

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

### Hearing Statement On Behalf of Natural Basingstoke (NB)

#### Addressing: Issue 4 Other Housing Matters

##### **7. Landscape and other constraints on development:**

*7.1 Are the Plan's landscape protection policies (EM1-3) sound and how much weight should be given to them as constraints to new development? How important are the proposed strategic gaps and how should they be designated?*

*7.2 Should a review of any of the landscape policies be undertaken as part of the Plan?*

#### **Questions 7.1, 7.2**

1. Chapter 6 Policy **EM1** (and associated text) is unsound. Policy EM1 is derived from a Sustainability Appraisal (SA) that NB believe has not been positively prepared because it has not integrated requirements of the NPPF into policy.
2. The policy is not justified because it is derived from a Sustainability Appraisal Core Strategy, objectives, appraisal criteria and Indicators that did not take account of the requirements of the NPPF and where the Core Strategy is in the view of NB in conflict with the NB.
3. Policy EM1 is not effective or consistent as it omits NPPF guidance on landscape and landscape related considerations and terminologies for decision making e.g. the need for development applications to contribute towards and fit within landscape scale priority habitats, coherent ecological networks, wildlife corridors and stepping stones, including when they cross administrative boundaries e.g. NPPF, 117. There is no mention of any of these.
4. Policy is required to recognise the "*wider benefits of ecosystem services*" NPPF109 when assessing development also not mentioned.
5. Policy should be used to plan "*positively*" NPPF114 to achieve (or exceed) targets set for national and local Priority Habitat restoration and re-creation. Other targets could include for populations of Priority Species or the geographical spread of such species NPPF117.
6. Policy should do more than "*respect, enhance and not be detrimental*" but instead "*promote the preservation, restoration and recreation of priority habitats and the protection and recovery of priority species populations*" also as per NPPF117.

7. Policy should plan positively for landscape scale biodiversity and “promote” “*preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations*” NPPF117 and do so to meet targets.
  
8. NB do not see that the Local Plan has separately articulated a “strategic approach” to biodiversity network planning and management, or similarly to green infrastructure as required by NPPF114. NB believe that this envisages a medium to long term plan identifying where the networks could be, what opportunities and where and how they can be expanded and managed so that development and green infrastructure can complement rather than compete. In any event Policy EM1 must make clear the need to plan for the distinctive role and function of networks and priority habitats in the landscape preferably before the development cycle even though they are part of green infrastructure. We need a commitment to a clear strategic planning policy in the Local Plan with measurable outcomes to deliver plans in advance of development and any other opportunities and can ideally lead to reserved space. NB believe without a commitment to this the plan cannot be effective.
  
9. The Local Plan definition of green infrastructure in *Appendix 4 Adopted Standards of the Submission Local Plan<sup>1</sup>* is not in our view consistent with the definition of the NPPF Glossary definition of Green Infrastructure. We believe that the Glossary definition allows that green space does not have to be multi-functional but rather that green infrastructure is comprised of green space each of which can have only a single function i.e. habitat only, or more functions where appropriate. Instead *Appendix 4 Adopted Standards* begin by requiring green space to be multi-functional. NB believe the default position should be that that green infrastructure is comprised of green space each of which can have only a single function. NB believe it is wrong to begin from the start point that all areas of biodiversity have to be multi-functional irrespective of the impacts of that approach on the biodiversity, and that the reverse should be the start point.
  
10. EM1 makes particular reference to rivers when for policy planning and consideration purposes NPPF references a list of “priority habitats” of which rivers are but one example and when priorities will be set locally and nationally. “Priority Habitats” (and Priority Species) are defined by S41 of the NERC Act 2006 as referenced in the NPPF Glossary.

