



*Basingstoke  
and Deane*



Basingstoke and Deane Borough Council

Landscape and Biodiversity Supplementary Planning  
Document

**Public Consultation Statement of Compliance**

June 2008

## **Introduction**

- 1.1 In line with the Town and Country Planning (Local Development) (England) Regulations, 2004 and Planning Policy Statement 12 (PPS12) 'Creating Local Development Frameworks', the council is required to prepare a Statement of Compliance upon the submission of each Local Development Document (LDD).
- 1.2 This Statement of Compliance states how the arrangements for public consultation have met the requirements of both the Regulations and the council's Statement of Community Involvement (SCI).
- 1.3 The SCI sets out the council's standards in relation to informing and consulting the community in preparation of all Local Development Documents. It aims to ensure that all sections of the community and other interested parties have the opportunity to get involved from the earliest stages of planning policy preparation.
- 1.4 This Statement of Compliance sets out details of the public consultation undertaken by the council prior to, and during, the preparation of the Landscape and Biodiversity Supplementary Planning Document (SPD) and accompanying Sustainability Appraisal (SA). It sets out:
  - i) details of the consultation arrangements;
  - ii) a summary of the main issues raised in by the consultees;
  - iii) details of the responses received (Appendix 1); and
  - iv) our responses to these issues in drafting the SPD

## **Background to the Landscape and Biodiversity SPD**

- 2.1 The purpose of the supplementary planning document (SPD) is to help protect and enhance our borough landscapes and biodiversity by providing guidance on the interpretation of related policies in the Basingstoke and Deane Borough Local Plan 1996-2011). As such, the SPD forms part of the local development framework. The local plan policies supported are:
  - E1 – Development Control
  - E3 – Areas of Architectural or Historic Interest
  - E5 – Historic Parks and Gardens
  - E6 – Landscape Character
  - E7 – Nature / Biodiversity Conservation
  - E8 – Water Environment
- 2.2 The main objectives of the SPD are to:

- Help prospective applicants, and other interested parties, understand the requirements of relevant planning policies so that they will know early on in the process whether a proposal is likely, in principle, to be acceptable;
- Help ensure that the necessary surveys and assessments are undertaken before formulating development proposals so that applications don't have to be refused because of issues that could have been resolved through the design process;
- Raise design standards in terms of landscape and biodiversity elements;
- Help ensure that applications are accompanied by all the information that is needed to assess the proposals in accordance with planning policy; and
- Provide a framework for decision making, ensuring a consistently rigorous approach to the consideration of landscape and biodiversity issues when determining planning applications.

### **Consultation Undertaken**

- 3.1 Basingstoke and Deane's SCI sets out a list of statutory bodies specified by the Regulations and government guidance who should be consulted in the preparation of LDDs. The following sections set out the consultation process undertaken in the preparation of this SPD and the accompanying SA.

### **Initial Consultation**

- 4.1 Consultation prior to preparing the Landscape and Biodiversity SPD and SA included:
- i) consultation on the Scoping Report for the Sustainability Appraisal; and
  - ii) consultation on the Issues and Options for the SPD.
- 4.2 Both the SA Scoping Report and the Issues and Options paper were available for public consultation between 5 January 2007 and 16 February 2007.

### **SA Scoping Report**

- 4.3 The SA Scoping Report formed the first stage in the production of the SA for the Landscape and Biodiversity SPD. The SA provides an assessment

of the economic, social and environmental effects that are likely to arise from the implementation of the SPD.

- 4.4 The aim of the Scoping Report was to help ensure that the relevant sustainability issues were considered in the production of the SPD.
- 4.5 The Scoping Report was sent to the three statutory consultees (English Heritage, Environment Agency and Natural England) and key local stakeholders. Responses were received from the Environment Agency and Natural England and a summary of their comments is provided below.

#### **Environment Agency**

- 4.6 The Environment Agency stated a desire to see objectives and targets specific to the Biodiversity Strategy for the Loddon Catchment and to wetland enhancements in general. However, it is considered that this would be inappropriate in relation to a SPD aimed at development control, because the types of appropriate biodiversity enhancement will depend on the location and context of the development. It is considered implicit in the guidance given by the SPD that wetlands should be created in the appropriate context.

#### **Natural England**

- 4.7 Natural England said that they expected to see indicators relating to wild bird populations included within the indicators for the appraisal framework. However, the wild bird data that are used to produce a national biodiversity statistics are based on sampling and it is considered that there are too few local sample stations to provide a statistically valid local indicator. In addition, wild bird populations are influenced by many factors and, even if a local population indicator could be derived, it would not provide a useful indicator to monitor the effects of the Landscape and Biodiversity SPD.
- 4.8 Natural England also stated that they expected targets for the achievement of biodiversity action targets to be included. The sub-objectives of avoiding the loss of designated sites and achievement of biodiversity enhancements do contribute to biodiversity action plan targets. However, because the opportunities for enhancement depend on the timing, location and size of development proposals, which are not all under the council's control, it is considered that it would be inappropriate to set, for example, targets for creating a given amount of a particular habitat type by a particular date. It is further considered that an approach which is dominated by quantitative targets could be detrimental to the achievement of overall design quality that respects the site and

surroundings. However, biodiversity enhancements do form part of the SA monitoring methodology.

### **Comments from other Organisations/Individuals**

- 4.9 A comment was received stating that an indicator for non-designated land of importance for restoring and linking habitats is needed. The identification of such land falls outside of the scope of the proposed SPD, or any SPD for that matter, because these documents must not be used to allocate land (PPS12). However, this is a consideration for higher-level development plan documents.

### **Issues and Options**

- 4.10 The Issues and Options paper for the Landscape and Biodiversity SPD sought comment on number of issues, including:
- whether formal guidance in the form of a SPD is needed
  - the scope of the proposed SPD
  - the level of detail required
  - topics to be covered
- 4.11 Twenty three responses were received, including comments from eleven town/parish councils, one parish councillor, the Environment Agency and Natural England. Other responses came from local environmental groups, the Ramblers' Association, the Royal Society for the Protection of Birds, Hampshire County Council, two members of the public and Network Rail.
- 4.12 Nineteen of the respondents supported the production of a formal SPD with only three preferring a more informal approach of advice being given on a case-by-case basis. Reasons given in support of the latter include better allowance for local circumstances, more freedom and individuality in the design of new development and the view that the local plan policies provide enough detail on their own. The main reasons given in support of formal SPD include certainty and consistency in what is expected and the value of SPD status in giving greater weight to the guidance. The value of setting out the council's expectations in writing to save officer time is also cited.
- 4.13 Most respondents stated a preference for a comprehensive SPD that covers specific application types. The SPD attempts to address this, whilst minimising the overall size of the document, by providing two main sections. The first is aimed at small-scale developments such as single dwellings and extensions. The second, is aimed at larger housing and commercial developments.

- 4.14 The Table 1 (Appendix 1) sets out details of who responded and provides a reference number for each. This reference number is used in Table 2 which sets out public consultation responses to a questionnaire sent out with the Issues and Options document and SA Scoping Report. Table 2 also sets out the council's response to these comments, including how the SPD has been prepared to addresses them, where this was considered to be appropriate.

### **Consultation on the Draft SPD and Draft Sustainability Appraisal**

- 5.1 Consultation on the draft Landscape and Biodiversity SPD and SA were with the following:

- Specific consultation bodies which includes the statutory consultees, government agencies and utility companies;
- Town and Parish Councils;
- Developers and their agents;
- Local stakeholders, including civic groups and Natural Environment Forum members; and
- Elected Members and council officers.

- 5.2 Formal public consultation on the Landscape and Biodiversity Draft SPD and SA took place during December 2007 / January 2008. Copies of the draft SPD and Draft SA were be made available for public inspection at the following locations:

- Basingstoke and Deane Borough Council Offices, Parklands Reception, Civic Offices, London Road, Basingstoke
- Basingstoke Library, 19/20 Westminster House, Festival Place, Basingstoke
- Chineham Library, Chineham District Centre, Chineham, Basingstoke
- Kingsclere Library, The Village Club, George Street, Kingsclere
- Overton Library, High Street, Overton
- South Ham Library, Paddock Road, South Ham, Basingstoke
- Tadley Library, Mulfords Hill, Tadley
- Whitchurch Library, Bell Street.

