

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

Hearing Statement On Behalf of Natural Basingstoke (NB)

Hearing Session:

Addressing: Issue 10 Environment Q20 EM5 Green Infrastructure

20. The environment:

20.1 Do policies EM4-5 provide a clear and integrated framework for conserving, managing and increasing the Borough's green infrastructure, bio-diversity and other environmental assets?

ISSUE 10 EM5 GREEN INFRASTRUCTURE

1. NB do not consider the Local Plan in respect of Green Infrastructure to be positively prepared, justified or effective and is not consistent with achieving sustainable development.
 - a. NPPF165 requires a mapping of ecological network components and opportunities for extending to be effective in the delivery of requirements based on NPPF117,156. We do not have that information to determine if the NPPF requirements have been met. NB anticipated that the plan would be supported with mapped routes of network components and potential **sub-regional ecological networks** and **wildlife corridors** plus **opportunities** for priority habitat restoration, re-creation, connection as overlays to network components, so as to aid site designation, site habitat and network connections and development application decisions PPG 12-009-20140306¹, that will also aid planning for species movement, abundance and distribution, to develop new and more sustainable populations and while also taking account of climate change needs for species movement.
 - b. There are no local targets or timescales for green infrastructure net gains, let alone that can be judged as to whether they are “*significant*”², and linked to local and national targets (Biodiversity 2020) and UK Indicators³, nor commitment to measuring success against targets NPPF117. Policy Para 6.22 makes reference only to “*...seek to avoid a net loss in biodiversity.....*”.

¹ **Appendix 1** PPG ID: 12-009-20140306 Ecological Networks

² **Appendix 2** PPG ID: 8-007-20140306 Biodiversity, Ecosystems and Green Infrastructure

³ **Appendix 3** UK Biodiversity Indicators

- c. NPPF 157 guidance requires identification in the Local Plan of land that would be (a) regarded as inappropriate for development or (b) identified as Nature Improvement Areas (NIA's). We can find no reference to either, even to say "*there are none*". It should be clear, if correct, that no NIA's have been identified. It is not clear that every piece of land is regarded as appropriate for development. If so we need to know on the basis of what assessment and community consultation.
- d. For a development applicants to be made aware that their proposals are not in conflict with GI Strategy NB conclude a strategic map of GI and GI Opportunities should be available. NB have not had visibility of such a map. To be sound NPPF182 the Local Plan must demonstrate it is positively prepared and we believe that should include a map of "objectively assessed..... infrastructure requirements" which in this case applies to ecological networks and wildlife corridors as well as Biodiversity Opportunity Areas or Nature Improvement Areas.
- e. The development planning process should take into account land identified by GI planning as being a **priority habitat Opportunity. Opportunities** need to be mapped now, based on objective criteria (see How to Make Plan Sound), so that decisions on Opportunities for securing or reserving of land prior to development site designations and dwelling calculations are made, or an approach can be determined prior to ad hoc planning applications , landscape scale projects, Nature Improvement Areas, and any other GI impacting developments. The absence of these provisions demonstrates in our view that the plan has not objectively assessed development and infrastructure requirements.
- f. NPPF92 guidance on the opportunities for biodiversity, ecosystem services and community benefits afforded by **Community Forests** is not included in GI policy (and possibly Strategic Gaps Policy), so has not been considered as part of designating site developments or, we believe, GI network planning even though such a policy and the provision for community forests is part of guidance and could be a material consideration in preparing development plans and in deciding planning applications as per NPPF92. The absence of these provisions demonstrates in our view that the plan has not objectively assessed development and infrastructure requirements.

g. It is unclear how **Community Forest** provision might relate to green space standards⁴ which NB have consistently submitted should include the omitted higher levels of green space provision proposed by **Nature Nearby**⁵ and which could provide a basis for community forest calculations. These omissions despite evidence in the SA about large past and projected increases in population, loss of habitats⁶, declines in ecosystem services (unevaluated), and biodiversity - against a backdrop of over **800 species** requiring protection⁷. GI policy is not positively prepared, or justified as alternatives have not been considered – even when proposed. The policy cannot be considered to be effective or consistent with national policy. The policy should include community forest requirements on the basis of existing SA evidence and ensure that provision is a material consideration in preparing development plans and in deciding planning applications NPPF92. The absence of these provisions demonstrates in our view that the plan has not objectively assessed development and infrastructure requirements.