<sup>1</sup> **Appendix 1** Local Plan Appendix 4 Adopted Standards

11. Policy requires climate change assessment and mitigation where there are risks to biodiversity and landscape and flood risks and threats to or from water supply. NB believe this requires earlier planning than the normal development cycle allows but we as already stated we cannot see provision for this kind of advance strategic planning committed to in this Local Plan.
12. Policy EM1 should for policy purposes make clear the aim to create or restore new priority habitat on proposed sites and recognise the consequences of adverse impacts on priority habitats, ecological networks, wildlife corridors, stepping stones (and biodiversity working with biodiversity team) to seek net gains or a high level of mitigation that is evidenced. or require compensatory measures e.g. financial that not only fully compensate losses but deliver net gains. NPPF 152. Other impacts on green infrastructure should be similarly dealt with.
13. Local Plan Chapter 6 Para 6.8 page 85 refers to “green networks” but is not a recognisable planning term as is the case with; green infrastructure, ecological networks, wildlife corridors and stepping stones.
14. **NPPF**
15. The view of NB is that strategic gaps represent opportunities to create more priority habitats around new development (NPPF 118), including community forests (NPPF 92). Strategic gaps can deliver habitat corridors/links links between large areas of important landscape, e.g. the North Wessex AONB and the South Downs, restore populations of priority species and facilitate species movement (NPPF 99, 156). While the NPPF talks only in terms of “net gains” and meeting local and national targets we need measures of human and development impacts on habitats and species to make the case for new areas. The Borough has **819 species** that have statutory protection or are recognised as needing special conservation effort. *Living Landscapes 2014 Appendix 1<sup>2</sup>*.

#### **HOW TO MAKE PLAN SOUND**

16. NB believe Local Plan policies can only be made sound by thorough revision that will include incorporating the requirements and terminology of the NPPF. NB have also proposed some more precise ways of measuring outcomes. There should also be room for introducing positive local requirements not in conflict with national policy e.g. in site policies for land to be set aside. In

the event that the Inspector is minded to approve the Local Plan then NB have proposed some areas of change but this is not the place to perform the wider review required.

<sup>2</sup> Appendix 2 Living Landscapes Appendix 1 Protected and Notable Species

## 17. Policy EM1 Landscape

*Development will be permitted only where it can be demonstrated, through an appropriate assessment, that the proposals make positive changes to the character and visual quality of the area concerned, enhance relevant priority habitats and, contribute to ecological networks, wildlife corridors or stepping stones and to other elements of green infrastructure. Development proposals must have particular regard to the following:*

*e) Amend to include. Priority habitats including trees,.....rivers, ponds and other landscape features,*

*h) Remove.*

*i) Provisioning of habitat viable green bridges and other mechanisms as solutions to connecting or reconnecting habitats and preventing or avoiding habitat fragmentation when all natural solutions have been explored.*

*j) Delivering rural and urban landscape changes that preserve, restore or recreate landscape scale priority habitats that reduce the impacts of climate change by protecting and enhancing ecosystem services (NPPF 109) and facilitate the movement of flora and fauna, and are consistent with plans for connected coherent ecological networks, wildlife corridors or stepping stones, including where they cross administrative boundaries.*

*l) Resolving adverse impacts on priority habitats and priority species or assemblages of species through mitigation that evidentially will minimise losses or if not, will be compensated for.*

*m) Promoting priority habitat preservation, restoration, recreation and connectivity that support priority species.*

*n) Designing strategic gaps to deliver priority habitats, restore populations of priority species of flora and fauna and facilitate their movement, provide additional ecosystem*

*services, contribute to ecological networks and wildlife corridors and especially where they link significant landscape areas such as AONB's, forests, national parks, SSSI's, SAC's, SPA's .*

18. Development proposals must also respect the sense of place, sense of tranquillity or remoteness, and the quiet enjoyment of the landscape from public rights of way. Development proposals will not be accepted unless they maintain the integrity of existing settlements and green infrastructure (including ecological networks and wildlife corridors) and prevent their coalescence.
  
19. Where appropriate, proposals will be required to include a comprehensive landscaping scheme to ensure that the development would successfully integrate with the landscape and surroundings while with green infrastructure, ecological networks and wildlife corridors. The assessment of character and visual quality and the provision of a landscaping scheme should be proportionate to the scale and nature of the development proposed.
  
20. Local Plan Appendix 4 Adopted Standards<sup>1</sup>. Remove all references to multi-functional but include an initial statement to the effect that: "Green infrastructure is comprised of green spaces each of which can have only a single function but may be multi-functional".
  
21. NB believe that landscape appraisals should take account of plans for ecological networks, wildlife corridors and stepping stones and requirements for space in an evidenced form that should be incorporated into site plans (together with known species) before sites are designated, in the same way that space for roads, schools and other facilities are made requirements in advance.

## **22. Implementation and Monitoring**

The policy will be implemented and monitored through:

- Measurement of qualitative and quantitative changes (gains and losses) of extent, connectivity and condition against national and local targets for; priority habitats, ecological networks; wildlife corridors and stepping stones.
- There should be differentiation of above measures between development change and changes arising from working with local and national partners including; Local Authority, Local Economic Partnership, Local Nature Partnership and other community partners.

