

Comments on ‘Draft Local Nature Recovery Strategy for Hampshire’

1. Ensuring that the LNRS is integral to local planning decisions

1.1 The LNRS will only deliver genuine improvements for nature in our county if it is integrated into planning policy. Whilst this may be beyond the current scope of the LNRS, we would like to see:

- a clear statement regarding how areas identified in the LNRS (APIBs/ ACBs, etc.) will be protected when making decisions about spatial strategy [See notes 1 and 2]
- a ‘roadmap’ for how it is expected that the LNRS will be integrated into local planning policies to ensure that its recommendations are considered in decision-making regarding local development, irrespective of whether a borough is currently meeting its housing land supply target [See note 2].

1.2 Greater clarity is needed on how neighbourhood-level biodiversity evidence will be integrated into strategic decision-making and how the LNRS will be integrated with Neighbourhood Plans (to reinforce planning alignment at the community level).

Notes:

1. According to Government Planning Guidance, “local planning authorities have a legal duty to have regard to the relevant strategy for their area. Local planning authorities should consider the priorities set out in the relevant Local Nature Recovery Strategy when determining how their local plan should contribute to and enhance the local and natural environment”. It goes on to say that “Local planning authorities should be aware of those areas mapped and identified in the relevant Local Nature Recovery Strategy and the measures proposed in them and consider how these should be reflected in their local plan” and requires them to “consider what safeguarding would be appropriate to enable the proposed actions to be delivered”.
2. The **Greater Manchester LNRS** provides an example of how the strategy can capture the integration of LNRS priorities into planning processes and Local Plan reviews. This example provides some practical guidance for local authorities on incorporating LNRS objectives into development control decisions.

2. Ensuring that the LNRS delivers measurable biodiversity benefits

2.1 The CE of HIWWT makes the very valid point that LNRS success depends upon: “...*robust delivery mechanisms, ambitious targets, and strong monitoring to track progress, along with clear accountability and good governance. [providing] a real road map to recovery, driving forward the restoration of ecosystems, improving the protection of our unique landscapes and supporting a resilient, prosperous, healthy nature-positive economy*”

2.2 Whilst we recognise that the LNRS is only intended to provide recommendations (not commitments for delivery), in order to provide the foundation to deliver measurable benefits it needs to include a specific monitoring and governance framework. [See note 1].

2.3 Related to this, we would also like to see the inclusion of some form of bridging statement, setting out how:

- it will be determined who will take decisions about allocation of effort and funding in response to options set out in the LNRS [1.19] [See note 2]
- it will be determined who is accountable and responsible (at county, borough, and district level) for delivery of each of actions set out in the LNRS
- the LNRS will be translated into measurable actions and targets, to ensure rapid delivery.

2.4 It is unclear how those responsible for detailed strategy development, delivery, monitoring and management, will engage with local conservation volunteers to seek their active input (as opposed to simply 'informing' them). [See Note 3]

Notes:

1. The **Greater Manchester LNRS** provides an example, incorporating a commitment to establish a framework for transparent monitoring, regular progress reporting, accountability, and adaptive management.
2. There are a large number of references to potential sources of funding (e.g., Water Environment Improvement Fund, Environmental Land Management, Countryside Stewardship Schemes, Landscape Recovery Schemes) but it is unclear how these will be secured for BNG given they are not new sources and must be subject to existing demand].
3. The **Buckinghamshire** and **Cornwall LNRSs** provide examples of how to engage effectively with local stakeholders, ensuring extensive community consultation and active stakeholder engagement throughout the strategy development and implementation phases.

3. Ensuring that the key stakeholders are engaged in LNRS delivery [Page 15/ 16 - para 1.21 - 1.25]

3.1 Delivery of the goals of the LNRS will be heavily dependent upon the cooperation of many different types of groups, including landowners and developers. Whilst we recognise that the LNRS is only intended to provide recommendations, we would like to see the inclusion of a bridging statement setting out how it will be determined who will take:

- ownership of engagement with different stakeholder groups to pursue implementation of the proposals set out in the LNRS
- responsibility for determining the approach to, and driving the adoption of, nature-based solutions to wider environmental problems (flooding, climate change mitigation and adaptation, poor water quality etc.).

4. Rivers & Wetlands – Opportunities for nature recovery [Page 25, para 2.26-2.28]

4.1 The LNRS captures our key concerns regarding protection of local rivers and wetlands, such as: consideration of the impact on water environments in council decision-making and spatial planning; providing appropriate categorisation/ protection for our chalk streams; establishment of riparian buffer zones; development of river recovery strategies and action plans.

