|  |  |
| --- | --- |
| Basingstoke and Deane Borough Council  Civic Offices  London Road  Basingstoke  RG21 4AH | [insert your name and address here] |
|  | [Insert date here] |

**Basingstoke and Deane Local Plan Update – response to consultation**

Dear Sir or Madam,

This letter comments on the draft Local Plan update for Basingstoke and Deane.

Over the last decade, the area has entered a new phase of accelerated development, impacting our local environment. Whilst there is a need for local housing, it is important that this is balanced against the responsibility to avoid further environmental damage. I understand that the Council *does not agree with the proposed house building target* (set by central Government), and I support efforts to reduce this to a more realistic number.

Ahead of discussions about housing numbers being finalised, the Local Plan needs to set objective standards to govern planning decisions, ensuring that future development is consistent with your obligations to address the Climate Change and Ecological Emergencies.

**Local Nature Recovery Strategy**

Consultation is currently underway on the Local Nature Recovery Strategy, which aims to identify areas to be protected across Hampshire. Whilst the Local Plan includes a list of such ‘Green Infrastructure’ it is currently limited, and a full list should be incorporated into the final version of the plan (capturing new areas identified in theLocal Nature Recovery Strategy). The Local Plan should also incorporate a map, showing the Green Infrastructure assets across the borough *[Infrastructure Delivery Plan, page 38-40].*

This list of assets should then form the basis for determining those areas where development cannot be proposed/ approved, with a clear statement included in the plan protecting them by prohibiting them from future development. *[Infrastructure Delivery Plan, page 38].*

The Local Plan also provides the opportunity to set minimum standards for basic provisions to support Protected Species and Species of Principal Importance, within developments**,** and I welcome the reference to provision of appropriate measures (e.g.: swift boxes, bat boxes etc.). However, this section needs to be strengthened to make this mandatory unless a pre-approved exception (against an agreed list) applies [*Draft for Regulation 18 Consultation, page 167].*

**Biodiversity Net Gain**

The Government has recently introduced a requirement upon developers to deliver a 10% net gain in biodiversity when undertaking construction projects and I note that this is referenced in the Local Plan. The Environment Act (2021) permits local authorities to set targets that exceed this limit, and I would like to see the Council demonstrating leadership, in response to its declaration of an ecological emergency, by incorporating a 20% BNG target in the Local Plan. *[Infrastructure Delivery Plan, page 38-39/ Draft for Regulation 18 Consultation Page 162 (ENV6)].* This would be consistent with other local authorities in the south-east (e.g.: Surrey Heath, Wiltshire) reflecting the degree of nature depletion in the area.

The Local Plan states that Biodiversity Net Gain (BNG) “must be delivered on site wherever possible or, where agreed on off-site land that supports strategic nature recovery initiatives such as Local Nature Recovery Strategies”. To ensure that this is effective, I would like to see:

* Objective criteria included to provide the basis for decisions as to when it is not possible to deliver BNG on site – rather than at this being based on the subjective opinion of the developer or their advisers [*Draft for Regulation* 18 Consultation, Page 16].
* Appropriate sanctions built into the plan to discourage inaccuracies in BNG measurement, for example not adequately reflecting/ categorising habitats and associated species (including seasonal variations). ***[****Draft for Regulation 18 Consultation, Page 163, para 5b.*
* Where BNG is delivered off-site this must deliver genuine biodiversity benefits for the borough rather than being directed into projects of limited value or locations outside Basingstoke & Deane. I suggest that the statement regarding delivery of off-site BNG is clearly cross-referenced to a list ofpriority biodiversity projects for the borough. [*Infrastructure Delivery Plan, page 38/ Draft for Regulation 18 Consultation Page 163 (ENV6].*

The success of BNG also depends upon clear processes being established to monitor developers’ compliance and this should be covered in the relevant measurement section of the Local Plan.

**Policy ENV6 - Biodiversity, Geodiversity and Nature Conservation (***Draft for Regulation 18 Consultation,* page 162-168.)

Policy ENV6 is welcomed, however, I would like to understand how this is going to be applied in practice – to ensure that compliance (or otherwise) is objectively measured. I would also like to see the following specific points covered in this policy:

* To ensure that developers’ ecological assessments are effective, it is important that they are obligated to base their survey reports on data from authoritative local sources – *including the Hampshire Biodiversity Information Centre*.
* ‘Supplementary Planning Document Biodiversity Landscape and trees’ is an important document as it sets out buffer zones between development and natural features such as woodlands and rivers. I would like the Local Plan to ensure that developments do not further damage local biodiversity by incorporating mandatory requirements for buffer zones, as follows:
* Woodlands/ Tree Belts – Minimum buffer 20m[[1]](#endnote-1)
* Hedgerows – Minimum buffer 5m[[2]](#endnote-2)
* Watercourses – Minimum buffer 20m[[3]](#endnote-3)
* Ponds – Minimum buffer 20m[[4]](#endnote-4)

[*Draft for Regulation 18 Consultation, page 167].*

**Other responses to the Climate Change and Ecological Emergencies**

Our valuable local chalk streams are in a particularly poor state, only 16% of designated rivers currently meet standards indicating good ecological health. I would therefore like to see the Local Plan:

* afford them, a higher level of protection from damage arising from development, aligned with the Catchment Based Approach’s Chalk Stream Strategy and Implementation plan (<https://catchmentbasedapproach.org/learn/chalk-stream-strategy-3/>) (*Draft for Regulation 18 Consultation, ENV5,* page 159-162)
* include an obligation on developers to contribute to investment in water supply and treatment infrastructure (avoiding additional burden on chalk aquifer abstraction) (*Draft for Regulation 18 Consultation, ENV9,* page 176-179).

**Application of the Local Plan**

Whilst I am aware that the Council needs to demonstrate that it can meet its housing supply obligations it is important that this does not override obligations on developers to submit proposals that protect and enhance our local biodiversity. Furthermore, inclusion of a development within the Local Plan must not be perceived as a carte blanche in terms of assumed approval of detailed proposals irrespective of the quality of the ecological assessment and proposals supporting individual applications.

The plan includes a statement that: “Proposals that would harm the green and blue infrastructure network will only be permitted in exceptional circumstances and any negative impact arising from the development must be wholly mitigated to the satisfaction of the council” [*Draft for Regulation 18 Consultation, page 172*]. To ensure that this represents an effective mechanism for preventing such harm a definition is required as to what constitutes “exceptional circumstances”, together with objective criteria against which the council can judge the satisfactoriness of proposed mitigation.

The Local Plan also needs to be supported by training, guidance, and communications to ensure that all those involved in the planning process understand the changes and correctly apply new policy.

**Conclusion**

As the Local Plan is intended to “set the planning policy framework for the area, guide future growth and change” [*Draft for Regulation 18 Consultation, page 6],* it is imperative that it provides clarity on how national policy is expected to be implemented locally.

To avoid further impacts on our local ecology and biodiversity, I would like to see the planning process supported by strong guidelines and objective evidence, as set out in this letter. I am confident that failure to implement these types of measure will ultimately further erode local biodiversity and contribute to the current crises.

I look forward to seeing the Council embrace this opportunity to set and enforce effective standards for future development.

Yours faithfully,

[Insert your name here]

1. 1) Tree health is dependent upon protection of root systems, which are approximately the same size as the tree canopy. 2) To ensure survival, trees need to be adequately insulated from the localised impact on the water table and from ground compaction, arising from adjacent development. 3) Where buffers are less than 20m, the zone of influence of developments will impact upon bat species for which tree/ woodland margins are vital corridors/ feeding territory. [↑](#endnote-ref-1)
2. 1) As per woodlands (but on a smaller scale reflecting relative size and extent of root systems). 2) In an increasingly fragmented landscape, hedgerows are becoming a critical habitat and means of connectivity for remaining wildlife. Buffer zones need to be sufficient to mitigate the impact of the zones of influence of human activity associated with residential developments on the habitats and natural behaviour patterns of species (e.g.: feeding corridors for bats, nesting for birds and hibernation locations for Hazel Dormice). [↑](#endnote-ref-2)
3. 1) Reduction of the impact of residential development on water quality and thereby species (e.g.: White Clawed Crayfish, Brown Trout). 2) Supporting environmental stability by moderating the speed and volume of water ‘run-off’ from the developed landscape. 3) Retaining critical marginal habitat for species which depend upon water and adjacent terrestrial habitats {e.g.: Water Vole, Otter, invertebrates, water course marginal flora). [↑](#endnote-ref-3)
4. As per watercourses. Additionally, it supports protection of terrestrial habitats for species of plants and animals (particularly amphibians) whose natural behaviours require both ponds and marginal land habitats. [↑](#endnote-ref-4)