- 5.3 Copies of the Draft SPD and Draft SA were also made available on the council's website at: [www.basingstoke.gov.uk/planning/ldf/spd.htm](http://www.basingstoke.gov.uk/planning/ldf/spd.htm)
- 5.4 A formal notice of public consultation was published in the following local newspapers:
- Basingstoke Gazette
  - Andover Advertiser
  - Newbury Weekly News

### **Issues Raised by Consultees**

- 5.5 Only ten responses were received, but many of these were positive, including those from statutory consultees Natural England and the Environment Agency, with only minor changes requested (see Appendix 2 for details). The latter did state a desire to see baseline environmental information against which the SPD can be monitored. However, the council's stance is that the site-specific surveys required for each development proposals will provide the most appropriate level of detail required for monitoring the SPD. This information can, of course, be related to borough-wide information on protected sites, but because the extent of the latter are subject to change for a number of reasons, it is not considered appropriate to use the current extent as a baseline indicator. One respondent expressed grave concerns about the SPD having a disproportionate financial impact on rural property. This respondent also considered the requirements of the SPD to be unnecessary, believing there to already be adequate protections relating to rural land. It is accepted that, as the main part of the document is aimed at major development, the full requirements set out in this part would be excessive for small-scale farm diversification schemes, such as those involving the conversion of existing buildings within a farmstead. Therefore, a section has been added to the SPD to make clear that it is not aimed at this type of development and to refer the reader to existing guidance in the form of the Farm Diversification and Traditional Farmsteads SPD. There were a number of other points made by this respondent, but no changes were made to the document in response. These points and our reasons for not making any changes are also set out in Appendix 2.
- 5.6 A further respondent felt that there should have been a presentation and workshop for interested parties as part of the consultation. However, this would have involved significant extra time in preparing what is intended to be a straight forward guide that consolidates existing best practice. No other respondents have expressed a desire for this level of involvement.

## **Glossary**

SA – Sustainability Appraisal  
SEA – Strategic Environmental Assessment  
SCI – Statement of Community Involvement  
SPD – Supplementary Planning Document

## **Appendix 1: Representations in Relation to Issues and Options Consultation and Our Responses**

**Table 1: Consultation Respondents (Issues and Options and SA Scoping Stages)**

Ref	Respondent
01	Basingstoke Alternative Action Group
02	Silchester Parish Council
03	Baughurst Parish Council
04	Sherfield-on-Loddon Parish Council
05	Oakley and Deane Parish Council
06	North Waltham Parish Council
07	Old Basing Parish Council
08	East Woodhay Parish Council
09	Hurstborne Priors Parish Council
10	Heather Rainbow
11	Cllr Mrs Claire Bryant
12	The Ramblers' Association
13	Tadley Town Council
14	Newnham Parish Council
15	Country Watch (Alan Read)
16	Paul Beevers
17	Hampshire County Council - Landscape Planning Group
18	Hampshire County Council - Development and Biodiversity
19	Chineham Parish Council (Cllr David Thornton)
20	Network Rail
21	Natural England
22	RSPB
23	Environment Agency

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
Issue 1: Formal SPD or Informal Guidance		
i) formal SPD	01,04,05,06,07,09,10,11,12,13,14,15,16,17,18,19,21,22,23	<p>There should be an opportunity for specific queries</p> <p>Will ensure consistency in implementation</p> <p>Better that guidance is available in advance to save time &amp; ensure consistency &amp; transparency</p> <p>Option is likely to ensure greater consistency</p> <p>Would help reduce demands on staff in the long term, leading to increased efficiency and would add transparency to decision making. It would also help cllrs who are responsible for decision making. If wording is careful, it does not have to be prescriptive. There is also the danger that the officer giving advice may not be cognizant of all implications and therefore could give inadequate advice.</p> <p>Case-by-case is too open to individual interpretation and inconsistency</p> <p>Will give a more consistent approach.</p> <p>The best way to provide generic information and guidance</p> <p>LDF should still be used to give guidance on biodiversity and landscape issues</p> <p>It is still appropriate to give specific guidance on particular land use planning issues that are biodiversity and landscape related through individual sections and site-specific policies in the LDF</p> <p>Will provide a framework for applicants and developers to identify potential</p>

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
		<p>constraints and give standard criteria.</p> <p>A case-by-case approach would introduce inconsistency, time wasting and more work</p> <p>Planning should include firm proposals, understood by all stakeholders, to prevent proposals progressing past the outline stage without clear landscape objectives</p> <p>Option more efficient than alternative</p> <p>Will provide certainty to developers and planners on what is required</p> <p>Would give more weight being a material consideration and therefore provide a more useful framework when responding to consultations on applications. Informal document not as strong a document</p>
ii) informal case-by-case	02,03,08	<p>More informal approach would enable local issues to be addressed rather than one size fits all approach</p> <p>Would allow more freedom and individuality</p> <p>The policies provide sufficient guidance in themselves</p> <p>The SPD is unnecessary. All planning applications should be required to provide relevant supporting information and expert reports if appropriate. Compliance with planning conditions and criteria of compliance should form part of planning consent. Therefore, no need to spell it out in a SPD.</p>
<b>Council Response</b>		
<p>Having taken into account the arguments for and against producing formal guidance as and SPD, it is accepted that having written guidance will help to provide consistency and reduce officer time spent advising applicants on issues that occur repeatedly in applications. It is also accepted that SPD status will give more weight to the guidance and therefore enhance its effectiveness. This does not preclude the need for case-specific advice and, indeed, pre-application advice is encouraged in the draft SPD. However, by covering general issues that apply to</p>		

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
<p>many sites, the SPD should help to focus pre-applications discussion on site-specific issues. Because a key principle of the draft SPD is that designs should be informed by a through understanding of a site’s context and its inherent constraints and opportunities, it is considered that this will encourage locally-distinctive development proposals rather than lead to standard solutions. It is considered that this addresses the comments made about the need for local issues to be addressed and the scope for more freedom and individuality. Whilst the local plan policies set out the overall requirements, experience in dealing with applications suggests the need for guidance on how to integrate these policy considerations into the process of preparing planning applications so that there is an increase in acceptable submissions.</p>		
<p><b>Issue 2: Generic or Application Specific Guidance</b></p>		
<p>i) generic guidance</p>	<p>01,02,04,09,13,18,19</p>	<p>Provided that it is not prescriptive – we recognise that option ii) is unlikely to cover all the cases</p> <p>Specific advice should be available for particular types of development</p> <p>Brevity, concise writing and plain language should ensure consistent applications</p> <p>Would ensure the document does not become too long and wordy, which may deter people from reading them properly.</p> <p>It could be difficult to cover every eventuality that may arise in the guidance and it may be misconstrued that, if something is not in the document, then there are no landscape or biodiversity issues associated with it. This could lead to the submission of applications without sufficient consideration of such issues, and this again could lead to more work, delays and inconsistencies</p> <p>Second option seems to fall between two stools as it cannot provide the close guidance that each individual application must have</p>
<p>ii) application specific</p>	<p>03,05,06,07,10,11,12,14,15,17,22,23</p>	<p>Greater coverage, of wider issues, would result</p> <p>Would provide more meaningful &amp; detailed guidance</p>

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
		<p>Guidance should be as clear as possible to assist all stakeholders</p> <p>This option is likely to be most useful</p> <p>Clear guidance is required</p> <p>Clear comprehensive and consistent advice should be given with more specific advice on particular types of applications</p> <p>Will provide information which is specific to certain types of development</p> <p>Different levels of information and detail will be required for different sizes of development</p> <p>Option would provide more robust and reliable guidance than could be provided through generic guidance</p> <p>Would give applicant more information and ideas targeted to their circumstances</p>
Particular types of application to provide guidance on		
		<p>Should be clear distinction between new build and extensions</p> <p>Any rural development (new or conversion) and its impact on rare or unusual species</p> <p>Residential development including the landscaping of pedestrian routes</p> <p>Farm diversification – particularly the maintenance of landscape features and landscape character</p> <p>Guidance on visual impact of developments from a distance (say 5 miles).</p> <p>Guidance on biodiversity impact from new development</p> <p>Developments that could impact biodiversity of designated, or the linkages</p>

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
		<p>between, sites, and river ecology</p> <p>Conversions with adverse wildlife impact</p> <p>EIA level applications, mineral and waste, major development areas, urban extensions, applications within AONB, farm building conversions, alternative energy production, conservation areas</p>
Council Response		
<p>The solution proposed by the draft SPD is generic guidance for smaller applications, including single dwellings, extensions, alterations and demolitions and a separate section providing generic advice for larger applications, with the stipulation that it provides comprehensive guidance for major applications but much of it is applicable to smaller ones. Comments from the second round of consultation will be very valuable in assessing whether this solution adequately addresses the arguments put forward for the options set out above.</p> <p>Advice specific to farm diversification is given in the council’s Farm Diversification SPD, which is referenced in the draft Landscape and Biodiversity SDP.</p> <p>Guidance on the AONB, designated sites, river ecology and conservation areas and other aspects mentioned is an integral part of the guidance so it not considered that it would be appropriate to have separate sections for each of these issues.</p>		
Issue 3: Level of Detail		
i) keep document as short as possible	01,02,03,04,05,10,11,13,17,18	<p>Happy to consult landscape assessment document for details</p> <p>Too many changing areas of information to cover otherwise</p> <p>Reference material might be accessible from the internet, council website or from a paper library</p> <p>CDs of accessory material might be made available for purchase. This approach would minimise the cost to the council of providing thick, expensive</p>

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
		<p>documents (expensive in time, money and environmental impact)</p> <p>Would allow most up to date planning documents and best practice to be referenced</p> <p>Would ensure there are no errors if rewriting and copying the SPD</p> <p>Would allow possibility of referencing most up-to-date copies of other planning docs by providing a live link.</p> <p>Would make document more succinct and easier to reference</p> <p>Would avoid duplication of information already available</p> <p>SPD would not need to be updated with legislation changes</p> <p>Document should contain a brief outline of issues to advise users if they need to investigate further and where they need to search— for example, when protected species licences are required and who to obtain them from.</p>
ii) include as much information as possible	06,07,09,21,23	<p>One reference point would be useful but with references links as appropriate</p> <p>Approach would be more user friendly</p>
iii) include reference material in a separate volume	06, 19	<p>Preference for ii), but option iii) could be adopted if it includes use of cross references</p>
Suggested supporting information		
		<p>Use URLs to the other sources</p> <p>Bullet points, perhaps, as quick reference guide</p> <p>Maps, lists of landscape and nature conservation designations (NNR, LNR</p>