4.2 These are currently suggestions, with no legal force, how is it proposed to turn these into binding legal commitments backed up by funding and resources?

5. Woodland – Opportunities for nature recovery [Page 29, para 2.52/ page 30, paras 2.54 – 2.58]

5.1 The LNRS highlights the conflict between the needs of wildlife and recreational activities, a growing problem in our area as house-building increases. However, the LNRS does not include any recommendations as to how this problem can be addressed. In our view it is imperative that new developments make adequate (and separate) provision for nature and for human activity.

5.2 Aside from this, the LNRS captures our key concerns regarding protection of woodlands, such as: improving connectivity; managing for priority species; improving woodland management.

5.3 These are currently suggestions, with no legal force, how is it proposed to turn these into binding legal commitments backed up by funding and resources?

6. Grasslands – Opportunities for nature recovery [Page 32, paras 2.66 – 2.73]

6.1 The LNRS does a good job of laying out areas of concern/ opportunity, in relation to grasslands, in particular the need for improved connectivity; sub-optimal management of verges; and the opportunity to utilise grassland management to provide carbon sequestration.

6.2 However, this part of the report would benefit from inclusion of a section setting out specific opportunities for nature recovery for grasslands (the associated cross-reference in para 2.73 does not appear to be correct).

6.3 In addition, consideration is needed as to how to turn any proposal into binding legal commitments backed up by funding and resources.

7. Species specific approach to local nature recovery [Page 34, para 2.81 - 2.85]

7.1 Whilst it is recognised that the species-specific approach is to some extent covered by other sections, we would like to see the LNRS including more explicit information on species-specific recovery plans.

7.2 For example, **Buckinghamshire's LNRS** takes a species-specific approach, incorporating species recovery plans with measurable targets for locally significant species (e.g., butterflies, bats).

8. Greenspace, health, and access to nature – Opportunities for nature recovery [Page 38, para 2.107]

8.1 Land owned by other appropriate private landowners such as faith groups (e.g., around churches, temples, etc.) also provides an opportunity for conversion to more natural spaces.

9. North Hampshire – Potential opportunities for nature recovery [Page 55 – 59, section 2.3]

9.1 The biggest single threat to this area is not mentioned in the LNRS. Development (largely residential but to some extent commercial), is progressively encroaching on local countryside adjacent to Basingstoke and other major towns in the borough, often in close proximity to rivers or remnants of ancient woodland. This problem requires a strategic solution to ensure that development is sympathetic to our landscape – undertaken in the right place and in the right way. There is a danger that the volume of proposed development will otherwise undermine all the measures to support biodiversity proposed within the LNRS.

[Note: Our comments also apply to those parts of the Thames Basin Heaths that sit within the borough of Basingstoke & Deane].

LNRS Supporting Maps

10. Inclusion of all relevant green/ blue corridors within the LNRS

10.1 What criteria were used to:

- a) Identify Areas of Particular Importance for Biodiversity (APIBs)
- b) Determine which areas to include as Areas that Could become important for Biodiversity (ACBs)

11. Verges and embankments

11.1 We note that a large amount of the areas identified as potential green corridors in North Hampshire are road and rail verges/embankments. How is it anticipated that landowner agreement will be secured to utilising these areas in this manner?

12. Irreplaceable Habitats

12.1 Basingstoke and Deane is home to a number of chalk streams (e.g., Rivers Test and Loddon), and the local authority has recently passed a motion granting rights to our rivers. Given the rarity of and threat to these habitats, we would like to find a way to effectively capture them within the Hampshire LNRS, even if they do not fall under the current legal definition of an Irreplaceable Habitat.

13. APIBS (Areas of particular importance for biodiversity) [ABP02 & page 115-121]

13.1 Crabtree Plantation/ Crabtree Grassland and Black Dam Ponds – This area is a LNR, however, it is only shown on the map as a SINC. In addition, this location is home to a small area of highly valuable Carr habitat which is not shown on the map. Together these factors serve to diminish the apparent importance of a valuable local green space.

14. ACBs (Areas that Could Become of Particular Importance for Biodiversity) [ACB map & page 132-134]

14.1 North Basingstoke

14.1.1 North Basingstoke is known for populations of several important species, including Great Crested Newts, Common Toads and Hazel Dormice. There is an opportunity to protect this landscape and the species that it supports, by encouraging creation of a green corridor linking green spaces owned by a range of potentially sympathetic landowners, such as the National Trust.