- 4 NB are of the view that a strategically planned green infrastructure should inform sustainability appraisals prior to site selection and green infrastructure Opportunities and requirements should be included in designated site plans as would be roads, schools, play areas, retail areas, community facilities, dwellings and other infrastructure. The absence of this approach to planning demonstrates that the plan is not being positively prepared for the environment dimension of sustainable development. This cannot be justified, effective or consistent with the NPPF. The Local Plan is not sustainable because the planning for environment, in this case G,I is not evaluated on an equal basis as other forms of infrastructure, nor are there commitments to action and deliverables or an evaluation of funding needs as for economic and social dimensions of sustainable development. **NPPF 8** states that ***“These roles should not be undertaken in isolation, because they are mutually dependent.”*** NPPF 9 reaffirms that approach. But that is not what has happened with the natural environment. On that basis requirements for Green Infrastructure, certainly in relation to development plans should have requirements for priority habitat reserved in sites when appropriate in the same way as other infrastructure.

⁴ Local Plan Appendix 4 Adopted Standards page 160

⁵ **Appendix 4** Nature Nearby, Accessible Green Space Standards (Angst)

⁶ **Appendix 1** PPG ID: 12-009-20140306 Ecological Networks

⁷ Living Landscapes – All Appendices, Appendix 1 page 8 ENV12 (see PS/02/08 for FINAL)

- 5 With the exception of a single Country Park located at the behest of the landowner not the community the Local Plan has no plans, targets, strategy for delivery or costings for significant Green Infrastructure such as community forests, urban network improvements or landscape habitat restoration and re-creation that addresses national policy for improvements. The Local Plan therefore is not positively prepared as other infrastructure requirements are for the other 2 dimensions of sustainable development. They could and should be, even if the IDP were to show a shortfall in funding. The Local Plan in the view of NB is not effectively prepared for delivering GI outcomes that are evidentially in keeping with national guidance on what should be achieved in the period up to 2020 or beyond, let alone “*significantly*” against biodiversity and habitat targets set out in Biodiversity 2020.
- 6 GI policy emphasises beneficial social functions but not **ecosystem services** NPPF 109. Policy is therefore unclear about how the benefits of ecosystem services will or can be realised and how those benefits will be assessed, protected or delivered including how natural solutions will replace engineered solutions, for example through **community forests**. It also could be clearer that there must be integration of urban green infrastructure into ecological networks⁸ as emphasised by the Environment White Paper – The Natural Choice: securing the value of nature.
- 7 The policy does not accord with NPPF114 where the authority is required to set out its strategic approach in the Local Plan for “management of networks of biodiversity and Green Infrastructure”. This should then link to the Green Infrastructure Strategy as an audit trail. The policy is not effective, not consistent.

⁸ **Appendix 6** The Natural Choice: securing the value of nature

HOW TO MAKE PLAN SOUND

1. The Local Plan should set out how the GI infrastructure will be managed and maintained and set targets and measure of performance that then link to subsidiary documents such as Living Landscapes and Green Infrastructure Strategy to provide an audit trail of targets and performance.
2. Infrastructure opportunities and requirements for GI habitat and including links and locations for network connections and stepping stones should be assessed and incorporated into site plans, if possible as conditions, but in the same way and at the same time as other infrastructure requirements i.e. when sites are being considered for designation.
3. Using available evidence plans for GI for large green spaces such as community forests should be compiled and incorporated into development proposals and the iDP together with plans for ecological and other green network improvements that will contribute to priority habitat and protected species gains.
4. NB are of the view that it is essential for effectiveness that the Local Plan should be supported by maps that go beyond existing network components to overlay sub-regional networks and wildlife corridors that enter, cross and leave the borough and join with equivalents in other administrative areas such as the NWAONB and links to the South Downs. Opportunities should also be an overlay. Maps should include links between town and country that will help restore biodiversity by facilitating the movement of species and the creation of new populations or increasing the resilience of others while also providing ecosystem services.
5. **Local Plan Natural Environment Strategic Priorities.** The Local Plan should incorporate actions and delivery commitments from; Living Landscapes, Green Infrastructure Strategy and additionally on Biodiversity and they should be consistent with Government guidance on meeting or exceeding targets in Biodiversity 2020.
6. **Priority Habitat Opportunities and Criteria.** While this will require more detailed discussion, including with Hampshire Biodiversity Information Centre (HBIC) we propose that this might include; soil type, topography, soil condition i.e. undisturbed through to

arable, existing habitat, biodiversity and condition, proximity to; existing similar or, complementary habitat.

