

Natural Basingstoke – Questions Concerning the Enquiry in Public

Natural Basingstoke respectfully wish to raise with the Inspector a number of points in relation to the EiP and in particular with respect to **October 6th Issue 2 Sustainability Appraisal & Habitats Regulations Assessment**.

Just as the Inspector asked at the preliminary hearing that attendees supported him in his task, NB simply ask the same. NB are here to try to ensure that the Local Plan is, in connection with the natural environment, fully considered, is consistent with the NPPF, is justified and will deliver the outcomes expected by the NPPF. Above all NB understand that is the purpose of the EiP.

1. NATURAL ENGLAND AND WEIGHT ATTACHED TO THEIR COMMENTS

In the course of the above session the local authority (LA) placed emphasis on what they regard as positive responses from Natural England. The Inspector stated that he would place *“considerable weight”* on feedback from Natural England (NE). NB believe there is no basis for the Inspector to place *“considerable weight”* on feedback from NE or indeed that the Inspector should place any weight at all on feedback from NE that is outside the EiP. The Inspector has no way of telling how comprehensively Natural England reviewed the Local Plan documents or indeed how consistent or effective were the comments made nor have they been available to be critiqued. Natural Basingstoke contend that the comments from NE were quite clearly just comments, put together in an *ad hoc* way and with significant and major omissions. NE have never suggested that their contribution was any more than comments or that comments were thorough or even always right. NE are just as fallible as anyone else. NB contend that there are many more questions to be answered by the Local Authority about the Local Plan documents and we reiterate that we understand that the purpose of the EiP is to test the Local Plan documents against the guidance in the NPPF and not rely on external *ad hoc* comments.

At the preliminary hearing the LA stated verbally to the Inspector that NE *“supported”* the Local Plan submitted to them. Further, the document setting out how the LA fulfilled its Duty to Co-operate also stated that NE were in *“support”* of the Local Plan. This is not correct. NE have never supported the Local Plan or suggested that they did. Due we believe to NB comments since the preliminary hearing, at the session on October 6th the LA changed its wording but still inferred that NE were happy with the Local Plan. Again we point out that this is not correct and no such inference can be drawn from NE comments. NB are concerned that the LA and the Inspector are attaching so much reliance to *ad hoc* NE *“comments”* when the purpose of the EiP

is to apply the tests set out in the NPPF. **NB urge** the Inspector to accept our contention that there is no justification to give any weight to NE comments and that the LA should fully respond to arguments that it is not complying with the NPPF.

2. THE SA SUSTAINABILITY OBJECTIVES, SPATIAL AND CORE STRATEGY, NPPF GUIDANCE AND TERMINOLOGY

The NPPF chooses its words carefully and they have great significance. The SA was predicated on 2 words, *“Protect and enhance”* used to describe how the SA would make objective assessments of sustainability and ultimately evaluate and select sites for inclusion. The NB hearing Statement questioned the consistency and effectiveness of these terms in the context of the NPPF. The LA made no attempt at the above session to respond to the challenge that these words were inadequate in respect of NPPF guidance which uses words such as *“Create”, “Restore”, “Connect”*. These words are supplemented by terms like *“positive planning”* and *“opportunities to incorporate biodiversity in and around developments should be encouraged”*. Also *“promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations,.....”*. *“Recognition for the wider benefits of ecosystem services”*. These words and terms are very significant in natural environment terms and for site selection and planning and NB submit that *“Protect and enhance”* does not begin to address NPPF guidance on sustainability and that this must have had an impact to a greater or lesser extent on objective assessment, site evaluations and selection and indeed how such sites should or could contribute to *“ecological networks, wildlife corridors and stepping stones”* and deliver *“net gains in biodiversity”*. **NB request** that the LA account for the significant difference between the SA and the NPPF and that the Inspector notes and understands the implications of these differences.

3. THE STATE OF THE NATURAL ENVIRONMENT IN BASINGSTOKE & DEANE

The NB Hearing Statement questioned the characterisation of the Borough natural environment by the LA in the SA which NB described as *“overly optimistic and misleading”*. NB proposed an alternative as to how the Borough natural environment should be characterised that was more realistic. This is important because it demonstrates the extent of the LA understanding of the task it has to address, it is vital that Councillors and residents have visibility of a realistic appraisal, it initiates a process that leads to defining measurable indicators and targets as part of the Local Plan and it meets the requirement of the NPPF for up to date environmental

information to be used. **NB request** that the LA respond to the points we have made including the alternative characterisation being a more accurate representation and that the Inspector understands the implications of these differences.

NB drew attention at the outset to our belief that issues in the SA cascade through the Local Plan policies and so will keep recurring. We reiterate our belief that the LA should begin by addressing the issues again raised here and in the Hearing Statement of October 6th so that the natural environment can properly be considered as part of the EiP process. NPPF 8 emphasises the *mutual dependency* between planning for economy, society and environment and NB agrees.

Thank you.

Paul Beavers

Natural Basingstoke