

Appendix H(i): Summary of consultees' comments and the LPA's response

Name / Organisation	Part of SPD	Summary of comments	BDBC Response	Change to text
General comments (about document as a whole)				
Louise Porton (Kingsclere Parish Council)	General	Support the document. Emphasise the need to ensure policies are enforced consistently across the borough, including outlying parishes.	Noted.	No change
David Flint	General	Consider that a Landscape Management Plan should be required from BDBC for the ancient woodlands at Manydown. BDBC should make provision for public access to these ancient woodlands as well as for their management for the benefit of wildlife.	Impacts from Manydown are being addressed as part of the planning application for that site. The purpose of this SPD is to establish principles to guide all development across the borough.	No change
John Jervoise (Herriard Estates)	General	There is lack of clarity here between the objectives of visual environment, green & low carbon issues around the environment, and wildlife conservation.	The document sets out a range of considerations relating to landscape, biodiversity and trees that are material to decisions on planning applications. These would need to be weighed into the decision-making process taking into account other material considerations and site-specific factors.	No change
John Jervoise (Herriard Estates)	General	<p>The existing Landscape and Biodiversity SPD, whilst needing updating, is a balanced and measured document which exempts all smaller applications. There is no need to add to the requirements.</p> <p>The proposed SPD increases the cost, complications and time needed prior to submission of applications. These extensive, detailed reports distract the decision maker from taking an overview of the benefits of the proposals to people and communities, cause delay, and slow down housing delivery.</p> <p>The document contains no clear or unambiguous size related criteria so there will inevitably be regulatory creep – this is likely to seriously impact on rural communities and residents.</p> <p>The additional costs will reduce viability and may, for example, result in fewer affordable homes being delivered.</p> <p>Considers that conditions result in a better outcome than requiring information with the applications.</p>	<p>The previous SPD does not exempt all smaller applications, but it is structured in a different way. The current SPD (para 1.8) is clear that 'the council will seek information proportionate to the scale of the development proposed and the extent to which it is likely to impact upon the natural environment'.</p> <p>It is therefore considered that the level of information required is appropriate whilst reflecting the requirements of the NPPF.</p> <p>The council will consider the use of pre-commencement conditions wherever possible, however it is necessary to ensure that satisfactory information is provided with the planning application.</p>	No change
James Rowley (BDBC Manydown)	General	General support for the document. The principles are well considered and should operate successfully alongside other guidance provided they are treated as guidance and not applied too prescriptively.	Support noted. The document will be a Supplementary Planning Document which will be a material consideration in the determination of planning applications. The implementation of the requirements of the document would need to take into account other material considerations including site-specific factors.	No change
Glen Strongitharm (Highways England)	General	No comments	n/a	No change
Richard Carr (Transport for London)	General	No comments	n/a	No change
Green Infrastructure				
Maria Miller MP	Green Infrastructure	Welcomes the draft SPD. Considers the explanation of how the SPD links with the GI Strategy helpful.	Noted.	No change
James Rowley (BDBC Manydown)	Green infrastructure	Creating a garden town will be about creating new green infrastructure, tree-planting and landscape as well retaining the best of the existing landscape, to help	This is welcomed. It is considered that these elements are already addressed in the SPD, however para 2.8 has been bolstered to include references to existing and new	<p>Para 2.8 revised to state:</p> <p>The SPD is a key element in the delivery of the council's</p>

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		form an established setting for new buildings and contribute to the Manydown objective of “greenery everywhere”. This could also be reflected more in the SPD.	GI.	emerging new Green Infrastructure (GI) Strategy (2018), which encompasses biodiversity, landscape and trees amongst other elements. <u>It relates to the existing GI resource throughout the borough, along with the creation of new GI in new development.</u>
Trevor Codlin (Hampshire and Isle of Wight Wildlife Trust)	Principle GI1: Green Infrastructure	Consider this to be a good principle and pleased to see the inclusion of the creation of wildlife habitat. However, some GI site would not offer best opportunity for wildlife habitat creation, suggest may be better to use offsetting approach and take contributions to restore 'opportunity areas' within ecological networks.	Points noted and text to GI1 has been revised. However, if a particular development had an impact on habitats and species we would seek to address this using Policy EM4 (Biodiversity, Geodiversity and Nature Conservation) rather than Policy EM5 (Green Infrastructure), i.e. habitat creation would be one of a number of functions green infrastructure might fulfil rather than a mechanism to address impacts on species from isolation/habitat fragmentation. Wording in relation to the sections on compensation updated to include reference to offsite habitat creation supporting strategic projects such as the council's BPAs and the network mapping.	Following change made to second para of Principle GI1: <u>It is important that all areas of green infrastructure within developments serve a useful range of functions where these are compatible with each other. They will need to be designed in order to fulfil these functions. Such functions can include recreation, wildlife habitat (in the form of habitat corridors or stepping stones), screening, and sustainable drainage.</u> New text added to the end of para 4.64: <u>In particular the 'Network Opportunities' mapping can be used to target potentially the best areas for offsetting habitat loss if this is required.</u> Following text added to para 4.75: <u>Where offsite compensation measures may be required the council will seek opportunities to support strategic initiatives where these exist and are appropriate, such as habitat creation, restoration and/or management within the council's Biodiversity Priority Areas or the areas mapped as 'Network Opportunities' within the Borough (see paragraph 5.5).</u>
Mr Alex Swann (Environment Agency)	Principle GI1	Page 7. Principle GI1: Suggest terms "habitat corridors" and "stepping stones" are added to the list of useful functions.	Agreed.	Following change made to Principle GI1: <u>It is important that all areas of green infrastructure within developments serve a useful range of functions where these are compatible with each other. They will need to be designed in order to fulfil these functions. Such functions can include such as recreation, wildlife habitat (in the form of habitat corridors or stepping stones), screening, and sustainable drainage and that they are designed in order to fulfil these functions.</u>
Landscape				
Megan Pashley (Gladman Developments)	Landscape general	Raise concerns that a number of the principles are inconsistent with the revised NPPF and adopted ALP Policy. Consider that Principles L3, L5, L7 and L8 seek to afford landscape protection and unsubstantiated design detail requirements beyond the scope of the NPPF. The principles / supporting text do not differentiate between outline / full / reserved matters applications. The landscape requirements go beyond what can reasonably be expected with an outline planning application.	The principles outlined in the response build upon and provide guidance in relation to the over-arching requirements set out in policy EM1 within the local Plan and therefore do not constitute new policy. It is considered that the approach taken in the SPD responds to paragraph 126 of the NPPF in allowing distinctive places to be created based on the circumstances and characteristics of a particular site. The document is considered to be sufficiently clear about when information should be provided.	No change
Martin Small (Historic England)	Landscape introduction	Welcome the reference to Historic Landscape Characterisations in Box L1 but do not consider these to be "local planning policy documents" or others (see	It is acknowledged that the Historic Landscapes Characterisations and other referred documents are not planning policy documents in themselves, however they	Box L1 changed to state: 'Key local planning policy <u>and evidence base</u> documents that should inform the design of development proposals'.

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		full rep list) unless adopted as SPDs.	are key materials to be referred to within the planning application process.	
Martin Small (Historic England)	Principle L1	<p>Welcome the recognition of the need for applicants to consider heritage assets when seeking to create a strong landscape structure that responds to the site's context, however it is important that historical significance is also considered.</p> <p>Suggest that Principle L1 ii include "historical significance" alongside landscape character and visual amenity and L1 iii include historic features as an element that could contribute to a successful landscape structure.</p>	<p>A reference to the significance of assets will be included within the text at paragraph 3.6, and this will be addressed in greater detail in the Heritage SPD.</p> <p>As the assessment of the character will include heritage assets and significance (which is one of a number of elements that contribute to its character), it is not considered necessary to amend principle L1 ii</p>	<p>Change to para 3.6</p> <p>A successful development will in part be determined by how well it responds to the local landscape and the many elements that combine to give an area a unique character – including the shape of the landform, land use (natural and built), vegetation, landscape features, heritage assets, <u>historical significance</u> and views.</p>
Charlotte Mayall (Southern Water)	Principle L1 (para 3.10)	<p>Consider paragraph 3.10 requires further clarification relating to preliminary site surveys as to the potential need to consider existing underground infrastructure. Note that where any water or wastewater infrastructure exists under a site, Southern Water would require an easement, which may affect site layout, developers are encouraged to contact Southern Water to assess their sites at an early stage in the process.</p>	<p>The list in 3.10 currently includes reference to non-mains drainage and also states that the list is not exhaustive – however this point can be clarified</p>	<p>Change final bullet point of 3.10</p> <p><u>'Subterranean infrastructure including non-mains drainage...'</u></p>
Martin Small (Historic England)	Principle L2	<p>Welcome the reference to heritage in paras 3.10 and 3.16. However, suggest changes to the 'heritage assets' section (including specific suggested text).</p> <p>Para 3.28 should refer to the use of Heritage Impact Assessments to assess the historic significance of a registered historic park and garden and the potential impacts of the development proposals on that significance and the appreciation of that significance. Also refer to Conservation Management Plans.</p> <p>Suggest reference could be made in paragraph 3.29 to views into and out of conservation areas, which can contribute to their character and appearance.</p>	<p>Revised text has been included to address these points.</p>	<p>Changes made to paras 3.26 and 3.27 in line with HE advice.</p> <p>Historic parks and gardens are designed landscapes of special historic interest. Although they are not protected by a separate consent regime, they are designated heritage assets and applications for planning permission will give great weight to their conservation in accordance with the National Planning Policy Framework and Local Plan Policy EM11 (The Historic Environment). There are two tiers of historic parks and gardens in the borough:</p> <ul style="list-style-type: none"> • Those registered by Historic England (of national significance); and • Those registered at county level. <p>Although they are not protected by a separate consent regime, the inclusion of a historic park and garden on the Historic England Register is a material consideration in the determination of planning applications. Those on the Historic England Register are designated heritage assets and great weight will be given to their conservation when determining applications for planning permission, in accordance with the National Planning Policy Framework and Local Plan Policy EM11 (The Historic Environment).</p> <p>There are two tiers of historic parks and gardens in the borough:</p> <ul style="list-style-type: none"> • Those registered by Historic England (of national significance); and • Those registered at county level. <p>Para 3.28 amended to refer to Heritage Impact Assessment and Conservation Management Plans</p> <p>If the proposal could affect a historic park or garden, specialists in garden history and restoration should be engaged to evaluate</p>

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				<p>the importance of features in terms of conserving the historic interest of the site, having regard to any designation applying. <u>This should include the use of Heritage Impact Assessments to assess the historic significance of the site and impacts of development.</u> A further assessment must be made of the site's capacity to accommodate the type of development proposal, without adversely affecting its historic character. Restoration potential must also be assessed, unless a restoration plan has already been prepared. <u>Conservation Management Plans are a useful tool in securing the long-term endurance of the significance of parks and gardens, and can be secured through a Section 106 agreement.</u></p> <p>Para 3.29 amended to state:</p> <p>Conservation areas are designated for their special character and appearance. The buildings are central to this, but the spaces between them, <u>views in to and out from conservation areas</u>, landscape features including trees, and, in some cases, the wider landscape, are also key components.</p>
John Jervaise (Herriard Estates)	Principle L2	<p>The Guidelines for Landscape and Visual Impact Assessment on which this appears to rely in part, appears to be written by a trade body (see https://www.landscapeinstitute.org/technical/glvia3-panel/).</p> <p>By definition these professionals are focused on this area and not taking a balanced approach in the round of public interest, so the balance here is fundamentally wrong.</p> <p>The trade body should not be writing and tightening planning policy</p>	The GVLIA is an established method of assessment used across the country by landscape and planning professionals to assess landscape and visual elements of planning applications and therefore is considered appropriate to use as a commonly used method of assessment. This ensures that a consistent approach is used by applicants and LPAs alike, thus making the decision making for this element, more efficient (rather than having to agree parameters for assessment before an application is then assessed)	No change
James Rowley (BDBC Manydown)	Principle L3 (i)	In terms of building orientation, we support the intention and agree that best practice suggests that housing should generally face (rather than back onto) woodland, with buffers provided between. However, there could be exceptions (eg where side boundaries adjoin the buffer to turn the corner or where ecological considerations means that access which would need to be provided by a front access road needs to be limited). In addition, having all homes & access fronting adjoining woodland would require separate access roads throughout with one sided development, so is not normally applied as blanket approach to design & layout, so some flexibility is required.	It is considered that the requirements of the document are well evidenced to reflect best practice. In order to ensure high quality design that does not result in post-implementation problems such as encroachment and fly tipping, the requirement for houses to face onto woodland should remain. The SPD would be a material consideration in any future planning application that would need to be balanced against other material considerations including site-specific factors.	No change
Mr Alex Swann (Environment Agency)	Principle L3 (i)	Suggest point 'housing must face onto...woodland' from Principle L3 is also applied to watercourses, with appropriate buffers and including physical enhancement or restoration.	Agree	<p>Following change made to Principal L3 point i:</p> <p>Housing must face onto areas of existing woodland <u>and main rivers</u>, with appropriate buffers (<u>see Box B6</u>).</p>
James Rowley (BDBC Manydown)	Principle L3 (ii)	The principle should require important trees to be protected, based on survey analysis to determine value (rather than all trees). Suggest the words 'where possible' are also added'.	<p>Criterion (ii) already only requires important trees to be retained.</p> <p>It is not considered necessary to add the words 'where possible', as sufficient weight needs to be provided to</p>	No change