7. The Local Plan should incorporate priority tasks and commitments to delivery with links (an audit trail) back from; Living Landscapes, Green Infrastructure Strategy and any other sources NPPF114.
8. EM5 might be reworded more positively to try to avoid using terms that really require definition, for example “important”.

Development proposals will only be permitted where they;

- a. Enhance, restore or create, connect and integrate, in accordance with the Green Infrastructure Strategy (and subsequent updates).
- b. Guarantee the integrity of or restore existing corridors/links, or create new connections between components of the Green Infrastructure network in accordance with the strategy.
- c. Deliver net gains or fully mitigate any impacts on the green infrastructure network and its functions as a whole.

The council will support proposals.....

9. NB are unclear from EM5 Green Infrastructure definition that there is recognition of the underlying function of all green infrastructure. Foremost, it is to provide natural and semi-natural areas of green space (and ecosystem services) and includes the connections between them. The NPPF definition is brief but encompassing but it is worth reading the EU definition of green infrastructure which is clearer in this regard ⁹.
10. **Para 6.29** As stated by NB in greater detail in ISSUE 4 Other Housing Matters we believe that Appendix 4 Adopted Standards should be amended to recognise that the start point for green space is that it can have a single function even if it can be multi-functional.

⁹ **Appendix 6** Green Infrastructure – Enhancing Europe’s Natural Capital

11. **Para 6.29.** While recognising that the list is comprised of examples, almost all are urban spaces. It is not clear why the omission of; ecological networks, wildlife corridors, and stepping stones all of which are habitats is for a particular reason or not. If not then the list could be better balanced.
12. GI should report positive or negative variances in priority habitat losses or increases arising through restoration and re-creation. Changes in priority habitat extent, condition and connectivity of ecological networks, wildlife corridors and stepping stones. Includes losses and gains processed by the planning system (to calculate net gains or losses).
13. **Para 6.31.** Bullet 5. NB propose that to be compatible with the NPPF (and the NERC Act) *“Support biodiversity conservation”* would be better expressed as *“provide net gains in biodiversity where possible”*.
14. Commit to produce and transparently publish annual action plans, targets and performance measurement statistics on Green Infrastructure, species and habitat changes on the Borough website.

Paul Beevers

Natural Basingstoke

Appendix 1 Planning Policy Guidance Reference ID: 12-009-20140306

Natural Environment
Landscape
Biodiversity, ecosystems and green infrastructure
Brownfield land, soils and agricultural land



Paragraph: 009 Reference ID: 12-009-20140306

What are local ecological networks and what evidence should be taken into account in identifying and mapping them?

The components of an ecological network are explained at section 2.12 of the [Natural Environment White Paper](#).

Relevant evidence in identifying and mapping local ecological networks includes:

- the broad geological, geomorphological and bio-geographical character of the area, creating its main landscapes types;
- key natural systems and processes within the area, including fluvial and coastal;
- the location and extent of internationally, nationally and locally designated sites;
- the distribution of protected and priority [habitats and species](#);
- areas of [irreplaceable natural habitat](#), such as ancient woodland or limestone pavement, the significance of which may be derived from habitat age, uniqueness, species diversity and/or the impossibilities of re-creation;
- habitats where specific land management practices are required for their conservation;
- main landscape features which, due to their linear or continuous nature, are important for the migration, dispersal and genetic exchanges of plants and animals, including any potential for new habitat corridors to link any isolated sites that hold nature conservation value, and therefore improve species dispersal;
- areas with potential for habitat enhancement or restoration, including those necessary to help biodiversity adapt to climate change or which could assist with the habitats shifts and species migrations arising from climate change;
- an audit of green space within built areas and where new development is proposed;
- information on the biodiversity and geodiversity value of previously developed sites and the opportunities for incorporating this in developments; and
- areas of geological value which would benefit from enhancement and management.

Local Nature Partnerships can be a useful source of information for existing ecological networks.

Revision date: 06 03 2014

Appendix 2 PPG Biodiversity, ID: 8-007-20140306

Note word “*significant*” in last sentence para 1.

Natural Environment
Landscape
Biodiversity, ecosystems and green infrastructure
Brownfield land, soils and agricultural land



Biodiversity, ecosystems and green infrastructure

Paragraph: 007 Reference ID: 8-007-20140306

Is there a statutory basis for planning to seek to minimise impacts on biodiversity and provide net gains in biodiversity where possible?

