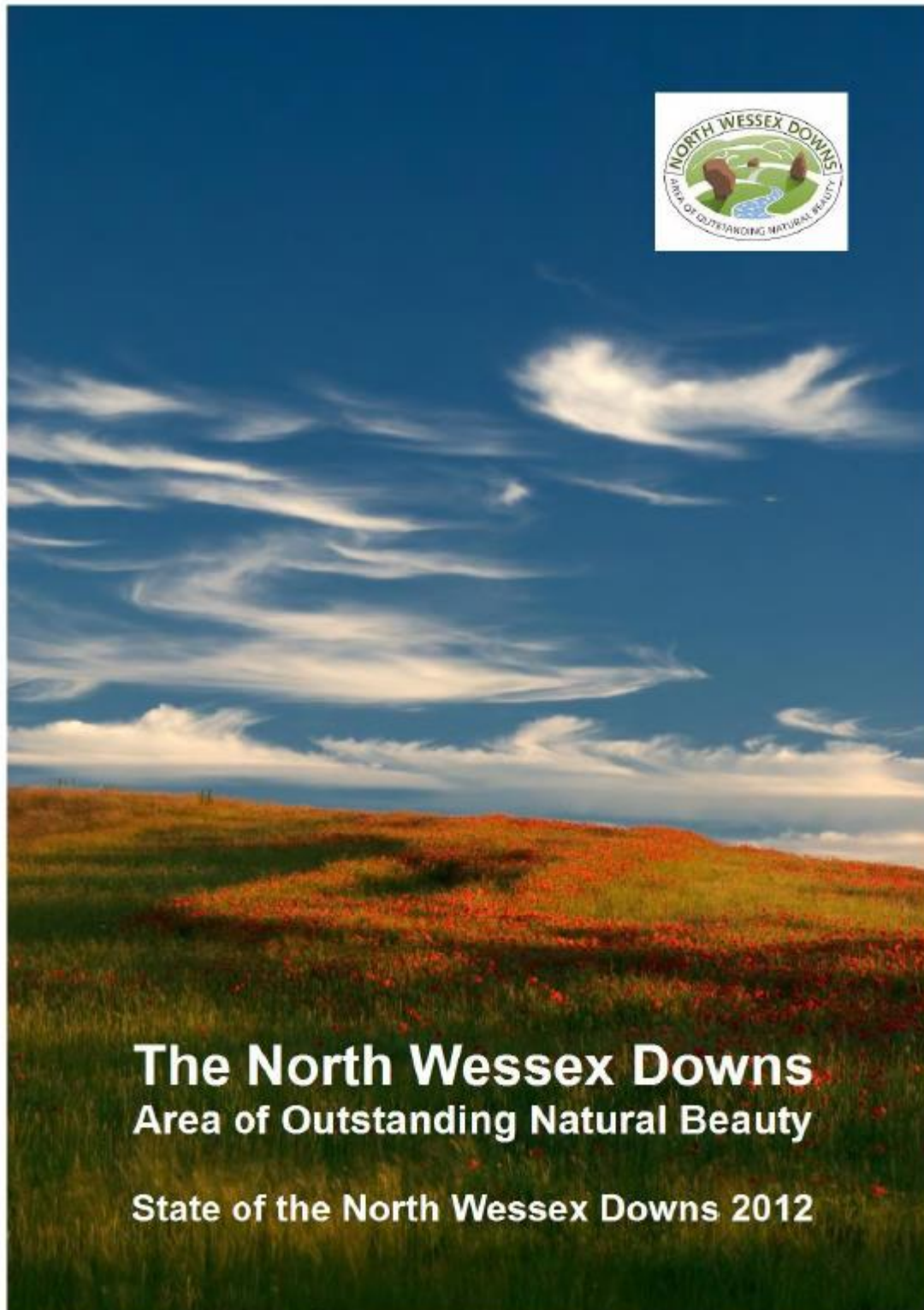
24. A new Sustainability Appraisal that will include all the issues around all of Manydown not just SS3.10, that recognises the social and cultural benefits to be derived to secure “*the better planning of the area*” for existing residents and evaluates all the infrastructure issues, including ecological, associated with Manydown and recognises the extent, diversity and value of priority habitats and priority species already present as well as ecological network and wildlife corridor opportunities.

