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

Hearing Statement On Behalf of Natural Basingstoke (NB)

Addressing: Issue 5 Greenfield Site Allocations Q11.10 SS3.10 Manydown

11**. *Greenfield Site Allocations:*** *Are the proposed* ***major new developments*** *for new housing and other uses positively prepared, justified and deliverable? Does the* ***level of detail*** *in the policies and Inset Diagrams meet the requirements in the PPG for Local Plans to make clear* ***what*** *is intended to happen in the area over the life of the plan,* ***where*** *and* ***when*** *this will occur and* ***how*** *it will be delivered? (PPG Ref ID 12-002-20140306.)*

ISSUE 5

1. NB submit that this policy is unsound as it is reliant on the results of an unsound Sustainability Appraisal that is not consistent with guidance in the NPPF, the Council Plan 2013 - 2017 or community strategy Pride in Our Place.

2. Apply the terminology, definitions and requirements of the NPPF to make policy statements effective and consistent.

3. NPPF165 says that planning policies and decisions should be based on up to date information that includes the identification of components of ecological networks. NB believe this information should be included as policy statements to make the policies effective – but is not included, together with biodiversity data. NPPF158,165,166.

4. Site plan statements supported by targets should promote opportunity taking during the planning process to restore or create additional habitat. The policy refers to particular habitats like woodlands k) rather than to priority habitats and to key species instead of priority species and notable species, all have precise definitions and habitats have targets for restoration and recreation..

HOW TO MAKE PLAN SOUND

Notwithstanding the view of NB that the policy is unsound we would propose the following amended wording as pointers to ways in which the policy can be made more sound.

5. K) Include a requirement to protect, restore or create habitat for assemblages of flora and fauna [1] of species that together represent a valuable community as per local (and national) site designations.

6. Addition to n) In the event of a link between the A339 and the M3 Old Down Woodland Park will be excluded from any part of that link.

7. Amend m) To include a requirement for green bridges or underpasses or other infrastructure to ensure that ecological networks and wildlife corridors are preserved or reconnected, and that all species have the means to move in response to climate change.

8. Use the south facing railway line as an opportunity for a south facing wildlife buffer that will facilitate the movement of species. Glow worm is known to be on the bank to the east and will leave the bank in summer to feed and possibly breed in a suitable buffer. Consider railway lines or the space beside them as a strategic priority habitat wildlife corridor or even ecological network.

9. Incorporate artificial features for nesting or hibernation including in areas of low disturbance where opportunity or space allows.

10. Mitigation must demonstrate <u>evidentially</u> that it is effective and minimal. Where it is not then compensatory habitats should be required.

11. Site policy should be clear that connections will be into urban as well as rural areas.

12. NB believe that there is evidence to support the designation of additional SINC's on this part of Manydown [2] so that NPPF guidance is fulfilled, mitigation or compensation made more effective, and development options and constraints are properly considered.

Paul Beevers

Natural Basingstoke

[1] **Appendix 1** HBIC SINC Criteria

[2] **Appendix 1** Hampshire Downs Arable Plant Area NCA 130

Appendix 1 HBIC SINC Criteria

ENGLISH NATURE

Hampshire County Council

Hampshire & Isle of Wight

Criteria for selecting Sites of Importance for Nature Conservation in Hampshire

The criteria below define those sites which are considered to be of particular importance for nature conservation within Hampshire. These sites are in addition to the statutorily designated sites and are referred to as Sites of Importance for Nature Conservation (SINCs).

Woodland

1A Ancient[1] semi-natural[2] woodlands.
1B Other woodland where there is a significant element of ancient semi-natural woodland surviving.
1C Other semi-natural woodland if;
(ii) they comprise important community types of restricted distribution in the County, such as yew woods and alder swamp woods
1D Pasture woodland and wooded commons, not included in any of the above, which are of considerable biological and historical interest.

1 *Ancient - refers to woodlands which have developed particular ecological characteristics as a result of their long continuity. Those identified to date which are over 2ha are included on the Hampshire Inventory of Ancient Woodlands (Provisional).*

2 *Semi-natural - modified types of vegetation in which the dominant and constant species are accepted natives to Britain and that locality, and the structure of the community conforms to the range of natural vegetation types.*

Neutral/acid/calcareous grassland

2A Agriculturally unimproved grasslands[3]
2B Semi-improved grasslands which retain a significant element of unimproved grassland.
2D Grasslands which have become impoverished through inappropriate management but which retain sufficient elements of relic unimproved grassland to enable recovery.

3 *Agriculturally unimproved grassland - grassland that is composed of a mixed assemblage of indigenous species in essentially semi-natural communities which has been allowed to develop without the major use of herbicides or inorganic fertilisers.*

Heathland

3A Areas of heathland vegetation; including matrices of dwarf shrub, acid grassland, valley mires and scrub.
3B Areas of heathland which are afforested or have succeeded to woodland if;
(i) they retain significant remnants of heathland vegetation which would enable their recovery, or
(ii) they are contiguous with, or form an integral part of an open area of heathland,

October 1996

Coastal habitats

4A Semi-natural coastal and estuarine habitats, including saltmarsh, intertidal mudflats, sand dunes, shingle, brackish ponds, grazing marsh and maritime grasslands.

Wetlands

5A Areas of open freshwater (eg. lakes, ponds, canals, rivers, streams and ditches) which support outstanding assemblages of floating/submerged/ emergent plant species, invertebrates, birds or amphibians.

5B Fens, flushes, seepages, springs, inundation grasslands etc. that support a flora and fauna characteristic of unimproved and waterlogged (seasonal or permanent) conditions.

Species

6A Sites which support one or more notable species[4].

6B Sites which regularly support a significant population of a species which has a restricted distribution or has substantially declined in population or range. Such sites may be used seasonally or for only one part of a species life-cycle.

6C Sites which support an outstanding assemblage of species.

[4] *Notable species include Red Data Book species, Nationally Scarce species, species covered under Schedules 1,5 and 8 of the Wildlife & Countryside Act 1981, Annex 1 of the EC Bird Directive 79/409 and Annex II & 1V of the EC Directive 92/43/EEC 'The Habitats Directive', and those covered by the Bern, Bonn and Ramsar Conventions. Notable species will also include species which are considered 'County Rare' or 'County Scarce'. County Rare = those species recorded in 1% or less tetrads in Hampshire or either of the two vice-counties (11 & 12) separately. County Scarce = 4% or less tetrads.*

Social value

7A Sites of nature conservation interest which occur in areas otherwise deficient in such interest, and/or are known to be of particularly high value to local communities e.g. community wildlife sites.

Sites selected under this criteria will be rigorously confined to those which, if lost, would result in a considerable and demonstrable loss to the local community which would be very difficult/impossible to replace. Because of the widespread distribution of sites of nature conservation interest in Hampshire, and the high threshold used to define critical importance, only a limited number of sites are likely to meet this criteria.

Geology and geomorphology

8A Sites which have been designated as Regionally Important Geological/Geomorphological Sites (RIGS)

Regionally Important Geological/Geomorphological Sites are sites of regional importance excluding SSSIs. RIGS are analogous to biological non-statutory sites.

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Appendix Hampshire Downs Arable Plant Area NCA 130

Note that this is an extract from a larger document mapping individual species that needs to be printed at least A3 and in colour

National Character Area 130
Hampshire Downs

The National Character Area (NCA) following the Hampshire Downs (130) is particularly rich in arable plants: 79 out of 121 rare and threatened plants have been recorded since 1987, giving a total Important Arable Plant Area (IAPA) score of 372. This is one of the highest scores in the country, and thus the Hampshire Downs NCA should be prioritised for conservation measures.

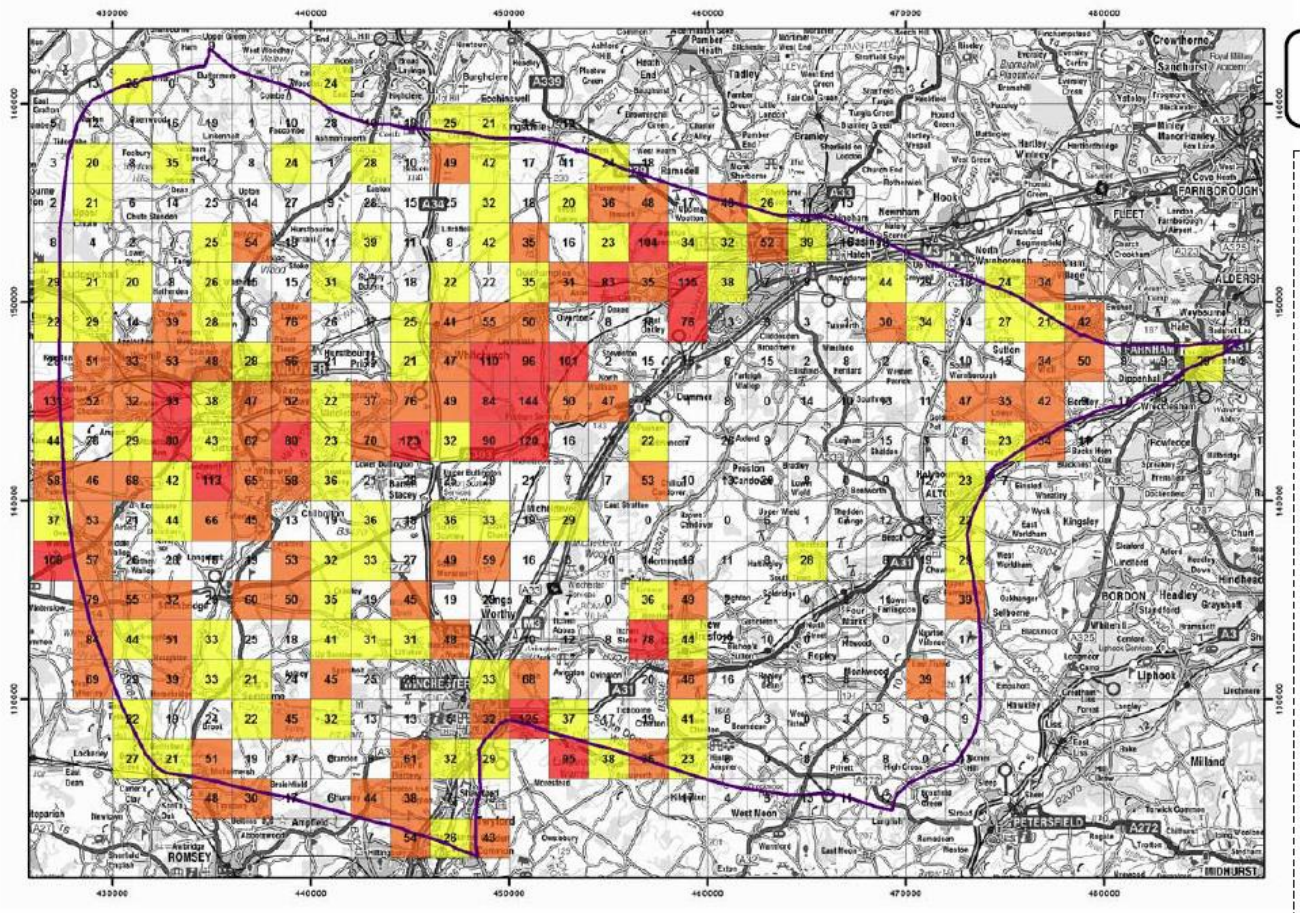
Seventeen of the 22 Section 41 (S41) arable plants listed under the NERC Act 2006 have been recorded in the Hampshire Downs. Of these, only seven plants have recent post-2000 recorded populations, and all of the plants appear to have declined in coverage. This is most apparent for pheasant's-eye, ground-pine (which is at the western limit of its range in the UK), red hemp-nettle, annual knawel, spreading hedge-parsley and broad-fruited cornsalad. A 2013 survey of an estate near Basingstoke located a large population of annual knawel, which is only the second population to be identified since 2000 in the Hampshire Downs. In addition, a new population of shepherd's-needle was found on the same estate in 2014, indicating that there is still plenty of potential to discover new populations of arable plants. The naturally occurring populations from the soil seed bank of cornflower have declined, but the plant is being used in many annual seed mixtures along with Austrian chamomile, corncockle and corn marigold which is boosting the number of locations with this species. Corn buttercup historically had a widespread distribution across the NCA, but no populations have been found since 2000. Further surveys of arable land may find more populations of Section 41 species, and locations with historical records should be a target along with adjacent arable land.

The coincidence of S41 species indicates that the richest location is adjacent to Longparish. Access to this site has been restricted since a solar array was constructed adjacent to the field. It is not known whether the threatened arable plants survive on this site, which ought to be a priority for conservation measures. An assessment of suitable agri-environment scheme options indicates that some measures are in place on the adjacent estate which also has S41 species, but they miss some of the other rare plants such as spreading hedge-parsley. Development pressure is also a concern, and the tetrad west of Basingstoke with three S41 species is under threat from expansion of the urban area. In addition, there are concerns about the application of suitable management practices at other locations with S41 species. Further feedback to farmers and landowners is needed to ensure that the disturbance requirements for these plants are in place, as this is contrary to management for other threatened habitats, such as grassland, and the land managers may not realise the extent of the disturbance required by these annual plants to ensure their survival.

The IAPA mapping indicates that in the Hampshire Downs there are 21 tetrads of European Importance, 81 of National Importance, and 87 of County Importance for arable plants. The distribution of these tetrads also follows the arable land that has been targeted for survey, and may not be the complete picture of the distribution of arable plants in the Hampshire Downs. Communities of arable plants and threatened species may be present in the southeast quarter of the NCA, which has not been as well-surveyed. In addition, there are suitable agri-environment measures present on these farms, and targeted surveys of these holdings would find out whether these measures are suitably located.

In summary, the IAPA tetrad map does provide a good baseline for targeting agri-environment scheme measures and voluntary conservation measures, particularly cultivated margins. However, it is not a complete picture, and it is likely that there are undiscovered populations of rare and threatened arable plants in this particularly rich NCA. There is a need for additional surveys on holdings with historical and current populations of arable plants and feedback to land managers and Natural England Advisers, where appropriate, suggesting changes in management to help sustain populations of threatened plants and potentially resurrect populations from buried seed. Holdings that have agri-environment options suitable for arable plants should be surveyed to find out whether the management is suitably targeted, particularly if the farms are entered into higher-level options.

NATURAL ENGLAND Plantlife



IAPA Status

- County Importance
- National Importance
- European importance

Kilometers
5

Data maintained by the Vice-County Recorder and provided by the Botanical Society of the British Isles and Ireland and accessed from the BSBI Distribution Database 2014.

Contains Plantlife Important Arable Plant Area database data 2014.

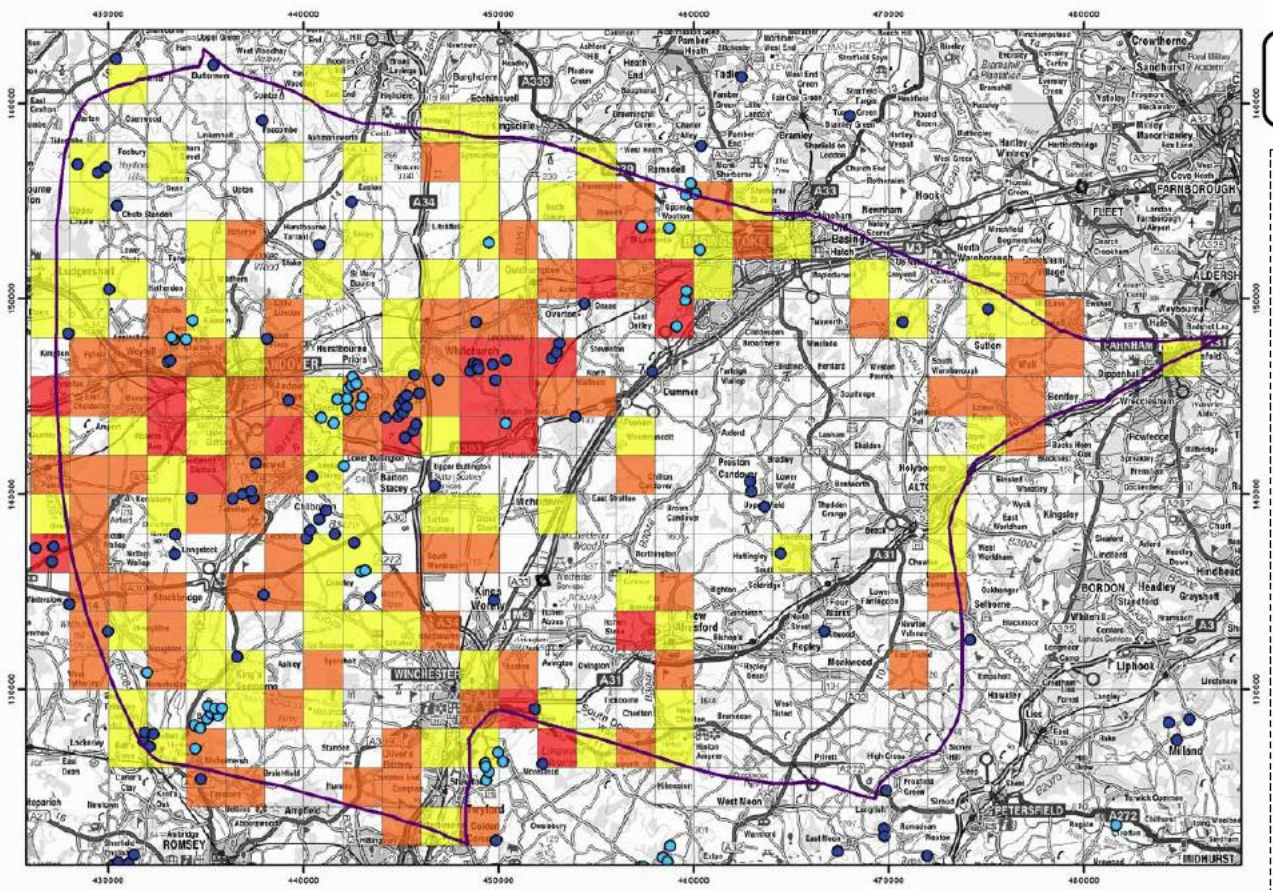
130 Hampshire Downs IAPA Status

Twenty-one of the 519 tetrads in the Hampshire Downs are considered to be of European Importance for arable plants, 81 are considered to be of National Importance, and 87 are considered to be of County Importance. These are concentrated on agricultural holdings that have been relatively well surveyed, particularly on the chalk rich soils, rather than the heavier calcareous clay soils. Only records post-1987 have been included in this analysis. In total, 79 IAPA species have been recorded in the Hampshire Downs NCA giving an IAPA score of 372.

Ground-pine is at the western edge of its range in the NCA Pheasant's-eye, red hemp-nettle, corn buttercup, annual knawel and shepherd's-needle were all once widespread across the Hampshire Downs. Either the locations with these populations have not been visited recently, or there has been an actual decline in the number of populations of these plants.

Arable land is still a dominant land use in the Hampshire Downs, but agricultural intensification from the 1960s onwards, in particular the use of herbicides, has reduced suitable habitat for arable plants. In addition, a new threat in the form of solar arrays and wind turbines may affect their survival. For example, at Longparish, a field next to a pheasant's-eye and spreading hedge-parsley populations was converted to solar energy production. Access to the site has been restricted and it is not known whether the plants are still present.

Arable plants are also associated with other disturbed and nutrient poor habitats. Records from urban areas and sown mixtures have been excluded from this analysis where possible to concentrate on the rural countryside and agricultural environment. The Micheldever Spoil Heaps SSSI with red hemp-nettle and cut-leaved germander has been included.



Environmental Stewardship

Analytical assessment of agri-environment management has found that cultivated margins and plots provide the most suitable habitat for arable plants. In Environmental Stewardship these are delivered though the ELS option 'EF11 uncropped cultivated margins for arable plants', and the HLS option 'HF20 cultivated fallow plots or margins for arable plants (rotational or non-rotational)'. Within the Hampshire Downs NCA, these options have been well targeted with 73% of the margins present within tetrads that are of County, National or European Importance for arable plants. However, there are tetrads with high IAPA scores that have been missed, such as west of Andover and west of Basingstoke.

IAPA Status of Tetrad	Option	No. Plots / Margins
European	HF20 (NR)	13
	HF20 (R)	7
	EF11	5
National	HF20 (NR)	11
	HF20 (R)	10
	EF11	14
County	HF20 (NR)	14
	HF20 (R)	6
	EF11	12
No status	HF20 (NR)	7
	HF20 (R)	13
	EF11	14
Total	HF20 (NR)	45
	HF20 (R)	36
	EF11	45
	Total	126

Some options are located in areas with fewer records of IAPA plants. This may be due to low numbers of IAPA plants being present, or due to lack of surveys and recording. For example, the HLS options near Four Marks and Lower and Upper Wield. The farms entered into the cultivated margins options (and other suitable options) should be surveyed for arable plants to find out if there are any rare or threatened plants benefitting from the conservation measures and if they are located in the right areas of each field.

Environmental Stewardship Options

- EF11 Uncropped cultivated margins for rare plants
- OF11 Uncropped cultivated margins for rare plants (organic)
- HF20 Cultivated fallow plots or margins for arable plants (rotational)
- HF20NR Cultivated fallow plots or margins for arable plants (non-rotational)

Kilometers
5

Data maintained by the Vice-County Recorder and provided by the Botanical Society of the British Isles and Ireland and accessed from the BSBI Distribution Database 2014.

Contains Plantlife Important Arable Plant Area database data 2014.