14.1.2 Sites that could be added to the LNRS, Little London and Pamber End/Heath - See proposals in Appendix A.

14.1.3 Sites that could be added to the LNRS map, Sherborne St John to Bramley - See proposals in Appendix B.

14.2 South Basingstoke

We are surprised to note that, whilst numerous woodland features are shown on the map, the only area identified as an ACB in this area is Hackwood Park. This does not seem to be consistent with the statement in paragraph 2.3 that a key opportunity is the ‘use [of] corridors of green and blue spaces to link Basingstoke and the countryside’.

14.3 East Basingstoke

East Basingstoke is the location of one of our valuable chalk streams – the river Loddon. We note that the majority of the Loddon habitat is shown on the ACB Map as a prospective ‘blue corridor. However, we have the following observations:

- by comparison with the blue corridor covering the river Test, the Loddon corridor appears disjointed, exhibiting a number of gaps [Note: This may be due to land ownership issues, however, the potential for creating a continuous green corridor should at least be explored]
- the chalk aquifer situated south of the M3, also feeds the Loddon via medieval fishponds located within the Black Dam and Crabtree Local Nature Reserve, this important linkage is missing from the ACB map and needs to be included (see area circled in purple in Figure 3). [Note: This may be due to Black Dam and Crabtree LNR featuring on the APIB Map, however, we are currently working with South East Rivers Trust to develop a restoration project for this stretch of the river Loddon, it therefore has growing future significance].

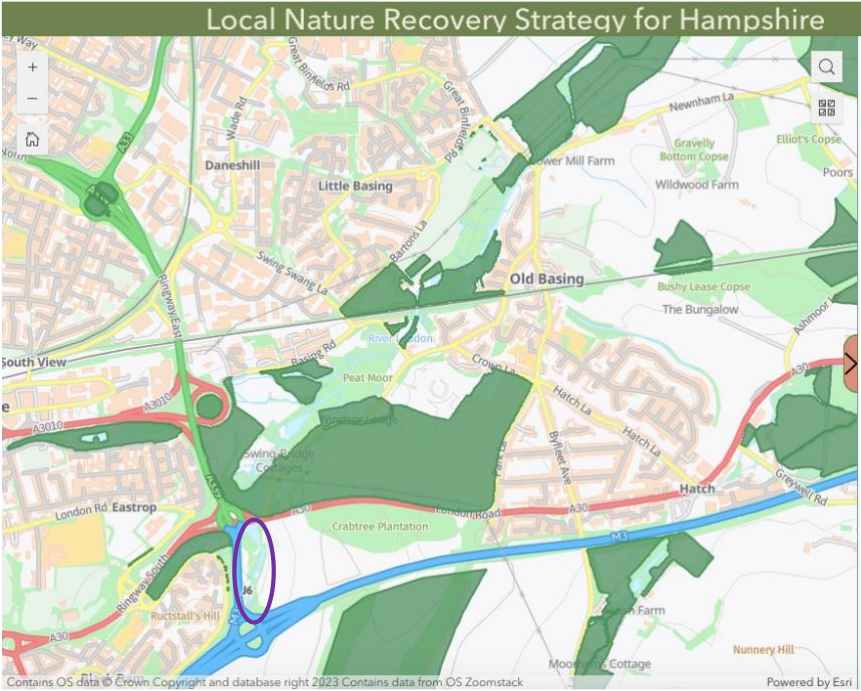


Figure 3: Loddon Green Corridor (Black Dam Ponds)

14.4 West Basingstoke

West Basingstoke is the proposed location for the Manydown Countryside Park, a key element of nature protection in this area, together with the strategic gap between Basingstoke and Oakley (both shown on the ACB Map). This landscape is in close proximity to an important feature, the Old Down SINC, a meadow which forms an integral part of the chalk downland landscape. This important landscape linkage is missing from the ACB map and needs to be included (see area circled in purple in Figure 4).