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
		<p>SINCs), ancient woodlands, CAs, historic gardens, ancient monuments and archaeological sites, landscape character areas, footpaths and rights of way etc.</p> <p>There should be a borough BAP that can be referenced</p> <p>Integrated Character Assessment (townscape and rural landscape assessment)</p> <p>Sensitivity assessment of the landscape and townscape</p> <p>Landscape and townscape Strategy – outlining broad visions for different LCAs</p> <p>Historic Environment</p> <p>Should include a reference section clarifying where and how developers and planners can get additional information on specific subjects</p> <p>A list of external sources should be included.</p> <p>The document should incorporate the aims, targets and threats outlined in the Loddon Biodiversity Strategy</p>
Council Response		
<p>Information that is not readily available elsewhere, including checklists, guidance on when additional ecological surveys are required and lists of priority species have been included as appendices. All other information sources are referred, within the main document or within an appendix, giving details of further sources of information.</p> <p>Because the purpose of the proposed SPD is to guide day-to-day development control work, it is not considered appropriate to incorporate the aims, targets and threats outlined in the Loddon Biodiversity Strategy. However, it is implicit within the draft, that where a development may affect the habitats and species that the strategy aims to conserve, then these must be taken into account. In addition, a proper analysis of enhancement opportunities based on the site and context, as advocated by the draft, will result in proposals relevant to the aims of the strategy, where this is appropriate.</p>		

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
<p>The absence of a borough BAP does not prevent applicants from accessing information about designated sites, carrying out adequate surveys and preparing proposals based on a sound assessment of the ecological implications and opportunities for enhancement, having full regard to relevant national and local (county) biodiversity action plans. Therefore, the fact that there is not a borough BAP that can be referenced is not considered to be an impediment to the production of an SPD.</p>		
<p><b>Issue 4: Topics to be covered</b></p>		
<p>i) include all suggested topics</p>	<p>01,02,03,04,06,10,12,13,17,18,22</p>	<p>All should be covered but only in general terms</p> <p>Proposed topic list seems complete &amp; logical</p> <p>Proposed topic list should mean there can be no claims of ignorance when an application does not include sufficient information</p> <p>Make clear to applicants the entire process and details of what needs to be included in the application. In this way, there can be no claims of ignorance when an application does not include, for example, sufficient survey information</p>
<p>ii) including suggested additions or omissions to topics or those requiring particular detail</p>	<p>14,21,23</p>	<p>The list should be expanded to include the sequential approach as advocated in PPS9, habitat creation and restoration and the use of planning obligations</p> <p>Role of pre-application discussion should not be overlooked and can be useful tool in securing enhancements in large sites, allowing a smoother application process</p> <p>Subsections f (council decision making process), h (possible reasons for refusal) &amp; i (compliance with planning conditions) are unnecessary. Sections (c) assessing impacts &amp; (l) long-term management arrangements need expanding. Steps to protect existing features and wildlife (eg. trees, hedges, meadows, water features, priority species, and all designated land (SSSI,</p>

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
		LNRs, SINCS)) are required. This is not mitigation or enhancement, but a category in its own right
<b>Council Response</b>		
<p>The draft SPD is based on the principles of avoiding impacts through constraints and opportunities plans, applying mitigation only where impacts cannot be avoided and applying compensation only where mitigation cannot adequately address the impacts that cannot be avoided. The draft also promotes enhancement as a separate matter from mitigation and compensation.</p> <p>Council decision making has not been included as a specific topic. Rather the points that the council will look for form an integral part of the guidance. Reasons for refusal has not been included as a specific topic as it is considered that these are implied by the local plan policies and draft SPD setting out what is required for planning permission to be approved.</p>		
<b>Issue 5: Checklists</b>		
Include all suggested checklists	01,02,06,07,09,11,15,18,21,22,23	<p>When determining the scope of ecological surveys, reference should be made, and explanation given, to type of surveys required eg. geological and/or geomorphological</p> <p>Must be made clear that any checklist is not definitive but a guide, in case something unusual or rare is not listed. Applicants should not be able to claim that "it was not on the checklist it should not be considered"</p> <p>The detail of what is included in the checklists will be crucial to their success</p>
i) scoping landscape and ecological surveys iv) preparation of landscape schemes and discharge of conditions	12	

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
ii)	19	
iii)	03,04,13,17	Keep it as simple as possible The emerging HGLG Landscape and Development Checklist could be referred to
i), iii), iv)	14	
Suggested checklists		Sustainability issues Timing of certain surveys and works eg. bats, breeding birds, black redstarts
<b>Council Response</b>		
<p>Types of survey required are dealt with in the main body of the draft SPD rather than through checklists.</p> <p>The HGLG Landscape and Development Checklist has been used to inform the checklists and other contents of the draft so that these can be considered in an integrated way, as part of a formal SPD. Because of this, it is not considered necessary to have a reference to a separate document.</p> <p>Sustainability is a theme than runs throughout the draft SPD and the included checklists. Therefore, it is not considered necessary to have a dedicated checklist dealing with this.</p> <p>Guidance on the timing of ecological surveys is provided by Figure 1 in the draft SPD.</p>		
<b>Issue 6: Guidance on Designated Sites / Areas</b>		
i) guidance incorporated into the main text	03,04,12,22	Clearly shows such considerations are a central and crucial part of the SPD and are not marginalised in anyway Will ensure not overlooked by readers

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
ii) guidance provided in dedicated sections or inset boxes	02,05,06,11,13,14,15,17,18	Would highlight importance and could prevent important information being lost in the text rather message being lost in the text
Types of site or area where guidance is particularly desired	02,05,06,11,13,14,15,17,18	<p>North Wessex Downs AONB</p> <p>Conservation Areas</p> <p>Tree Preservation Orders</p> <p>Sites of Special Scientific Interest</p> <p>Sites of Importance for Nature Conservation</p> <p>Local Nature Reserves</p> <p>Special Protection Areas and Special Areas of Conservation, if any in neighbouring districts that might be affected by cross-boundary impacts</p> <p>River Loddon catchments area— we believe it is essential for the borough to identify the Loddon/Lyde valley as a special, interconnected countryside designation and ecosystem. In Berkshire, the Loddon Valley is a Wildlife Heritage Site— B'stoke should copy</p>
Council Response		
<p>These sites have been dealt with in the main text and through text boxes, where additional information was considered to be necessary. Designating areas is outside of the scope of SPDs, which cannot be used to allocate land.</p>		
Issue 7: Definitions		

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
i) include glossary and definitions section	01,02,03,04,06,10,12,13,14,17,18,22	<p>Keep to the simple approach</p> <p>There should be a cross reference to indicate where a term is defined in glossary</p> <p>Would like an explanation or footnote the first time such a term is met in its section eg. SPD is cited in full at the heading of the consultation document and then used as SPD thereafter</p> <p>An asterisk should mark the words which are defined in the glossary</p> <p>Footnotes can be repetitious and missed</p> <p>Footnotes can make a document look clumsy and complicated and can be repetitious. Applicants may need to look up a definition several times or may only dip into the document and miss the appropriate explanation of a term</p>
ii) explain terms within text or using footnotes		
iii) combined options i) and ii)	05,07,09,11,15,16	<p>Ease of use</p> <p>Would assist the public, though if all documentation were in plain English there should be no need</p> <p>Words defined should be marked with asterisk</p> <p>Text should include examples with use of the term. This could be an example of what to do and also what not to do. Examples make things clearer!</p>
Council Response		

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
<p>The SPD has been drafted avoiding technical terms wherever possible. However, given the nature of the topic, this has been unavoidable in places. Therefore, a glossary has been included.</p>		
<p>Other Issues and Options Raised</p>	<p>14,15</p>	<p>Should be able to include reference to a local Basingstoke Borough BAP we must have a Basingstoke BAP - it is not acceptable not to have one A borough BAP must be produced to inform the SPD</p>
	<p>23</p>	<p>Should provide guidance on green and brown roofs, bat and bird boxes etc.</p>
	<p>17</p>	<p>State of the Landscape/Townscape document to be used as a monitoring document to fulfil SEA and SA obligations and help in assessing change due to policies in the LDF</p>
	<p>16</p>	<p>It does not seem logical that development can go hand in hand with enhanced landscape and bio-diversity</p> <p>There has to cognisance of non-designated land. The planning system only takes account of SSSIs and now possibly SINCS. But there is land out there that has diversity value that official organisations simply turn around and say “there is no protection”. The SPD has to make provision for sites that are above a certain threshold in areas where diversity is low to be saved. It is a rather sad fact that some gardens and paddocks, especially but not always in rural areas now have a greater diversity than much or even most of the countryside and we need to capture these especially if they are next to areas of unbuilt land. Furthermore once a site is recognised to have a diversity that puts it above a threshold that site should be protected from unscrupulous</p>