25. Plans should include the retention of particularly important areas for arable wildflowers and for priority species associated with Manydown and that take account of the particular challenges of securing them.

Paul Beevers
Natural Basingstoke

Appendix 3 North Wessex Downs – State of the North Wessex Downs 2012

State of the North Wessex Downs Report 2012



Land Management

The North Wessex Downs AONB Management Plan objectives relating to land management are outlined below:

- To encourage initiatives that facilitate sustainable land management.
- To encourage diverse and viable agriculture, forestry, horseracing and other land-based enterprises that support the delivery of a wide range of public benefits.
- To create a diverse rural skills base to support traditional and emerging land-based enterprises that enhance the special qualities and features of the North Wessex Downs.

Indicator 2. Area of land in active environmental management

Indicator Background

Approximately 84% of the North Wessex Downs AONB is classified as farmland with over 60% under arable cultivation. This means that agriculture is the dominant land use and the major influence determining landscape character and quality.

Environmental Stewardship is a government-funded scheme open to all farmers, land managers and tenants in England who through good stewardship and management improve the quality of the environment. It was introduced in 2004 to replace the Countryside Stewardship Scheme; however some existing Countryside Stewardship agreements will continue until 2014.

Environmental stewardship is a two tier scheme:

- Entry Level Stewardship/Organic Entry Level Stewardship which provides a straightforward approach to delivering simple and effective environmental management across the whole farm. Agreements last for five years.
- Higher Level Stewardship/Organic Higher Level Stewardship builds upon the Entry Level Scheme providing funding for more detailed management over a longer period of time. Agreements last for 10 years.

Environmental Stewardship, and Countryside Stewardship before, provide a straightforward approach to supporting good stewardship. However it is recognised that take-up of the schemes does not necessarily lead to good environmental management. The North Wessex Downs AONB has been helping to develop targeted methods of promoting Environmental Stewardship options through initiatives such as the North Wessex Downs Farmland Bird Project.

We remain committed to assisting our partners in delivery of environmental stewardship objectives. However it should be noted that with the prospect of Common Agricultural Policy reform and recent cuts to staff and budgets the future of Environmental Stewardship is unclear.

Appendix 4 North Wessex Downs Management Plan – Biodiversity



We still do not know one thousandth of one percent of what nature has revealed to us

Albert Einstein

Biodiversity

The North Wessex Downs AONB spans five of Natural England's Natural Areas: Berkshire and Marlborough Downs, South Wessex Downs, Hampshire Downs, Thames and Avon Vales, and London Basin. The AONB forms part of the delivery for the regional biodiversity targets for the South East and South West regions and the County Biodiversity Action Plans (BAPs) for Oxfordshire, Hampshire, Wiltshire, and Berkshire⁴⁰ (the targets for Swindon are included in the Wiltshire BAP). All actions proposed in this Management Plan support BAP policies. It also has the potential to contribute to Defra's Public Service Agreement (PSA) targets for farmland birds and favourable management of wildlife sites.⁴¹

The varied geology of the North Wessex Downs is reflected in the breadth of ecological diversity. Within the AONB, there are seven Special Areas of Conservation (SACs), part of the internationally important network of European Natura 2000 sites. Both Pewsey Downs SAC and Fyfield Downs SSSI are also National Nature Reserves with outstanding chalk grassland flora and fauna that include nationally important populations of rare species, including the endemic Early Gentian. The AONB contains 66 Sites of Special Scientific Interest (SSSIs) covering 3,330 hectares (or 2% of the area of the AONB) of which 29 have a chalk component amounting to 1,421 hectares (0.6% of the AONB area). In addition, there are a total of 249 locally important wildlife sites (known by various names, for example County Wildlife Sites, Conservation Target Areas and Sites of Importance for Nature Conservation) that have a chalk grassland component. The total area of these sites amounts to 2,163 ha or 1.3% of the AONB area. Unfortunately the absolute figure for chalk grassland within the local sites has not been calculated, so this information is not available.

