

NATURAL BASINGSTOKE QUESTIONS + POINTS IN RESPONSE TO INSPECTOR CONCERNS

1.1 Sustainability Appraisal. Will the Inspector's examination of the robustness of the SA, especially in respect of the largest greenfield site at Manydown (SS3.10), include as a key issue the soundness of the Biodiversity Assessment 2010 at Appendix 10 and 12a of the SA? Will the Inspector expect this Assessment to cover the whole of the Manydown site and not just that part that is proposed for development within this Local Plan, especially, as policies SS3.10 (m) and (n) specifically refer to areas outside the current development proposals?

- The Sustainability Assessment is a partial assessment of Manydown and does not register its significance, potential or possible role as green space in the "better planning of the area".
- Basingstoke does not have any publicly owned large "Country Parks" and is seen to be deficient compared to several Hampshire authorities. Natural England's Guidelines for "Nature Nearby" are not even mentioned and this wider consideration of open space needs to be included. Biodiversity, landscape and the wellbeing potential of Manydown have not been assessed in this regard or the benefits for existing as well as future residents.
- The North Wessex AONB is protected for landscape. Not specified is habitat and biodiversity or its condition. This important very different calculation should be incorporated.

3. Environmental Issues. We note the Inspector's concern over the environmental impact for sites to the east of the Borough. Will the Inspector also show similar concern for the need to build sustainable habitats for wildlife in the masterplan for site SS3.10 (Manydown)?

- For Manydown, the biodiversity evidence base is unsound. Opportunities for restoration, corridors, network connectivity, landscape and wellbeing benefits are inadequately assessed. The Borough affirmation of "no net loss of biodiversity" in EM 2 (iv) will be undermined by a piecemeal approach to planning.
- Manydown and spaces in urban and rural areas are not yet recognised within a Green Infrastructure of ecological corridors, networked habitats and access routes for existing urban and rural communities. We need the NPPF to be better reflected in our Local Plan.
- There are proposals for roads crossing all of Manydown but inadequate concern for Green Infrastructure. Unstated is another possible road on adjacent community managed bio-diverse rich public space refused LNR status by the Council despite support from Natural England and the wider community.
- Spatial thinking and Policies such as EM3 Green Infrastructure are too aspirational, lacking positive commitment to action or delivery compared to positive policies and delivery for "infrastructure" or "facilities" e.g. CN5, CN7 and IDP. Neither does the Local Plan recognise the need for dedicated areas for nature enjoyment and wildlife, deviating from the NPPF requirement for positive planning.

6.1 Level and Detail of Presentation. In view of the Inspector's concern that masterplans for strategic housing proposals should not be "hidden" in yet to be delivered SPDs, would he expect to see in such masterplans a green infrastructure strategy that would make detailed provision for habitats of an appropriate scale and diversity integrated into ecological networks and not just random green spaces for the new residents of housing development but for the existing residents of Basingstoke as well?

- Green Infrastructure should be informing decisions, during Local Plan site appraisal and selection, then inform site planning, and not be an afterthought.
- The Borough has around 850 protected and notable species and at least 226 found in the area of Manydown. Knowing the function, extent and true condition of habitats and biodiversity and having a rigorous appraisal and reaction process is essential. These things will contribute towards positive planning and the assertion in the NPPF that all 3 elements are inter-dependent and should not be undertaken in isolation.
- Neither the Green Infrastructure Strategy nor Living Landscapes are included in the Evidence Base. We believe these documents should be included and scrutinised as part of the examination of the Local Plan.

Paul Beevers , On behalf of **Natural Basingstoke**