Figure 4: Western Basingstoke Green Corridor (Old Down SINC)

Appendix A - Sites that could be added to the LNRS, Little London and Pamber End/Heath

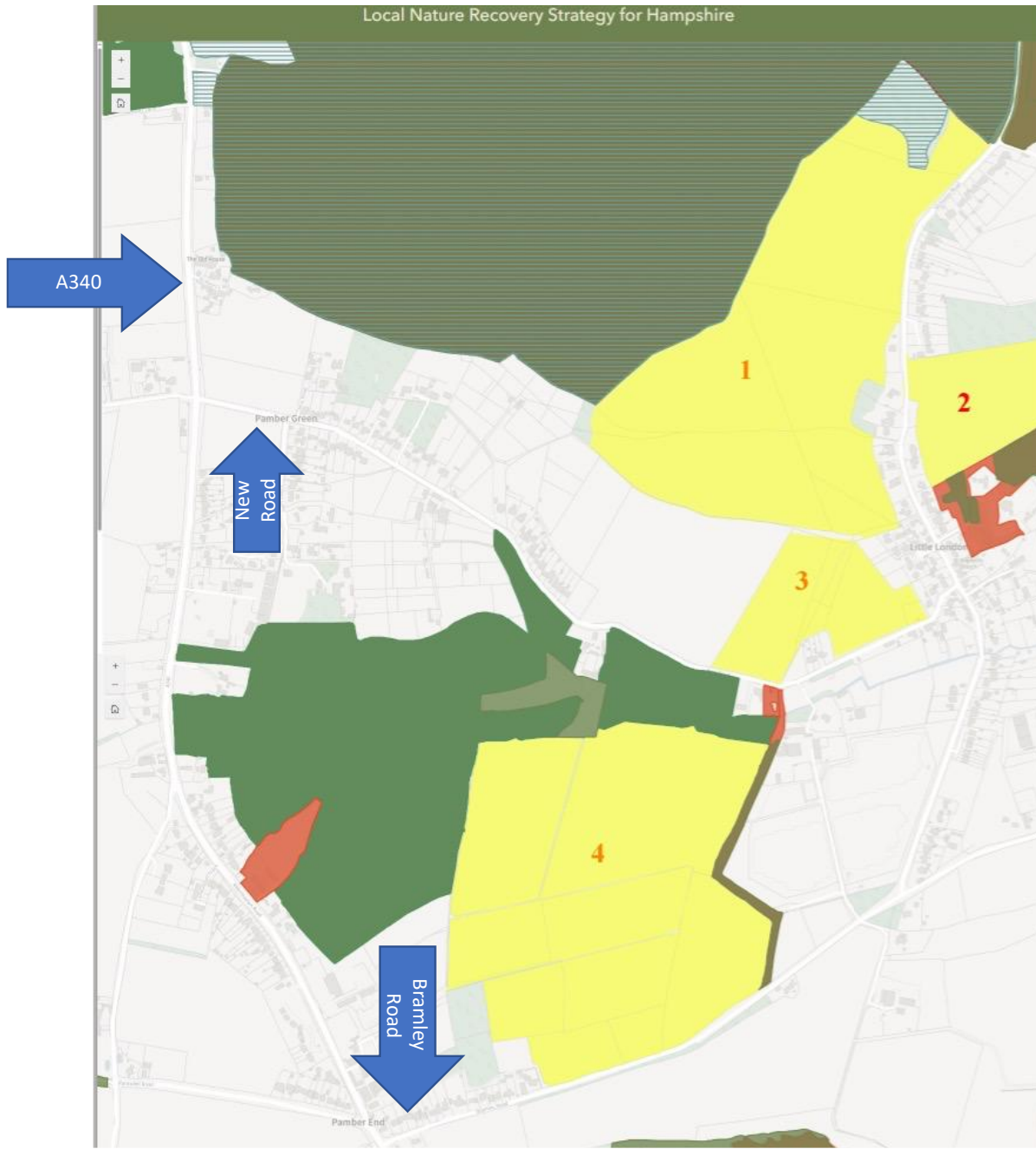


Figure 1: Little London/ Pamber Heath Green Corridor

Key to figure 1

1 - Fields that switched from arable to organic grassland roughly 23 years ago. Already undergoing a process of nature restoration but one that could be enhanced and accelerated.

2 - Roman Brick Field. Designation as a Scheduled Ancient Monument is being proposed. Nature recovery would make an ideal companion.

3 - Fields that for the last two centuries have never been farmed intensively, sprayed, or seeded, therefore meaning they are likely to harbour significant biodiversity already. Akin to that in a local SINC in Little London. Grazed but botanical interest not extinguished. The landowner is known to be interested in moving away from farming the land and potentially amenable to adopting a nature recovery approach to managing the land if financial environmental incentives are available.

4 - Proposed solar park where the stated intention is to encourage the recovery of nature.