23. **Para 6.1.** is amended to read; “An overall ambition of the Local Plan is to promote the preservation, restoration and re-creation of landscapes and habitats, including priority habitats and ecological networks, whilst meeting the area’s social and economic needs”. Remove final sentence.
24. **Para 6.2** is amended to read; “Policies within this chapter ....., N (sustainable habitats and biodiversity),” ....
25. **Para 6.3** is amended to read “The countryside of the borough is one of its key assets, contributing significantly to the quality of life locally. Across Hampshire though there have been significant landscape changes including a 50% decline in ancient semi-natural woodland in the last 70 years and a decline of 98% in species-rich unimproved grassland over the last 150 years, one of the rarest habitats in Hampshire and the UK” Sustainability Appraisal Baseline Data, Biodiversity Appendix 2 page 16. .
26. **Para 6.8** The term “green networks” is replaced by; The countryside and the Borough’s network of green Infrastructure, ecological networks, wildlife corridors and stepping stones provide a resource for agriculture.....”. Mapped networks including stretches where they are disconnected or might be reconnected will be identified to inform development and other planning decisions. Network mapping will include sub-regional green infrastructure, ecological networks and wildlife corridors that enter, exit and cross administrative boundaries.
27. Appendix 3 Glossary Green Infrastructure be amended to adopt the definition for Green Infrastructure used in the NPPF. A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
28. Appendix 4 Adopted Standards be amended by removing all references to the term “multi-functional” so making clear that there is no absolute need for individual green spaces to be multi-functional and thereby allow for any green space to support a single primary function while not precluding multi-functional sites. For example it should be possible for some natural green spaces to function effectively as habitats for wildlife so as to enable them to achieve a high value nature reserve status.

29. The Glossary to include a definition of the term “Landscape”. One definition is “All the visible features of an area of land, often considered in terms of their aesthetic appeal. synonyms include: scenery, countryside, topography, country, land terrain, environment;
30. The Glossary should include definitions of “Ecological Network” and “Wildlife Corridor” which are mentioned in the NPPF Glossary but are best articulated in Making Space for Nature .
31. Paragraphs 6.1 to 6.11 be amended to reflect other changes to wording in Chapter 6 and Policy EM1.

**Paul Beevers**  
**Natural Basingstoke**

<sup>3</sup> Appendix 3 Making Space for Nature – Ecological Network definitions

**Appendix 1 Submission Local Plan Appendix 4 Adopted Standards**

## Appendix 4 – Adopted Standards

### ADOPTED GREEN SPACE STANDARDS (JULY 2013)

#### Maximum Distance Thresholds

Multi-functional Green Space (MFGS) made up of: <ul style="list-style-type: none"> <li>• Amenity Green Space (including informal play space and kickabout)</li> <li>• Accessible Natural Green Space</li> <li>• Parks.</li> </ul>	5mins (300m walking)  10mins (600m walking, 1500m cycling) 15mins (900m walking, 2250m cycling, 5625m car)
Equipped play areas	10mins (600m walking) to nearest facility
Allotments	10 mins (600m walking, 1500m cycling, 3750m by car)

#### Quantity Standard

Multi-functional Green Space (MFGS) made up of: <ul style="list-style-type: none"> <li>• Amenity Green Space (including informal play space and kickabout)</li> <li>• Accessible Natural Green Space</li> <li>• Parks</li> <li>• Green corridors and buffers</li> <li>• Important biodiversity sites and landscape features.</li> </ul>	65m <sup>2</sup> per person (in/adjacent to Basingstoke) 32m <sup>2</sup> per person (rural)
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#### Absolute Minimum Requirement

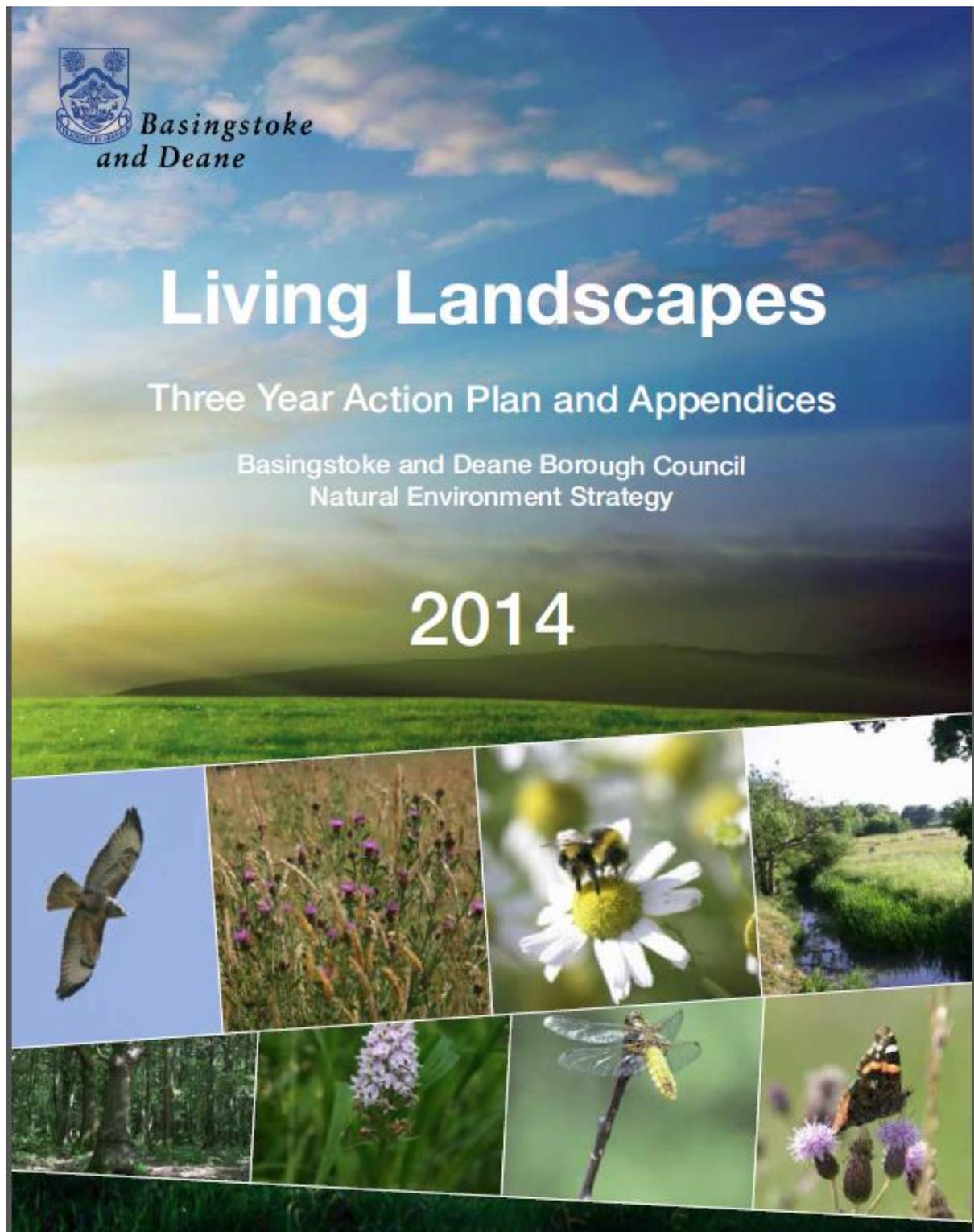
Multi-functional Green Space (MFGS) made up of: <ul style="list-style-type: none"> <li>• Amenity Green Space (including informal play space and kickabout)</li> <li>• Accessible Natural Green Space</li> <li>• Parks.</li> </ul>	20m <sup>2</sup> per person (all areas)
Equipped play areas	0.5m <sup>2</sup> per person (all areas)
Allotments	3.4m <sup>2</sup> per person (all areas)

The Local Plan should be read as a whole. Proposals will be judged against all relevant policies  
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**Minimum Sizes**

Multi-functional Green Space	0.2ha (2000m <sup>2</sup> ) with no dimension less than 15m
Neighbourhood Parks	2ha
Strategic equipped play areas including provision for teenagers	1250m <sup>2</sup> in/adjacent to Basingstoke
Neighbourhood equipped play areas including provision for teenagers	750m <sup>2</sup> in/adjacent to Basingstoke 1000m <sup>2</sup> in rural settlements to allow for the lack of strategic sites
Local equipped play areas	300m <sup>2</sup> in/adjacent to Basingstoke 450m <sup>2</sup> in rural settlements to allow for the lack of strategic sites
Allotments	10 plots (approx. 1375m <sup>2</sup> ) min 5 rods

**Appendix 2 Living Landscapes Appendices 1 and 4**



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Note that “Protected Species” should read “Priority Species”.

## Appendix 1: Protected and Notable Species

Protected species and notable species are those that have statutory protection or are recognised as needing special conservation effort. See key at end of appendix for status abbreviations. Data provided by the Hampshire Biodiversity Information Centre (Winter 2013).

