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Thursday 22nd January 2026

CONSULTATION: Basingstoke and Deane Local Plan (Draft Spatial Strategy Regulation 18)

Hampshire and Isle of Wight Wildlife Trust take the position that new mandatory housing targets for Basingstoke and Deane are wholly inappropriate and fundamentally unsustainable, failing to adequately consider material environmental thresholds. Under successive local plans, the authority area (notably around Basingstoke), has already experienced development at a scale and extent that has placed significant strain on environmental capacity, with key thresholds relating to water resources, biodiversity and landscape character being approached or exceeded. Going forward, the level of growth now proposed represents a tipping point in sustainability for the Borough. A new target of 1,127 homes per annum represents a 35% increase on the previous target. This target does not account for resource limits, such as water supply, which face increasing pressures from over-abstraction, climate change and ageing infrastructure. Therefore, in our view, site allocations as outlined in the Draft Spatial Strategy Regulation 18 Plan does not reflect best practice in plan-making, failing to deliver meaningful protections and enhancements to nature across the Borough.

The Draft Spatial Strategy Regulation 18 document focuses solely on those matters related to an increase in housing need. Despite supporting evidence (i.e. Habitats Regulations Assessment, & Interim Sustainability Appraisal), this document does not go far enough to consider the much-needed protection, mitigation and conservation measures necessary to protect and restore the natural environment, whilst delivering housing numbers required. Housing need does not exist in a vacuum and, therefore, the document cannot be considered in isolation of other constraints, including the biodiversity and climate crises. It is wholly unfeasible to consult on housing need and additional site allocation alone. At a minimum, all housing allocations must be in alignment with the Hampshire Local Nature Recovery Strategy, as well as legally binding Environment Act targets to protect 30% of land and sea for nature by 2030.

Site Allocations

The proposed strategic housing allocation for approximately 235 dwellings at Skates Lane, Tadley (SPS5.16) is situated immediately adjacent to Pamber Forest and Upper



Inhams Copse Nature Reserve, which is a Local Nature Reserve and designated as a SSSI. The reserve is home to a large area (approx. 212 hectares) of ancient woodland and is an integral link in the ecological network, linking to the wider Silchester Common SSSI. The close proximity of this development presents a substantial risk of increased recreational pressure on these sensitive habitats. This is likely to lead to greater levels of wildlife disturbance, habitat degradation, path compaction and heightened management demands on the Trust, ultimately resulting in increased financial and operational burdens. SPS5.16 does not reference the impact from increasing recreation at Pamber Forest (onto Silchester Common) SSSI as a material factor determining the sustainability of the allocation.

The proposed allocation is also close in proximity to Ron Wards Meadow, a fragile wildlife sanctuary which plays a vital role in helping the rarest and most vulnerable species to thrive, where both direct and indirect impacts of development could be detrimental. In conjunction with a raft of designated sites, both within the allocation footprint and within close proximity, which is reflected in the LNRS spatial mapping, the sustainability of this allocation warrants greater scrutiny.

Similarly, the proposed allocation for approximately 1,500 dwellings on Land at Whitmarsh Lane (SPS5.4) lies in close proximity to important sites for nature and threatens the ecological network. The allocation lies adjacent to Hook Common and Bartley Heath SSSI and Bartley Heath SINC managed by the Trust, as well as Bartley Heath SSSI, Butterwood SSSI and Odiham Common SSSI. The allocation is also in close proximity to the River Whitewater (SINC), a rare and vulnerable chalk stream habitat, which has influence on both the North Warnborough Green and the Greywell Moors nature reserves downstream. Any further built severance of these important wildlife sites along this section of the M3 corridor will add additional burden to the coherence of the ecological network and risks eroding the ability to manage the land for respective features of interest.

These concerns are not confined to the two proposed sites discussed above. The 35% increase in housing targets across the Borough collectively contributes to an escalation of recreational demand on the local natural environment. Without stringent protections and careful mitigation, these pressures could result in the degradation of these habitats and diminished biodiversity in the long-term, reducing the capacity for these sites to deliver both environmental and community benefits.

Water

As mentioned above, the Trust has concerns around the state of water infrastructure in the Borough. In 2024, Silchester Waste Water Treatment Works spilt effluent into the Silchester Brook 97 times, for a total of 1,685 hours. The Trust questions the confidence of the Council in the capacity of the water network to provide services to the sites allocated, whilst maintaining ensuring utility compliance with licenses.

With climate change increasing both the frequency and severity of drought events, the Local Plan must go beyond existing policy when evaluating a proposed development. The Council should adopt a requirement for water neutrality in all new developments,



taking note of the approach adopted by West Sussex County Council. Achieving water neutrality is essential to safeguard and replenish the fragile chalk aquifer that sustains the flow of chalk rivers in the Borough.

With the Council recently recognising the Rights of Rivers in Basingstoke and Deane, river rights, derived from the Universal Declaration of River Rights, should be embedded into Local Plan policies to deliver stronger protections to the Loddon, Whitewater and others within the Borough. We welcome Policy SPS7 provides a clear requirement, in specified cases, for development proposals to demonstrate that they will “not exacerbate deterioration in the relevant catchment,” and also requires intervention mechanisms to improve the quality of the relevant catchment. Supporting text to the policy could be expanded to set a clearer framework for what should be required as regards enhancement of waterways. To strengthen river rights within the Borough, the Council should introduce requirements that encompass a broader aim of enhancing rivers and their catchments, in a more holistic way, alongside existing commitments to water quality standards and nutrient neutrality. In addition, policy must more strongly reflect aims to restore aims to restore and enhance waterways, not just to protect from harm.

Nature Recovery Network and Local Nature Recovery Strategy

The recently published Hampshire Local Nature Recovery Strategy should guide where development should not take place, to avoid severance of the landscape and ecological corridors. A large proportion of Skates Lane (SPS5.16) and Land at Whitmarsh Lane (SPS5.4), earmarked for development, is identified in the LNRS as an Areas That Could Become of Particular Importance for Biodiversity (ACB). ACBs have been identified owing to their importance (sometimes integral) ensuring ecological integrity and function of the natural landscape.

We support the consultation response submitted by Natural Basingstoke, which requests that the next iteration of the Plan is aligned with the LNRS, can clearly demonstrate how environmental limits have shaped site selection and incorporates analysis of cumulative effects at a strategic level.

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,
Lorna Selby
Policy and Advocacy Officer
Hampshire and Isle of Wight Wildlife Trust