Yes. [Section 40 of the Natural Environment and Rural Communities Act 2006](#) , which places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector, which should be seeking to make a significant contribution to the achievement of the commitments made by Government in its [Biodiversity 2020 strategy](#).

Guidance on statutory obligations concerning designated sites and protected species is published separately because its application is wider than planning and links are provided to external guidance. Local planning authorities should take a pragmatic approach – the aim should be to fulfil statutory obligations in a way that minimises delays and burdens.



The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution.

[Revision date: 06 03 2014](#)

Appendix 3 UK Biodiversity Indicators

http://jncc.defra.gov.uk/page-4233

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The Biodiversity Indicators

Indicator number, title, and measures where applicable	Status of indicator	Last updated ¹	Latest data ²	
A1. Awareness, understanding and support for conservation	Finalised	2014	2014	
A2. Taking action for nature: volunteer time spent in conservation	Finalised	2014	2013	
A3. Value of biodiversity integrated into decision making	Under development	2013	Not Applicable	
A4. Global biodiversity impacts of UK economic activity / sustainable consumption	Under development	2014	Not Applicable	
A5. Integration of biodiversity considerations into business activity	A5a. Environmental Management Systems	Finalised	2014	
	A5b. Environmental consideration in supply chains	Finalised	2014	
B1. Agricultural and forest area under environmental management schemes	B1a. Area of land in agri-environment schemes	B1a(i) Higher-level or targeted schemes	Finalised	2014
		B1a(ii) Entry-level type schemes	Finalised	2014
	B1b. Area of forestry land certified as sustainably managed	Finalised	2014	2014
B2. Sustainable fisheries	Finalised	2014	2012	
B3. Climate change adaptation	Under development	2014	Not Applicable	
B4. Pressure from climate change	Interim measure available	2014	2014	
B5. Pressure from pollution	B5a. Air pollution	B5a(i). Area affected by acidity	Finalised	2014
		B5a(ii). Area affected by nitrogen	Finalised	2014

- C4b. Species - frequency
- C5. Birds of the countryside
- C6. Insects of the countryside
- C7. Plants of the countryside
- C8. Mammals of the countryside
- C9a. Animal genetic resources
- C9b. Plant genetic resources
- D1a. Fish size classes
- D1b. Greenhouse gas removal
- D1c. Pollinating insects
- E1. Biodiversity data
- E2. Biodiversity expenditure
- Enquiries
 - ▶ UK Forum
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 - ▶ UK Protected Sites
 - ▶ UK Geoconservation
 - ▶ UK Legislation

	B5b. Marine pollution		Finalised	2014	2012
	B6. Pressure from invasive species	B6a. Freshwater invasive species		2014	2014
		B6b. Marine (coastal) invasive species	Interim measure available	2014	2014
		B6c. Terrestrial invasive species		2014	2014
	B7. Surface water status		Finalised	2014	2012
	C1. Protected areas	C1a. Total area of protected areas: on-land		2014	2014
		C1b. Total area of protected areas: at-sea	Finalised	2014	2014
		C1c. Condition of Areas / Sites of Special Scientific Interest		2014	2014
	C2. Habitat connectivity		Under development	2014	2007
	C3. Status of European habitats and species	C3a. Status of UK habitats of European importance		2013	2013
		C3b. Status of UK species of European importance	Finalised	2013	2013
	C4. Status of UK priority species	C4a. Status of priority species – relative abundance		2014	2012
		C4b. Status of priority species – frequency of occurrence – insects	Finalised	2014	2011
	C5. Birds of the wider countryside and at sea	C5a. Farmland birds		2014	2013
		C5b. Woodland birds		2014	2013
		C5c. Wetland birds	Finalised	2014	2013
		C5d. Seabirds		2014	2013
		C5e. Wintering waterbirds		2014	2012-13
	C6. Insects of the wider countryside	C6a. Semi-natural habitat specialists		2014	2013
		C6b. Species of the wider countryside	Finalised	2014	2013
	C7. Plants of the wider countryside		Under development	2014	2007
	C8. Mammals of the wider countryside (bats)		Finalised	2014	2013
	C9. Genetic resources for food and agriculture	C9a. Animal genetic resources – effective population size	C9a(i). Native sheep breeds		2014
			C9a(ii). Native cattle breeds	Under development	2014
				2014	2007
	D1. Biodiversity and ecosystem services	D1a. Fish size classes in the North Sea	Finalised	2013	2011
		D1b. Removal of greenhouse gases by UK forests	Interim measure available	2014	2012
		D1c. Status of pollinating insects	Interim measure available	2014	2010
	E1. Biodiversity data for decision making	E1a. Cumulative number of records		2014	2014
		E1b. Number of publicly accessible records at 1km ² resolution or better	Finalised	2014	2014
	E2. Expenditure on UK and international biodiversity	E2a. Public sector expenditure on UK biodiversity		2014	
		E2b. Non-governmental organisation expenditure on UK biodiversity	Finalised	2014	2013-14 financial year (public sector) and 2012-13 (NGOs)
		E2c. UK expenditure on international biodiversity		2014	

¹ This is the year the indicator graph(s) or fiche was last changed (minor typographical changes will not be recorded).

² This is the latest year for which data for this indicator / measure are available.

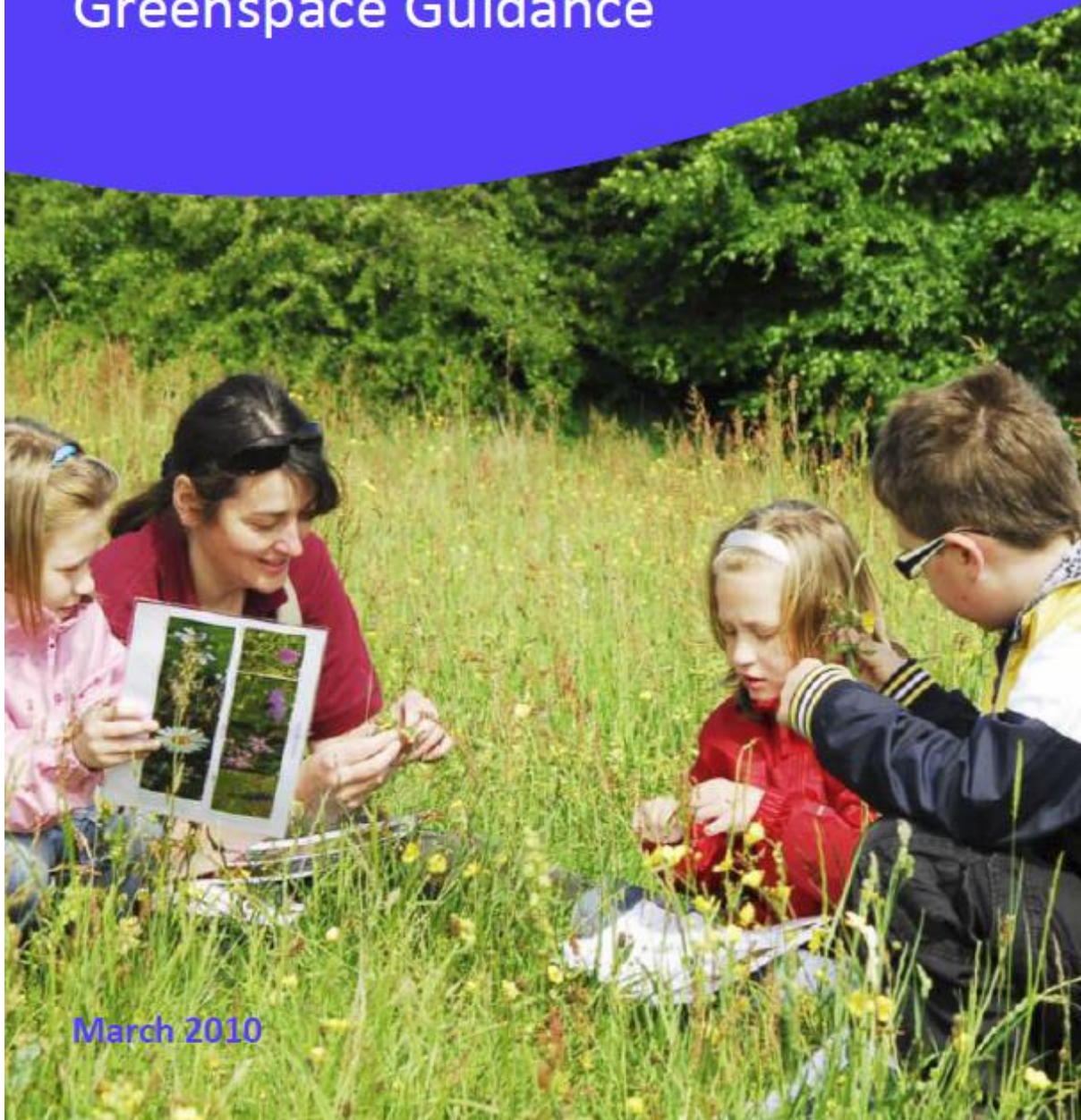
Appendix 4 Nature Nearby Accessible Natural Green Space Standard (Angst)

www.naturalengland.org.uk



'Nature Nearby'

Accessible Natural Greenspace Guidance



March 2010

1.2 Accessible Natural Greenspace Standard

Access to the natural environment through local green spaces varies widely across the country, and even within a single local authority area. ANGSt aims to address this by setting a range of accessibility standards for natural sites and areas within easy reach of people's homes. A broad view is adopted on what constitutes 'natural'. Natural does not necessarily mean it has to be rare or notable enough to be designated. Users will find nature in wildlife, open landscapes, seasonal changes and places of tranquility.

ANGSt

ANGSt recommends that everyone, wherever they live, should have an accessible natural greenspace:

- of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home;
- at least one accessible 20 hectare site within two kilometres of home;
- one accessible 100 hectare site within five kilometres of home; and
- one accessible 500 hectare site within ten kilometres of home; plus
- a minimum of one hectare of statutory Local Nature Reserves per thousand population.

ANGSt is based on three principles:

- a) Improving access.
- b) Improving naturalness.
- c) Improving connectivity.

a) Improving access

Improving access, and the distance thresholds used in the Standard, is based on what we know of people's behaviour. We know for example that the majority of parents are unwilling to allow their children to be unaccompanied more than 300m from home. Although local circumstances may lead to variations on this distance, adopting this as a standard would ensure that the majority of children do have a natural space near their home, which they are able to use freely. These distance requirements are set at a level that takes into account the need for local spaces, as well as larger strategic spaces. Because ANGSt takes a broad view of what constitutes natural greenspace, the requirements can be met through a wide range of different types of space, from local parks, greenways and footpaths, areas set aside for sustainable urban drainage systems, woodland and heathland. The 300 metre and 2 km standards are valuable standards to apply for new housing developments, growth areas, and in the master planning process. Natural England has piloted a number of projects that improve access to the natural environment and people's connection to it. Some site examples are provided in [Annex 6](#).

Accessibility should not only be seen in terms of distance from people's houses and access into and within a site. People need to know where their local green spaces are, and should feel comfortable in using them. This requires active management and promotion by taking all

The Natural Choice: securing the value of nature



Restoring nature in our towns, cities and villages

2.78 We need urban green infrastructure to complete the links in our national ecological network. Urban green space allows species to move around within, and between, towns and the countryside.

Even small patches of habitat can benefit movement. Urban green infrastructure is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heatwaves. It is part of the answer to the challenges posed by a changing climate.

2.79 The NEA highlights reductions in both the quality and the quantity of urban green space over the past half century and identifies the underperformance of urban ecosystems. The benefits of green infrastructure are unevenly distributed throughout society, and one in six urban local authorities says its green spaces are declining.

2.80 We want urban green spaces to be recognised as an essential asset and factored into the development of all our communities. They will be managed to provide diverse functions for the benefit of people and wildlife. They will cool urban areas and reduce flood risk, helping communities to adapt to a changing climate. They will continue to play a key role in regeneration projects throughout England, supporting local economic growth. Greener neighbourhoods and improved access to nature will improve public health and quality of life and reduce environmental inequalities. Urban green spaces will provide varied ecosystem services and will contribute to coherent and resilient ecological networks.

Definition of 'green infrastructure'

Green infrastructure is a term used to refer 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 cover benefits provided by trees, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification. Green infrastructure maintains critical ecological links between town and country.³²

Around the country local partnerships are seeking to use green infrastructure to drive economic growth and regeneration and improve public health, wellbeing and quality of life. It can also support biodiversity and the functioning of natural systems such as rivers and flood plains and help reduce the negative impacts of climate change.

Appendix 6 Green Infrastructure – Enhancing Europe’s Natural Capital



Brussels, 6.5.2013
COM(2013) 249 final

COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS

Green Infrastructure (GI) — Enhancing Europe’s Natural Capital

{SWD(2013) 155 final}

Page 3 paragraph 2

GI: a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services. It incorporates green spaces (or blue if aquatic ecosystems are concerned) and other physical features in terrestrial (including coastal) and marine areas. On land, GI is present in rural and urban settings.