The most ecologically important habitats within the AONB are the remnant chalk grasslands, semi-natural broadleaf woodlands and wood pasture, chalk rivers and associated wetlands, and arable farmland managed for conservation. A wide variety of other habitats characterise particular areas within the AONB, from remnant heathland on river gravel deposits in the east, including areas of seminatural acidic grassland in the area around Iknep, to the wide grassy verges of the droeways crossing the downs. At a local level the hedgerow network, springs, remnant crossbeds, road verges and dew ponds also provide important refuges and habitats – with chalk cuttings having magnificent displays of Primrose and Cowslip each year.

Changes to climate will alter the composition of the natural communities that are characteristic of chalk downland, woodland, streams and arable fields. Diverse natural communities of plants and animals are most likely to survive on soils and in streams with low nutrient status and in large patches of habitat.



⁴⁰ Oxfordshire Habitat Action Plans produced by the Oxfordshire Habitat Conservation Forum; Hampshire Habitat Action Plans and Special Action Plans produced by the Hampshire Biodiversity Partnership; Wiltshire Biodiversity Action Plan (2006) produced by the Wiltshire Biodiversity Action Plan Forum; and Berkshire Habitat Action Plans produced by the Berkshire Habitat Conservation Forum.

⁴¹ PSA3: "Improve biological diversity by reversing the long term decline in the number of farmland birds by 2020, as measured annually against underlying trends" and "bring into favourable condition by 2015 65% of all nationally important wildlife sites"

Appendix 6 Monitoring Change in Priority Habitats, Priority Species and Designated Areas

Hampshire Biodiversity Information Centre



Monitoring Change in Priority Habitats, Priority Species and Designated Areas

For Local Annual Monitoring Reports

2011/12 (including breakdown by district)

Produced by

Hampshire Biodiversity Information Centre

October 2012

Sharing information about Hampshire's wildlife
The Hampshire Biodiversity Information Centre Partnership includes local authorities, government agencies, wildlife charities and biological recording groups.



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Sharing information about Hampshire's wildlife
 The Hampshire Biodiversity Information Centre Partnership includes local authorities,
 government agencies, wildlife charities and biological recording groups.



Table 9C: Statutory Designated Sites (as at 31st March 2012)

Designation	Site Name	Area (ha) within district
LNR	Chineham Woods	9.17
LNR	Daneshill Park Woods	4.43
LNR	Herbert Plantation	25.59
LNR	Pamber Forest	189.86
LNR	Popley Ponds	1.44
LNR	The Mill Field	11.68
LNR	Up Nately	2.85
NNR	Ashford Hill	23.39
SSSI	Ashford Hill Woods & Meadows	141.55
SSSI	Bere Mill Meadows	10.27
SSSI	Burghclere Beacon	80.67
SSSI	Butter Wood	45.31
SSSI	Duncroft Farm Pit	0.12
SSSI	East Aston Common	0.53
SSSI	Greenham & Crookham Commons	0.46
SSSI	Greywell Tunnel (Basingstoke Canal)	0.11
SSSI	Highclere Park	69.58
SSSI	Hook Common & Bartley Heath	6.55
SSSI	Ladle Hill	10.50
SSSI	Mapledurwell Fen	0.41
SSSI	Micheldever Spoil Heaps	26.73
SSSI	Old Burghclere Lime Quarry	4.52
SSSI	Pamber Forest & Silchester Common	341.72
SSSI	River Test	41.86
SSSI	Ron Ward's Meadow with Tadley Pastures	11.52
SSSI	Sidley Wood	11.72
SSSI	Stanford End Mill & River Loddon	1.84
SSSI	West Woodhay Down	0.42

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Appendix 6 HBIC Map of SINC's in B&DBC