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
		<p>developers at the very least by heavy fines or the ability to force them to restore the land.</p> <p>Documents relate to new planning developments but do not recognise that there is an equal need to see how existing (urban) development can be enriched. This is an omission that needs to be rectified given the hectares already built on. There are plenty of opportunities to increase biodiversity within existing developments.</p> <p>Emphasis is on keeping what is there and not as there should be, provision for actual re-introductions of lost diversity. This would be more than just establishing channels between areas because areas may be too remote for connectivity to work.</p> <p>Policies as proposed do not suggest delivery of landscape and biodiversity enhancement and I am not sure how that will be achieved. Perhaps examples? One possible method is to insist that planting schemes in public areas use native trees, plants, grasses and wildflowers managed in traditional ways only plus habitats known to be attractive to plants, insects, small mammals etc.</p> <p>What about policies that design out roads in favour of public transport and cycle path provision and where public transport is provided with special user friendly bus stops and given superior or dedicated connections to major areas of employment, leisure or shopping?</p> <p>“inappropriate traffic generation” (ref E1) is not defined and as we know if it is not defined it never works – hence Woods Lane in Cliddesden.</p> <p>Landscaping schemes should use native plants, grasses etc. but add value in terms of places for insects, animals, birds to nest etc.</p> <p>Provision needs to be made for lost species reintroduction.</p> <p>Over grazing of horse paddocks needs to be addressed.</p>

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
		Could a mechanism be defined that would reward proposals in some way that incorporate particularly strong environmental improvements?
Council Response		
<p>The absence of a borough BAP does not prevent applicants from accessing information about designated sites, carrying out adequate surveys and preparing proposals based on a sound assessment of the ecological implications and opportunities for enhancement, having full regard to relevant national and local (county) biodiversity action plans. Therefore, the fact that there is not a borough BAP that can be referenced is not considered to be an impediment to the production of an SPD.</p> <p>The value and role of green/brown roofs is covered in the draft SPD, but technical guidance is already available elsewhere and references are included.</p> <p>Whilst there is a borough landscape assessment, which covers urban areas as well as the countryside, the character descriptions and issues identified are largely subjective. It is not considered that this provides a suitable basis for monitoring the SPD and supported local plan policies.</p> <p>Whilst there may be some situations where development would directly conflict with biodiversity conservation, there are many situations where development can occupy land with limited existing biodiversity value, where enhancements through landscaping and incorporation of other habitat features can provide a net improvement in biodiversity. The draft SPD and supported local plan policies aim to prevent situations where there will be a direct conflict and encourage the latter situations where there are opportunities for a net gain.</p> <p>Allocation of land for planning purposes is outside the scope of SPDs. Therefore, the draft is not able to address the question of safeguarding non-designated land, other than where this is a requirement for protecting species that are already a material consideration due to planning policies.</p> <p>The documents only relate to new developments and not enriching existing urban developments because the SPD relates to development control, which can only influence new applications.</p> <p>The draft SPD does suggest delivery of landscape and biodiversity enhancement but avoids being prescriptive because the opportunities vary from site to site. There is an emphasis on the use of native species, but the draft recognises that there are situations where exotic species may be more appropriate. 'Traditional management' is rarely an option for habitats in built up areas because options such as grazing (which attempt to mimic traditional forms of land management) are often not practical where there is disturbance from dogs and vandalism / conflicts</p>		

**Table 2: Consultation Comments and Council Response**

<b>Issues and Options</b>	<b>Respondent Ref</b>	<b>Comments</b>
		<p>with fencing. Animal welfare is a major consideration with any grazing scheme. Nevertheless, more modern techniques such as the use of harvesting machinery can provide a practical alternative.</p> <p>There are policies elsewhere that aim to reduce dependence on private cars and contribute to public transport and cycle paths etc. However, this issue is largely outside the scope of the proposed SPD, other than ensuring that developments provide suitable links to cycle and pedestrian links, and layouts that are not dominated by highway considerations.</p> <p>Re-introduction of lost species is a complex matter and a project in its own right, requiring a lead from the appropriate nature conservation bodies. It is something that generally needs to be carried out at a strategic level, ensuring that there is adequate habitat and management of the habitat to support viable populations of the species and all the issues that led to loss of the species in the first place need to be addressed. For these reasons, it is not considered appropriate to promote reintroductions within the proposed SPD. However, because loss of habitat is a major factor in local extinctions, the promotion of habitat improvement through the SPD will help to support reintroduction programmes.</p> <p>Over grazing of horse paddocks falls outside of the scope of the SPD, but it is accepted that it is an issue that needs to be addressed through other mechanisms.</p> <p>The council already has a design awards scheme, which includes a category for sustainability and therefore provides a mechanism for rewarding proposals that incorporate particularly strong environmental improvements.</p>
<b>Issues and Options</b>	<b>Respondent Ref</b>	<b>Comments</b>
Sustainability Appraisal Scoping Report		
Plans, Policies and Strategies informing the SA	12	The policies which have been reviewed are considered to be appropriate, but could also include SPD on Farm Diversification, council's tree policy and access strategies.
Council Response		

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
<p>Farm Diversification and Traditional Farmsteads Supplementary Planning Document and council’s tree policy (2007) added to the context review and key points drawn out to inform the sustainability appraisal. Access issues picked up within the sustainability framework and within the SPD.</p>		
Issues and Options	Respondent Ref	Comments
Sustainability Appraisal Scoping Report		
General	16	<p>A number of comments overall:</p> <p>We need a measure for non-designated land to show that so much of what is left is in such a terrible state. We also need to say that some of that land, if it is above a certain count threshold and in locations key to increasing diversity or expanding fragmented sites, must be afforded planning protection and we then need to set ourselves targets for doing so. We may not know where they are or whether they may come up for development but we must have a mechanism for saying “we need to save these sites and restore them because we have so little land even of this low quality”.</p> <p>Could we define some mechanism that would reward proposals in some way that incorporate particularly strong environmental improvements.</p> <p>We need a separate and parallel policy now for bringing about improvements to existing developed land. That policy could be very similar but delivery would have to be through community groups supported by grants. We have to have this as a companion policy in order to have an impact on biodiversity and to improve sustainability performance. By doing so perhaps starts to address section 6.17. We ought to be able to use national biodiversity sustainability measures and the Hampshire BAP and anything else that is logical and apply them to the Borough. That means we need some baseline</p>

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
Any Other Data That Might Provide		<p>survey data including the hectareage of SINC's, SSSIs and non-designated land, for example, so as to increase those figures and to establish numbers, distribution and frequency of key birds in say, urban and rural areas, or distribution and numbers of various species of plants, insects etc. We cannot afford to simply deal with future development, we have to make an impact on all development whether new or existing. Perhaps we need to set targets for parishes, for example, (could we work up some targets for Cliddesden as a pilot?) and get on with introducing Urban Parishes as well to make people realise that individually they have to do some work or take actions. It would be a great way of saying to the borough, "this is where we are, this is the decline we have experienced and this is where we need to get to and this is how we need you to get us there."</p> <p>THE GREAT CONTRADICTION IN THIS POLICY IF WE DON'T TACKLE EXISTING DEVELOPMENT AS WELL THEN BY BUILDING FACTORIES &amp; HOUSES WE ARE BY DEFINITION DESTROYING THE SUSTAINABILITY WE SEEK TO ACHIEVE.</p> <p>We need to make provision for lost species reintroduction.</p> <p>Need to require public spaces to use native trees, plants and grasses with greater diversity. This will have an immediate effect of drawing in insects and birds and possibly small mammals.</p> <p>Address the over grazing of horse paddocks</p> <p>6.5 Fig 1. There is no indication of extinct species in Hampshire.</p> <p>6.12. Agree the point but how are we going to protect, need a measurable threshold that says this site is too valuable to lose?</p> <p>I don't understand Appendix 1. There are 2/3 sensible references like "Biodiversity the UK Action Plan" and "Living landscapes" but most of it does not add value to finding a solution – perhaps I'm missing something.</p>



**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
raise these wider sustainability issues, which are outside of the scope of the Landscape and Biodiversity SPD and associated consultations.		
Issues and Options	Respondent Ref	Comments
Sustainability Appraisal Scoping Report		
<p>Plans, Policies and Strategies informing the SA</p> <p>Any other data that might provide relevant baseline information</p>	21	<p>Omissions from table 4 include PPS12 and the publication LDF Monitoring: A Good Practice Guide (2005), which both contain important guidance including suggestions for targets and indicators which will be valuable for populating the table at appendix 1.</p> <p>Most potential sources have been identified. The detail of what data and information are/is required must be established at the next steps stage of the SA process and will depend on proposals for indicators and monitoring.</p> <p>NE recommends that the list of sustainability objectives produced in Table 9 is expanded to provide clarity over the health of the biodiversity of the borough. The biodiversity sub-objective on page 22 should be revised to make it clear that the council seeks to enhance the biodiversity resource, not just avoid loss (critical features of PPS9). In addition, it is recommended that the list of biodiversity indicators in Table 9 is expanded. We suggest including, at the least, info on the condition of the borough's statutory conservation sites and info on the area of non-stat sites. We would also expect to see indicators relating to wild bird populations and the achievement of biodiversity action plan targets.</p>
Council Response		

**Table 2: Consultation Comments and Council Response**

Issues and Options	Respondent Ref	Comments
<p>PPS12 and the publication LDF Monitoring: A Good Practice Guide (2005) added to the context review and key points drawn out to inform the sustainability appraisal.</p> <p>Annual loss of SINCs and SSSIs attributable to development has been added as an indicator. Condition of SSSIs attributable to development (as assessed periodically by Natural England) has also been added as an indicator. There is currently no equivalent monitoring of SINC condition, nor are there data on wild bird populations that would provide a valid local indicator of the effects of development within the borough. Instead, a bespoke monitoring method has been developed to assess the effects of the SPD, which includes assessment of contribution towards delivering biodiversity action plans.</p> <p>Net gain in biodiversity has been added as an explicit sustainability sub-objective.</p>		
Issues and Options	Respondent Ref	Comments
<p>Sustainability Appraisal Scoping Report</p>		
<p>Plans, Policies and Strategies informing the SA</p> <p>Other</p>	<p>23</p>	<p>Loddon Biodiversity Action Plan should be included in the local documents review and its aims and targets taken into account.</p> <p>Table 9: under PPS1 and PPS9 it is not acceptable to aim for no net loss of habitats; enhancement is expected and this should be reflected in SPD.</p>
<p>Council Response</p>		
<p>Loddon Biodiversity Action Plan added to review and issues and SPD has been amended in a number of ways to reflect water/wetland issues. However, it is not considered appropriate to include specific targets from the plan within the SPD as the opportunities for habitat creation will depend on the nature, location and extent of development proposals and this mean that wetland habitat creation is not always appropriate. It is further considered that where the creation of wetlands is appropriate, that this is implicit within the SPD.</p> <p>Net gain in biodiversity has been added as an explicit sustainability sub-objective.</p>		

**Appendix 2: Representations in Relation to Draft SPD and Our Responses**

<b>Table 3 Representations in Relation to Draft SPD and Our Responses</b>		
	<b>Comments</b>	<b>The council's response</b>
Thames Water Utilities Ltd	Encouraged that utilities are mentioned in relation to tree planting at paragraph 14.9.1. Recognise environmental benefits of trees and encourages the planting of them. However, indiscriminate planting can cause serious damage to the public sewer system and water supply infrastructure. Trees and shrubs should not be planted over the route of sewers or water pipes.	The plotting of utilities on constraints and opportunities plans is fully endorsed by the SPD.  No changes to the document.
	Recognises the environmental and economic benefits of Sustainable Urban Drainage (SUDS) and encourages appropriate application where of overall benefit to our customers. However, does not consider them to be appropriate for use in all areas. SUDS also require regular maintenance to ensure effectiveness.	It is considered that SUDS are appropriate for all areas as not all features associated with SUDS have to be used on any one site. Even where there is no free drainage, features such as green roofs and wetland features can slow run-off and reduce problems associated with storm water run-off. It is accepted that regular maintenance is required to ensure effectiveness and this is already acknowledged in the SPD.  No changes to the document.
The Ramblers' Association – North Hampshire Downs Group	Full endorse the view that the distinctive characteristics of the local countryside help created an attractive and desirable borough to live in and that at a neighbourhood level high quality landscapes rich in wildlife have a significant effect on people's sense of wellbeing and can provide the motivation for outdoor exercise as part of a healthy lifestyle.	Supports draft SPD  No changes to the document.
	Broadly support the approach taken and commend the level of detail required from developers.	Supports draft SPD  No changes to the document.

	<p>We are particularly interested in the opportunities offered for protection and enhancement of biodiversity at the same time safeguarding and enhancing opportunities for walking within new developments through the network of green spaces linking to the wider countryside and existing rights of way network. The two are considered to be complementary and mutually compatible. It is considered that land required for buffer zones, SUDS features and public open space could all potentially form part of a green network.</p>	<p>Supports draft SPD</p> <p>No changes to the document.</p>
	<p>Para 8.1 – requirement to record location of public rights of way and public access land should be extended to sites within settlement policy boundaries.</p>	<p>Agreed. Final draft amended.</p>
	<p>Para 11.4 – rights of way, open access land, boundary features (walls, dykes and ditches), existing water and drainage features should also be required features to be plotted in the general site survey.</p>	<p>Agreed that existing boundary features, water and drainage features should be included on general survey as these are physical features. Final draft amended accordingly.</p> <p>It is not considered that it would be appropriate to include designations such as rights of way as these are not physical features that would be picked up in a normal land survey. It is considered more appropriate that these are shown on opportunities and constraints plans. No change to the document has been made with respect to this aspect.</p>
	<p>Para 11.7.3 – the publicly accessible areas identified in the visual appraisal should include views from rights of way, open access land and the road network within the visible zone.</p>	<p>Document has been amended to clarify that publicly accessible areas within the visible zone should be identified.</p>

	<p>Para. 12.2.1 – the social value of public access to natural greenspace should be given a high weighting.</p>	<p>This is considered to be a matter for higher-level policy documents within the LDF. The SPD deals with the practical implementation of policies and ensuring sufficient information is obtained to judge proposals against policies, therefore it would not be appropriate to try to assign weightings within this document.</p> <p>No changes to the document.</p>
	<p>Box 4 – Full consideration should be given to exploring the public access potential of creating new paths within buffer zones.</p>	<p>It will not always be appropriate to do this within buffer zones—for example they may be needed to protect sensitive habitats from human disturbance. However, the text box has been expanded to make the point that buffer zones should incorporate other uses such as recreation and sustainable drainage, where compatible.</p>
	<p>Para. 13.5.4 – where the creation of substitute habitats is being considered as part of mitigation measures, the scope for creating public access in and to these substitute habitats should be fully considered.</p>	<p>It is considered that this is adequately dealt with by section 14.5, where it is stressed that open space should, ideally, provide a range of functions. Para 13.5.4 specifically deals with compensation for habitat loss, so is not considered to be the appropriate place to cover multiple land use benefits.</p> <p>No changes to the document.</p>
	<p>Para 14.3.2 – there is considerable potential to link areas of land forming part of a sustainable drainage system and land used as buffer zones into a green network of spaces through which an extensive network of green pathways could run.</p>	<p>An additional para. has been included in section 14.5 to say that open spaces and paths should be designed to contribute towards the wider network of green open spaces and corridors.</p>

	<p>Para. 14.5.1 – agree with statement that it is import that all areas of open space serve a useful and ideally a range of functions. It is important to create linkages for wildlife across all areas of open space; the resulting green network can also be used to provide a network of paths for public use. The impact of development on neighbouring land, which may be of a higher biodiversity value, can be mitigated to some extent by the provision of a green network within the development site.</p>	<p>Supports SPD. No changes to the document.</p>
	<p>Para. 14.5.5 – it is agreed that it is not appropriate to light all paths within areas of adopted open space.</p>	<p>Supports SPD. No changes to the document.</p>
	<p>Para. 14.6.1 – for access to be inclusive stiles should be avoided as these are a considerable barrier to the less mobile. Any gates should be wide enough for wheel chairs, pushchairs and prams.</p>	<p>Agreed. Document amended to reflect this point.</p>

	<p>Para. 14.7.2 – crime is best tackled by careful management and good design not by restricting access. People who are out and about will be a deterrent to criminal activity and well used open space is less likely to become a target for antisocial behaviour. Would not wish to see access restricted to areas of open space within developments because of fears about crime and antisocial behaviour.</p>	<p>The SPD supports this approach. However, there are circumstances where access may need to be restricted such as where maintenance access is needed to the rear of properties and it cannot be designed to provide adequate natural surveillance.</p> <p>No changes to the document.</p>
	<p>Checklist 2: Constraints and Opportunities Plans (Appendix 8) – opportunities to link with paths, bridleways and cycleways, and the scope of improvements within the site and links to local facilities and amenities, should all be considered as encouraging walking is the most sustainable means of transportation. In some cases residential developments will need to provide pedestrian links to major centres of activity. Good design rather than prohibiting access will be the key to preventing problems associated with such routes.</p>	<p>The first part is covered in the checklist so comments are taken as support.</p> <p>Good design as a way of preventing criminal and anti-social behaviour problems is also supported by the document, but it is considered that prohibition of access will be necessary in some cases as multi-objective design inevitably means that the ideal cannot be achieved on every sight for every issue.</p> <p>No changes to the document.</p>
	<p>Checklist 4 (part 1): Biodiversity Impacts (Appendix 8) –do not accept that rights of way and other publicly accessible land should be associated with increased risk of unlawful activities such as trespass and vandalism. The RA consider that the increased use of footpaths will in itself be a deterrent to criminal activity and antisocial behaviour.</p>	<p>Unfortunately, evidence shows that such sites near to residential areas do suffer from these problems. Therefore, an impact assessment that failed to consider this would be incomplete.</p> <p>No changes to the document.</p>