Appendix B - Sites that could be added to the LNRS, Sherborne St John to Bramley

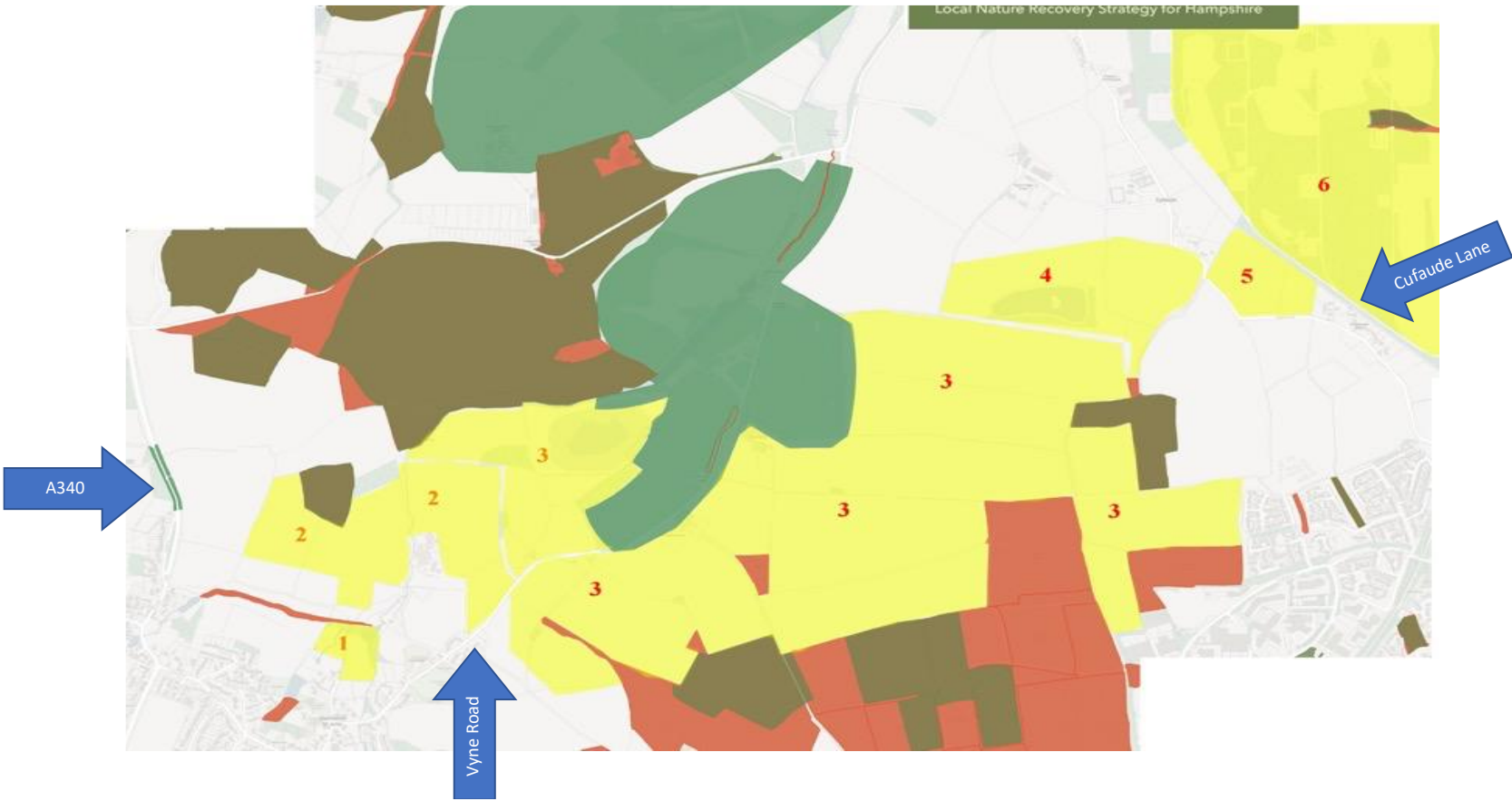


Figure 2: Sherbourne St John to Bramley Green Corridor

Key to figure 2

- 1 - Manor Farm nature restoration project – nature recover already underway.
- 2 - Proposed solar park where the stated intention is to encourage the recovery of nature.
- 3 - Additional National Trust Vyne Estate land, all of which has the potential for nature recovery.
- 4 - Land that includes the lake which hosts most of Cufaude Lane’s breeding Common Toads.
- 5 - The HCC field proposed for nature restoration in association with UCF.
- 6 - Bramley Army Camp, much of which is already biodiversity rich.

For reference, the extent of the Vyne Estate:

