



Dear Sir/Madam,

24/00349/OUT | Outline planning application for up to 245 homes (use class C3); a Convenience Store (use class E); vehicular access from Aldermaston Road (A340), and the provision of; cycle and pedestrian access, open space, landscaping, SuDS, and other associated infrastructure. All matters reserved except for access. | Land Off Skates Lane Pamber Green Hampshire

Hampshire and Isle of Wight Wildlife Trust **objects** to the proposed development on the grounds of insufficient information supplied in the outline application to assess the environmental and ecological impact on nationally and locally important wildlife sites and protected species.

The Trust considers this proposal to be a notable deviation from adopted Local Plan policies and would constitute significant damage to on-site and surrounding areas of high biodiversity importance, with consequential impacts to the local ecological network and emerging Local Nature Recovery Strategy.

Landscape context

Hampshire & Isle of Wight Wildlife Trust manages two nature reserves in close proximity to the application site; Pamber Forest & Upper Inghams Copse (SSSI & LNR), and Ron Wards Meadow (SSSI).

Pamber Forest and Upper Inghams Copse constitute a large area of ancient woodland, approximately 212 hectares, forming the southern edge of a much larger block of semi-natural and forestry land that stretches to the Hampshire border and linked to the wider Silchester Common SSSI. Located immediately to the east of the application site. It comprises five principal habitats: semi-natural ancient woodland, grazed wood-pasture, heathland, and acid & neutral grassland. In landscape terms it is part of a much larger area of woodland, historically being recognised as royal forest with the first positive evidence of the site dating from the early years of the reign of Henry II (1216-1272) as forming part of the 'Great Northern Forest of Hampshire'. The nature reserve is one of the foremost important woodland sites outside of the New Forest, exhibiting considerable biodiversity importance. The Trust manages Pamber Forest in partnership with Basingstoke and Deane Borough Council.

Ron Ward's Meadows adjacent to the northern boundary of the application site is a flower-rich hay meadow covering approximately 10 hectares, which descends into an area of wet grassland. The nature reserve is managed as a traditional hay meadow and forms part of a wider ecological network with Pamber Forest and the landscape through Skates Lane.

As evidenced by the applicant's Ecological Appraisal, the site falls within a highly designated and largely contiguous ecological network. This area forms an integral link within the ecological network and is expected to be highlighted as significant within the emerging Local Nature Recovery Strategy.

Emerging Local Plan

We note that that Basingstoke and Deane have been consulting on their emerging Local Plan , through the statutory Regulation 18 consultation. We are aware that the land at Skates Lane was included in earlier drafts, yet was removed by agreement at the Basingstoke and Deane Cabinet Meeting on 9th January 2024, stating that

*“This site is considered to score reasonably well, both in relation to the Basingstoke sites which have been proposed for allocation and in comparison with the other Tadley option, TAD015. However, due to the site’s inaccessibility and distance from facilities, and impacts on settlement character, **biodiversity** and heritage the site is not proposed for allocation.”*

We consider this to be evidence of the council’s own assessment regarding the proposal’s lack of sustainability and its inappropriateness against existing and emerging Local Plan policies.

Biodiversity

We consider this proposal to be in contravention of council **Policy EM4 – Biodiversity, Geodiversity and Nature Conservation**. The Preliminary Ecological Appraisal evidences a high biodiversity value to the site and within the context of the ecological network or statutory and non-statutory designated sites. The site has highlighted its importance for European Protected Species, notably bats, utilising the site as a network foraging corridor. This alone would hinder compliance with Policy EM4 (1, a & f).

The applicant’s Biodiversity Net Gain calculation and schematic does not evidence how this will mitigate and prevent damage to European Protected Species and adjacent designated sites, or how the loss of landscape and habitat function within the site is measured.

Of particular concern for the Trust is the lack of assessment on recreational disturbance to designated sites and the ability to manage increased footfall onto Pamber Forest Nature Reserve. A development of this scale, despite provision of its own open space, will generate a far higher level of footfall onto surrounding sites. The applicant cannot demonstrate compliance with Policy EM4 without robust, independently assessed appraisal of this known impact. Failure to consider this off-site impact would be open to challenge and review.

Water Quality

We consider there to be insufficient assessment of potential detrimental impacts to the stream north of the site. The current state of river water quality in England is unacceptable with no rivers achieving good chemical status and only 16% of designated rivers meeting good ecological health. This is indicative of the current state of play with our water and drainage infrastructure that frequently fails and, which is unable able to meet existing requirements or adhere to licensed conditions.

Tadley Town Council have highlighted the local situation including the sewage overflows adjacent to Bishopswood Schools in 2023 and two serious sewage spills on Tadley Common SSSI in February 2024. Given the current lack of confidence in effective and timely investment in our critical water infrastructure no further development should take place in Tadley until the current issues with storm water drainage are addressed and any proposed developments must ensure that it does not add further burden to the acute pressures faced by the Borough’s water environment. In the current situation allowing the proposed development to go ahead would exacerbate the deterioration of water quality (or hydrological function) in the catchment infringing **Policy EM6 – Water Quality** and **Policy SS4 – Ensuring a supply of deliverable sites**.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful and if you wish to discuss these matters further, please do not hesitate to do so. I also ask that you keep the Trust informed of the progress and outcome of this application.

Yours sincerely

A handwritten signature in black ink, appearing to be 'M de Retuerto', written in a cursive style.

Martin de Retuerto
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