Basingstoke Heritage Society	Para 7.1 – Have great concerns over loss of trees, hedgerows and bushes within the urban area. There is a great loss of local wildlife including birds, small mammals and insects, particularly where large sites are cleared and built on to a much higher density. This is a real loss to town dwellers.	Whilst the SPD will not prevent the loss of all trees, hedgerows and bushes, it will help to ensure that proposals are explicit about such losses and that there is sufficient information submitted with such proposals to allow the significance of such losses to be evaluated within the framework of national and local policies on these features.  No changes to the document.
	Para 14.7, Crime and antisocial behaviour – Point about opening up views to make areas safer or at least feel safer is noted. However, the loss of tree and shrub screening can open up views that are not necessarily an improvement and can increase light and noise pollution for residents relying on this screening.	It is considered that the balance of these potentially conflicting design objectives is already covered in the document. Indeed, para. 14.7 makes the point that retention of such natural features can help to encourage public access and thus help deter anti-social and criminal activities.  No changes to the document.
Environment Agency	Generally supportive of the key principles contained within the document and feel that it will have a positive contribution to development.	Supports document.  No changes to the document.
	Part 1: small-scale development – A paragraph should be inserted within this section to prevent the culverting of small water courses/ditches etc. It should also ensure that 5 metre or 8 metre buffers zones are maintained adjacent to non-main or main rivers respectively.	Agreed. Document amended to incorporate this point.
	Part 2: large-scale development, Section 11.4 general site survey – this should also include a requirement to show watercourses, ditches (dry or wet) and ponds as well.	Agreed. Document amended to incorporate this suggestion.

	<p>Box4, buffer zones information – we would recommend that ditches are also included in this section in addition to main rivers, and non main rivers or ponds.</p>	<p>Agreed. Document amended to incorporate this suggestion.</p>
	<p>The Environment Agency also recommend that a paragraph be included in this section highlighting the value of buffer zones for biodiversity and the water environment. The following text could be included:  “Buffers zones to watercourses and water features are required for the following purposes:</p> <ul style="list-style-type: none"> <li>(i) to allow the watercourse to undergo natural processes of erosion and deposition, and associated changes in alignment and bank profile, without the need for artificial bank protection works and the associated destruction of natural bank habitat;</li> <li>(ii) to provide for the terrestrial life stages of aquatic insects, for nesting water-related bird species, and for bank dwelling small mammals;</li> <li>(iii) to provide a “wildlife corridor” bringing more general benefits by linking a number of habitats and affording species a wider and therefore more robust and sustainable range of linked habitats;</li> <li>(iv) to allow for the maintenance of a zone of natural character with vegetation that gives rise to a range of conditions of light and shade in the watercourse itself. This mix of conditions encourages proliferation of a wide range of aquatic species, including fish;</li> </ul>	<p>Agreed. Document amended to incorporate this suggestion.</p>

	<ul style="list-style-type: none"> <li>(v) to allow, where appropriate, for the regarding of banks to a lower and safer profile, in areas where there is public access;</li> <li>(vi) to prevent overshadowing of watercourses by buildings; and</li> <li>(vii) to reduce the risk of accidental pollution from run-off.”</li> </ul>	
	<p>Section 14.9 plant choice and planting. (Locally) native species should also be used next to watercourses and other surface water features (not just in ‘rural on urban fringe areas’) to benefit local wildlife, maintain the region’s natural balance of flora, and help prevent the spread of invasive, alien species along watercourses.</p>	<p>Agreed. Document amended to incorporate this point.</p>
<p>Hampshire County Council</p>	<p>Para. 11.6.1 – it should be made clear at the outset of this paragraph that a phase 1 survey should be carried out at the appropriate time of year, as should species surveys.</p>	<p>Agreed. Document amended to incorporate this point.</p>
	<p>Para. 12.2.1 and Box 2 and Appendix 6 – should reference also be made to the list of habitats and species of principal importance in England as stated in section 41 of the NERC Act 2006 and the new list of priority species and habitat as presented in the species and habitats review report 2007 that has now adopted by the government and is listed in the UK Biodiversity Action Plan. This will ensure the most up-to-date lists are included.</p>	<p>The guidance in the SPD has to relate to planning policies. Unfortunately, the policies to which the SPD relates (E7 of the local plan and Planning Policy Statement 9) predate the NERC Act and the UK BAP species and habitats review.</p> <p>No changes to the document.</p>
	<p>Para. 14.2.1 – insert the word “are” between “that” and “unable” in final sentence.</p>	<p>Agreed. Document amended.</p>

	Para 14.9.3 – change “housting” to “housing” in last sentence.	Agreed. Document amended.
	Appendix 4 – please note that HCC Archaeology / Historic Buildings and Parks and Gardens officers are now located in Eastleigh along with Ecology and HBIC. It is a temporary move for another 18 months / 2 years.	Document amended.
	Appendix 7 – for “developments affecting woodland, rural hedgerows, tree belts and scrub where elm is present” – feel the surveys required should say “white-letter hairstreak butterfly, dormouse, reptiles, badgers, bats and Schedule 1 birds”, so as not to give the impression that if elm is present only the butterfly needs a survey.	Partly agreed. Document amended to make clear that where elm is present, white-letter hairstreak should be surveyed for in addition to dormouse, reptiles, badgers, bats and Schedule 1 birds.
Natural England	Supports the production of the document and is delighted to see such a detailed and comprehensive document. The draft appears to be consistent with local plan policies, together with the policies in PPS7 and PPS9 and the guidelines and checklists provided should help to meet the stated objectives of the SPD.	Supports SPD.  No change to document.
	Part 1. Support the guidance provided for small-scale development, including the guidelines for undertaking bat surveys which appear to follow recommendations published by the Bat Conservation Trust.	Supports SPD.  No change to document.
	Part 2. Natural England supports the guidance provided for larger developments and believes the suggested figures and tables will be helpful to those using the SPD.	Supports SPD.  No change to document.
	12.2.5: currently refers to Table 1 for SSSI condition status, as assessed by Natural England. Should it be changed to Appendix 8 Checklist 1?	Agreed. Document amended.

	<p>12.2.8 Box 3 – clear distinctions should be made between the hierarchy of international, national, regional and locally designated sites, in line with government guidance in PPS9: Biodiversity and Geological Conservation.</p>	<p>Text amended to make the differences as clear as possible without redefining the supporting policies and to briefly state the distinct statutory requirements that relate to development and international sites and Sites of Special Scientific Interest.</p>
	<p>14.5 Open Space Provision and Adoption Issues: NE advocates including the following:</p> <ul style="list-style-type: none"> <li>• Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation</li> <li>• Natural England’s Access to Natural Greenspace Standards (ANGSt) (reference is already listed in Appendix 5).</li> </ul>	<p>The council policy referred to already takes account of these documents.</p> <p>No change to document.</p>
	<p>NE advocates that adjacent greenspaces be interconnected, with the priority and extent being determined by local decision making informed by stakeholder involvement.</p>	<p>This is considered to be a matter for higher-level planning policies.</p> <p>No change to document.</p>
	<p>In certain cases, ANGSt standards will encourage access to sensitive sites that are designated at the national or international level and where increased access is likely to cause harm to protected species and habitats. Local Authorities should carry out a risk assessment (consulting with NE) over the level of access a designated site could take before including is as part of their ANGSt calculations.</p>	<p>Assessment of access impacts on designated sites, at whatever level they are designated, is part of the requirement of the SPD. There are also procedures for the consultation of NE where developments affect nationally or internationally designated sites.</p> <p>No change to document.</p>
	<p>Please add NE SE Region Western Area Team to list of useful contacts.</p>	<p>Agreed. Contact details added.</p>
	<p>Appendix 8, checklist 1 – in the footnote, please point out that the Habitats Regulations Assessment (or ‘Appropriate Assessment’) may be required if the proposals has the potential for a likely significant effect on a European site.</p>	<p>Agreed. Document amended to include this point.</p>

	Please note, condition assessment data for SSSIs are also available through the website: <a href="http://www.natureonthemap.org.uk">www.natureonthemap.org.uk</a>	Document amended to reflect this point.
Oakley Parish Council	Feel it is a good document and will set the scene for consistency. However, it is very long and drawn out and realistically it will be difficult to get planners to take in all the information and consider everything in the document. We suggest creating a shorter document with briefer statements with references to this document “for further information”.	This was considered at the scoping stage and most respondents indicated the desire to see a comprehensive document.  Production of a shorter guide would be an additional option at a future date.  No change to document.
Barton Willmore on behalf of Banner Homes and Bewley Homes	Generally we consider this document to be extremely helpful in setting out the information required for a planning application.	Supports SPD.  No change to document.
	Key Principles – bullet point 2 states that there must be adequate information on landscape and biodiversity to inform the planning stages. However, there is no clarification as to what is meant by the term adequate information and we seek that there is a clear understanding of this term to ensure that all parties are aware of what constitutes adequate information.	Wording of this principle amended to: “there must be adequate information to allow the impacts of the proposal on landscape character, landscape quality and on biodiversity to be assessed in accordance with planning policies and legislation.” A significant part of the SPD, of course, provides guidance on the information required to comply with this principle.

	<p>Bullet point 2 – We question the difference between mitigation and compensation through the creation of new features? Does compensation only relate to new off-site features? Appendix 2 on page 30 attempts to summarise these terms, but we consider that greater clarity is required in order to ensure this key principle is understood.</p>	<p>Footnote added to document stating that “mitigation means measures taken to reduce harm to a landscape or biodiversity feature or a species population; compensation means the creation of new features (on or off site) to help make up for the loss of, or damage to, existing landscape / biodiversity features or a species population.”</p> <p>The definition of compensation in the glossary (Appendix 2) also amended to make it clear that compensation is to make up for the loss of, or damage to, existing landscape / biodiversity features or a species population and that it can include on site or off site features.</p>
	<p>Trees – Para. 7.1, page 5 states that “if there are hedgerows within, or on the boundary of, the site, or trees on the site, or within 30 metres of it, a measured site survey (at a scale of at least 1:200) must be undertaken”. It is considered this requirement could be very onerous, for instance if the site is adjacent to woodland. However, we do recognise that the document does go on to add a caveat “if adjacent land cannot be accessed for measuring, and estimate should be made.” However, para. 11.4.1, bullet point 11 states that “woodland can be recorded as the outer canopy edge with outer edge of trunks individually plotted”. It is considered that greater clarity is required in order to provide sufficient guidance as to what can and can’t be assessed in order to meet the requirements of this document.</p>	<p>Document amended to ensure that the same points—recording of woodlands and what to do where trees on adjacent land cannot be accessed for surveying—are made in both sections (small and large-scale developments).</p>

	<p>Visual Appraisal, Para. 11.7.4, page 12 – It is considered that the requirement relating to assessment of lighting on the surrounding countryside is onerous and would be very complex. We question how can a valid judgement be made on, for instance, an outline application, without the expense of computer generated images and a lighting expert? We consider that a requirement of this nature, at the outline stage, is both unnecessary and given the nature of outline consents, difficult to establish the actual visual impact. We therefore seek that greater clarity is provided as to at what stage in the planning process this is required.</p>	<p>Document amended to state that such an assessment may be required (for example where visual assessments reveal the potential for significant light pollution in the countryside). This requirement should be discussed with the council through pre-application discussion.</p>
	<p>Biodiversity – Para. 12.2.1 page 12 states “The social value in terms of public access to natural greenspace must be evaluated”. We seek greater clarification as to what is actually meant here. There may be a conflict with nature conservation and public access and that needs to be addressed in this document.</p>	<p>Document amended by including this in a new para. stating that the social value of natural green space should be evaluated in terms of the public access it provides and the opportunities for learning about wildlife (eg. how good the site is for wildlife watching). Its relative contribution to the amount of accessible natural greenspace in the area should also form part of this assessment.</p>
	<p>Landscape, Section 12.3 – titled landscape, is considered to be unevenly weighted ie. Some aspects from Guidelines for Landscape and Visual Impact Assessment have been depicted in detail and other aspects left out. The landscape section is more detailed than the visibility section and we seek that the two elements are given equal weighting and guidance.</p>	<p>Partly agreed and section expanded. However, it is not considered appropriate to provide too much technical detail as it is expected that the appropriate professionals will be employed who will be familiar with the technical details.</p>
<p>Mr J Jervoise</p>	<p>Substantial reservations as follows:</p>	

	<p>Whilst this is proposed as a general policy the costs will fall disproportionately on rural property as that is where most of the trees, landscape features and other issues mentioned are found.</p> <p>Developments and building works in the countryside already face a considerable process of approvals. These already protect many of the issues addressed by this SPD. This document proposes making this process more complex and costly both initially at the planning application stage, and as a total cost of development. This is directly at odds with the borough rural strategy which seeks to encourage a living working countryside.</p>	<p>The SPD does not introduce any new policies. Rather it provides guidance on good practice to help ensure existing policies and legislation are properly implemented. As such, there is no reason why the document should impose additional costs on those who already comply with legal and planning policy requirements. Indeed, by encouraging applicants to start considering these issues early on in the design process, the SPD could potentially help applicants reduce the costs, which can otherwise increase due to delays or refusal of planning applications because of inadequate consideration of landscape and biodiversity issues.</p> <p>The issues within urban areas can be just as complex as those related to rural development as some of the most protected species are just as likely to occur in urban areas. In addition, trees within urban areas are much more likely to be protected by preservation orders.</p> <p>Whilst the role of the land-based industries in underpinning management of the countryside is fully recognised and it is accepted that certain types of development are necessary to maintain the economic viability of these businesses, there is an important role for the planning system to play in ensuring that such development, on balance, supports rather than harms the quality of the countryside and the biodiversity that it supports.</p> <p>No change to document.</p>
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The Country Land and Business Association believe there are already adequate protections on rural land use; unsure what threats this SPD seeks to deal with. Threats or concerns should be specifically identified, otherwise we are just adding more bureaucracy to an already cumbersome and expensive system. This paperwork and bureaucracy is the glue in the business environment which slows change and decision making and makes UK as a business uncompetitive with China etc.

The introduction to the document has been amended to explain the intended benefits of the guidance that it provides ie. designs that start with the landscape and biodiversity of the receiving environment so that they are sympathetic to the character and can make a positive contribution to wildlife and, by doing this from the start, help reduce the time and cost to the applicant from having proposals rejected, having to change proposals and/or experiencing delays resolving unforeseen constraints.

Whilst environmental regulations will, of course, slow, and in some cases prevent, change, history provides overwhelming evidence that industrial growth without environmental regulation leads to the damage of our landscapes and the loss of biodiversity. This is considered to be contrary to the public interest. Whilst there is now strong protection in law and planning policy for biodiversity, the fact that it is still declining shows that there is a need for more effective implementation, which is what this document seeks to achieve. Relaxing environmental controls to a level comparable with countries such as China would inevitably mean suffering the same levels of environmental degradation with consequent effects on quality of life.

An advantage to the business sector of requiring improved standards from all developers is that it will improve the competitiveness of companies that already practice corporate social responsibility and follow good practice in terms of environmental sustainability.

	<p>The distinction between small scale and larger developments is understood and supported. However the definition of size here is clearly important and it is believed that most rural and farm projects on existing farm buildings or sites, and including new farm buildings, should fall within the small category. Only much larger green field Major Development Area type proposals should require the further detailed information – which I suspect they already do, hence there is no reason for this aspect.</p>	<p>It is accepted that greater clarification is required as the SPD is intended to cover the main types of application that make up the majority of applications received by the council. Some guidance on landscape and biodiversity issues is already provided in the Farm Diversification and Traditional Farmsteads SPD and it is considered that further guidance for these types of project is best covered by project-specific advice from officers as part of pre-application discussions, which could be supplemented by the future publication of a checklist that is specific to small-scale rural and farm diversification proposals. Therefore, a section has been added to the SPD to make it clear that it is not aimed at this type of small-scale application . However, it is considered that the requirements set out in the section for larger developments are applicable to most major developments, whether rural or urban, not just Major Development Area proposals.</p>
	<p>Emphasis on more care in planning landscape and layout supported. This is a general comment on large development covering all the large schemes in and around Basingstoke. Is this not what landscape management plans and planning conditions cover already?</p>	<p>Landscape management plans and conditions can only achieve satisfactory results if there has been sufficient thought and effort behind the planning of the landscape and layout. The experience of officers is that guidance is also required on management plans and compliance with planning conditions in order to reduce rejections / time spent providing guidance on the standards required to fulfil planning conditions.</p> <p>No change to document.</p>

	<p>Paragraph 11.1.4 clearly shows the problem – mentioning 4 specialists who would be required for a commercial barn conversion in the countryside if this went through as proposed. This represents a very substantial cost. There are existing mechanisms for each of these areas and changing these needs to be specifically justified and explained and debated.</p>	<p>This para. relates to the section on larger developments, where the complexity of issues is liable to require a large team of specialists, not just those dealing with landscape and biodiversity. Certainly, new build development in the countryside could require the input of an ecologist, landscape architect and arboriculturist, depending on the nature of the proposals and the sensitivity of the location. Barn conversions are liable to require the input of an ecologist or wildlife consultant because of the potential for bats roosts and nesting birds, but this is necessary to ensure compliance with the law in any case. A landscape architect may also be required where there is a need for a landscaping condition, but this happens already. The main difference brought about by this SPD is that these issues will need to be considered as part of the design process rather than being left until the application is considered and possibly rejected by the council. Therefore, it should help to reduce costs caused by delays and unsuccessful planning applications.</p> <p>No change to document.</p>
	<p>It is clearly appropriate that EU and UK habitat legislation be part of the planning process. There is no need however to restate this as there is a likelihood of extending what is already complex and restrictive legislation, or alternatively if it is incomplete then the SPD is inadequate in that regard. All that needs to be said is that the requirements of the Habitat Directives in regard to protected species must be complied with.</p>	<p>The SPD does not restate what is already in the legislation. Rather, it seeks to ensure that these considerations are integrated into the design process from the earliest stages rather than left until planning permission has been granted. If left until this stage, costly changes to the design may be required, which may then need further planning approval, or the project may be prevented altogether because the necessary licence cannot be granted.</p> <p>No change to document.</p>

The items on trees paragraph 7 is unduly detailed, complex, expensive and bureaucratic, and would as drafted apply to most rural sites. Planning conditions re landscape are already imposed and trees have an existing legislative framework of approval for work. Trees are not buildings - they grow (quite fast in many cases) expand and then die or fall over. They can be replaced pruned or otherwise dealt with as appropriate and this is all covered by existing law and practice. The idea of root protection areas I totally oppose. Trees can be removed and replacements planted. Most of the trees around us are under 50 – 80 years old and we should not be seeking to conserve individual trees as a generality but to maintain the feel and shape of the landscape and countryside.

There is a legal obligation for the council to consider tree preservation when determining planning applications. This can only be done with the type of information required by the SPD.

Trees may be valued both for their collective contribution to the character of the landscape and for their merits as individuals or small groups. Local people may attach great value to individual trees, especially where they are of great stature and form, are very old, have historical associations, or are an unusual species. Individual trees may also provide habitat for protected species. Therefore, it is considered important that trees are evaluated in terms of collective and individual merit, with the context determining the approach, as set out in the guidance.

Planning conditions can only help to protect trees that have been carefully integrated into the design of a scheme and it is this that the guidance seeks to achieve. Attempts to protect trees through conditions where they have not been afforded adequate space for their roots and canopies during the design process cause delays in construction, waste local authority resources and are generally ineffective in the long-term.

		<p>It is accepted that relatively young/immature trees can be replaced through new planting (or they can be moved out of way), but the approach advocated in the SPD allows for this. The benefits of mature trees, on the other hand, including wildlife habitat and their aesthetic value cannot be adequately compensated for through new planting in the short to medium term. Thus new planting within development should be seen as a contribution to maintaining continuity of tree cover rather than way to overcome concerns about loss of high value mature trees.</p> <p>No change to document.</p>
	<p>The point on landscape views is, if anything, more important in urban landscapes and this could be a part of general landscape policy. However, I think we should consider how this is being approached nationally before imposing local costs. It also could have significant private property implications which I will investigate through the Country Land and Business Association and National Farmers' Union if it is proposed to include this.</p>	<p>Guidance on views given in the document is not limited to rural areas, although aspects such as views across the wider landscape and out of settlements obviously relate to the countryside.</p> <p>It is considered that the assessment of visibility from publicly accessible land and the impact of proposals on landscape views is entirely reasonable given that an underlying principle of the planning system is that constraints are placed on private property in the public interest.</p> <p>No change to document.</p>

	<p>I regret not being more positive, but believe existing protections and documentation provide adequate protection in most of these areas, and some of what is in this document restates policy detailed elsewhere. If there are areas of risk or concerns they need to be specifically identified, however this approach as currently set out could significantly restrict rural planning and developments and harm the rural economy.</p>	<p>The importance of a viable rural economy in supporting the type of land management necessary to maintain landscape quality and biodiversity is accepted. However, it is important that any environmental impacts of diversification schemes are compatible with these aims. This is fully supported by national Planning Policy Statement 7: Sustainable Development in Rural Areas.</p> <p>No change to document.</p>
	<p>I believe my concerns reflect the position of the NFU and CLA, and that as the representatives of business in the countryside this must carry some weight. I would be pleased to meet and discuss this further. Should the decision be taken to disregard the above concerns I would be grateful to know how this takes place as I will then wish to take the matter up with our local Borough councillor and others.</p>	<p>Respondent contacted to explain that a new section has been added to provide specific guidance on small-scale rural projects and to explain the next stage of the process regarding the reporting of consultation comments and amended SPD document to Cabinet, Portfolio Holder and to Council.</p> <p>No change to document.</p>
<p>Mr P Beevers</p>	<p>1. I cannot identify any elements or better still targets that give confidence that the Borough <u>will</u> achieve a net improvement in biodiversity. The minimum appears to be to do no more damage to what, in most cases has already been damaged. For example, if the majority of land that is developed is arable and therefore with little diversity value, how can the SPD help bring about a <u>real</u> improvement in native diversity if the developer chooses to argue that his plans, through more gardens, will increase the number of birds and provide more nectar for insects? Can there be a clearer statement of what net improvements will be required as the price of development?</p>	<p>It is considered inappropriate to set targets for biodiversity improvements through development as the nature and number of planning applications is not under the control of the council. Furthermore the nature of improvements that are appropriate for a given proposal will depend on the details of the site and its setting, which is a fundamental principle of the guidance—proposals should respond to the site context rather than being based on standard design solutions. The types of habitat that can be created will depend on factors such as soil type, hydrology, slope and aspect etc.</p> <p>No change to document.</p>

	<p>We can see in the borough that even quite large sites adjacent to developed land are not contributing significantly to biodiversity stabilisation or improvement because of the impact of humans and their pets. All the best intentions of this document are undermined if that continues to happen without action to mitigate those impacts. How does the council propose to make the SPD work therefore?</p>	<p>The SPD clearly states (Checklist 4) that off-site impacts from people and pets are to be considered in assessing the impacts on biodiversity.</p> <p>No change to document.</p>
	<p>I would like to see more design features and mitigation measures stated more explicitly, and provided to developers as examples that should be adopted by designers. For example, should we be enabling hedgehogs and other small mammals to be able to move around gardens by providing low gaps in fences or holes at the foot of walls. Should we require nest bricks to be used in houses for swallows or other birds, or create places where bats can hibernate or breed or owls can nest for example? Why not require small areas of grassland of the type that often occurs now to be seeded with native wildflowers as a way of providing sources of nectar for butterflies and seeds for birds etc. See Draft Sustainability Appraisal Page 6 Table 1 that refers to the need to provide guidance on standards...).</p>	<p>Partly accepted. Document to be illustrated with examples of enhancement features. However, it is not considered appropriate to have a generic requirement for all developments to include a specific habitat type as the appropriateness of this will depend on the site and future management considerations.</p>

	<p>Refer 6.2. I have a modern barn behind my house which has lost a soffit board and which is now used year on year by little owls to raise their young. I do not understand what would be done to replace this nesting site when the barn is knocked down and redeveloped and the little owls are evicted. The eviction of owls has happened time after time in this village and I just wonder if anything will change from the position now. Many of the changes that have occurred have been on relatively small developments but a lot of them have occurred. Section 6 does not define how these impacts are to be mitigated so my assumption is there will be no mitigation. How do we then claw back these "deaths by a thousand cuts"?</p>	<p>It is not considered appropriate for the document to go into this level of detail. It is a guide to the overall approach that is aimed at developers / project managers etc. and will help to trigger the input of specialist advice, which is needed to design effective mitigation proposals. Also, there are existing documents that provide guidance on mitigation for protected species, which are listed in the document under useful publications.</p> <p>No change to document.</p>
	<p>Section 14.9.3 I believe this is too restrictive. There are literally dozens of example of land on modern Basingstoke estates that could be seeded with a wildflower mix that would provide colour and interest for much of the year as well as help feed birds and insects. The town needs that and people need to be educated about the subject. Developers should be encouraged to propose such an outcome wherever possible.</p>	<p>The reason for specifying native species is that these support the greatest biodiversity. There are many native wildflowers so the requirement to use natives does not restrict the use of wildflower mixes—so long as they are properly sourced.</p> <p>No change to document.</p>
	<p>On the consultation process itself I believe there should be a presentation and workshop on the aims and details of the document to interested parties to enable there to be an informed discussion and at which the various parties could have gained a better understanding of the document and its purpose, what it was intended to achieve, how it relates to other work. It would have sparked a useful debate and value could have been added. I believe the consultation process is flawed by the absence of that kind of input and simply replicates the mistakes of past consultation processes.</p>	<p>Only one other respondent has indicated a desire for more in depth discussion of the draft. A presentation and workshop would have had significant time and cost implications that have to be weighed against the public benefit. Given that this is a relatively low-level planning document, which sets out good practice for meeting existing planning policies, but does not introduced new ones, this level of consultation was not considered to be appropriate.</p>

<b>Table 4 Comments on Draft Sustainability Appraisal</b>		
	<b>Comments</b>	<b>The council's response</b>
Natural England	Further to comments on previous scoping consultation, it is noted that the biodiversity sub-objectives now make it clear that the council seeks to enhance the biodiversity resource and not just avoid loss.	Supports document.  No change to document.
	Regarding the biodiversity indicators/targets, NE notes the reasons given in the Public Consultation Statement of Compliance (4.7 and 4.8) for not adopting our previous advice. Although it may not be appropriate to set targets, for example to create a given amount of a particular habitat type by a particular date, Biodiversity Action Plan targets can still play a useful role in monitoring the effects of the SPD. For example, by recording the contribution that enhancements make to local BAP targets.	This will be picked up by the proposed monitoring system.  No change to document.
	Regarding the preparation of an evidence base that is specific to Basingstoke and Deane, please see NE's response to the Sustainability Appraisal Scoping Report for the LDF Core Strategy, dated 6 Nov 2007.	It is considered that the application-specific survey information required by the SPD will provide the most appropriate baseline information for monitoring the effects of the SPD.  No change to document.
	Table 1 (page 6): under 'supporting evidence' for 'ensuring that the external environment within new developments and local greenspace is accessible to all', NE advocates including the following: PPG 17; NE's ANGSt standards	Agreed and document amended accordingly.