Taxon name	Common Name	Status
<b>Amphibians and Reptiles</b>		
<i>Anguis fragilis</i>	Slow-worm	NERC_s41 WCA_s5s91(t)
<i>Bufo bufo</i>	Common Toad	NERC_s41
<i>Natrix natrix</i>	Grass Snake	NERC_s41 WCA_s5s91(t)
<i>Triturus cristatus</i>	Great Crested Newt	EU_Hab_2np EU_Hab_4 HBAP NERC_s41 WCA_s5s94b WCA_s5s94c HabReg_s2
<i>Vipera berus</i>	Adder	NERC_s41 WCA_s5s91(t)
<i>Zootoca vivipara</i>	Common Lizard	NERC_s41 WCA_s5s91(t)
<b>Birds</b>		
<i>Accipiter gentilis</i>	Northern Goshawk	WCA_s1s1 CR
<i>Acrocephalus scirpaceus</i>	Reed Warbler	HBAP
<i>Alauda arvensis</i>	Sky Lark	BOCC_Red HBAP NERC_s41

<i>Alcedo atthis</i>	Common Kingfisher	EU_Bird_1 WCA_s1s1
<i>Anas clypeata</i>	Northern Shoveler	CR
<i>Anas querquedula</i>	Garganey	WCA_s1s1
<i>Anas strepera</i>	Gadwall	HBAP
<i>Anser erythropus</i>	Lesser White-fronted Goose	EU_Bird_1
<i>Anthus petrosus</i>	Rock Pipit	CR
<i>Anthus trivialis</i>	Tree Pipit	BOCC_Red NERC_s41
<i>Ardea cinerea</i>	Grey Heron	CS
<i>Ardea purpurea</i>	Purple Heron	EU_Bird_1 WCA_s1s1
<i>Asio flammeus</i>	Short-eared Owl	EU_Bird_1
<i>Asio otus</i>	Long-eared Owl	CR
<i>Aythya ferina</i>	Common Pochard	HBAP CS
<i>Aythya marila</i>	Greater Scaup	BOCC_Red NERC_s41 WCA_s1s1
<i>Botaurus stellaris</i>	Great Bittern	EU_Bird_1 BOCC_Red HBAP NERC_s41 WCA_s1s1

**Records counted for Natural Basingstoke by Paul Beevers**

NOTE 1; THE APPENDIX REFERS TO PROTECTED SPECIES BUT THESE ARE PRIORITY SPECIES

164 X 541 Species of flora and fauna

655 X Notable Species

819 X Protected and Notable Species

Appendix 4: Habitat Creation and Restoration Targets as outlined in the council's Green Infrastructure Strategy

<b>Table 4 - Habitat Targets within the Biodiversity Priority Areas and the wider Borough (to 2029)</b>					
	Land owned and/or managed by BDBC		Land outside BDBC ownership/management		
Habitat type	Existing areas to be maintained (ha)	New areas to be created or restored (ha)	Existing areas to be maintained (ha)	New areas to be created or restored (ha)	Total areas in Borough where known (ha/m)
Terrestrial Great Crested Newt habitat (includes scrub and grassland specifically managed for GCNs)	6.27	*	unknown	unknown	6.27
Heathland (includes areas of acid grassland, bog and some woodland)	195.61	3.18	208.57	unknown	407.36
Native woodland (includes ancient semi-natural woodland and wet woodland)	52.56	16.30	592.09	4.67	665.63
Orchard	1.50	0.28	unknown	unknown	1.78
Ponds and other open water (includes lakes and canals)	3.07	0.92	18.16	unknown	22.15
River (only targets for known works along River Loddon given)	-	1045 m	unknown	unknown	1045 m
Species rich grassland (includes many habitat types such as chalk grassland, neutral grassland and floodplain grazing marsh)	16.17	40.91	171.04	4.45	232.57
Fen	unknown at present	*	1.86	unknown	1.86

### Appendix 3 Making Space for Nature –Ecological Networks definitions

#### Making Space for Nature - Page vi

*“An ecological network comprises a suite of high quality sites which collectively contain the diversity and area of habitat that are needed to support species and which have ecological connections between them that enable species, or at least their genes, to move”.*

This is further explained on page 14 under 2.2.1. What is an ecological network?.

*“It is this network of core sites connected by buffer zones, wildlife corridors and smaller but still wildlife-rich sites that are important in their own right and can also act as ‘stepping stones’ that we call an ecological network”.*

*‘Wildlife corridors’ do not have to be continuous, physical connections: a mosaic of mixed land use, for example, may be all that is needed – it is the permeability of the landscape to species (or their genes) that matters’.*