



**Hampshire &
Isle of Wight
Wildlife Trust**

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CONSULTATION: Basingstoke and Deane Local Plan Update (Regulation 18)

Hampshire & Isle of Wight Wildlife Trust is an independent charity founded in 1961 and together with 46 others we are part of The Wildlife Trusts, the largest grass roots nature conservation federation in the UK with 900,000 members. Locally across Hampshire and Isle of Wight we have over 27,000 members and we currently manage 5,000 hectares of land for wildlife, primarily nature reserves of local, national, and international importance.

We welcome the opportunity to comment on the draft Basingstoke and Deane Local Plan. While we are pleased to see the environment as a key issue of the Local Plan, we consider that the Local Plan in its current form suffers from a lack of development of key policies; it does not represent current best practice in policy clarity and ambition to put nature into recovery across the district.

The Wildlife Trusts are calling for at least 30% of land and sea to be restored for nature and climate by 2030, in line with national and international commitments.

We would welcome Basingstoke and Deane Council in joining this ambition and putting in place a clear target for nature's recovery by 2030 backed by mapping and appropriate policy mechanisms to ensure that the state of nature is turned around and wildlife starts to recover during this decade.

Biodiversity Net Gain

To ensure that biodiversity net gain truly halts nature's decline and puts it into recovery, we encourage the Council to amend draft **Policy ENV6: Biodiversity, Geodiversity and Nature Conservation** and set a target for development to go above and beyond the Government's 10% minimum Biodiversity Net Gain, instead aiming for at least 20% Biodiversity Net Gain.

We recommend looking at Kent County Council's assessment (<https://kentnature.org.uk/wp-content/uploads/2022/07/Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf>) of the potential effect of a 15% or 20% Biodiversity Net Gain target on the viability of residential-led development in Kent. In summary a shift from 10% to 15% or 20% Biodiversity Net Gain did not materially affect viability in the majority of instances when delivered onsite or offsite. The biggest cost in most cases is to get to the mandatory, minimum 10% Biodiversity Net Gain. The increase to 15% or 20% Biodiversity Net Gain in most cases costs much less and is generally negligible and because the Biodiversity Net Gain costs are low when compared to other policy costs, in no cases are they likely to be what renders development unviable.

We believe at least 20% net gain should be achieved, and that any offsite gains should be strategically targeted through Local Nature Recovery Strategies, secured in perpetuity and be additional to other commitments and initiatives to recover nature.

We welcome that the draft **Policy ENV6: Biodiversity, Geodiversity and Nature Conservation** states that BNG delivered off site “*supports strategic nature recovery initiatives, such as Local Nature Recovery Strategies (LNRSs)*”. However, LNRS and the Nature Recovery Network should be the spatial foundation for directing delivery of BNG and the wording of the policy should reflect this. Therefore, we recommend that, when allocating off site BNG delivery, the land within the LNRS and NRN is preferred.

Nature Recovery Network and Local Nature Recovery Strategies

We would strongly recommend that the council commits to the creation and maintenance of a functioning Nature Recovery Network as this is a key mechanism through which the biodiversity of the district can be protected and enhanced. It is now well established that nature is in trouble and that to put nature on the road to recovery it needs bigger, better, more and joined up space to thrive. The Nature Recovery Network, embedded within national policy through the Environment Bill, is the key mechanism to deliver nature’s recovery within the local plan, providing multiple benefits and meeting the government’s 25 Year Environment Plan targets.

Nature Recovery Network mapping is about taking a strategic spatial approach to the natural environment, identifying areas of existing value, and looking for opportunities to create connections with new habitats that will benefit people and wildlife. Without such spatial mapping, it will not be possible to identify where interventions are required in order to create the nature recovery network and thus deliver the environmental policy ambition.

Therefore, we strongly recommend that Basingstoke and Deane Council prepare and use the Nature Recovery Network as a foundational tool for the Local Plan to:

1. Identify areas within the local plan area that are of special importance within the context of the Nature Recovery Network, including: existing habitats that are of highest value, areas that buffer existing core habitat, and gaps within the existing ecological network that, if filled, would improve ecological connectivity and reduce fragmentation.
2. Assess, identify and prioritise opportunities for ecological enhancement through local plans and strategies.
3. Identify the best sites for development and those areas where development should be avoided. Sites of core importance to the Nature Recovery Network should be protected and development should not result in severance of ecological connectivity within the network.
4. Inform the design of any development in such a way that it makes a net contribution to the Nature Recovery Network.
5. Inform and target biodiversity net gain delivery and other nature-based solutions.
6. Inform the use of building standards that promote biodiverse developments within local plans (e.g., Building with Nature standards) to ensure that development targets action to most effectively contribute to restoring nature.
7. Send a clear market signal to developers of your expectations for all future planning to contribute positively and meaningfully to nature’s recovery.

The Nature Recovery Network and Local Nature Recovery Strategies should also guide where development should not take place to avoid severance of the landscape and ecological corridors. For more information on Nature Recovery Network, we recommend reading the South East Nature Partnerships’ ‘Principles of Nature recovery Networks across the South East of England’ document, available here: <https://hantswightlnp.files.wordpress.com/2021/07/joint-south-east-nrn-principles-senp.pdf>

Green infrastructure

Green Infrastructure should support both biodiversity, and mitigation and adaptation for the climate crisis. We would like to see the Draft Local Plan adapt the green infrastructure policy to set high quality green infrastructure principles across the built footprints of new and existing areas. This would lead to increased sustainability of developments, boost climate resilience and public wellbeing, as well as increase value, support a resilient economy and desire to live in the area.

Therefore, we welcome the inclusion of the Building with Nature accreditation in draft **Policy ENV7: Green and Blue Infrastructure** which sets a new framework for green infrastructure. It brings together existing guidance and good practice to recognise high-quality green infrastructure where wellbeing, biodiversity and water are core foundations. We recommend that all proposals for green infrastructure will be expected to be designed with the Building with Nature standards, or an equivalent standard set by the Council. This will ensure that all green infrastructure is delivering maximum benefits for the health and wellbeing of residents, and for nature's recovery.

Nutrient Neutrality

Whilst it is positive to see draft **Policy ENV4: Nutrient Neutrality** suggests that where possible *“mitigation proposals should incorporate opportunities for creating and improving habitats as identified through the government’s forthcoming Nature Recovery Network and the Local Nature Recovery Strategy”* we strongly encourage the Council to create a standalone water quality policy that gives a strong preference to nitrate mitigation schemes that will deliver wider environmental benefits, especially for biodiversity.

Hampshire and Isle of Wight Wildlife Trust is well positioned to deliver biodiversity net gain and mitigation for nitrates, prioritising significant added value. We are currently one of the only organisations delivering an established, high-quality nitrates mitigation programme and provide other nature-based solutions services. We would be pleased to discuss these in more detail with you.

Nature Based Solutions

We are pleased to see the inclusion of Nature Based Solutions in **Policy ENV6: Biodiversity, Geodiversity and Nature Conservation**. We encourage that investment in Nature Based Solutions is prioritised to be within the Local Nature Recovery Strategy to ensure that they have the have a more effective impact on increasing local biodiversity.

Rivers

The River Loddon, Test and Enborne are ecologically important and rare chalk streams. Chalk streams are a vital natural capital asset. They provide key regulatory and provisioning services as an important source of water for drinking, agriculture and industry. Pressures from over abstraction, increased development pressure and a legacy of human modification and intervention have resulted in significant and ongoing declines in biodiversity and water quality.

We are pleased that The Chalk Stream Strategy (Catchment Based Approach Chalk Stream Restoration Group, 2021) is included in the supporting text draft **Policy ENV5: River Loddon, Test and Enborne corridors** however given their importance, We would like to see the recommendations of the Catchment Based Approach Chalk Stream Strategy embedded within the local plan including “Planning approval must be contingent on the pre-existence of or parallel investment in more than

adequate supply and treatment infrastructure with no additional burden on chalk aquifer abstraction. Developers should make water-company developer contributions to help cover the costs of addressing such impacts”.

In addition to this, we welcome the inclusion of natural buffers in the draft policy but encourage the council to go further by including specific natural buffer figures. We would recommend a minimum buffer of 20m.

It is positive to see that as part of draft **Policy ENV10: Managing Flood Risk** that all planning applications for major development are required to ensure that Sustainable Drainage Systems (SUDs) are used for the management of surface water and all new developments in areas at risk of flooding must give priority to the use of sustainable drainage systems. In addition to this, due to the high sensitivity of chalk streams and the many threats they are already under we recommend that sustainable drainage systems should be required on all new, large-scale developments (e.g. housing, roads and car parks) if the application is in a chalk catchment, without adding to the substandard capacity of combined drainage and sewage systems.

Water Quality

We are pleased to see the requirement for new homes to meet a water efficiency standard of 110 litres or less per person per day in draft **Policy ENV12: Sustainable Design and Construction and Adaptation** is positive. However, we think this could be taken further and would recommend the council to amend the draft policy to 90 litres or less per person per day.

Of added importance is the current, unacceptable state of river water quality with no rivers achieving good chemical status and only 16% of designated rivers meeting good ecological health. Recent survey data published by the Angling Trust highlight The River Loddon as exhibiting among the highest phosphate concentrations of all rivers surveyed nationally. 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. Given the current lack of confidence in effective and timely investment in our critical water infrastructure this plan must ensure that it does not add further burden to the acute pressures faced by the District’s water environment, notably chalk catchments such as the Test & Loddon. Conversely this plan has the opportunity to drive effective investment and safeguards through its policies.

Sites allocated for development

We have concerns about the high combined number of houses due to be built through multiple developments in such a constrained area. The council must be confident that the environment can accommodate the in-combination effects of development at this scale. Environmental limitations must be taken into account, such as the water and drainage infrastructure being overwhelmed. As previously mentioned in the above water quality section, the council has a responsibility to ensure that new development does not add further burden to the pressures faced by the district’s water environment.

The planned large-scale developments all concentrated in the same area to the west of Basingstoke extending southwards will result in landscape scale change to the environment. Currently we feel there is a lack of ambition to contribute to not just conserving but enhancing and creating opportunities for nature’s recovery in the proposed developments. The council have a duty to provide ambitious green infrastructure and nature recovery on a scale that reflects the magnitude of the proposed developments. There is an opportunity for Basingstoke and Deane District Council to strategically connect the green infrastructure and the habitat creation and enhancement of these

neighbouring potential developments to create an adjoining ecological corridor running and connecting the whole area to achieve far reaching nature recovery.

We are also concerned about the locations of the sites allocated which are in close proximity or adjacent to designated sites and habitats of high ecological importances (e.g. SINC's, ancient woodland, etc.) and the negative impacts they might have, especially Popham Garden Village. This proposed site is opposite a SSSI and boasts vast floral diversity including cutleaf germander (*Teucrium botrys*) and historically was the national site for this rare species. Therefore, the council must ensure that these proposed developments have an in-depth comprehensive environmental impact assessment, all the relevant ecological surveys and thorough mitigation and opportunities for nature enhancement and creation that go above and beyond the minimum requirements, as well as full comprehensive management plans.

We hope that you will find our comments helpful and, if you have any questions or wish to discuss these matters further, please do not hesitate to contact us. I also ask that you keep the Trust informed of the progress and outcome of this plan.

Yours Sincerely,



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