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		This seems a more logical approach as some natural features will have more value than others and there will be occasions where it is not possible to retain all trees and existing features eg due to access or layout requirements.	retain important elements of the landscape structure, which should dictate the layout of a place rather than vice-versa.	
James Rowley (BDBC Manydown)	Principle L3 (iii)	In relation to the requirement for “all hedgerows to be retained”, whilst it’s desirable to retain mature hedgerows within new developments wherever possible from the landscape point of view, again this should be based on an assessment of their value and there are occasions within residential layouts where this is not always possible. A well designed layout will retain as much as existing greenery as possible, but also needs to follow a pragmatic approach including other design factors.	Criterion (iii) only requires ‘existing important hedgerows’ to be retained. It is considered that this principle should not be changed, as it is important to ensure that important landscape features are appropriately retained within developments. The SPD would be a material consideration in any future planning application that would need to be balanced against other material considerations including site-specific factors.	No change
Martin Small (Historic England)	Principle L3 (iv)	Welcome principle L3 v.	Noted.	No change
James Rowley (BDBC Manydown)	Principle L5	Within phase specific masterplans at reserved matters at Manydown, detailed open space details for smaller areas of LEAPS, LAPs etc. which would come forward with the key phase at reserved matters; but these standards/requirements could also be included in site wide specification /technical guides.	The document recognises that each planning application will be different, and that the level of detail required (and the timing/manner of the submission) may depend upon a number of different development-specific factors.	No change
Ms Katherine Snell (HCC)	Principle L6 (Para 3.43)	Should provide example of the standards being applied to para 3.43, to add clarity and ease of application.	With respect to paragraph 3.43 – this instance could occur where the additional number of residents in a development does not result in a new area of open space that is big enough to function as a particular type of open space.	Para 3.43 amended to read: (1) The quantity standard for the number of additional residents does not result in a requirement for green space which meets the minimum size standard for a particular green space (for example, the number of additional residents may not be sufficient to trigger the requirement for a space that is big enough to accommodate a kickabout area, so an offsite contribution would be required instead); and/or
Martin Small (Historic England)	Principle L7	Welcome principle L7 vi but important to note that planting in prominent locations may not be appropriate if that location has historic significance. Welcome reference to historic hard surfacing in paragraph 3.54.	Comment noted, however principle L7vi, states that new planting needs to be in keeping with the historic character. No change required.	No change
Anthony Styles	Principle L8	Concerned about impacts of light pollution upon biodiversity and landscape. This is not adequately addressed in the document.	Further detail added to Principle L8. The biodiversity aspects have already been addressed in the Biodiversity chapter (Box B5).	Additional criterion added to Principle L8. <u>Lighting should consider the need to avoid adverse impacts on dark skies and wildlife corridors. Where these issues have been identified through the analysis process, the design of lighting should seek to avoid impacts on them.</u>
Rebecca Aziz (Natural England)	Principle L9	Reference to temporary SuDS should be made, where applicable, when a construction Method Statement is needed (Principle B9). Where a development may incur adverse impacts from poor water quality, the SPD should strengthen the requirement for an application to	SuDS are currently referred to in Principle L9, however the response provided does include some more specific examples of its application and therefore the supporting text to L9 will be reviewed to provide relevant additional text.	Update to supporting text to Principle L9: The design of elements such as SuDS, green roofs and walls will need to be a fundamental part of the process and can contribute to other aspects of design such as biodiversity and visual amenity,

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		be supported by details of a sustainable drainage system, and provide more detail on types of SuDS features. See full rep for list of possible features.		<p>making a contribution to place making and focal points. <u>Other examples of approaches to consider can include on-site features such as:-</u></p> <ul style="list-style-type: none"> • <u>greywater recycling (harvesting and re-use of bath/shower/sink water);</u> • <u>rainwater harvesting (will decrease the volume of run-off requiring SuDS treatment)</u> • <u>rain gardens;</u> • <u>filter trenches around driveways and road (to aid infiltration and act as temporary storage);</u> • <u>swales and filter strips (with undulating depressions and long tussocky vegetation to slow the flow-rate and allow settlement of particles); and,</u> • <u>planting to encourage habitat creation and development.</u>
James Rowley (BDBC Manydown)	Principle L9 and Paragraph 3.59	Welcome the potential for the council to adopt above ground areas such as swales and balancing ponds; however to meet the FRA requirements for Manydown underground storage eg below permeable paving will also be required; this this could result in different bodies maintaining different elements of the surface water attenuation system.	This is a specific issue relating to the Manydown development and will need to be managed through the development of the application. Whilst the comment suggests the need to minimise the number of bodies managing an area (which is agreed), no changes are required to this SPD.	No change
James Rowley (BDBC Manydown)	Principle L11	Landscape Management plans are important -we would expect to provide these as outline/ RM conditions at Manydown. Detailed arrangements are covered under 3.74.	Noted.	No change
James Rowley (BDBC Manydown)	Principle L12	The option to adopt POS/GI areas by the council through commuted payments is welcomed; at Manydown it may be preferred to maintain such areas through a community trust or Manco arrangements; so flexibility is required at this stage-with the detailed arrangements to be agreed within management plans.	Adoption is set out as a preference, but each proposal will be considered on its own merits.	No change
Biodiversity				
Richard Barnes (Woodland Trust)	Biodiversity general	<p>Principles of net biodiversity gain should be given greater prominence and included in the introduction and be reflected in changes to the development principles.</p> <p>Suggest that as well as reordering B7 as a new B1, the sentence "Loss of or damage to irreplaceable habitats (such as ancient woodland and aged or veteran trees), will, by definition, always entail net loss of biodiversity, so should be avoided.", and remove the words "where possible" from the second sentence of the first paragraph.</p>	<p>Brief text from B7 has been incorporated into opening Introduction paragraph without going into too much detail ahead of key terminology being explained. As a result B7 has not been moved to be the new B1 Principle.</p> <p>Text added to Principles B5 and B8 rather than B7 to state irreplaceable habitats can never be compensated.</p> <p>B7 revised following changes to NPPF.</p> <p>The words 'where possible' have been removed from text relating to net gain to ensure the document reflects the changes in the latest version of the NPPF.</p>	<p>Following text added to end of para 4.2 to increase prominence of requirement for enhancement:</p> <p><u>The council will expect all proposals to enhance the biodiversity of the receiving environment thereby providing the necessary biodiversity net gain over and above any residual losses from development.</u></p> <p>Addition to end of Box B3</p> <p><u>'Irreplaceable habitats: Paragraph 175 of the NPPF includes a presumption against development that would result in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) unless there are wholly exceptional reasons and a suitable compensation strategy exists.</u></p> <p>Following text added to end of Principle B5:</p> <p><u>Loss of or harm to irreplaceable habitats (such as ancient woodland and aged or veteran trees), will, by definition, always entail net loss of biodiversity, so should be avoided.</u></p>

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				<p>Following text added to end of Principle B8:</p> <p><u>Harm or loss of irreplaceable habitats, such as ancient woodland, cannot be compensated and will always result in net loss of biodiversity.</u></p> <p>Following revisions to Principle B7:</p> <p><u>As a minimum developments must result in no net loss of biodiversity and where possible provide a measurable net gain.</u></p> <p>Consequential change to para 4.63</p> <p>Basingstoke and Deane Borough Local Plan Policy EM4 and the NPPF require that new developments deliver a net gain where possible for biodiversity.</p>
Rebecca Aziz (Natural England)	Biodiversity general	<p>Ensure SPD in line with new NPPF (particularly sections: 2.1, 3.2, 3.17, Box B3 and 5.3 and regard to emphasised need for biodiversity net gain). Recommend the concept of net gain should be strengthened and brought forward within the SPD.</p> <p>Also refer early on to the mitigation hierarchy (avoid, mitigate, compensate), stressing need to early stage consideration by developers. The intention for the development of a Biodiversity Compensation Framework could also be introduced here as well.</p>	<p>Agree to updates to reflect NPPF 2018.</p> <p>Additional text on the mitigation hierarchy and net gain added to the introductory paragraphs to biodiversity section and para 4.51.</p> <p>Mitigation hierarchy added to the glossary.</p>	<p>Sections 2.1, 3.2 3.17, Box 3 and 5.3 have been adjusted to reflect the 2018 update for NPPF.</p> <p>Following additional text added to the end of para 4.2, so requirement for biodiversity enhancement is stated at the outset:</p> <p><u>...The council will expect all proposals to enhance the biodiversity of the receiving environment thereby providing the necessary biodiversity net gain over and above any residual losses from development.</u></p> <p>Para 4.51 updated to introduce the mitigation hierarchy more clearly:</p> <p><u>...This series of sequential, hierarchical steps that need to be taken to limit, as far as possible, the negative impacts on biodiversity from development is known as the mitigation hierarchy. It should be followed for every development...</u></p> <p>Mitigation hierarchy added to the glossary.</p>
Trevor Codlin (Hampshire and Isle of Wight Wildlife Trust)	Biodiversity general	<p>Generally support the SPD. Note that the SPD still refers to NPPF (2012) throughout and consider the SPD should be revised to refer to the NPPF 2018.</p> <p>Note that reference is made to 'key species and habitats' throughout the document. This is not a widely used term in relevant documents and/or legislation. The NPPF refers to 'wildlife-rich', 'priority' and 'irreplaceable' and the NERC act refers to 'priority' species or habitats. Consider that for consistency and to avoid confusion, this document should describe sensitive or important habitats and species using aforementioned wording.</p> <p>Pleased to see reference to Local Nature Partnership's Ecological Network Mapping.</p>	<p>References to NPPF now updated to reflect the revised guidelines published in Jul 2018.</p> <p>The term 'key' habitats and species reflects the wording used in policy EM4 of the Local Plan. It was purposely used to encompass all levels of species/habitats we consider should be a material consideration, for example Hampshire notable species which may not also be Section 41 species, i.e. not 'UK Priority Species'. Similarly our Living Landscape strategy refers to some habitats which aren't also UK Priority habitat types such as Green Lanes.</p>	Various changes to reflect the publication of the 2018 NPPF.
Marion Wolstencroft (Natural Basingstoke)	Biodiversity general	The SPD should recognise that it is about more than just planning new housing development but also about delivering outcomes relating to any land use change requiring planning consent. That would include land use activities undertaken by local authorities (B&DBC & HCC) or by community groups on Borough and County owned land, i.e. restoring habitats and species	The principles set out in the SPD are broad in order to relate to a wide variety of applications. The land use activity changes such as from amenity to natural areas on council owned land do not require planning permission and as such are outside the remit of this document.	No change

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		listed in S41 of the NERC Act.		
Marion Wolstencroft (Natural Basingstoke)	Biodiversity general	<p>Communities and community groups endeavouring to deliver habitat and biodiversity enhancements that would help meet NERC Act aims, Biodiversity Action Plan and AICHI targets need a process for initiating change, securing permission and making change happen. For several years the process was ad hoc but worked. Progress has stalled in the last 2/3 years. HNG has proposed that the core Planning Application system might serve this need with fee waivers.</p> <p>We remain concerned that the LA still does not appear to be taking action in accordance with the NERC Act.</p> <p>Old Down should be designated as an LNR.</p> <p>Should provide more contextual information about biodiversity in the borough and that there are 850 species that require conservation action.</p>	These comments are outside the remit of this consultation. It is considered that sufficient contextual information is provided for the purpose of this Planning document.	No change
Marion Wolstencroft (Natural Basingstoke)	Biodiversity general	The Local Plan (and possibly Council Plan) should incorporate DEFRA relevant Biodiversity Indicators and targets to guide the delivery of the Landscape, Biodiversity and Trees SPD. We also expect the Annual Monitoring Report to measure progress against those Indicators. We also propose that the Borough consider placing responsibility on Parishes and Wards to play their part for restoring biodiversity, in Neighbourhood and Community Plans. Other measures of success might include defragmentation.	This statement is outside of the remit of this consultation	No change
Marion Wolstencroft (Natural Basingstoke)	Biodiversity general	<p>On the ground in some parts of the Borough invasive species including those permitted in public areas are a spreading problem e.g. snowberry, cotoneaster, laurel..... This includes spreading (or even having been planted) into ancient or deciduous woodland and also in areas that could be valuable opportunities for specialist biodiversity e.g. banks. Only a very few invasive species relevant to Basingstoke are subject to legislative control. Other species classed as invasive by the Non-Native Species Secretariat (NNSS) can have big impacts on valuable habitats resulting in species diminution. There is no action or funding for control from the Borough but a cost exists as biodiversity declines and management need increased. Developers and residents are not restricted or required to pay for the consequences so practical restrictions should be applied We wish to propose that the Council (a) include a policy element that includes a list of invasive species that can be managed in habitats and adjacent areas, and (b) should not be planted by Developers in public areas and (c) that community groups will be able to control and replace and that these permissions be included in Management Plans. The costs of no action should not be ignored or passed to future generations and if volunteers can take corrective action to diminish problems we already have</p>	Paragraph 3.50 (in the Landscape Section) notes the need to avoid invasive species and has been updated to include a link to the government website for invasive species. Some of the species noted in the comment are appropriate in some situations and therefore a blanket ban on them is considered inappropriate.	<p>Additional link added to para 3.50</p> <p>Native species should be used next to watercourses or waterbodies to maintain their biodiversity value and the spread of invasive alien species must be avoided. <u>The following link provides further guidance on invasive species - https://www.gov.uk/guidance/prevent-the-spread-of-harmful-invasive-and-non-native-plants</u></p>

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		then we suggest the Council should support that.		
Rebecca Aziz (Natural England)	Biodiversity introduction	<p>Provide further information / clarity about the network mapping.</p> <p>Suggest elaborating on Section 4.5 with wording as follows:</p> <p>“The dataset, accompanied by a policy framework, includes statutory and non-statutory designated sites, priority habitats and areas of ‘Network Opportunities’, developed by the Hampshire Biodiversity Information Centre (HBIC) for the Hampshire Local Nature Partnership (LNP). Network opportunities are areas identified for suitable habitat creation based on various factors including geology, hydrology and topography. This can be used as an evidence base and a useful tool to help influence the design of developments, where existing green infrastructure can be identified and opportunities for new green infrastructure to be incorporated. It can also be useful in identifying suitable areas to target offsetting of habitat loss and achieving biodiversity net gain.”</p> <p>Recommend supporting ecological surveys should be supported by an up to date baseline data search from HBIC (major developments - include priority habitats)</p>	<p>Text in Section 4.5 amended to include more information on what the network mapping consists of.</p> <p>Some additional text added to Section 4.64 but feel essentially the original wording made the same points.</p> <p>Principle B3 states a desk-based study will be required to support ecological surveys. Text added to Section 4.16 that HBIC data can be used to assess impacts and provide net gain.</p>	<p>New text added to 3rd bullet point in para 4.5 to explain the Ecological Network Map:</p> <p><u>It consists of areas identified as being suitable for habitat creation based on habitat mapping for the county and other factors such as geology, hydrology and topography. An emerging policy framework will accompany the dataset to embed the use of the network opportunity mapping within local plan policy across Hampshire.</u></p> <p>New text added to the end of para 4.64:</p> <p><u>In particular the ‘Network Opportunities’ mapping can be used to target potentially the best areas for offsetting habitat loss if this is required.</u></p> <p>New text added to para 4.16:</p> <p><u>This data can be used to assess impacts from the development and provide information on the opportunities for biodiversity enhancement to secure a biodiversity net gain.</u></p>
Richard Barnes (Woodland Trust)	Principle B2	Principle B2: suggest adding new sentence: "When consulting the Ancient Woodland Inventory, the absence of a woodland from the inventory does not necessarily mean that it is not ancient, especially if it is below 2ha."	Information about Ancient Woodland Inventory added as a footnote in the information gathering section.	Footnote added to para 4.16 that reads: <u>Only ancient woodlands greater than 2ha appear on the Ancient Woodland Inventory on the Magic maps website. Therefore woodlands below 2ha may be ancient even if absent from the Inventory.</u>
Trevor Codlin (Hampshire and Isle of Wight Wildlife Trust)	Principle B2	Have serious reservations about the continued use of the Biodiversity Checklist, and in particular on page 36, paragraph 4.15 where it is mentioned that the checklist can be completed by "developers and members of the public". Recommend that if the council wishes to continue to use them, it is required that they are only filled in by qualified ecologists only.	<p>The main use of the checklist from BDBC’s point of view is to provide applicants with information on whether their proposal is likely to impact biodiversity by identifying the types or locations of developments so that then they are aware ecological surveys will be required.</p> <p>We have had similar experience in terms of the checklist having been incorrectly completed but still feel this is the best way to highlight the sort of information that might be required to accompany an application in the absence of anything else. It mainly benefits/prompts householder/small scale applications and therefore requiring it to be filled in by qualified ecologists would be considered unreasonable.</p>	No change
James Rowley (BDBC Manydown)	Principle B2 (para 4.16)	Council could also provide a link for their on-line mapping system referred to, as has been provided for Magic and HBIC.	Agree. Footnote added.	Footnote with web link added to para 4.16.
Nick Knight (Hampshire Bat Group)	Principle B3	The document should be clearer on the interaction between bats and trees.	No change required. It is considered that this is adequately addressed by Box B4.	No change
James Rowley (BDBC Manydown)	Principle B3 (Figure B2)	The recommended survey times for dormouse (Dormouse Conservation Handbook plus Natural England interim guidance and standing advice) identify April to November inclusive for nest tube survey, with	Agreed Figure B2 has been amended to show this information.	Figure has been amended (old and new figures set out at end of document to show extent of change)

Name / Organisation	Part of SPD	Summary of comments	BDBC Response	Change to text
		nut hunts also recommended September through to December inclusive.		
James Rowley (BDBC Manydown)	Principle B3 (Box B4)	Ideally BCT guidance (2016) should be referred to when determining the need for bat surveys. The checklist presented in the box is only a part of the current guidance checklist recommended by BCT in current guidance.	The checklist gives all parts of the present guidance that are related to normal built development, we do not list other factors within the guideline list such as those appropriate to trees, windfarms, lighting etc. as they are not relevant at this point.	No change
Trevor Codlin (Hampshire and Isle of Wight Wildlife Trust)	Principle B3	Note that the principle makes no reference to 'key' habitats or species. Suggest the use of the term 'priority' to ensure such habitats are included within scope of principle.	Text updated to be consistent with rest of document and Policy EM4 of the Local Plan.	Following revisions applied to first para of Principal B3: Where development may potentially have an adverse impact on designated sites, a priority or other notable <u>key habitat type</u> , or legally protected or key notable species, biodiversity surveys must be provided.
Mr Alex Swann (Environment Agency)	Principle B3 (Figures B2 and B4)	Include fish in Figure B2 (page 38). See full rep for survey times. Include fish in Figure B4 (page 48). Optimal time for mitigation when fish not spawning. Aug-Oct is ideal.	Figures B2 and B4 are reproductions of charts widely used elsewhere for species carrying some sort of legal protection. Fish are not routinely surveyed for as a species to be impacted by proposed developments. However, where a water course exists in close proximity to a development measures will be taken to protect the watercourse itself and thereby its associated wildlife. Many of the important rivers within the Borough carry some sort of designation and/or qualify as priority habitat status. Therefore impacts/appropriate mitigation on these habitats and associated wildlife, including fish, will be taken into account especially where fish such as wild brown trout are a feature of the water course. As a result no changes to these Figures B2 and B4 have been made.	No change
Marion Wolstencroft (Natural Basingstoke)	Principle B4	Terms used to make decisions must be defined for clarity hence it is important to define "Significant Harm" unambiguously and as required by the NPPF. It is used in Policy EM4 and referenced in 4.50 in the SPD. A definition is crucial for visibility, to understand recommendations and for informed decision making by Officers and Cllrs.	At present "significant harm" to biodiversity is measured through compliance with points a to f of Section 1 of Local Plan Policy EM4. Following the revision of the NPPF however and with the adoption of biodiversity metrics which measure losses in overall habitat areas via quality and distinctiveness, our approach will be changing to measured losses of habitat calculated through a biodiversity metric allied to criteria a to f of section 1 of Policy EM4 which cover aspects such as impacts on key species or protected site designations not covered by the metric. Agree to add definition of 'significant harm' to the glossary.	Text added to the Glossary: <u>Significant Harm (to biodiversity) – A development proposal would be considered to result in significant harm to biodiversity if it cannot meet the criteria given in points a to f of Section 1 of Planning Policy EM4 or results in a biodiversity net loss as calculated using a Biodiversity Compensation Framework (to be developed).</u>
Mr Alex Swann (Environment Agency)	Principle B6 (Box 6)	Pleased with the detail provided particularly in relation to buffer zones and biodiversity enhancement.	Noted	No change
Mr Alex Swann (Environment Agency)	Principle B6 (Box B6)	Page 49 Box 6: Omit "normal water level" in line 6. Leave as "top of bank".	Text removed from Box B6 regarding 'normal water level'.	Following change made to Box B6: Aquatic habitats: These measurements should be taken from the top of the adjacent bank or normal water level rather than mid-channel.
Robert Steele (Savills)	Principle B6 (Box 6)	The proposed 20m buffer lacks flexibility and the ability to respond to a site's opportunities and constraints. The 2008 SPD included a requirement for a 20m buffer unless it could be demonstrated that a lesser buffer would be satisfactory.	The previous SPD (adopted in 2008) sought a 20 metre minimum buffer zone between development and adjacent woodland habitats but included a degree of flexibility to allow a lesser distance where it could be demonstrated to be acceptable. Experience has shown that the flexibility in the 2008 SPD	No change

Name / Organisation	Part of SPD	Summary of comments	BDBC Response	Change to text
		<p>There is no evidence to suggest that this approach was failing or resulted in significant harm to woodland. It is therefore considered that there is no justification for this change.</p> <p>The SPD fails to recognise that every woodland is different and that a broad-brush requirement for a 20m minimum buffer relating to all woodlands is not reasonable or justified through evidence.</p> <p>It is not possible to conclude that without the minimum 20m buffer there would be a demonstrable harmful impact to woodlands.</p> <p>The proposed approach would negatively impact upon housing delivery and be contrary to the NPPF (requiring policies to promote an effective use of land in meeting the need for homes and other uses).</p> <p>The SPD should be worded to support all planning applications which are well justified and provide detailed information to demonstrate there would be no harmful impacts on the integrity and health of woodland as a result of the development (regardless of whether it incorporates a min. 20m buffer).</p>	<p>has allowed developers to justify buffers less than the stated minimum, which did not deliver the best outcome for biodiversity or green infrastructure.</p> <p>The borough has many examples of development decisions where impacts on woodland have been detrimental, for example housing within Chineham adjacent to ancient woodlands. These woodlands suffer from invasive species, dumping of waste, noise/light pollution, shading effects, pressure for the council to remove unsafe trees etc. The LPA monitors these woodlands with the local record centre, an independent source, who survey the woodlands (and others in the Borough) on the council's behalf and assess their condition. Therefore the LPA is well aware (and it is documented) of the effects that having development too close to woodlands can have.</p> <p>The LPA is now taking a proactive approach to prevent this with future developments, provide habitat net gains and deliver green infrastructure as reflected in local and national planning policy. This reflects the NPPF which has now been strengthened to state: <i>Para 175 c. development resulting in the deterioration of irreplaceable habitats (such as ancient woodland) should be refused.</i> In this respect it is considered that having a set buffer would provide additional environmental benefits, add to the biodiversity net gain on site and result in better outcomes for important woodlands.</p> <p>It is recognised that the purpose of the SPD is to provide guidance and advice to support the Local Plan. Whilst it is a material consideration in the determination of planning application, it is not policy itself. All new major housing schemes would be expected to deliver buffers in line with the distances stipulated. There may, however, be other material considerations that the decision maker would need to be weighed into the planning balance.</p> <p>It is noted that biodiversity buffers were already factored into the capacity work that informed the site allocations in the Local Plan. These buffers would therefore not constrain the anticipated housing delivery on these sites.</p>	
Richard Barnes (Woodland Trust)	Principle B6 (Box B6)	<p>Principle B6: Rather than stating a 20 metre minimum rule, buffers for application near ancient woodland should be decided under a precautionary principle in line with Natural England's Standing Advice.</p> <p>Suggest adding wording in Box B6 after first paragraph under 'Tree Belts and Woodlands' as follows: "As a precautionary principle, this Council will expect development adjacent to ancient woodland to provide a 50m buffer. Applicants will have to prove that a smaller buffer will have no impact on the ancient woodland." Then revise second sentence to say "...edge of the woodland/tree belts and the development."</p>	<p>Text is already included in Box B6 to state the LPA will expect buffers greater than 20 meters for all development adjacent to ancient woodland. It is considered that it would not be reasonable to require a 50m buffer (given its development land take), and the council's proposed wording would allow buffers to be increased when necessary.</p> <p>It is recognised that there are particular opportunities to provide strategic green infrastructure and deliver biodiversity enhancement on large sites.</p>	<p>Text in Box B6 added:</p> <p>Where it is considered the woodland and/or tree belt form part of an important wildlife corridor, for example of particular importance to bats or where the woodland is ancient in origin then <u>the Council will expect buffers exceeding the 20 metres minimum as a precautionary principle and especially for major development. a buffer width beyond that of the minimum will be expected.</u></p>
Maria Miller MP	Principle B6 (Box 6)	Welcome requirement for buffer width to exceed 20m adjacent to Ancient Woodland.	Noted	No change
Rebecca Aziz (Natural England)	Principle B6 (Box B6)	Ancient woodland and veteran tree buffers should comply with Natural England standing advice.	New requirement for applicants to provide a justification if they use a buffer of the minimum distance.	Updated Box B6:

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		<p>Buffers should be designed on a case by case basis that takes into account the scale and type of development. Generally, larger developments should incorporate larger buffers. Where minimum buffers are used, the application should provide a sound justification that demonstrates no adverse impact upon the habitat.</p>	<p>Text recognises that large sites provide the opportunity to include strategic Green Infrastructure that offer particular opportunities to provide biodiversity enhancement.</p> <p>Further info about buffer zones around ancient or veteran trees added in tree section.</p>	<p>A minimum buffer of <u>20 metres</u> should be provided between the edge of the woodland/tree belt and the development. When designing housing schemes close to woodland, housing must face onto areas of existing woodland. Where a minimum buffer is proposed, information will be required to demonstrate that this will be adequate to prevent any adverse impact upon the woodland or tree belt feature.</p> <p>Where it is considered the woodland and/or tree belt form part of an important wildlife corridor, for example of particular importance to bats or where the woodland is ancient in origin then <u>the Council will expect buffers exceeding the 20 metres minimum as a precautionary principle and especially for major development. a buffer width beyond that of the minimum will be expected.</u></p> <p>Also, updated para 5.23:</p> <p>Due to their special status, the council will resist any encroachment into the root protection area of aged ancient or veteran trees. <u>This is a buffer zone at least 15 times larger than the diameter of the tree, or 5m from the edge of its canopy, if that is greater.</u></p>
John Jervoise (Herriard Estates)	Principle B6 (Box B6)	<p>Concern about the buffer zones.</p> <p>Proposed buffers will increase the amount of land required for development sites. Most people want new housing on as little land as is reasonable.</p> <p>The buffer zone sections appear to widen buffer zones and 4.58 and 4.59 set out many challenges and effectively sterilise significant areas from use. Open areas not used in an urban environment are a cost to the community and will often become unkempt and untidy.</p>	<p>The buffer requirements are in line with national guidelines and intended to protect vulnerable, irreplaceable habitats such as ancient woodland, river systems etc. from harm. The buffers also improve the environment for the local population by providing wildlife areas within their neighbourhoods.</p> <p>The design aspects within the biodiversity chapter relating to buffers echo advice from Natural England, the EA and Woodland Trust and seek to reduce impacts on irreplaceable habitats adjacent to expanding urban fringe development.</p>	No change
John Jervoise (Herriard Estates)	Principle B6 (Box B6)	<p>The impact and value of wildlife corridors in urban areas is unproven - where there are domestic animals and people which directly conflict with ecological objectives. There is some argument that it is better to separate people and wildlife</p> <p>There is no clear evidence for the comment on creating cat hunting habitat in buffer zones will have any effect.</p>	<p>The council seeks to retain wildlife corridors through built development in order to retain connectivity for species such as insects, bats known to be on development sites through these areas into adjacent countryside. They also improve the environment for the local people living in that area.</p> <p>The effects of disturbance by people and domestic pets have been studied and shown to impact sensitive species such as ground nesting birds. It is acknowledged that it is better to separate people from wildlife but on allocated development sites where species are already present this may not be possible and mitigation as described within the SPD will be required in order to maintain species populations.</p> <p>Buffers will incorporate habitat as a matter of course. The reference to cat predation (in para 4.59) is just quoted as an example of what the habitat is likely to be utilised as.</p>	No change
James Rowley (BDBC Manydown)	Principle B6 (Box B6)	Questions how buffers should be measured.	These are set out clearly in Box B6 and Figure B5. No change required.	No change
Rebecca Aziz (Natural England)	Principle B6 (Thames Basin)	SPD should include reference to the potential need for an Appropriate Assessment for large developments	New text added to Section 4.61 to explain the need for appropriate assessment.	Amendment to Principle B7:

Name / Organisation	Part of SPD	Summary of comments	BDBC Response	Change to text
	Heaths SPA)	within the 5-7km TBH buffer. Advise "where possible" is removed from Principle B7 / para 4.63 as net gain requirement is required by revised NPPF.		<p>'As a minimum Developments must result in no net loss of biodiversity and where possible provide measurable net gain'.</p> <p>Consequential change to Para 5.64</p> <p>'Basingstoke and Deane Borough Local Plan Policy EM4 and the NPPF require that new developments deliver a net gain where possible for biodiversity'.</p> <p>Following text added to Section 4.61:</p> <p>As a result if <u>such</u> developments fall within the 5 km buffer zone around the Thames Basin Heaths SPA, a separate assessment, known as an Appropriate Assessment under the Habitats Regulations 2017, will <u>may</u> be required. <u>Appropriate Assessments may also be required for large scale residential development within 5-7 km of the SPA along with bespoke mitigation.</u></p>
James Rowley (BDBC Manydown)	Principle B6 (Figure B4)	The 'birds' row should ideally be split into breeding and overwintering, as works that may affect or disturb important / supporting winter habitats for loafing/roosting/feeding are best avoided during the timings indicated. Also, the "Dormouse" timings should ideally refer to and follow best practice guidance which generally recommends two stage clearance - above ground removal during the winter months (avoiding active season when dormice are in the canopy; NE guidance recommends November-March) and complete clearance with ground level works during the active months after winter canopy removal (avoiding the winter hibernation when dormice go to ground; NE recommends May-September)	Agreed, alterations will be made to the table to reflect birds and dormice comments	Alterations made to Figure B4 (Optimal Mitigation Times for Key Species) (old and new figures set out at end of document to show extent of change)
James Rowley (BDBC Manydown)	Principle B7	Council should state their preference for a pre-existing biodiversity metric in the interim period until they have developed their own.	Additional information provided to address this point.	<p>Para 5.64 amended.</p> <p>Once this has been adopted, the council will expect developers to use this to demonstrate how biodiversity enhancements have been achieved. <u>In the meantime developers are encouraged to use one of the metrics in use by other local planning authorities in the country, such as Warwickshire County Council. These are based on the metric developed by Defra.</u></p>
Rebecca Aziz (Natural England)	Principle B7	Welcome intention to introduce Biodiversity Compensation Framework. Advise that in interim, SPD refers to use of model based on the Defra metric. Advise highlighting the need to development a Borough / County wide strategic approach to compensating habitat loss through development.	<p>Use of interim metrics added to Section 4.75 and details of strategic projects the council will look to support has been added.</p> <p>Further information about offsite compensation measures added.</p>	<p>Amendments made to text in B7:</p> <p><u>Developments must result in no net loss of biodiversity and provide a measurable net gain.</u></p> <p>Following supporting text added to para 4.63:</p> <p><u>In the meantime developers are encouraged to use one of the metrics in use by other local planning authorities in the country, such as Warwickshire County Council. These are based on the metric developed by Defra</u></p> <p>Following text added to para 4.75:</p> <p><u>Where offsite compensation measures may be required the council will seek opportunities to support strategic initiatives where these exist and are appropriate, such as habitat creation, restoration and/or management within the council's</u></p>

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				<u>Biodiversity Priority Areas or the areas mapped as 'Network Opportunities' within the Borough (see paragraph 5.5).</u>
John Jervoise (Herriard Estates)	Principle B7	Principal B7 is incorrect. Development leads to habitat loss on the area where it takes place and that cannot be avoided. It is wholly unrealistic to expect to improve habitat on all developed site and this will be used by objectors to hold up all kinds of development. It is far more important on a residential site to achieve visual and community improvements for those living there.	It is noted that habit loss is bound to happen where you have development. However national policy now seeks to require the creation and management of habitats both within development or if not possible on agreed offset sites in order to achieve net gain for biodiversity. Principle B7 follows NPPF guidance in requiring developments to achieve net gain for biodiversity.	No change
Trevor Codlin (Hampshire and Isle of Wight Wildlife Trust)	Principle B7	Welcome principle but suggest new wording for example the removal of "where possible" to reflect to new NPPF requirement for net gains.	Wording changed and strengthened to reflect changes to the NPPF, as a result use of the words 'where possible' now removed.	Following text revisions applied to Principle B7: <u>As a minimum developments must result in no net loss of biodiversity and where possible provide a measurable net gain.</u> Para 4.63 amended to state: Basingstoke and Deane Borough Local Plan Policy EM4 and the NPPF require that new developments deliver a net gain where possible for biodiversity.
Marion Wolstencroft (Natural Basingstoke)	Principle B7	Outline planning applications must take full account of green infrastructure and hard infrastructure simultaneously, and to the same level of detail. Outline planning applications should be at a level of detail to provide certainty for both and avoid later compromises that would negatively affect GI at the Reserved Matters stage.	Agreed. The Local Plan includes a number of policies relating to the natural environment that form part of the development plan and therefore provide the starting point for decision making. With the advent of the new NPPF we will be working towards a front loaded model that can show biodiversity "measurable net gain" at the outline permission stage. This will involve the use of biodiversity metrics to show measurable net loss vs gain and the provision of a biodiversity enhancement plan to deliver this through S106 agreement. This has been explained through revisions to the text.	New text added to the end of para 4.64: <u>In particular the 'Network Opportunities' mapping can be used to target potentially the best areas for offsetting habitat loss if this is required.</u> Following text added to para 4.75: <u>Where offsite compensation measures may be required the council will seek opportunities to support strategic initiatives where these exist and are appropriate, such as habitat creation, restoration and/or management within the council's Biodiversity Priority Areas or the areas mapped as 'Network Opportunities' within the Borough (see paragraph 5.5).</u>
Marion Wolstencroft (Natural Basingstoke)	Principle B7	Natural Basingstoke is unable to access the Ecological Network layer provided by HBIC. The map in the SPD is at an unintelligible scale. With respect to MAGIC, while it is noticeable that the extent of Grassland Priority Habitat nationally appears low, the picture for Basingstoke & Deane appears even more acute. Is this a complete picture or does it represent work in progress please? If complete then we would have questions about how Grassland Priority Habitats are defined and what the relationship is between "Opportunities" in the Ecological Network layer and the Priority Habitat categories on MAGIC.	The mapping will not be available to the public on a digital format until the associated policy wording has been adopted by the council. Until such time information will be available on specific development areas by request to the council. The Ecological Network layer is a completed project, questions on its definitions should be placed with HBIC who developed the database.	Para 4.64 amended to refer to the availability of the data. The BOAs and 'Network Opportunities' components of this mapping should be used to inform proposals to achieve net gain for biodiversity as part of the planning process. <u>In particular the 'Network Opportunities' mapping can be used to target potentially the best areas for offsetting habitat loss, if this is required. Information on the mapping for individual developments should be requested from the council until such time as the information becomes publicly available from HBIC.</u>
Marion Wolstencroft (Natural Basingstoke)	Principle B7	The qualitative impacts of additional people on biodiversity and wellbeing should be evaluated/measured and if appropriate new green space allocated rather than degrading its value. If you do so then declines should be reflected in measures of net gain or loss. See SPD 4.11, Fig B1. 5. Compensation.	Impacts of public use are referred to in Box B5 of Stage 3 Designing for Biodiversity. There is no metric to measure impacts on biodiversity net gain by pre-development assumptions on increased public use. The only way this could be factored is through comparative surveys before and after the development followed by retrospective action.	No change

Name / Organisation	Part of SPD	Summary of comments	BDBC Response	Change to text
Marion Wolstencroft (Natural Basingstoke)	Principle B7	The "Opportunities" identified as part of the ecological network mapping needs to be accompanied by definitions, an explanation about the methodology, interpretation and risks or else the purpose could be misunderstood. The characteristics of an "Opportunity" are broadly that it is a site with permanent vegetation that approximates to a type of habitat. Amenity land is included but arable land is not. The map identifies vegetated areas as "opportunities" that it is almost impossible to believe will be opportunities for the foreseeable future if at all, and in any event without further policy changes such sites could be developed. The calculation (8.3% or 5,267 ha), it seems to us then, is unreliable and needs to be treated with great caution. It may though be the best approach at this time. We note that there is no explanation of the role that could be played by arable land and the soils that underpin different areas and it seems to us this needs to be explained as well (further comments and statistics in Detailed Comments Document Appendix B).	We do not provide full context for other designations within the report such as SINCS, SSSIs etc. which have short descriptions within the glossary and so the council considers that a full description of the Ecological Network (which would run to several pages) is not necessary. The ecological network has been developed and tested by the Local Nature Partnership throughout the county with the best fit information as derived by the Hampshire Biodiversity Information Centre (HBIC). Several meetings have taken place with differing boroughs and the county council to identify if sites were broadly representative of the best opportunity sites based on the HBIC data layers.	No change
Dr Andrew Broadhurst (Hampshire Swifts)	Principle B7 (paras 4.71 and 4.72)	Support enhancement of biodiversity on buildings by including swift bricks but suggest that document needs to be more specific. Two should be included in every suitable building - should be applied by condition irrespective of ecological report recommendations. Support nest sites for House Martins and Swallows, Optimal enhancement = 2 swift bricks, 2 house martin nest sites and 1 swallow nest per habitation.	Section 4.70 and 4.71 outlines the simple measures to enhance buildings for these particular species and officers will seek to include such measures on new build wherever possible. No stipulation is given that every new build will be expected to install such measures simply because there may be may be relatively simple measures for a whole host of species of material consideration but we would not be able to list them all. However, text revised to emphasise how simple enhancement measures can be taken.	Changes to para 4.71 and 4.72 <u>New development creates opportunities to enhance sites for such species within routine building practices by providing breeding spaces for them.</u> Artificial house martin or swallow nests can easily be fitted under eaves to encourage nesting following development and swift bricks or boxes can be installed into walls or beneath roof structures. <u>Colony nesting species such as house sparrows can be catered for using artificial nesting boxes which house three or more nests and can also be fitted to walls.</u> <u>Barn owls use quiet barns and cavities in trees for nesting and roosting. Enhancements for this species can be made by installing a barn owl nest box in a suitable position</u> Colony nesting species such as house sparrows can be catered for using artificial nesting boxes which house three or more nests and can also be fitted to walls.
John Jervoise (Herriard Estates)	Principle B9	Principal B9 (requiring Wildlife Protection and Mitigation Plans) adds to cost and administration	A wildlife protection and mitigation plan is required in order to address the protection of species listed under various acts of law such as The Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017.	No change
Trees				
Ms Katherine Snell (HCC)	Principle T2 (and Box T1)	Box T1: unclear as to how an applicant will be required to undertake to a canopy cover change assessment and consider that if an assessment has no bearing on the decision, an applicant is not likely to commit to the expense. Requires clarification over size of development that the assessment is required for.	Box T1 provides a mechanism for understanding canopy cover change as a result of development, as required by the Green Infrastructure Strategic Priority no. 11. Clarification has been provided in relation to the scale of development that would trigger the assessment and an outline of how it could be calculated. It is considered that the truncated sentence about how the information will be used provides sufficient clarity about the purpose of the assessment.	Amended box T1: Box T1: Canopy cover change The council is committed to mitigating the effects of climate change in the borough. Tree canopy cover can help by locking carbon, filtering pollutants and reducing surface water flooding. The council therefore requires developers to provide an assessment of the overall gain or loss of canopy cover across a site, taking into account tree removals and the ultimate size of new tree planting for the following types of development: • <u>Residential developments of 5 for more dwellings (gross):</u>

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				<ul style="list-style-type: none"> • <u>All other major non-residential development</u> <p>The change should be expressed as a % increase or % decrease, using the tree survey as a baseline before taking into account the mature size of the new trees planting and any tree removals.</p> <p>Whilst the figure of gain or loss will not in itself inform the acceptability of a planning application, The information will be used to monitor, maintain and enhance net canopy cover in accordance with the council's Green Infrastructure Strategy.</p> <p>The council will seek to enhance canopy cover wherever appropriate.</p>
Richard Barnes (Woodland Trust)	Principle T2 (Box T1)	<p>Suggest new sentence/paragraph added after para 5.1.</p> <p>"The background research and evidence for the many benefits of accessible woodland and high canopy cover, along with guidance on the retention and planting of trees in new development, can be found in the report Residential Development and Trees published by the Woodland Trust".</p> <p>Suggests reference to the report: the Economic benefits of woodland (Europe Economics, 2015). Suggests opportunity for a 25% canopy cover target for development, following Wycombe DCs example. Should adopt the principles of Woodland Access Standard, and use this to guide new woodland creation.</p>	<p>The additional information of the cross cutting benefits of trees is recognised; however it is considered that the balance of benefits outlined in the document provides sufficient background without interfering with the usability of the document.</p> <p>With regard to setting standards, it is beyond the scope of this document to set a policy for increase of woodland cover or to inform the location of new development, which is identified as part of the Basingstoke and Deane Borough Council Local Plan document</p>	No change
Richard Barnes (Woodland Trust)	Principle T2 (and various)	<p>Suggest new wording of paragraph 175 of the new NPPF is referenced in the SPD, explicitly the 'wholly exceptional' test for ancient woodland and ancient or veteran trees.</p> <p>Also need to update further references where "aged" should be replaced by ancient i.e. in Para 5.17.</p> <p>Suggest the addition of a large amount of information and references (see full rep for detail) relating to residential development and trees to bolster the existing text. This additional information covers the topics of Flood risk and Air quality, urban heat islands, climate change and health.</p>	<p>The changes to the NPPF are noted and the document has been updated accordingly. Clarification has also been provided for the Root Protection Area of an ancient or veteran tree at paragraph 5.23, in accordance with Forestry Commission standing advice</p> <p>The additional information of the cross cutting benefits of trees is recognised; however it is considered that the balance of benefits outlined in the document provides sufficient background without interfering with the usability of the document.</p>	<p>Updates throughout document to reflect new NPPF.</p> <p>Updated para 5.17: Irreplaceable habitats and key habitat types Whilst all trees are a material consideration when determining planning applications, the National Planning Policy Framework places special emphasis on irreplaceable habitats.</p> <p><u>Development resulting in the loss of such as ancient woodland or ancient and aged-veteran trees shall be refused, unless there are wholly exceptional reasons, as outlined in the NPPF, and a suitable compensation strategy exists. That stand outside ancient woodland</u></p> <p>Updated para 5.23: Due to their special status, the council will resist any encroachment into the root protection area of aged ancient or veteran trees. <u>This is a buffer zone at least 15 times larger than the diameter of the tree, or 5m from the edge of its canopy, if that is greater.</u></p> <p>Updated appendix 1: Ancient or veteran tree –Veteran trees have cultural, historical, landscape and nature conservation value because of their age, size, or condition. <u>Ancient trees are ancient in years, with consideration given to the species, climate, soil type and other factors that influence the growth rate and longevity of trees.</u></p>
Maria Miller MP	Principle T2	Considers that the greater protection required for	SPD updated in line with the recent advice.	Updated para 5.23:

Name / Organisation	Part of SPD	Summary of comments	BDBC Response	Change to text
		ancient woodland and vetyeran trees should be more explicitly stated in accordance with recent advice from Natural England and the Forestry Commission.		Due to their special status, the council will resist any encroachment into the root protection area of aged <u>ancient or veteran trees. This is a buffer zone at least 15 times larger than the diameter of the tree, or 5m from the edge of its canopy, if that is greater.</u>
Martin Small (Historic England)	Principle T2	Welcome para 5.18 considering impact upon heritage assets.	Noted.	No change
Trevor Codlin (Hampshire and Isle of Wight Wildlife Trust)	Principle T3	Welcome inclusion of principle T3.	Noted.	No change
Charlotte Mayall (Southern Water)	Principle T4	Support inclusion of paragraph 5.31.	Noted	No change
Appendices				
Mr Alex Swann (Environment Agency)	Appendix 1 (Glossary)	Consider adding term "buffer zone", with regard to rivers and their corridors in Appendix 1. GI needs to have a specific reference to End 2 - watercourses/wetlands etc. (Blue Infrastructure)	Reference to components of 'blue infrastructure' added to Appendix 1 GI definition.	Following additions made to Appendix 1: <u>Buffer Zone</u> – an area of land to provide environmental protection to a feature of interest. <u>Green Infrastructure</u> - A network of multifunctional greenspace (including watercourses and wetlands), urban and rural <u>areas</u> which is capable of delivering a wide range of environmental and quality of life benefits.
Martin Small (Historic England)	Appendix 1 (Glossary)	Other heritage assets should be acknowledged in the Glossary of Terms (see full rep for list of suggested inclusions).	Glossary definition of heritage asset updated.	Change to glossary: <u>Heritage Asset</u> – A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage assets include designated heritage assets (including scheduled monuments, listed buildings and conservation areas), and assets identified by the local planning authority (including local <u>listing</u>).

Changes to Figure B2:

Old

	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
BADGERS		Optimal	Optimal	Optimal	Sub-optimal	Sub-optimal	Sub-optimal	Sub-optimal	Sub-optimal	Optimal	Optimal	Sub-optimal
BATS (Hibernation Roosts)	Optimal	Optimal	Optimal								Optimal	Optimal
BATS (Summer Roosts)				Sub-optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Sub-optimal		
BATS (Foraging/Commuting)				Sub-optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Sub-optimal		
BIRDS (Breeding)			Optimal	Optimal	Optimal	Optimal	Optimal	Optimal				
BIRDS (Over wintering)	Optimal	Optimal									Optimal	Optimal
DORMICE	Optimal				Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal
GREAT-CRESTED NEWTS	Terrestrial		Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal		
	Aquatic		Optimal	Optimal	Optimal							
INVERTEBRATES				Optimal	Optimal	Optimal	Optimal	Optimal	Optimal			
OTTERS	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal
REPTILES			Optimal	Optimal	Optimal	Optimal			Optimal			
WATER VOLES		Sub-optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Sub-optimal		
WHITE-CLAWED CRAYFISH							Optimal	Optimal	Optimal			
EXTENDED PHASE 1 / HABITATS / VEGETATION				Optimal	Optimal	Optimal	Optimal	Optimal	Optimal			

Optimal Survey Time: Optimal (Green), Sub-optimal (Yellow)

New

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Badgers		Optimal	Optimal	Optimal	Sub-optimal	Sub-optimal	Sub-optimal	Sub-optimal	Sub-optimal	Optimal	Optimal	Sub-optimal
Bats (hibernation roosts)	Optimal	Optimal	Optimal								Optimal	Optimal
Bats (summer roosts)				Sub-optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Sub-optimal		
Bats (foraging/commuting)				Sub-optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Sub-optimal		
Birds (breeding)			Optimal	Optimal	Optimal	Optimal	Optimal	Optimal				
Birds (overwintering)	Optimal	Optimal									Optimal	Optimal
Dormice (nest tube surveys)				Optimal	Optimal	Optimal						
Dormice (nut surveys)									Optimal	Optimal	Optimal	Optimal
Great crested newts (Terrestrial)			Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal		
Great Crested newts (Aquatic)		Optimal	Optimal	Optimal	Optimal							
Invertebrates				Optimal								
Otters	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal
Reptiles			Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal		
Water Voles		Sub-optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Optimal	Sub-optimal		
White clawed crayfish							Optimal	Optimal	Optimal			
Extended Phase 1/Habitats/Vegetation				Optimal	Optimal	Optimal	Optimal	Optimal	Optimal			

Changes to Figure B4:

Old

	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
Badgers							Optimal	Optimal	Optimal	Optimal	Optimal	Optimal
Bats			Optimal	Optimal						Optimal		
Birds	Optimal									Optimal	Optimal	Optimal
Dormice (small areas)				Optimal	Optimal				Optimal			
Great Crested Newts			Optimal									
Invertebrates	Species Dependent											
Otters	Site Dependent											
Reptiles			Optimal									
Water Voles	Site Dependent											
White-clawed Crayfish							Optimal	Optimal	Optimal	Optimal		

New

	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Badgers								Optimal	Optimal	Optimal	Optimal	Optimal
Bats			Optimal	Optimal						Optimal		
Birds breeding	Optimal									Optimal	Optimal	Optimal
Birds overwintering			Optimal	Optimal	Optimal	Optimal	Optimal	Optimal				
Dormice Above ground removal	Optimal	Optimal	Optimal								Optimal	Optimal
Dormice complete clearance					Optimal	Optimal	Optimal	Optimal	Optimal			
Great Crested Newts			Optimal									
Invertebrates	Species Dependent											
Otters	Site Dependent											
Reptiles			Optimal									
Water Voles	Site Dependent											
White clawed crayfish							Optimal	Optimal	Optimal	Optimal		

Appendix H(ii): LPA's response to points raised in workshops

RESPONSE TO DISCUSSIONS AT SPD WORKSHOP – 4 September

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
Landscape Group			
<u>Green Infrastructure – Principle G1</u>	Difficulties getting benefits of GI across to client	Noted.	No changes required
	This element needs to be set out in its own section, separate to the policy/context section.	Comment noted – it is acknowledged that GI as a separate section could help to raise its importance further.	Given that Landscape, Biodiversity and Trees are included in separate sections, a separate chapter will be created for GI.
	Explain in more detail as bullet points, the multi-functionality of the various elements including what benefits each provide	It is agreed that some more explanation of the benefits in the supporting text could assist in explaining the importance of GI.	Change para 2.9 to include additional information: GI will also encompass access to, from and through the site <u>including links to adjacent GI resources (e.g. links to hedges on surrounding land)</u> , opportunities for recreation, sustainability (e.g. climate change, pollutant filtration, Sustainable Drainage systems (SuDS), swales, low water demanding planting species, use of FSC sustainably managed timber products and soil products) and community involvement.
	Include a diagram from the GI strategy and consider definitions of GI from the Landscape Institute guidelines	Diagrams can help to explain a lot of issues and therefore it is considered that this should be included	New diagram added to end of GI Section.
<u>Landscape – Principle L4</u>	Landscape strategy should be put back to the end of the analysis section as it is a summary of the analysis.	Comment noted – having reviewed the content of the strategy, is it considered that this is a more appropriate location, as the strategy is a logical conclusion of the analysis.	Move paras 3.31-3.34 to after 3.29, and renumber principles.
	Also include a statement requiring that the landscape strategy is set out in a text document as well as plan, as not all relevant information can be shown on a plan. Text will also help to explain how the landscape structure fits into the chosen design.	Comment noted and is a good idea – the strategy should be a relatively short document that could be included within any design and access statement	Additional text at end of para 3.32: <u>Where a landscape strategy is provided, it should include both a plan and also a written submission which should explain those elements that are not represented on the plan.</u>
<u>Landscape – Principle L1</u>	Also reference other guidance from Natural England and National Character Assessment as other sources to help deliver character assessment.	Comment noted and additional references will be added	Update end of para 3.8 to reflect this. <u>Other guidance from Natural England including their Landscape Character Assessment can be used to help develop the character assessment.</u>
<u>Landscape – Principle L3</u>	Can existing land uses be incorporated into design? For example - ex allotments being bought back into use or informal children's play areas (such as woodland dens), as well as things like public rights of way.	Where appropriate, yes, such details could be considered within a design and at L3 iv, this notes the need to retain public rights of way. This point could be extended to include other existing features	New criterion added to Principle L3. <u>The design should also consider using other existing site features such as old allotments or informal play areas, as part of any proposal;</u>
<u>Landscape – Principle L6</u>	Quality of Play Equipment used - How is this considered other than using Fields In Trust Standards. Could use a ROSPA play value assessment of 'Good' as a benchmark. We could require via a play condition that the developer submits an independent RoSPA assessment demonstrating that the value is 'good' or above.	Play areas are currently assessed against the council's own play area specification and using professional expertise, which is considered appropriate.	No changes required
<u>Landscape – Principle L7</u>	Point viii requires that species should not just be native species but also a wildlife friendly palette of species.	Comment noted – there are many non-native species that are wildlife friendly, and this is referred to in point 8 of this principle	No changes required
	Point x- How do we calculate pit sizes for trees (maybe base on "Green & Blue" calculator)	Tree pit sizes are addressed within the tree section of the SPD	No changes required
<u>Landscape – Principle L8</u>	Roof gardens and green walls need to be included	These are two potential solutions that could be used within sites at therefore will be added to point c. They are also mentioned within Principle L9.	Criterion c updated: All hard surfaces – including ramps, steps, drainage, footpaths, <u>roof gardens, green walls, gabion walls, parking areas and highways;</u>

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
	Gabion Walls and interplanting as a suggestion (include in 3.54.)	This is one of a number of solutions that could be provided in response to dealing with hard landscaping solutions and it could be added to the list at L8c	Criterion c updated: All hard surfaces – including ramps, steps, drainage, footpaths, <u>roof gardens, green walls, gabion walls,</u> parking areas and highways;
<u>Landscape – Principle L9</u>	Should we consider “rain gardens” which have biodiversity benefits + help to create a sense of place/ visual amenity. Used in Inner London. South Cambridgeshire council insist on rain gardens.	Para 3.57 refers to the use of green roofs and walls. Rain gardens are another example that can be used, and the text will be updated to reflect this	Included in new supporting text to Principle L9.
<u>Landscape – Principle L10</u>	3.60- Last sentence change “may” to “should” and separate as a different point. Use the word “reflect” rather than “respond”	Comments noted and agree that this provides more clarity	Para 3.60 revised to state: It may <u>should respond to reflect</u> particular site characteristics such as plant species, landform or historical associations.
	What about combining living sculpture and play?	This is a potential solution that has been used in the borough with willow tunnels and subject to health and safety requirements could be a solution.	Para 3.60 updated: Where artwork is provided as part of a development, it can take a number of forms, for example some form of sculpture, bespoke railings/boundaries, inlays in surfaces/walls, <u>living sculptures (such as willow tunnels),</u> or street furniture.
	3.65: Should we include “pedestrian ...” in bullet point 4- views through planting.	Comment noted and would improve clarity	Para 3.65 bullet point 4 revised to state: <ul style="list-style-type: none"> The location and layout of open spaces, along with planting species choice should allow for natural surveillance <u>for pedestrians</u> (such as with overlooking properties);
<u>Landscape – Principle L11</u>	Last bullet point- add “and/or schedules” after maintenance regimes.	Comment noted, schedules may be appropriate, so this could be updated	Para 3.66, update last bullet point: A five year work programme including maintenance regimes <u>and/or schedules...</u>
<u>Landscape – Principle L12</u>	Highlight the need for adoption to be discussed at pre app.	Comment noted and would improve the process	Update to Principle L12: The arrangements for ongoing management will be set out in a S106 agreement between the Council and the applicant <u>and should initially be discussed at the pre-application stage.</u>
<u>Large infrastructure projects</u>	Need to get a hook into this SPD to design codes which are in the D + S SPD.	Paragraph 2.6 of the SPD notes the relationship to other SPDs and therefore it is considered that this issue is covered by that	No changes required
Biodiversity Group			
<u>Introduction/Key principle from the beginning</u>	More emphasise from the start that overall aim from any development would be to result in a net gain for biodiversity and how all other principals that then follow are guidance on how this is ultimately achieved by ensuring you do the correct surveys, assessing the interests, protecting those interests etc.	Additional text added to Section 4.2.	Following text added to para 4.2: The purpose of this chapter is to show how issues relating to biodiversity will need to be assessed to inform the planning process. The chapter sets out how biodiversity issues should be considered and how net gain for biodiversity should be delivered. <u>The council will expect all proposals to enhance the biodiversity of the receiving environment thereby providing the necessary biodiversity net gain over and above any residual losses from development.</u>
<u>Principal B3 – Biodiversity Surveys</u>	Consider what would be reasonable in terms of data to inform a desk top search for householders compared to larger applications. How can we make it a level playing field for those consultants who quote to include a data search in their costs versus consultancies who fail to do this and thereby win the contracts because they are cheaper? Discuss with HBIC how best we could overcome this.	As stated in Principle B3 and 4.20 all survey reports should include a desk-based study with up-to-date info and the LPA will expect this. This requirement would apply to all consultancies quoting for work within the Borough. If a report is received in the absence of this information and it is deemed there is information which needs to be taken into the account the council will ask the developer to address this. This therefore runs the risk of loss of reputation for the consultancy if it means the application will then take longer to determine because inadequate data has been supplied. It is not clear	No change.

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
		how else the LPA might be able to help in this respect.	
<u>Principal B4 – Protecting Key Habitat Types</u>	Add in some wording that absence of a woodland from the ancient woodland inventory does not mean that it is not necessarily ancient if it is below 2ha. Emphasise as a result it would be important to survey such habitats at the correct time of year to be able to assess their importance.	Text amended to include this point.	Following footnote added to para 4.16: <u>Footnote: Only ancient woodlands greater than 2ha appear on the Ancient Woodland Inventory on the Magic maps website. Therefore woodlands below 2ha may be ancient even if absent from the Inventory. Such woodlands would need to be surveyed at the appropriate time of year to assess their importance.</u>
<u>Principal B5 – Biodiversity and Site Design</u>	Within text section make a reference to further details on supplying a Construction Method Statement to avoid impacts and re-iterate the easiest way to achieve no net loss is to avoid impacts in the first place.	Text amended and CMS added to glossary.	Following text added to end of para 4.54: <u>Construction Method Statements should be used to demonstrate how harmful impacts on important biodiversity features will be avoided during construction.</u> Following text added to Glossary: <u>Construction Method Statement</u> – a document that details a safe system of work, explaining in detail the work to be undertaken.
<u>Principal B6 – Mitigating Impacts</u>	Natural England's AW Standing Advice now states larger buffers are required where impacts justify this rather than stating a 50 metre min rule. As a result cases should be decided on a case by case basis. Look at text to re-phrase to ask developers to demonstrate why there would be no harm from providing only the minimum buffer required. Look to incorporate some of the Woodland Trust's text on the issue including the use of the phrase 'precautionary principle', i.e. the LPA will seek a larger than 20 metre buffer in line with the precautionary principal.	Text amended to strengthen emphasis for bigger buffers.	Following text added to Box B6: <u>A minimum buffer of 20 metres should be provided between the edge of the woodland/tree belt and the development. When designing housing schemes close to woodland, housing must face onto areas of existing woodland. Where a minimum buffer is proposed, information will be required to demonstrate that this will be adequate to prevent any adverse impact upon the woodland or tree belt feature.</u> <u>...the Council will expect buffers exceeding the 20 metres minimum as a precautionary principle and especially for major developments.</u>
<u>Principal B7 – Biodiversity Enhancement</u>	Wording needs to be changed to be in line with the wording on the recently revised NPPF wording on net gain, i.e. remove the words 'where possible'.	Any use of the words 'where possible' now removed.	Following text changes made to Principle B7: <u>Developments must result in no net loss of biodiversity and provide a measurable net gain.</u>
	Add wording to state that in the future through 'emerging' work we will expect any habitats created to provide a net gain should contribute to the habitat network mapping. Tie in habitat enhancements/creation to green space standards to create additional ANGS.	Text amendments made to state enhancements should contribute to strategic projects where possible. Policy EM4 itself states improvements to biodiversity could be secured on-site or off-site in accordance with the council's adopted green space standards which include the creation of accessible natural green space. Additional text provided however.	New para added after para 4.75: <u>Where offsite compensation measures may be required, the council will seek opportunities to support strategic initiatives, where these exist and are appropriate. Current examples include habitat creation, restoration and/or management within the council's Biodiversity Priority Areas or the areas mapped as 'Network Opportunities' within the Borough (see paragraph 5.5). Other strategic initiatives may be developed following the adoption of the Biodiversity Compensation Framework.</u> Revised wording at end of para 4.63: The council intends to adopt a Biodiversity Compensation Framework that will provide a measurement metric to calculate biodiversity net loss or gain (see section on 'Compensation', below). Once this has been adopted, the council will expect developers to use this to demonstrate how biodiversity enhancements have been achieved. <u>In the meantime developers are encouraged to use one of the metrics in use by other local planning authorities in the country, such as Warwickshire County Council. These are based on the metric developed by Defra.</u> https://www.warwickshire.gov.uk/biodiversityoffsetting

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
<u>Principal B8 – Biodiversity compensation</u>	Include the issue of access within any Compensation Framework developed.	It is believed indirect impacts such as recreational impacts are not currently accounted for by the Defra metric therefore this would have to be acknowledged in any future Framework drawn up. This is outside the scope of the current SPD although reference is made to indirect impacts in Sections 4.50 and 4.52.	No changes to text required.
Tree Group			
<u>General</u>	There was support for the production of an SPD, and in particular the production of a stand-alone tree section that provided all the relevant information in one place. The green 'principle boxes' made it easy to identify the document's key requirements (though there were a number of places where it was suggested that these could be enhanced).	Noted. The principle boxes within the tree section are aligned with other areas of the document and so it is not proposed to change them.	No change
	The guidance would help to provide a consistent approach. The British Standard is quite non-specific and different LPAs interpret its requirements in different ways.	Noted	No change
	The SPD should clearly set out the Local Planning Authority's requirements, both in terms of information to be provided, and standards/specifications the council is seeking. This can ensure that acceptable proposals are submitted first time, and can help to speed up decision making.	Noted	Various changes made (as detailed elsewhere in this statement)
<u>Suggested additional requirements</u>	It would be helpful to include a short executive summary at the start of the section.	Noted. A general introduction and summary is provided at sections 5.1 and 5.2. These are aligned with other areas of the document and so it is not proposed to change them.	No change
	The section should include greater reference to 'Place Shaping' and cross references to the recently-adopted Design and Sustainability SPD. This could be covered in the document's opening paragraphs to set the direction of the document.	This is contained in the Policy Context section (Chapter 2) and Principle L1.	No change
	The SPD should support the submission of information about drainage (the location of soakaways and main drainage runs), as this is critical to prevent problems later in the planning process.	This is already covered in para 5.26	No change
	The SPD should support the submission of cross-sections (levels information) where non-dig surfaces are proposed. This is necessary to properly assess any impacts that would occur.	This is already covered in para 5.26	No change
	The introductory text should provide emphasis on the need for early engagement with the relevant professionals.	Agree that this may help ensure that trees are given due consideration from the outset of the development process	Para 5.2 revised: <u>The purpose of this chapter is to show how issues relating to trees will need to be assessed to in the planning process to ensure these benefits can be achieved. Whilst this document outlines broad tree considerations, it is strongly advised that landowners and developers should seek advice from a specialist arboriculturist from the outset.</u>
	The document should be expanded to explicitly address issues related to non-residential development. For example, there are particular opportunities for enhancing canopy cover where there are large car parks, although the trees need to have appropriate RPAs etc. to allow them to grow.	It is agreed that non-residential / commercial sites provide unique opportunities to provide large growing trees. Therefore a para 5.39 has been added to the document	New para added after 5.35: <u>Non-residential development provides unique opportunities to plant large growing trees that can grow to maturity without causing the associated disbenefits often seen when planting trees to close to homes. A good example is for areas of hard standing, such as car parks where trees can significantly reduce the urban heat island effect.</u>

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
<u>Monitoring tree canopy cover</u>	There was strong support for the council monitoring (and trying to increase) canopy cover. Although it was recognised that the SPD could not require developments to increase canopy cover, it was suggested that Box T1 could be enhanced to explain how such information could help to support a planning application (with a possible explanation of how this information could be presented).	Further clarification has been provided	New text added to Box T1: <u>The change should be expressed as a % increase or % decrease, using the tree survey as a baseline before taking into account the mature size of new tree planting and any tree removals.</u>
	A suggestion was made to elaborate on the tree planting opportunities on commercial and retail sites where some of the associated disbenefits such as shade are not so relevant.	Agree that this could be included.	New para added after 5.35: <u>Non-residential development provides unique opportunities to plant large growing trees that can grow to maturity without causing the associated disbenefits often seen when planting trees to close to homes. A good example is for areas of hard standing, such as car parks where trees can significantly reduce the urban heat island effect.</u>
	Local Authorities in Southampton and Bristol were implementing policies that required off-site enhancements/payments to compensate for tree loss. Officers expressed concerns about how this would work with CIL and the restrictions on the use of S106, but would investigate this further.	Restrictions on the use of CIL and S106 would limit opportunities for offsite contributions. There is also concern that the compensation measure would be an easier option for developers, resulting in new development without trees	No change
<u>Information requirements</u>	It was suggested that the list of documents in para 5.53 could be helpfully moved to the principle box, or could be expanded to some form of checklist.	Agree	These have been moved into a new box (Box T4): <u>If trees are being removed, or if there is development within the RPA of trees it will be necessary to provide an Arboricultural Impact Assessment in accordance with box T4</u> Box T4: Requirements of an Arboricultural Impact Assessment <ul style="list-style-type: none"> • <u>BS5837 Tree Survey</u> • <u>Tree removal/retention and evaluation of the impact of this</u> • <u>Application of tree buffers</u> • <u>Identification of any works within the RPA or under the canopy of trees</u> • <u>Proposed new tree planting</u> • <u>Arboricultural Masterplan</u> • <u>Canopy Cover Change Assessment</u> • <u>Tree Protection Scheme to include a Tree Protection Plan and Method Statement</u>
	Document should include reference to BS8545: Trees from nursery to independence – and that this would strengthen the council's enforcement capabilities.	Agree	Revision to para 5.29 <u>Young trees are an essential component of the landscape, providing the next generation of mature canopy cover. New development provides an opportunity for trees to be planted in the right place, increasing the sustainability of the scheme. Adequate provision must therefore be made for new trees planting to be planted to integrate the development into the landscape with all the necessary aftercare to ensure they successfully establish. All new planting should be included in the calculation of canopy cover change as set out in Box T1.</u> New section within 'Tree Planting' called 'Caring for new trees' states: <u>The planning, design and planting of new trees should be in accordance with the British Standard 8545 "Trees: from nursery to independence in the landscape – Recommendations". Further information on selecting and planting trees has been prepared by the Trees & Design Action Group (TDAG).</u>

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
	Document could helpfully provide reference to the Trees Review Action Group (TRAG) guidance note on trees and townscapes, which developers may find useful. The document has ministerial endorsement, though it was recognised that it has no planning status.	Agree	New section within 'Tree Planting' called 'Caring for new trees' states: ' <u>Further information on selecting and planting trees has been prepared by the Trees & Design Action Group (TDAG)</u> '.
<u>Planning conditions</u>	The guidance on planning conditions in para 5.54 was generally supported. It was recognised that accurately worded conditions were very important and that particular consideration should be given to the point at which they would be discharged. It was considered that para 5.54 captured the important sentiment that tree conditions were often best finally discharged once the development was complete.	Noted, although the paragraph has been amended to make this more explicit	Para 5.46 split and new para inserted in the middle: The tree protection drawing will need to demonstrate each of the above steps and will be made available to anyone that enters the development site, usually by displaying it at the site office. <u>Post-completion conditions will normally be applied to approved applications to ensure that site monitoring is carried out for the duration of the development, including pre-commencement site meetings and completion visits by the project arboriculturist.</u>
	It was suggested that guidance about conditions should be elevated to a 'Principles' box.	This isn't considered to be broad enough to form its own principle, in accordance with the rest of the document	No change
	The consultants explained how useful it was to have a meeting with the Tree Officer, prior to the commencement of construction. Officers raised concerns about the time implications of this.	Noted	No change
<u>Adoption</u>	Although not directly relevant to the SPD, a consultant raised concern about the council's costs for adopting trees, and whether the LPA should be taking into account the long-term benefit arising from the tree planting in determining a charge.	The benefits did not diminish the costs of maintenance etc.	No change
<u>Other matters raised</u>	It was suggested that the reference to strip foundations within RPAs (as set out in the box preceding para 5.24) should be reworded, to account for circumstances where there is already development in the RPA.	This level of detail is considered to be too technical for this document. However, earlier reference to use of an arboriculturist has been made in the introductory text at 5.2:	Para 5.2 revised: The purpose of this chapter is to show how issues relating to trees will need to be assessed to in the planning process to ensure these benefits can be achieved. <u>Whilst this document outlines broad tree considerations, it is strongly advised that landowners and developers should seek advice from a specialist arboriculturist from the outset.</u>
	The section on new tree planting should specifically support initiatives like community orchards and edible streets.	Agree	New para added at end of section following Principle T4: <u>For larger developments, consideration should be given to planting community orchards.</u>
	Para 5.34 provides general guidance on the mix of species. The paragraph could be expanded to set out a palette of species to be encouraged/avoided.	Whilst the benefit of providing a palette mix is noted, this has not been included at this stage as it could be seen as overly prescriptive. Nevertheless, the council will continue to assess the tree species diversity of the borough and may provide separate guidance on tree species planting, to include other areas such as TPO trees and the council's own estate.	No change
	There was some discussion about whether the use of terminology such as 'shall be' was too strong. It was nonetheless felt that this could be appropriate where it was suitably caveated.	Noted	No change
	It was suggested that the success of the SPD should be monitored – possibly through an annual meeting with arboricultural consultants/planning consultants.	Noted – this will be considered although it is out of the scope of this document.	No change

RESPONSE TO DISCUSSIONS AT SPD WORKSHOP - 5 September

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
Landscape Group			
<u>L1: A strong Landscape structure</u>	Concerns about the planting of inappropriate species in rural areas.	Point i of L1 refers to the need that a site must respond to local character, whilst point iii refers to the need for appropriate species and therefore it is considered that this point is covered.	No changes required
	Difficult to control fence heights etc.	Para 3.6 and policy L1, give the ability to ensure that boundary treatments are appropriate.	No changes required
<u>L2: Using existing landscape features and characteristics</u>	More difficult to do in urban areas than rural areas	It is acknowledged that there may be fewer features to use as a basis for a structure in an urban areas, however, the principles and policy would allow an appropriate landscape structure to be created.	No changes required
	Footpaths and PROW - Important to retain the line of the footpath within a new development	Yes, it is agreed that these features are important and this is recognised in Principle L3 point iv	No changes required
<u>L3: Initial site - Led design principles</u>	Poplars planted in water meadows but a gas main underneath	It is agreed that inappropriate planting should not be included within schemes and principle L7 would ensure that this does not occur in new development proposals	No changes required
	Landowners need to maintain Public Rights of Way on their land	It is acknowledged that this is an issue, however, this is a responsibility of Hampshire County Council and outside the scope of the SPD	No changes required
<u>L4: Requirements of the landscape strategy</u>	Does this apply to only the AONB? No. Make clear that it applies to all areas	The extent of the application of all principles is set out in the introduction, but this could be made more explicit here.	Update para 3.31 to reflect this change The assessment of landscape character and visual amenity will help to identify opportunities and constraints for development proposals <u>at any location within the borough</u> . These elements should help to inform the landscape strategy for the development.
<u>L6: Landscape masterplan</u>	Query about what a “small useless” piece of land means, in relation to habitat for eg slowworms. Can a note be added to define what “no useful purpose” means?	This refers to para 3.39 - An area with no useful purpose means that it does not perform as an area that can be used either for recreation, play, make a contribution to ecological interests and does not contribute to the amenity of this area.	Para 3.39 amended to improve clarity. Small areas that cannot be accessed for maintenance purposes and do not <u>contribute to any of these functions</u> serve any useful purpose should be avoided.
	These areas could be planted with trees	Trees will be included in proposals where appropriate.	No changes required
<u>L6: Quantity, accessibility and function of green space</u>	Importance of open spaces near family homes that are safe to access, example- Winklebury	Any new development will be required to provide the green space standards as set out – both in terms of quantity of area and accessibility, and therefore this issue is addressed.	No changes required
<u>L7: Soft landscaping</u>	Additional point- To provide for wildlife- should be added.	Bullet point viii of Principle L7 highlights the need to use species that promote biodiversity and therefore it is considered that this issue is covered.	No changes required
	Para. 3.50 - Should the DEFRA list of invasive species be cross referenced so it remains valid for the lifetime of the document?	Para 3.50 refers to the need to avoid the spread of invasive species and it would be appropriate to make this more explicit with reference to the document	Change para 3.50 to include reference and link to the DEFRA List of invasive species. The following link provides further guidance on invasive species - https://www.gov.uk/guidance/prevent-the-spread-of-harmful-invasive-and-non-native-plants
<u>L8: Hard Landscaping</u>	Concerns about use of hard built boundaries and hedgehogs. Can we add a point about that, and the movement of other species?	This issue links both to biodiversity and general Green Infrastructure and would be a straightforward way of promoting it and therefore an additional point could be added to ensure that boundary treatments are wildlife friendly.	Add point to Principle L8. <u>They should allow for wildlife movement within development – for example providing gaps at the bases of rear garden fences to allow hedgehogs to move throughout a wider area.</u>
	· Lighting - Is Street lighting absolutely necessary? Concerns about light pollution. Lighting design for wildlife and dark night/ skies very important. Additional points needed.	Lighting is necessary within many development to provide safety for residents, however, it is acknowledged that there can be some adverse impacts on wildlife, particularly bat corridors. Where these issues exist, it would be appropriate to require	Add point to Principle L8 <u>Lighting should consider the need to avoid adverse impacts on dark skies and wildlife corridors. Where these issues have been identified through the analysis process, the</u>

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
		adapted lights with cowlings that restrict light spill. This issue can be added as an additional point at Principle L8	<u>design of lighting should seek to avoid impacts on them.</u>
	Use of "arboreal shrubs" for screening purposes - an important principle	Principle L7 covers the requirements for soft landscaping and it is considered that 'arboreal shrubs' are included within that definition	No changes required
<u>L9: SUDS and Swales</u>	A lot of scope for emerging plants to be used within SUDS schemes (for wildlife)	A number of points relating to Suds and Swales have been raised in earlier comments, and it is considered that the contribution that they make to GI and biodiversity (through many things, including the use of emerging planting) can be made more explicit in this section	Covered by para 3.58 and additional related text.
	No mention of geology and hydrology of the site. Could add into para 3:10 - initial surveys	The second bullet point in the list at 3.10 refers to drainage, however, this can be extended to include hydrology and geology	Change 3.10 to reflect this <ul style="list-style-type: none"> Landform – including <u>geology</u>, drainage and topography
<u>L10: Artwork</u>	Designing to fit the place is important	It is agreed that this is important and it is considered that the text at 3.60 addresses the need to respond to site characteristics	No changes required
<u>L11: Landscape management plan.</u>	Important to provide for management of woodlands	This issue is also addressed in detail within the tree section of this document and also Principle L11 does note that the level of detail should be proportionate to the nature of the development. If there is woodland within the development, then this statement will cover that eventuality.	No changes required
<u>L12: Adoption of green space by the council</u>	Queries about whether housing associations will be required to hand over all land	The Section 106 Legal Agreement is the mechanism that allows with the transfer of land. Whilst the areas to be adopted can be negotiated, there is no mechanism whereby a housing association can be forced to offer land for adoption	No changes required
	Adoption of land by council might also help with land grabbing by residents	Comment noted and agreed that in some instances this approach can help	No changes required
Biodiversity Group			
	There is depletion of records in some cases with HBIC and a need for increased local data when viewing applications. This is a problem as the presence of no records is taken as a negative for that species even though they may be present. There is a need for greater recording across the county.	Comment accepted but no change required in the document.	No change
	There is a lack of links to the Ecological Network Map. Comments around the need for establishing greater hedgerow links in Pamber in the oncoming neighbourhood plan.	The Local Ecological Network Map is referred to in paragraph 4.35 and paragraph 4.64 of the SPD.	No Change
	Hedgerows - There is a need to classify all important hedgerows. Farmers are clearing hedgerows, against hedgerow regulations. Comment made this is a police matter except for planning applications.	Comment accepted but no change required in the document.	No change
	Discussion around the various possible biodiversity links on newly created sites. Educational use. Amenity grassland. Road verges and there links to the new GI strategy. The need for BDBC to communicate with Hampshire Highways in developing better roadside links for biodiversity	Covered through the BDBC GI strategy referred to within the SPD.	No change
	Checklists- Bird records- Handover of records from HOS to county database- HBIC access to database. 1 Million records- ... to BDBC. Local sites SINC- Problem with quality of local sites. Corridor mapping, key species, GI Actions- Local database provision. Discussion around the possibilities of	Observation requiring no change to the document.	No change

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
	creating and holding a local database and gaining localised records directly from county recorders which was seen as a possibility in order to maximise local data.		
	It was noted that any biodiversity records from people adjoining the development could possibly be checked directly with county recorder	Observation requiring no change to the document	No change
	The question was asked whether there are any thresholds for the requirement for surveys, could 2 checklists one for minor, one for major be arrived at.	There are at present no thresholds for survey requirements, as the requirement for surveys is determined by the characteristics of the site. A preliminary ecological assessment is initially requested to understand what issues may need surveying in all cases where habitat or species issues may be possible	No change
	Question was asked with unknown records- how can these be ratified. All records present through HBIC records.	All present records ratified through County recorders via HBIC	No change
	Pamber records- Ratification of records- data via HBIC, validated through county recorder- through living record. Gradually increasing records are being supplied on 1 record.	Observation requiring no change to the document	No change
	Question was asked how you know ecologists working on developments are adequately qualified. Answered that officers look at quality of reports and professional accreditation in making a judgement.	Observation requiring no change to the document	No change
Principle B4	It was suggested that Principle B4 should include reference to adjacent areas and indirect impacts of the development on them - example of Chineham woodlands, this should be linked to buffers section.	Additional text added to Principle 4 to reflect this	Change to Principle B4: Development proposals must not result in harm to nationally or locally designated sites or lead to the loss or deterioration of a key habitat type or harm the integrity of linkages between them <u>within the proposed development site and the surrounding area.</u>
	Avoidance of impacts through layout to design	This is covered within the SPD under Stage 3: Designing for Biodiversity	No change
Principle B6	Mitigating impacts- buffers for ... habitats- 20m rivers, 5m hedgerows and minimum of 20m woodland. It was argued that 20m was not enough to harbour adding canopy trees, creating ecotones and transitional habitats.	Additional text added to strengthen buffer statement around the need for above 20m as a precautionary principle	Change to Box B6: Where it is considered the woodland and/or tree belt form part of an important wildlife corridor, for example of particular importance to bats or where the woodland is ancient in origin then <u>the Council will expect buffers exceeding the 20 metres minimum as a precautionary principle and especially for major development, a buffer width beyond that of the minimum will be expected.</u>
Principles B7 and B8	Discussion around new NPPF and Measurable Net Gain. Need for introduction of new terminology into SPD regarding adjusted NPPF, the use of biodiversity metrics to measure net gain and its delivery through Biodiversity Enhancement Plans.	Additional text added referring to the council seeking to enhance strategic biodiversity networks through net gain following the adoption of a BDBC Biodiversity Compensation Framework and encouraging developers to use already present metrics such as that proposed by Warwickshire prior to the BDBC framework being adopted	New para added after para 4.75: <u>Where offsite compensation measures may be required, the council will seek opportunities to support strategic initiatives, where these exist and are appropriate. Current examples include habitat creation, restoration and/or management within the council's Biodiversity Priority Areas or the areas mapped as 'Network Opportunities' within the Borough (see paragraph 5.5). Other strategic initiatives may be developed following the adoption of the Biodiversity Compensation Framework.</u> Revised wording at end of para 4.63: The council intends to adopt a Biodiversity Compensation Framework that will provide a measurement metric to calculate biodiversity net loss or gain (<u>see section on 'Compensation', below</u>). Once this has been adopted, the council will expect developers to use this to demonstrate how biodiversity enhancements have been achieved. <u>In the meantime developers are encouraged to use one of the metrics in use by other local planning authorities in the country, such as Warwickshire County Council. These are based on the metric developed by Defra.</u>

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
	Remarked that there is a need for knowledge of species and habitats in this process.	Observation requiring no change to the document	No change
Principles B7 and B8	Discussion around the present reserved matters issues with biodiversity and the lack of delivery by developers. Remarked that with the new process front loading of maintenance and management into Biodiversity Enhancement Plans at the outline stage would alleviate some of these issues.	The new NPPF guidelines relating to the need for measured net gain and adoption of the new BDBC Biodiversity Compensation Framework as mentioned within para 4.75 will require measured biodiversity enhancements at the outline stage of applications addressing this issue relating delivery of reserved matters	Changes to para 4.75 and 4.63 as set out above.
	The need for species related enhancement example to go within document reference too Swift bricks, bat boxes etc. included in biodiversity section.	Examples are contained within Para 4.7	No change
Tree Group			
	There was support for the production of an SPD. It was considered helpful to have an overarching chapter about Green Infrastructure at the beginning, and a stand-alone section about trees that provided all the relevant information in one place. The green 'principle boxes' made it easy to identify the document's key requirements	Noted	No change
	It was considered that the benefits of trees should be reflected throughout the whole document, not just set out in the introduction. An understanding of why new trees were required and what benefits they generated (shading, biodiversity etc.) should inform the species, location, size, aspect etc. of new or replacement planting.	It is recognised that the document does not provide an exhaustive list of the benefits of trees. However, it aims to strike a balance between outlining the benefits whilst being a useable document providing practical advice for developers. The cross cutting benefits outlined at section 5.1 and box T1 are considered to provide adequate background to the benefits of trees, although further documents for information have been signposted at the tree planting section of the document.	No change
Principle T4	It was suggested that the document should set out specific requirements for tree management plans to ensure that newly planted trees survived their early years.	The establishment of new trees is an important subject and it is agreed that some basic advice should be included in this document, with signposting for more technical advice. A new section has therefore been added called "Caring for new trees"	New section within 'Tree Planting' (and revision to para 5.29) <u>Caring for new trees</u> <u>Planting a new tree is counterproductive when adequate care isn't given to its future maintenance. As part of a soft landscape strategy, the council will expect to see a commitment to ensuring the successful establishment of all new trees. This will include (but not be limited to) watering, weeding, mulching and formative pruning, wherever necessary.</u> <u>Management plans for young tree care will be required by enforceable conditions attached to planning consents. These will usually require the immediate replacement of a tree that dies within a period of 5 years from the completion of development.</u> <u>The planning, design and planting of new trees should be in accordance with the British Standard 8545 "Trees: from nursery to independence in the landscape – Recommendations". Further information on selecting and planting trees has been prepared by the Trees & Design Action Group (TDAG).</u>
	There was support for either providing a mix of species or sequential planting (planting over a number of years), where tree planting was required across large areas to make it more resilient.	Section 5.34 provides for species diversity. Whilst the benefits of sequential planting is noted, it is not possible to enforce through planning conditions. This will be requested under management plans under s106 agreements, where it is appropriate to do so.	No change

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
	Concern was expressed about sites being pre-emptively cleared, and how the former condition of the site could be taken into account as part of the planning process.	Although this is difficult to control through the planning process, it is considered that the document should provide greater disincentive to prevent trees being cleared from the site prior to submitting a planning application. To do so, a paragraph has been added under para 5.7 to highlight policy EM1 of the local plan, requiring that planning applications enhance visual amenity and that the council will require substantive replacement tree planting.	New paragraph added after para 5.7. <u>Where the correct design process is not followed and trees are pre-emptively removed before progressing a planning application, the council will require substantive replacement tree planting of similar species to demonstrate compliance with Local Plan Policy EM1. This will ensure development respects and enhances the visual amenity of the landscape. Early engagement of a professional arboriculturist will help to identify those trees that should be retained and those which should be removed to achieve a sustainable development. This may also reduce the likelihood of unauthorised tree works being undertaken, which could result in a prosecution.</u>
	The group suggested that Box T1 (Canopy cover) should be stronger. It should explicitly link to the GI Strategy, and there were suggestions that it should be a requirement that canopy cover was increased.	The purpose of box T1 is to monitor canopy cover change in accordance with the Green Infrastructure Strategy. It is beyond the scope of this SPD to require that development provides a NET increase in canopy cover. However, in accordance with box T1, the council will seek to enhance canopy cover wherever appropriate.	A hyperlink has been provided to the Green Infrastructure Strategy.
Principle T1	Should the council keep a list of registered or approved arboriculturalists?	This would not be appropriate, and explained that in order to meet the British Standard any arboriculturalist would need to be experienced and competent.	New para after 5.7 refers to early engagement with a professional arboriculturist. A footnote link has been provided at section 5,8 to the Arboricultural Association Footnote: <u>The Arboricultural Association maintain a list of independently approved arboriculturalists. This can be downloaded from their website at https://www.trees.org.uk</u>
Principle T2	The principle was clear but it would be helpful to add further explanation (either a table in the text or an appendix) to explain what the BS tree classifications meant.	Further information of the categorisation method has been provided at 5.12	Para 5.12 has been updated: <u>Trees shall be categorised according to their landscape, ecological and cultural value, and awarded a rating A to C, based on its quality and remaining life expectancy. Low quality trees with little estimated life expectancy, or that may be easily replaced are graded as U. It is important that results of the landscape and biodiversity evaluations are used in assigning these values, and this should not be an isolated exercise. Groups of trees and woodlands should be given an overall grading, rather than attempting to grade each individual tree within the entity; however, individual trees of particular importance within such areas should be recorded individually.</u>
Principle T3	Support for 4m buffer from the ultimate canopy spread. Support location of large growing trees within public open space rather than gardens.	Noted	No change
Principle T4	Principle should link back to canopy cover (Box T1)	A link to Box T1 is provided in the first paragraph of this section	No change
Principle T5	The group expressed concerns about how well trees were being protected 'on the ground' during development, and whether the details that had been approved by the LPA were being correctly implemented. They would like to see further monitoring, and supported proposals that would move the burden of this monitoring onto the developer (for example, through the discharge of conditions only once development is complete).	The council will continue to develop its conditions relating to new development. The SPD has been updated to make the site monitoring aspect of the development more explicit	Para 5.46 split and new para inserted in the middle: The tree protection drawing will need to demonstrate each of the above steps and will be made available to anyone that enters the development site, usually by displaying it at the site office. <u>Post-completion conditions will normally be applied to approved applications to ensure that site monitoring is carried out for the duration of the development, including pre-commencement site meetings and completion visits by the project arboriculturist.</u> Evidence that the approved tree protection measures have been implemented fully may be required in order to satisfactorily discharge any tree protection conditions once the development is complete. In some cases, the council may also monitor the progress of the site, especially where works are taking place close to important trees.
Principle T6	Supporting text should mention benefits of woodland.	Benefits of woodlands are outlined in the long term management aims and include recreational, ecological,	No change

Part of SPD	Summary of discussion point (as recorded in agreed meeting notes)	BDBC Response	Change required
		silvicultural and landscape values	

Appendix H(iii): Other minor changes

Part of SPD	Change made	Explanation
Principle GI1	Development must contribute to the overall themes, strategic policies and actions set out within the Green Infrastructure Strategy. This must be demonstrated as part of any planning application and extends to the existing GI resource as well as the creation of new GI. <u>This can be best articulated through a plan.</u> Para 3.4 amended to state: <u>'This can be best communicated via a plan showing the green infrastructure of a development'</u> .	To provide further clarity about how this information can best be presented.
3.24	<u>'...In particular, consideration should be given to corridors through sites and links to adjacent green infrastructure provision'</u> .	To strengthen links to GI chapter.
Principle L4	New criterion to state: <u>'Development should be informed by topography. Natural low points should be used for SuDS and swales with Accessible Natural Green Space (ANGS)'</u>	To provide consistency with Figure L1.
5.20	<u>... It is expected that following the completion of surveys, all relevant biodiversity data collected will be submitted to HBIC as appropriate in line with CIEEM guidelines. Data can be submitted direct to HBIC or through the Consultants' Portal</u>	To reflect good practice.
5.45	<u>... Where a protected species licence is required it should be noted that submission of the survey data obtained to the local environmental record centre (HBIC) is a requirement of the licence.</u>	To reflect good practice.
Box B6	When designing housing schemes close to woodland, housing must face onto areas of existing woodland	Repeats Principle L3
After 5.7 (at end of new para)	<u>'This may also reduce the likelihood of unauthorised tree works being undertaken, which could result in prosecution'</u> .	To highlight that unauthorised works on protected trees is an offence.