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20 January 2026

Basingstoke and Deane Local Plan Update: Response to 'Local Plan Draft Spatial Strategy Regulation 18 Consultation'

Dear Sir or Madam,

Introduction

This letter, and the attachments, set out the comments of Natural Basingstoke (BDBC's community partner for nature conservation) on the draft Local Plan. Our comments are endorsed by Hampshire and Isle of Wight Wildlife Trust.

We acknowledge that there is a need for housing in the borough, however, this must be balanced against avoidance of damage to our natural environment. As a guiding document for future planning decisions, it is important that the Local Plan:

- incorporates a spatial strategy that is informed by comprehensive, up-to-date environmental evidence, avoiding the highest risk sites for development
- enshrines protection for our local environment now, rather than deferring it for future consideration, and
- provides a policy framework that supports responsible decision-making that is mindful of the Climate and Ecological Emergencies.

This response is in addition to Natural Basingstoke's comments, during the prior round of consultation on the Local Plan Update, contained in our letter dated 27 February 2024 (Appendix C).

Key principles

Natural Basingstoke acknowledges the difficult task faced by the Council in accommodating the significant increase in housing land-supply, imposed by the Government. Furthermore, we support the delivery of new homes and infrastructure, where this can be achieved in a manner that is environmentally responsible, legally robust, and spatially coherent.

We have undertaken a detailed analysis of the spatial strategy (see Appendix A, Annex A and supporting Figures). Our focus is on whether the Spatial Strategy has been lawfully prepared, whether reasonable alternatives have been properly tested, and whether the Plan embeds environmental constraints and opportunities at the strategic level, as required by national planning policy and environmental assessment law. We have concluded that:

- the spatial strategy is based on analysis that fails to:
    - demonstrate how reasonable alternatives have been considered and environmental limits have shaped, rather than followed, site selection
    - incorporate cumulative (and in-combination) effects analysis at the strategic level
    - treat flood risk and green and blue infrastructure as structuring constraints, rather than downstream mitigation issues
    - align the Spatial Strategy with the LNRS as a mapped spatial opportunity framework rather than a deferred policy aspiration.

- the proposals place our natural environment at significant risk as they are contingent upon unspecified *future* mitigation, *future* infrastructure provision and *future* decision-making processes, to address risks that arise from the current spatial configuration.

Our analysis indicates that the proposed spatial strategy focuses solely on matters related to the increase in housing need. Despite supporting evidence (i.e., the HRA and ISA), the spatial strategy does not appropriately consider the necessary protection, mitigation and conservation measures required to restore the natural environment, in tandem with delivering the required housing numbers. Housing need does not exist in a vacuum and, thus, housing supply and site allocation cannot be considered in isolation of other constraints, including the biodiversity and climate crises.

At this stage, we do not seek wholesale deletion of allocations. Our objective at Regulation 18 is strategic correction: to secure a Spatial Strategy that is capable of being found sound at examination and that does not defer fundamental environmental questions to later plan stages, future masterplanning, or development management. We recognise that robust reanalysis may result in changes to the composition of the site portfolio in order to reduce strategic environmental risk.

Given the threat that increased development presents to our environment, and in the light of the Climate and Ecological Emergencies declared by the Council, it is imperative that the Local Plan incorporates a network of connected and protected habitats now (rather than deferring this for future consideration). More information on our proposals in this respect can be found in Appendix B.

General points

Based upon comments made by Council representatives, during the consultation process, we offer a few clarifications on our response.

Firstly, as a charity whose purpose is nature conservation Natural Basingstoke's response inevitably focuses on ecological matters, however, we recognise that biodiversity is one of many factors that the Council has to consider when developing the spatial strategy. Never-the-less, it is important that *effective* consideration is given to biodiversity when coming to conclusions as to where development should be located.

Secondly, we support the aim of ensuring that a robust plan is swiftly developed to avoid either intervention in our planning process by central Govt., or continuation of the current situation where we are at risk of unconstrained development due to the shortfall in housing land-supply. However, our analysis demonstrates that adoption of the proposed spatial strategy would result in realisation of the very risk we seek to avoid – licensing development at ecologically sensitive sites with protection being dependent upon future unspecified mitigation.

Thirdly, whilst our response focuses on the Local Plan Update, we are mindful that action is needed to protect our local environment now. During the period whilst the Local Plan update is finalised, developers will continue to submit speculative planning applications which could place our environment at risk and result in significant degradation before the Local Plan is established. We urge the Council to use all avenues available to it to secure appropriate protection ***now***, for example by implementing policy changes and establishing network of green/ blue corridors across the borough.

Finally, we see no merit (for either party) in entering into a protracted debate about whether or not the Council has complied with basic legal obligations in creating its proposed spatial strategy. Our priority is to ensure that a) further analysis is undertaken leading to the exclusion of sites exhibiting the highest cumulative environmental risk, and b) appropriate environmental protection and spatial framework measures (e.g., designation of green corridors, appropriate buffer zones) are included within spatial planning and the supporting policy forming part of the Local Plan. We hope that our consultation response will be considered in a constructive manner, rather than simply precipitating a defensive response.

Conclusion

Natural Basingstoke is keen to work collaboratively with Basingstoke and Deane Borough Council to help shape the next iteration of the spatial strategy underpinning the updated Local Plan, to ensure that it incorporates appropriate protection for nature and development is directed to lower-risk locations.

Decisions taken now will have implications for our future, that of subsequent generations and other species that do not have a voice. It is therefore imperative that effective consideration

is given to the impact on our natural environment and plans are developed, to protect and restore nature now, rather than at some unspecified future date.

Yours faithfully

Gillian Smallman,
Natural Basingstoke, Chair

Attachments:

- Appendix A – Natural Basingstoke response to Local Plan (Reg 18) Consultation
- Appendix B – Strategic Wildlife Corridors
- Appendix C – Natural Basingstoke response to 2023/4 Local Plan Consultation

Natural Basingstoke

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APPENDIX A: NATURAL BASINGSTOKE RESPONSE TO LOCAL PLAN (REG 18) CONSULTATION

Spatial Strategy, Strategic Environmental Assessment, and Green / Blue Infrastructure

0. EXECUTIVE SUMMARY

0.1 Natural Basingstoke supports the delivery of new homes and infrastructure where this can be achieved in a manner that is environmentally responsible, legally robust, and spatially coherent.

0.2 This representation responds to the Regulation 18 consultation on the draft Spatial Strategy and its supporting Integrated Impact Assessment (IIA), including the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). Our focus is on whether the Spatial Strategy has been lawfully prepared, whether reasonable alternatives have been properly tested, and whether the Plan embeds environmental constraints and opportunities at the strategic level, as required by national planning policy and environmental assessment law.

0.3 We do not seek wholesale deletion of allocations at this stage. Our objective at Regulation 18 is strategic correction: to secure a Spatial Strategy that is capable of being found sound at examination and that does not defer fundamental environmental questions to later plan stages, future masterplanning, or development management. Any references to individual allocations within this representation are used illustratively, to demonstrate systemic weaknesses in the spatial strategy and its supporting environmental assessment and should not be read as site-specific representations or requests for determination at this stage.

0.4 In particular, this submission seeks to secure:

- a lawful and transparent SEA reasonable alternatives process
- a coherent and explicit approach to cumulative and in-combination effects
- proper integration of flood risk, green and blue infrastructure, and ecological connectivity as spatial structuring factors, not downstream mitigation issues; and

- explicit alignment with the published Hampshire Local Nature Recovery Strategy (LNRS) as a statutory spatial evidence base and opportunity framework, rather than a deferred policy aspiration.

1. SCOPE AND PURPOSE OF THIS REPRESENTATION

1.1 This submission addresses the Spatial Strategy, the Key Diagram, and the IIA (including SEA and HRA), insofar as they function as strategic determinants of site selection and spatial distribution.

1.2 We do not comment on detailed development management matters, mitigation layouts, or future masterplanning. Nor do we accept that deficiencies in the Spatial Strategy or SEA can be cured solely at Regulation 19, through Supplementary Planning Documents, or via project-level assessment at application stage, without undermining the purpose of Regulation 18 consultation.

1.3 Site-specific examples are used illustratively, to demonstrate systemic issues in spatial logic, alternatives testing, and environmental integration. They are not advanced as detailed objections to individual site designs or planning applications.

2. THE STRATEGIC ROLE OF ENVIRONMENTAL CONSTRAINTS IN PLAN-MAKING

2.1 National planning policy and the SEA Regulations require environmental considerations to be integrated upstream in plan-making. Flood risk, ecological networks, landscape character, groundwater protection, and green and blue infrastructure should shape the identification and distribution of growth, rather than being addressed primarily as secondary mitigation considerations. This approach reflects national planning policy and the SEA Regulations, which require environmental considerations to inform spatial strategy and reasonable alternatives at the earliest stage of plan-making, rather than being deferred to later mitigation.

2.2 The draft Spatial Strategy repeatedly relies on later stages—masterplanning, site briefs, or future assessment—to address matters that should have informed site selection and spatial distribution at Regulation 18 stage.

2.3 The consequence is a Spatial Strategy that appears coherent at a high level, but which becomes less robust when tested against the Plan's own evidence base and mapped environmental constraints. This raises a legitimate question as to whether environmental assessment has meaningfully informed spatial choice, as required by the SEA Regulations, particularly in relation to locations whose development would permanently foreclose future strategic options for landscape-scale nature recovery and green infrastructure once other committed allocations are delivered.

3. REASONABLE ALTERNATIVES IN THE SEA

3.1 The SEA Regulations require the identification, description and evaluation of reasonable alternatives that are genuinely capable of meeting the Plan's objectives, with the aim of avoiding or reducing significant environmental effects at the earliest possible stage. This is a statutory requirement of the SEA Regulations, which oblige plan-makers to assess reasonable alternatives as an integral part of plan preparation, not as a retrospective justification of a preferred strategy.

3.2 In order to examine how this requirement has been applied in practice, Natural Basingstoke has undertaken a GIS-based screening of all SPS5 allocations against a defined set of ecological, hydrological, landscape and policy constraints. The results are presented in Annex A (SPS5 Ecological and Policy Constraints Screening), submitted alongside this representation.

3.3 Each allocation has been assessed on a transparent binary basis (1 = present; 0 = absent) against eleven strategic constraint categories, including:

- Flood Zones 2 and 3
- surface water flood risk
- ancient woodland and a 250 m buffer
- priority habitat inventory and a 100 m buffer
- SINCs and buffers
- SSSIs and a 100 m buffer
- Local Nature Reserves and buffers
- statutory river corridors (buffered)
- groundwater Source Protection Zones

- Local Green Spaces; and
- landscape character sensitivity areas.

3.4 For each allocation, a cumulative constraint count has been calculated as the sum of applicable constraints. This does not represent a site suitability score or an exclusion test. It is presented as a comparative indicator of relative strategic environmental exposure.

3.5 The screening demonstrates that no SPS5 allocation is free of material ecological, hydrological or landscape constraint, and that there is substantial variation in cumulative constraint exposure between sites.

3.6 Of particular relevance to SEA, constraint severity varies markedly between allocations. Several sites are subject to very high cumulative constraint counts, indicating acute cumulative sensitivity rather than marginal or isolated effects.

3.7 Despite this variation, the Environmental Report does not demonstrate—through transparent comparative reasoning—how avoidance-led spatial selection has been applied, nor how allocations subject to materially higher cumulative constraint exposure have been justified relative to less constrained alternatives **(see Annex A and Figures 1.1–1.3)**.

3.8 Instead, environmental constraints are predominantly treated as matters to be addressed through site-specific design and future assessment, rather than as considerations capable of shaping, refining, or differentiating spatial alternatives at Regulation 18 stage.

3.9 The concern is therefore not that constrained sites have been selected, but that the SEA does not yet demonstrate why spatial configurations exhibiting materially lower cumulative environmental exposure were identified and discounted, or whether such configurations were ever tested as reasonable alternatives before the preferred SPS5 portfolio was selected. In this context, it is also unclear whether unexamined spatial assumptions—such as the treatment of major transport infrastructure as fixed planning boundaries rather than permeable ecological interfaces—have unduly constrained the scope of reasonable alternatives considered.

4. AGGREGATION AND CUMULATIVE EFFECTS IN THE IIA

4.1 The IIA relies heavily on aggregation of effects across strategic growth areas. While aggregation has a role in strategic appraisal, it is not a substitute for assessing cumulative spatial interaction. National planning policy and SEA practice require cumulative and in-combination effects to be assessed in a manner that reflects spatial interaction and system-level change, rather than relying solely on aggregated scoring.

4.2 The constraint screening in Annex A shows that cumulative effects are embedded in the spatial pattern of allocations, through repeated interaction with the same classes of environmental constraint.

4.3 Higher cumulative constraint exposure is typically driven by combinations of priority habitats and buffers, flood risk and surface water pathways, landscape sensitivity areas, proximity to designated ecological assets, and chalk stream and headwater catchments.

4.4 In addition, cumulative effects arise through repeated loss or fragmentation of the same scarce habitat types and ecological functions across multiple allocations, a dimension of cumulative impact that is not explicitly assessed in the Environmental Report.

4.5 These interactions operate at landscape and catchment scale and cannot be meaningfully resolved through site-level mitigation alone once the spatial pattern of growth has been fixed, particularly where incremental severance or narrowing of ecological corridors gives rise to threshold effects that are irreversible at plan scale.

4.6 While the IIA includes narrative discussion of cumulative effects, it does not clearly explain how cumulative spatial interaction has influenced the weighting or selection of alternative spatial strategies.

4.7 The SEA also does not assess whether the cumulative spatial pattern of allocations gives rise to threshold or tipping-point effects, whereby incremental losses result in disproportionate or irreversible impacts on disturbance-sensitive species and ecological systems. In particular, the assessment does not test whether sufficient contiguous, low-disturbance habitat remains, at a strategic scale, to sustain viable populations once all preferred allocations are delivered. Such effects cannot be reliably addressed through site-by-site mitigation once the spatial strategy has been fixed.

5. FLOOD RISK AS A STRATEGIC SPATIAL CONSTRAINT

5.1 The Council's Strategic Flood Risk Assessment identifies extensive areas of fluvial and surface water flood risk across the borough.

5.2 Natural Basingstoke's GIS screening is consistent with the Council's evidence base and demonstrates that flood-related constraints recur across the SPS5 portfolio, frequently in combination with ecological and landscape sensitivities.

5.3 Flood risk contributes materially to higher cumulative constraint exposure at numerous allocations.

5.4 This pattern raises a legitimate question as to whether flood risk has functioned as an early **spatial structuring filter** in the identification of growth locations, or whether strategic exposure has been accepted and deferred for downstream mitigation rather than avoided through spatial configuration.

5.5 The Spatial Strategy does not yet demonstrate at a strategic, portfolio level how lower-risk spatial configurations were systematically prioritised at plan-making stage, nor how the Sequential Test has informed the overall distribution of growth, as distinct from site-level mitigation requirements. This is contrary to national policy expectations that flood risk is addressed through sequential, plan-led site selection before reliance is placed on site-specific mitigation or design responses.

5A. CHALK STREAMS AS STRATEGIC HYDROLOGICAL AND ECOLOGICAL SYSTEMS

5A.1 Chalk streams are a nationally rare and internationally important habitat, dependent on stable groundwater flows, high water quality, and intact catchment-scale processes. Their ecological function is inherently spatial and cumulative, extending well beyond the channel itself. These characteristics engage statutory plan-making duties that require avoidance of significant environmental harm where reasonably possible, rather than reliance on uncertain downstream controls once spatial choices have been fixed.

5A.2 The borough contains, and hydrologically influences, multiple chalk stream systems and headwaters. These systems are sensitive to:

- changes in groundwater abstraction and recharge
- increased surface water runoff and pollution pathways; and
- fragmentation of riparian and catchment-scale green infrastructure.

5A.3 Impacts on chalk streams typically arise in-combination across catchments, through multiple developments interacting over time. As such, they present risks that are difficult to characterise or resolve solely through site-by-site mitigation once the spatial pattern of growth has been fixed.

5A.4 The GIS screening undertaken by Natural Basingstoke identifies repeated interaction between SPS5 allocations and:

- groundwater Source Protection Zones
- river corridors and headwaters; and
- areas identified in the LNRS as priority river and wetland networks.

5A.5 Despite this, the Spatial Strategy and SEA do not clearly demonstrate how chalk stream sensitivity and catchment-scale risk have informed the location, distribution, or cumulative scale of growth.

5A.6 This raises a specific concern that the Plan relies on downstream mitigation to address impacts on chalk stream systems, rather than applying an avoidance-led spatial strategy at Regulation 18 stage, where the opportunity to prevent harm is greatest.

5B. WATER QUALITY AND WASTEWATER DEPENDENCY AS STRATEGIC RISKS

5B.1 Chalk stream and groundwater-fed river systems are particularly sensitive to changes in water quality, nutrient loading, and discharge regime, as well as to hydrological alteration.

5B.2 Several SPS5 allocations rely on existing or upgraded wastewater treatment infrastructure discharging within, or upstream of, sensitive catchments. Impacts arising from wastewater capacity and water quality are therefore cumulative and catchment-wide in nature.

5B.3 The Spatial Strategy and IIA do not clearly demonstrate how reliance on future wastewater infrastructure upgrades has been factored into the comparative assessment of spatial alternatives, nor how uncertainty around delivery timing and effectiveness has been addressed at plan-making stage.

5B.4 Prolonged and repeated storm discharge performance within relevant catchments reinforces that this is not a theoretical future risk but an evidenced strategic constraint. HIWWT report that Silchester Wastewater Treatment Works discharged to Silchester Brook 97 times in 2024 for a total of 1,685 hours, illustrating the scale of performance uncertainty that can arise within the borough's receiving waters. The Environment Agency's EDM annual returns provide the regulatory basis for assessing spill frequency and duration and confirm that, nationally, spill durations in 2024 remained unacceptably high. Moreover, Thames Water's own documentation for Silchester records that capacity enhancement works were delivered in 2024, with effectiveness to be evaluated through subsequent spill data—underscoring that improvement pathways exist but outcomes and timing are not certain at plan-making stage. The SEA/IIA should therefore explicitly treat wastewater headroom, upgrade deliverability and contingency as comparative factors in spatial alternatives testing and phasing, rather than assuming that future schemes will resolve risk without influencing the distribution and sequencing of growth.

5B.5 The concern is not that solutions cannot exist, but that strategic uncertainty is being deferred, rather than informing avoidance-led spatial selection at Regulation 18 stage.

6. GREEN AND BLUE INFRASTRUCTURE AS STRUCTURING ELEMENTS

6.1 The borough's adopted Green Infrastructure Strategy establishes green and blue infrastructure as a strategic network whose continuity, function and resilience should inform spatial planning decisions, including the safeguarding of continuous ecological corridors rather than fragmented or residual green spaces. This reflects the national planning policy approach that strategic green and blue infrastructure functions as part of the spatial framework for growth, rather than as a matter confined to site-level design.

6.2 However, the Spatial Strategy treats green and blue infrastructure largely as an internal design consideration within individual allocations, rather than as a determinant of where

growth should and should not occur, resulting in corridor fragmentation that cannot be remedied through later masterplanning alone.

Natural Basingstoke has previously worked constructively with developers and public landowners to secure a continuous ecological corridor at spatial-framework level, linking public and charitable landholdings without frustrating housing delivery. That work demonstrates that corridor continuity can be defined, mapped, and safeguarded early—before allocation layouts are fixed—where green infrastructure is treated as spatial infrastructure rather than deferred to site-level mitigation. This example is cited illustratively to demonstrate feasibility at spatial-framework stage, not to determine the merits of any individual allocation, and is shown in Figure 1.4 (Cufaude Lane Green Corridor - Illustrative example of continuous green corridor at spatial strategy scale).

6.3 Natural Basingstoke's GIS analysis identifies repeated interaction with, and pressure upon:

- river corridors and riparian habitats
- landscape-scale green links
- priority habitat networks; and
- areas identified as strategic green infrastructure assets.

6.4 Once constrained at the strategic scale, the ecological and hydrological function of these networks cannot be fully restored through site-level mitigation. The impact is structural rather than cosmetic. Appendix B provides illustrative, mapped evidence demonstrating how the absence of a spatially defined ecological corridor framework has limited the role of avoidance-led planning and reasonable alternatives testing at Regulation 18 stage.

7. THE ROLE OF THE HAMPSHIRE LOCAL NATURE RECOVERY STRATEGY (LNRS)

7.1 The published Hampshire Local Nature Recovery Strategy constitutes a statutory spatial evidence base which the Council is required to have regard to in plan-making, particularly in relation to ecological connectivity and nature recovery priorities.

7.2 The LNRS identifies priority habitats, opportunity areas and ecological corridors, including river, chalk stream and wetland networks, intended to deliver a coherent and resilient nature recovery network.

7.3 The Spatial Strategy does not yet demonstrate how its pattern of growth safeguards the integrity of LNRS-identified ecological corridors, or how corridor continuity has informed spatial selection, including how the growth pattern:

- avoids fragmentation of LNRS-identified corridors
- capitalises on LNRS opportunity areas; or
- contributes to network coherence rather than isolated, site-level enhancement.

7.4 The LNRS is not advanced as determinative of individual allocations. Rather, at Regulation 18 stage it provides a legitimate alignment and opportunity benchmark against which the spatial distribution of growth should be tested, and its role should not be deferred to later plan stages. In particular, the absence of LNRS 'priority' or 'opportunity' mapping in a given location should not be interpreted as evidence of low strategic value, given the LNRS's acknowledged evolving status, data limitations and dependence on land availability and delivery mechanisms. Where LNRS principles are applied primarily at the mitigation or enhancement stage rather than informing avoidance-led site selection, there is a risk that ecological corridors are treated as discretionary enhancements rather than spatial infrastructure, undermining the preventative purpose of plan-level environmental assessment.

7A. LOCAL GREEN SPACE DESIGNATION AND COMMUNITY-LED GREEN INFRASTRUCTURE

7A.1 National planning policy recognises Local Green Space designation as a plan-led mechanism for safeguarding green areas of demonstrable local significance, intended to be identified through the plan-making process and afforded long-term protection where justified. Where used appropriately, Local Green Space functions not as ad hoc designation, but as part of the wider spatial framework for green infrastructure, community wellbeing and ecological resilience.

7A.2 The Council has previously relied on Local Green Space designation through both neighbourhood planning and Local Plan processes, including the use of structured promotion mechanisms to enable communities to identify and evidence candidate sites at an early stage. However, the Regulation 18 consultation material does not set out any equivalent

mechanism, timetable, or evidential framework through which Local Green Spaces may be identified, assessed, or integrated within the emerging Spatial Strategy.

7A.3 This omission is material. In the absence of a defined process at Regulation 18 stage, opportunities for community-valued green spaces to contribute to spatial alternatives, green infrastructure continuity and LNRS delivery are effectively foreclosed or deferred. This is particularly significant given the Plan's stated reliance on neighbourhood plans for local green space protection, without clarity as to how Local Plan-led growth is intended to interact with, complement or safeguard such designations in areas where neighbourhood plans are absent, under review, or lag behind the Local Plan timetable.

7A.4 The absence of a Local Green Space identification framework also weakens the Plan's alignment with the Hampshire Local Nature Recovery Strategy. Many locally valued green spaces perform functional roles as stepping -stones, buffers, or connective tissue within wider ecological networks, even where they are not mapped as LNRS "priority" areas. Without a mechanism to identify and consider such spaces at plan-making stage, the Spatial Strategy risks treating community-scale green infrastructure as a residual outcome of site design, rather than as part of the spatial logic informing growth distribution and alternatives testing.

7A.5 Natural Basingstoke has deliberately not submitted site-specific Local Green Space nominations as part of this representation. In the absence of a lawful, transparent, and community-facing mechanism provided by the Council, doing so would pre-empt community-led designation and risk conflating strategic plan-making issues with site-level advocacy. The issue raised here is therefore not the merits of individual sites, but the absence of a plan-making process capable of identifying, testing, and integrating Local Green Spaces as part of the Spatial Strategy.

7A.6 To address this gap, the Council should clarify, prior to Regulation 19, how Local Green Space designation is intended to function within the Local Plan framework, including:

- whether and how Local Green Spaces may be promoted at plan-making stage
- how such designations will be assessed alongside other spatial alternatives
- how Local Green Spaces will be integrated with the Green Infrastructure Strategy and LNRS; and

- how reliance on neighbourhood planning will operate in practice where neighbourhood plan coverage or timing is incomplete.

7A.7 Without such clarification, the Plan risks proceeding to the next stage without having tested a reasonable and policy-supported spatial option for safeguarding locally significant green spaces, undermining both the robustness of the SEA reasonable alternatives assessment and the coherence of the green and blue infrastructure framework.

8. SITE-SPECIFIC EVIDENCE AS ILLUSTRATION OF STRATEGIC PATTERNS

8.1 Site-specific evidence is used here to illustrate systemic patterns rather than to assess individual site acceptability.

8.2 The constraint screening identifies several SPS5 allocations subject to particularly acute cumulative constraint exposure. By way of illustration:

- TAD016 and STE001 each intersect 11 strategic constraints, including hydrological, ecological and landscape sensitivities
- OLD001, CLID011 and OAK001 each intersect 10 constraints, placing them amongst the most constrained sites in the SPS5 portfolio
- a further group of allocations, including MWE004, BAS037 and HI011, intersect nine constraints.

8.3 At the other end of the spectrum, even the least constrained allocations intersect at least one material constraint and cannot be characterised as unconstrained or low-impact options.

8.4 These figures are not presented to assert that development would necessarily be unacceptable in principle. Rather, they demonstrate that:

- constraint severity varies significantly between sites
- several allocations are subject to extreme cumulative sensitivity: and
- the Plan does not clearly evidence how this variation has informed spatial selection.

8.5 In the absence of such explanation, the robustness of the SEA and reasonable alternatives assessment remains open to question.

9. QUESTIONS THE PLAN MUST ANSWER AT EXAMINATION

9.1 In its current form, the Plan leaves unanswered a series of questions that an Inspector is likely to probe, including:

- How were reasonable alternatives genuinely tested, and why were lower-impact spatial options rejected?
- How does the Plan minimise cumulative flood risk at borough and catchment scale?
- How does the growth pattern protect and enhance green and blue infrastructure networks as strategic assets?
- How is the LNRS embedded as a spatial framework rather than treated as a policy aspiration?
- Why are key environmental risks deferred to later stages rather than resolved through the Spatial Strategy?

9.2 These are not matters of detailed design. They go directly to plan-making legality and soundness.

10. CONCLUSION AND REQUESTED ACTION

10.1 Natural Basingstoke urges the Council to use Regulation 18 to re-open and strengthen the Spatial Strategy, rather than entrenching a pattern of growth that remains vulnerable at examination.

10.2 In particular, we request that the next iteration of the Plan:

- revisits the SEA reasonable alternatives framework with genuinely distinct spatial options
- explicitly incorporates cumulative effects analysis at the strategic level;
  treats flood risk and green and blue infrastructure as structuring constraints, not downstream mitigation issues
- aligns the Spatial Strategy with the LNRS as a mapped spatial opportunity framework; and demonstrates how environmental limits have shaped, rather than followed, site selection

- clarifies how Local Green Space designation will be identified, assessed, and integrated at plan-making stage, including its relationship to neighbourhood planning, green infrastructure delivery and the LNRS, rather than being deferred or left procedurally undefined (see Section 7A)
- demonstrates (within the Spatial Strategy and SEA/IIA), through explicit alternatives testing and phasing analysis, how known wastewater performance constraints and infrastructure deliverability uncertainty have informed the selection, distribution, and sequencing of growth, in accordance with the SEA Regulations' requirement to assess reasonable alternatives and avoid deferral of material environmental risk.

10.3 Addressing these issues now will materially improve the Plan's prospects of being found sound and reduce reliance on uncertain future mitigation at later stages.

10.4 A consistent theme across the Spatial Strategy, SEA and IIA is reliance on future mitigation, future infrastructure provision and future decision-making processes to address risks that arise from the current spatial configuration. While some degree of future refinement is inevitable, the cumulative reliance on unresolved future mechanisms raises a legitimate question as to whether the Plan, as currently drafted, is sufficiently justified and effective at Regulation 18 stage.

ANNEXES (REFERENCED)

- Annex A / Table NB-1 SPS5 Ecological and Policy Constraints Screening (CSV-based GIS analysis)
- Fig 1.1 Strategic Constraint Interaction Map (Natural Basingstoke GIS Screening)
- Fig 1.2–1.3 Allocation-Specific Constraint Maps

MAP EXPLANATION: STRATEGIC CONSTRAINT INTERACTION AND THE ABSENCE OF A SPATIAL GREEN–BLUE FRAMEWORK

1. **Figures 1.1–1.3** illustrate the interaction of key strategic environmental systems across the Regulation 18 spatial strategy area, including hydrology and flood risk, groundwater source protection zones, ecological networks (priority habitats, ancient woodland, and designated sites), and landscape character. These figures are presented to demonstrate

spatial interaction at strategy scale, not to assess site-level impacts or development acceptability.

2. **Figure 1.1** (Strategic Constraint Interaction Map) shows that the preferred spatial strategy has been defined in areas where multiple strategic systems coincide. Floodplains and surface water corridors, groundwater protection zones of varying sensitivity, and extensive ecological networks operate as continuous, landscape-scale systems rather than discrete, site-specific constraints.

3. The figure also shows that these systems are not currently organised or structured through a borough-wide green and blue infrastructure framework capable of shaping development distribution, form, or capacity at plan-making stage.

4. The key issue arising from Figure 1.1 is not the presence of constraints—which are widely acknowledged in the Plan—but the absence of an overarching spatial framework that integrates these interacting systems before allocations are relied upon to define the Spatial Strategy.

5. Instead, the Plan addresses these matters predominantly through individual site policies and future masterplanning, indicating a site-by-site approach to constraints rather than an upstream, spatially led strategy.

6. **Figures 1.2 and 1.3** provide inset illustrations for allocations located beyond the main Basingstoke strategy area (including SPS5.15 Mortimer West and SPS5.14 Oakley Farm, Wash Water). These insets demonstrate that similar patterns of interaction between water systems, groundwater sensitivity, ecological networks and landscape context occur across the wider borough. They are included to show that strategic constraint interaction is a borough-wide consideration, not confined to the main growth area.

7. Taken together, Figures 1.1–1.3 demonstrate that the Regulation 18 Spatial Strategy has been prepared without a binding, mapped green and blue infrastructure framework capable of organising these strategic systems across and between allocations. This absence is significant at Regulation 18 stage, as green and blue infrastructure functions as spatial infrastructure, not mitigation, and should therefore shape the identification and configuration of spatial alternatives before the preferred strategy is fixed.

8. These figures do not propose alternative sites, corridor alignments or mitigation solutions. Their purpose is to evidence that, at present, the Spatial Strategy relies on deferred resolution of interacting environmental systems rather than demonstrating how those systems have been used to structure the strategy itself. This represents a fundamental gap in the Regulation 18 spatial framework that must be addressed before the Plan can progress with confidence to Regulation 19.

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APPENDIX B: STRATEGIC WILDLIFE CORRIDORS

1. Introduction

1.1 Under the Environment Act (2021) Basingstoke and Deane Borough Council has a duty to "have regard to the Local Nature Recovery Strategy" when producing its Local Plan. Furthermore, Planning Practice Guidance requires local planning authorities to "be aware of those areas mapped and identified in the LNRS, and the measures proposed in them, and consider how these should be reflected in their local plan".

1.2 The Local Plan Draft Spatial Strategy for Basingstoke and Deane does not yet demonstrate how regard has been paid to these obligations, including how the emerging LNRS evidence base has informed the identification, comparison, and selection of spatial alternatives. This appears to reflect the timing of the publication of the Hampshire Local Nature Recovery Strategy relative to preparation of the draft Spatial Strategy.

1.3 The Local Nature Recovery Strategy for Hampshire Local Habitat Map, includes a network for 'wildlife corridors' across our borough[1], comprising of a combination of Areas of Particular Importance for Biodiversity (APIB) and Areas that Could become Important for Biodiversity (ACB). Together these represent what is regarded as the optimal "locations to create, restore and enhance habitats, providing the best opportunities to deliver nature's recovery".

1.4 In 2021, Basingstoke and Deane Borough Council declared an Ecological Emergency, and this was followed by production of a Biodiversity Strategy in 2023. In 2025, the Council also passed a motion to formally recognise the Declaration and the principles of rights of rivers. These initiatives demonstrated a clear, public, intent on the part of the local Council to take pro-active measures reverse ecological decline and enable nature restoration.

1.5 Analysis of the Local Plan Spatial Strategy identifies numerous conflicts between sites allocated for development and networks included in the LNRS Local Habitat map. Due to the scale of this overlap, the current spatial strategy risks failing to contribute to nature recovery and, in the absence of avoidance-led spatial correction at plan-making stage, risks embedding patterns of growth that exacerbate fragmentation and ecological decline.

1.6 Whilst the LNRS does not "limit choices land managers have on their land", if the Council is serious about its commitment to restore our natural environment a strategic approach needs to be adopted to allocation of land for nature. This will enable expectations to be set now for how development can proceed across the borough, ensuring that:

[1] It is worth noting that as the Hampshire LNRS is county-wide it is at high level and neglects some areas worthy of protection within our borough.

- when land is offered for development, landscape features that form part of the mapped network of wildlife corridors are afforded appropriate protection within both the design of developments and the conditions attached to approved planning applications
- the Council can adopt a pro-active approach to acquiring land for Biodiversity Net Gain and incentivising landowners to manage their land for nature, as envisaged by the Biodiversity Strategy.

1.7 We understand that the Council is currently producing an updated 'Green and Blue Infrastructure" Stategy, however, it is important that a protected area of wildlife corridors is an integral part of the Local Plan, ensuring that this network is given appropriate weight in planning decisions.

1.8 To comply with its obligations under the Environment Act (2021) and Planning Practice Guidance, the Council must give consideration as to how the corridors mapped within the LNRS are reflected in the Local Plan. For this to be effective, appropriate environmental protection and spatial framework measures (e.g., designation of green corridors, appropriate buffer zones) must be included within spatial planning and the supporting policy forming part of this plan. Failure to adopt this strategic approach will undermine the commitments already made by the Council in relation to our natural environment (see para 1.4), perpetuating the current piecemeal approach to development which prevents creation of an inter-connected natural landscape.

1.9 The sections below review the landscape directly surrounding Basingstoke by reference to corridors identified in the LNRS Local Habitat Map. The examples contained within each section are illustrative and represent neither exhaustive nor detailed proposals for a network of wildlife corridors across the borough.

2. North Basingstoke

2.1 Land to the immediate north of Basingstoke comprises a mosaic of land parcels owned by the Forestry Commission, National Trust, MoD, and Hampshire County Council. There is also a tranche of land that is proposed for development in the Local Plan (BRAM011- Land west of Upper Cufaude Farm) and a development that has recently been approved (24/00446/FUL – Land at Upper Cufaude Farm).

2.2 The landscape in this area includes a patchwork of ancient woodland remnants and riparian corridors and is home to a wide range of open countryside species (such as Hazel Dormice) and a nationally significant population of Common Toads.

2.3 To date development in this area has progressed in an ad-hoc manner without consideration of the wider landscape context. The result has been progressive urban

expansion to the north of Basingstoke, and loss and fragmentation of wildlife habitat. Developers attempts to address this have focused on creation of multi-user green spaces (shared between wildlife, people – and their pets), which fail to adequately protect the natural environment or address connectivity between green spaces.

2.4 Figure 1.4 uses the LNRS for Hampshire Local Habitat Map (north Basingstoke) as a framework for a more detailed illustration of a prospective wildlife corridor in this landscape. This is based on a concept developed by Natural Basingstoke, with the in-principle endorsement of Hampshire and Isle of Wight Wildlife Trust.

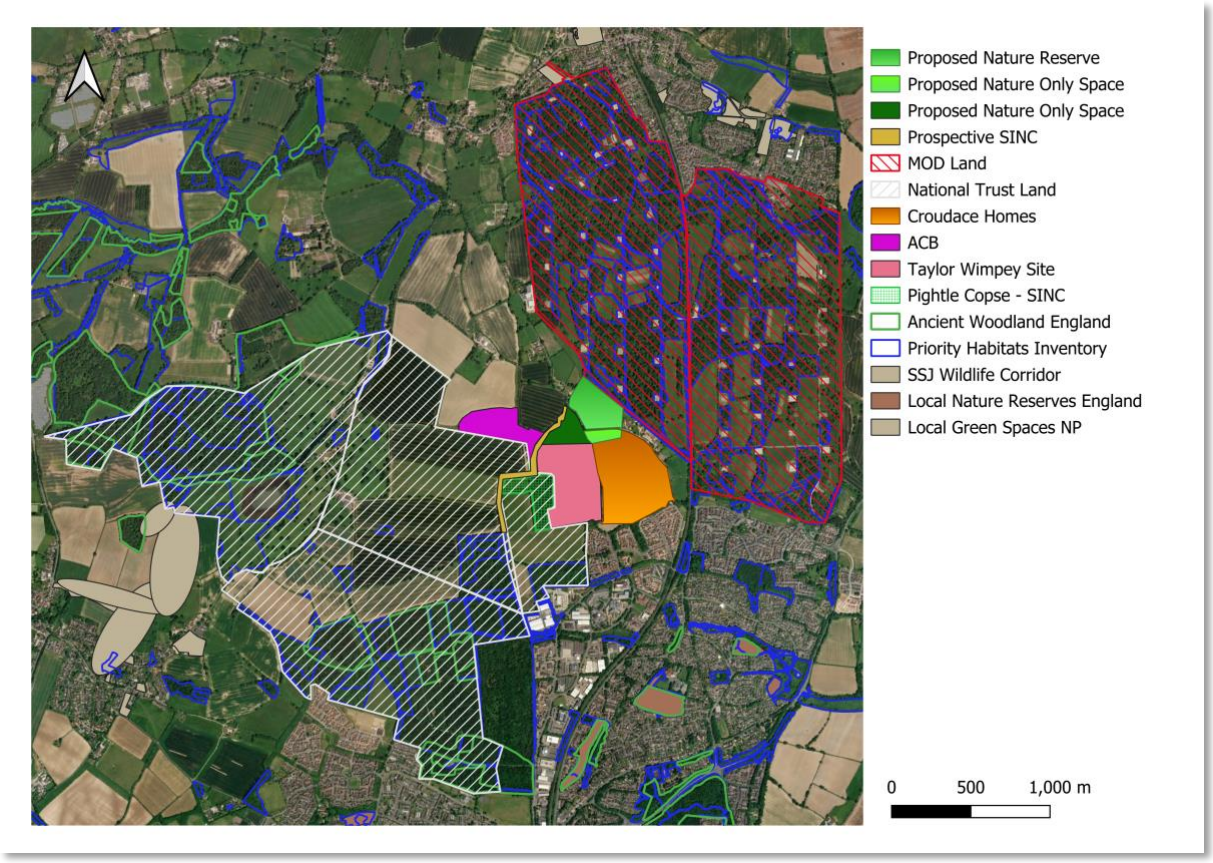

Figure 1.4 - Illustrative example of continuous green corridor at spatial strategy scale

Note: The purpose of this illustration is to demonstrate how ecological corridor continuity can and should be considered at spatial strategy stage as part of reasonable alternatives testing, rather than being deferred to site design or project-level mitigation. It does not represent a proposed allocation layout, mitigation scheme or determination of development acceptability.

2.5 As development progressively encroaches upon open countryside, converging on the strategic gap between Basingstoke and Bramley, and given plans for further housing, there is a pressing need to establish a wildlife corridor in this area. There is also significant potential for a northern green corridor, due to the nature of many of the landowners in this area. This example

is included to illustrate the potential for the spatial framework for this area, to incorporate environmental protection, as an integral part of the Local Plan.

3. West Basingstoke

3.1 Land to the immediate west of Basingstoke is a major focus for development within the Local Plan. In particular, Manydown North (BAS037) and Manydown South (OAK001) (together with already approved development at Manydown North) account for a significant proportion of the new homes to be built across the borough.

3.2 The landscape in this area is on the boundary of the North Wessex Downs National Landscape and associated with remnants of both chalk downland and ancient woodland. The area is also known as an important habitat for rare arable plants.

3.3 To the west of Basingstoke a significant project, to develop land bordering Roman Road, is in its early stages. This development will incorporate a Countryside Park (including areas dedicated to nature) and further landscape connectivity throughout and adjacent to the development. This provides a blueprint for the approach that could be adopted at Manydown South (and adjacent developments).

3.4 Historically there has been extensive development south-west of Basingstoke, without consideration of the wider landscape context. The result has been progressive urban expansion in this area, and loss and fragmentation of wildlife habitat.

3.5 Figure 1.5 is based on an extract from the LNRS for Hampshire Local Habitat Map, showing the landscape immediately to the west of Basingstoke. The wildlife corridor illustrated within the LNRS extends southwards through north and south Manydown before branching westward, linking up chalk downland and ancient woodland habitats stretching from Kempshott, via Oakley to the riparian landscape associated with the River Test. It also links the following in the wider landscape:

- Hatch Warren Biodiversity Improvement Zone
- Beggarwood Local Nature Reserve
- Old Down SINC

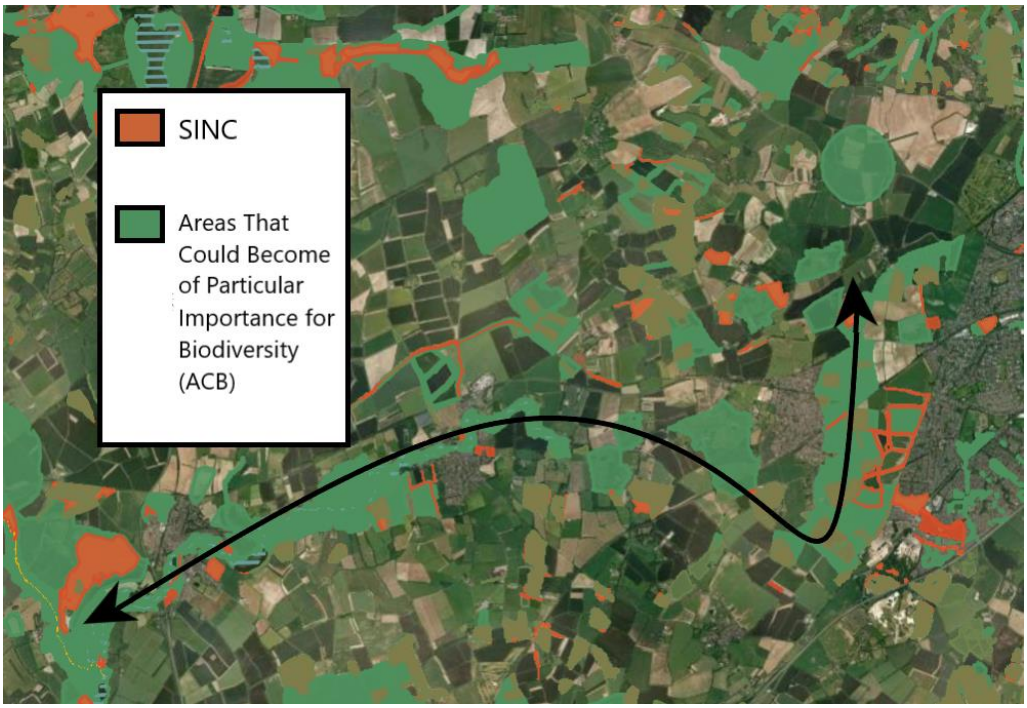

Figure 1.5 - LNRS west of Basingstoke wildlife corridor

3.6 As development progressively encroaches upon open countryside, converging on the strategic gap between Basingstoke and towns and villages to the west (such as Oakley), there is a pressing need to establish a wildlife corridor in this area. Planned development also runs the risk that the Council's own efforts to promote biodiversity in this area will be undermined by fragmentation, isolating important habitats such as Old Down SINC (a prospective Local Nature Reserve) from the wider natural landscape. North Manydown provides a useful precedent for how a spatial framework can be established at plan-making stage to safeguard corridor continuity, without pre-judging allocation layouts or development acceptability.

4. East Basingstoke

4.1 The boundary of the borough lies close to the eastern edge of Basingstoke with the result that there is limited scope for development in this area. The local landscape is particularly important as a riverine habitat, being the location of a rare and threatened chalk stream (the River Loddon and associated tributaries). It also includes areas of valuable wet woodland (carr) landscape, at Black Dam Ponds and Basing Fen and incorporates two Local Nature reservices (Mill Field and Black Dam & Crabtree).

4.2 In recent years small pockets of land in the area have been progressively developed and the continuation of this process is evident in inclusion of sites such as OLD-01 and OLD-02 within the Local Plan. This is resulting in progressive urbanisation, connecting Basingstoke with Old Basing, increasingly threating incursion into the riparian landscape around the Loddon, and driving loss and increasing isolation of key wildlife habitats.

4.3 Figure 1.6 is based on an extract from the LNRS for Hampshire Local Habitat Map, showing the landscape immediately to the east of Basingstoke. The wildlife corridor illustrated within the LNRS extends southwards along the riparian boundary of the River Loddon, via the Black Dam and Crabtree Nature Reserve to the landscape south of the M3 within which springs rise that feed the Loddon.

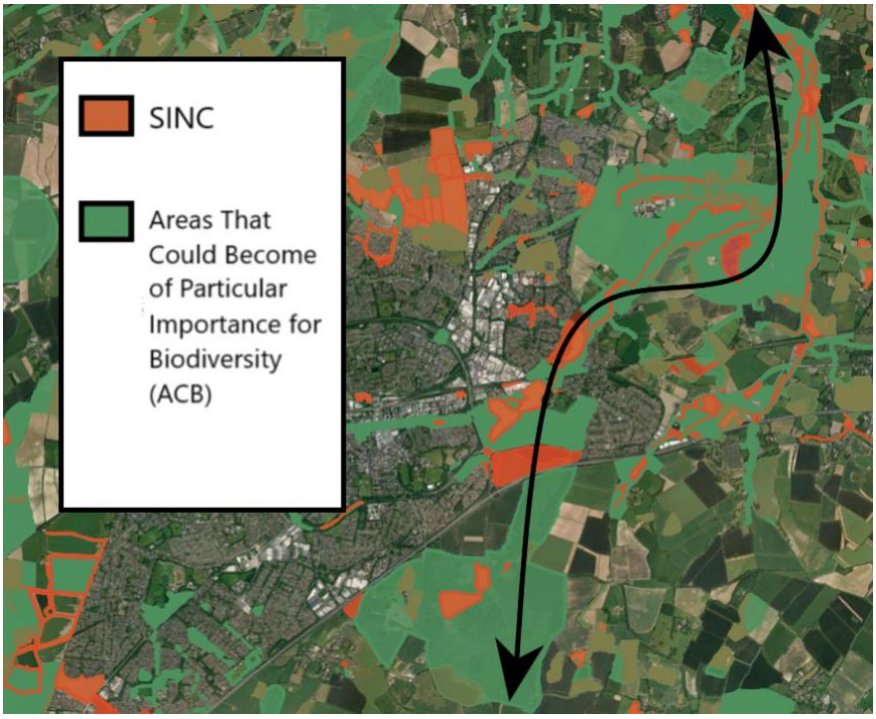

Figure 1.6 - LNRS east of Basingstoke wildlife corridor

4.4 In combination, past and planned developments threaten to fragment the landscape east of Basingstoke, and further degrade an important riverine habitat in opposition to the Council's declared intention to protect our chalk streams. An appropriate spatial framework is required now in order to promote habitat connectivity and adequate insulate the Loddon landscape.

5. South Basingstoke

5.1 To the immediate south of Basingstoke there has been progressive infill of land between the A30 and the M3 and this development is progressing into open countryside along the north-western boundary of the M3. There has been limited historic development south of the M3 (presumably due to the preponderance of farming in the area), however this notional boundary is now breached by the Local plan which includes a major development at Upper Swallick (CLID011).

5.2 The landscape in this area contains both the chalk aquifer feeding the river Loddon and the remnants of an important chalk Downland habitat (Basingstoke Down). Development in this area carries significant ecological risk, given the scarcity and value of chalkland habitats and the downstream impact of degradation of the aquifer.

5.3 The LNRS for Hampshire Local Habitat Map includes limited provision for wildlife corridors to the immediate south of Basingstoke, the main one being Hackwood Park. For this reason, an illustrative corridor map is not included in this section.

5.4 Natural Basingstoke regards this as a significant missed opportunity given the combination of the chalk downland and the chalk aquifer feeding the Loddon in this landscape. Whilst much of this area is currently farmland, local landowners are aligned as members of the Candover Valley Farm Cluster and (with the right incentives) are likely to be receptive to measures that support creation and restoration of a corridor on this area.

5.5 An appropriate spatial framework is required now to exploit the potential for recovery and protection of what remains of the historic chalk downland landscape and aquifer, to avoid habitat fragmentation and further ecological degradation as a result of the proposed development.

6. Conclusion

6.1 As previously stated, these examples are illustrative only and are intended to evidence strategic patterns and spatial interactions relevant to Regulation 18 plan-making, not to determine the acceptability, mitigation, or design of individual sites. In particular, they focus solely on land immediately adjacent to Basingstoke given the Council's statement that the "focus of growth will continue to be Basingstoke as the borough's most sustainable settlement". However, this concept can be extrapolated to development in adjacent areas such as Tadley, Steventon, Sherfield-on-Loddon and other areas that are the subject of Neighbourhood Plans.

6.2 The Council has acknowledged the ecological emergency and committed to take action to address biodiversity loss. The current Local Plan represents a key tipping-point where there is an opportunity to take pro-active steps to deliver a spatial strategy that encompasses a network of interconnected and protected green spaces rather than licensing development at ecologically sensitive sites with protection being dependent upon future unspecified mitigation.

6.3 Consistent with legal and regulatory obligations, the Local Plan Spatial Strategy must be updated to reflect the areas mapped and identified in the newly published LNRS, and the measures proposed in them. This provides the opportunity for Basingstoke and Deane Borough Council to counter the environmental threats posed by increased development, and translate is own policies into practical action, by creating a network of connected and protected habitats now (rather than deferring this for future consideration).

APPENDIX C: NATURAL BASINGSTOKE RESPONSE TO 2023/4 LOCAL PLAN CONSULTATION

Attached as a separate document.