

23 June 2025
L 230623 LNRS Consultation Response FINAL



One Forbury Square
Reading RG1 3BB



savills.com

BY EMAIL TO: Nature.Recovery@hants.gov.uk

Dear Sir/ Madam,

Hampshire County Council Draft Local Nature Recovery Strategy for Hampshire

This response to the Responsible Authority for the draft Local Nature Recovery Strategy (LNRS) is made on behalf of the Society of Merchant Venturers ('SMV').

The SMV is a private organisation, incorporated under the Royal Charter, that is the endowment trustee of the St. Monica Trust, a registered charity that owns and manages land within the charity's ownership to the south of Basingstoke, incorporating the southern half of the emerging allocation 'Southern Manydown'.

The income generated from the holding is used to help fund the work of the charity, and any proceeds generated are similarly held for the benefit of the charity.

Introduction

As background, the SMV owns the southern half of Southern Manydown; one of the sites BDBC recognises as being a 'larger' strategic allocation within the emerging Local Plan. Savills is promoting this land on behalf of SMV and working closely with BDBC and HCC in their Landholding capacity of the remaining part of the allocation. The site is being promoted for a significant number of new homes, industrial and logistics floorspace, land for a new hospital and various supporting uses including schools, community facilities and local shops as well as green infrastructure and open space. The Southern Manydown allocation is integral to the delivery of the development strategy identified in Basingstoke's draft Local Plan.

Savills, on behalf of SMV, has reviewed the emerging Local Nature Recovery Strategy (LNRS) in terms of any implications for the promotion of a strategic allocation site at Southern Manydown.

We are aware that LNRS designations are a material consideration for planning authorities when preparing their local plans, and they will likely carry weight in any planning balance. We are also aware that the intention of any LNRS is not to preclude development but given the weighting such designations will likely carry in the planning balance, our client would want to ensure that any LNRS designation does not frustrate the adoption of the emerging allocation and subsequent delivery of development.

Rather, we consider that with some changes to the coverage of the LNRS where it concerns SMV's landholdings, there is an opportunity for development across the emerging allocation to significantly contribute towards LNRS targets and act as a catalyst for nature recovery where it may otherwise be absent.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



SMV broadly supports the progress made by Hampshire County Council (HCC) in preparing the LNRS and notes that various stakeholders have been involved in the production of the draft LNRS. SMV also appreciates that in producing a document with the geographical scope that it has, it is not necessarily possible to engage individually with all of the landowners that the LNRS concerns. However, given the extent of the SMV land ownership as part of a 'larger' strategic allocation within Basingstoke and Deane's emerging Local Plan, engaging regularly over many years with the LPA and LHA, we are surprised not to have had any direct communication up to this point. Whilst we are aware that there is no obligation for a landowner to deliver any of the measures put forward in an LNRS where it concerns their landholdings, in moving forward, SMV would welcome the opportunity for proper liaison with the Responsible Authority to contribute as meaningfully as possible as the LNRS proposals progress.

To ensure that the LNRS aligns with the site assessment and masterplanning work that has already taken place in relation to land at Southern Manydown, SMV's response to this consultation makes a number of constructive comments and suggested changes to the LNRS which are deliverable, relevant to the site and its surroundings and intended to contribute to maximising local nature recovery.

Response

The format of the consultation is a web portal, which poses a number of questions. SMV's response to the draft LNRS consultation sets out the questions below along with our response.

Section One: About your response

Is this a personal response, or are you responding on behalf of an organisation, group or business or as a democratically Elected Representative? (Please choose one option).

- I am responding as an individual.*
- I am providing the official response of an organisation, group or business.*
- I am responding as a democratically Elected Representative of a constituency (e.g. as a county, district, borough, parish or town council Member or MP).*

SMV Response to Section One: This is the official response of SMV.

Section Two: Introduction to the Local Nature Recovery Strategy: Section two is provided for information only and no response required.

Section Three: Key issues and opportunities for nature in Hampshire and Section Four: Biodiversity priorities in different types of habitat

SMV Response to Section Three and Four - No comment.

Local Nature Recovery Strategy Consultation

If you think there are any priorities we have missed out, or have anything else to add about either the outcomes or potential measures for greenspace, access and transport related in Hampshire, then please write below.

SMV Response:

SMV would welcome the opportunity for proper liaison with the Responsible Authority to contribute as meaningfully as possible as the proposals progress.

SMV broadly supports the progress made by HCC in preparing the LNRS and notes that various stakeholders have been involved in the production of the draft LNRS. SMV also appreciates that in producing a document with the geographical scope that it has, it is not necessarily possible to engage individually with all of the landowners that the LNRS concerns. However, given the extent of the SMV land ownership as part of Basingstoke and Deane's largest strategic emerging allocation, engaging regularly over many years with the LPA and LHA, we are surprised not to have had any direct communication or engagement up to this point to input to the LNRS.

Indeed, the '*Local nature recovery strategy statutory guidance, What a local nature recovery strategy should contain, March 2023*', sets out the importance of engagement, stating at paragraph 88 that:

*"Responsible authorities should listen to landowners and managers' views for land they are considering mapping as areas that could become of particular importance for biodiversity. All draft strategies must go through public consultation. Responsible authorities do not need to engage with all relevant landowners and managers before public consultation but **they should invite them to participate**". [Our emphasis].*

Further paragraph 89 goes onto state that:

*"**If the responsible authority knows that a landowner opposes a potential measure on their land and is very unlikely to choose to carry it out, it would be better to explore alternatives or include other more suitable measures before public consultation. This is particularly important if they propose a location due to its potential to join up areas of habitat to create a wider network. If objections from landowners only become clear at public consultation, the responsible authority should try to accommodate their views where this does not undermine the coherence and ambition of the strategy as a whole**". [Our emphasis].*

It is therefore clear that due process must be followed, with consultation being a key part of that. SMV is now making their views known and would welcome full and proper engagement in the process, along with full exploration of alternatives in accordance with the guidance, ahead of the final draft being taken to Cabinet, currently targeted for November 2025.

To this end, SMV note the following:

Para 77 of the, '*Local nature recovery strategy statutory guidance, What a local nature recovery strategy should contain, March 2023*', sets out that:

*"Responsible authorities should be ambitious in proposing change but also realistic in the need to concentrate effort where it will have most benefit. **Indiscriminate or widespread***

mapping of areas that could become of particular importance would not aid targeting of available resources. *The proportion of each strategy area mapped for its potential importance will likely vary considerably depending on factors like the extent of existing designations and other constraints on land use*". [Our emphasis].

Regardless of this paragraph in the guidance, it appears that the extent of the areas proposed for change has however been indiscriminately blanketed with "W1: Create and manage new native woodland" without sound reasoning. Whilst SMV supports the broad principles of the objectives of linking woodlands together, it believes they can be connected with genuine benefits delivered without compromising development. Refining the areas shown to maximise enhancements would provide an opportunity to showcase how positive collaboration can be had between nature and development, and highlights again the importance of landowner involvement and engagement in the process.

Section Five: Species Recovery

Do you agree with the process that has been used to prioritise species for focus? (Please choose one option)

- Yes – I completely agree with the process.
- Yes – I partly agree with the process.
- No – I disagree with the process.
- I don't know.

SMV Response to Question: Yes completely agree with the process.

Section Five: Species Recovery (continued)

SMV Response to remaining parts of question 5 - No further response from SMV.

Any further comments

If there is anything else you would like to tell us about the draft LNRS, including the appendices, please tell us in the box below. If your suggestion is about a specific part, section and/or page, please make this clear in your answer.

SMV Response to Question:

As stated in relation to other questions, SMV is promoting a 'larger' strategic site to the south of Basingstoke. This development proposal has been identified in the emerging draft Basingstoke and Deane Local Plan and its delivery can be a catalyst to deliver the objectives of the LNRS and contribute to achieving nature recovery at Southern Manydown.

To see how the proposals identified in the LNRS relate to what has already been masterplanned for land at Southern Manydown, SMV has included in **Appendix 1** a high level Masterplan of the proposals with an overlay of the LNRS proposals. When the LNRS mapping is overlain onto the

Masterplan it is clear that areas proposed for development and other uses, such as sport provision by SMV fall within areas shown in the consultation document for nature recovery. The locations of these particular development parcels (predominantly housing) have been chosen following the consideration of their relationship with existing ecological and landscape features on site, and the effect that development as a whole at Southern Manydown will have on ecology. The wider masterplan has and continues to consider, nature recovery as part of the solution for green infrastructure and ecology as the proposals evolve.

As above, we believe that the delivery of development can be a catalyst to positively contribute towards Nature Recovery. We are also conscious that guidance around LNRS's explains that they should not be used as a tool in the planning balance to adversely tilt decision makers away from development. Whilst it is welcomed that the LNRS proposals reflect much of SMV's evolving masterplan for the southern half of the emerging allocation at Southern Manydown (within SMV control), concerns remain over the compatibility of the LNRS proposals with parts of the masterplan as identified above.

We would welcome the opportunity to meet with the team developing the LNRS to discuss how the polygons can be amended. The purpose of such a review would be to ensure overlap of the existing polygons with development parcels and proposed other uses can be avoided to ensure a robust approach towards all parts of the scheme, including nature recovery, can be developed collaboratively. To this end, SMV note that there are significant opportunities for local nature recovery across the emerging allocations without conflicting with development plots and ultimately contributing towards the delivery of the LNRS.

And finally...

Finally, to help us improve access to future consultations, please tell us where you first heard about this consultation: (Please choose one option)

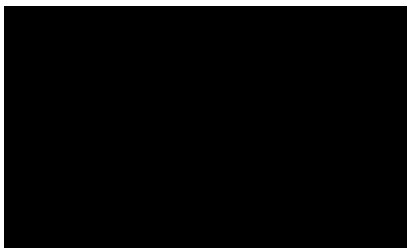
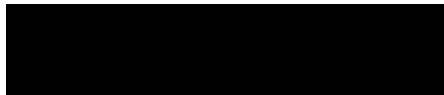
- *On social media (e.g. Facebook, Twitter, etc).*
- *On a poster or leaflet.*
- *In the news or on a news website.*
- *In a resident's newsletter (e.g. printed or e-newsletter) (please specify where below).*
- *Hampshire County Council website.*
- *Through my employer.*
- *Via Hampshire Perspectives residents' forum.*
- *In a public space (e.g. library, civic centre).*
- *Reported in the press (e.g. radio, newspaper) (please specify where below).*
- *Via an email or letter sent to you.*
- *Other.*

SMV Response to Question: Other - By word of mouth.

Conclusion

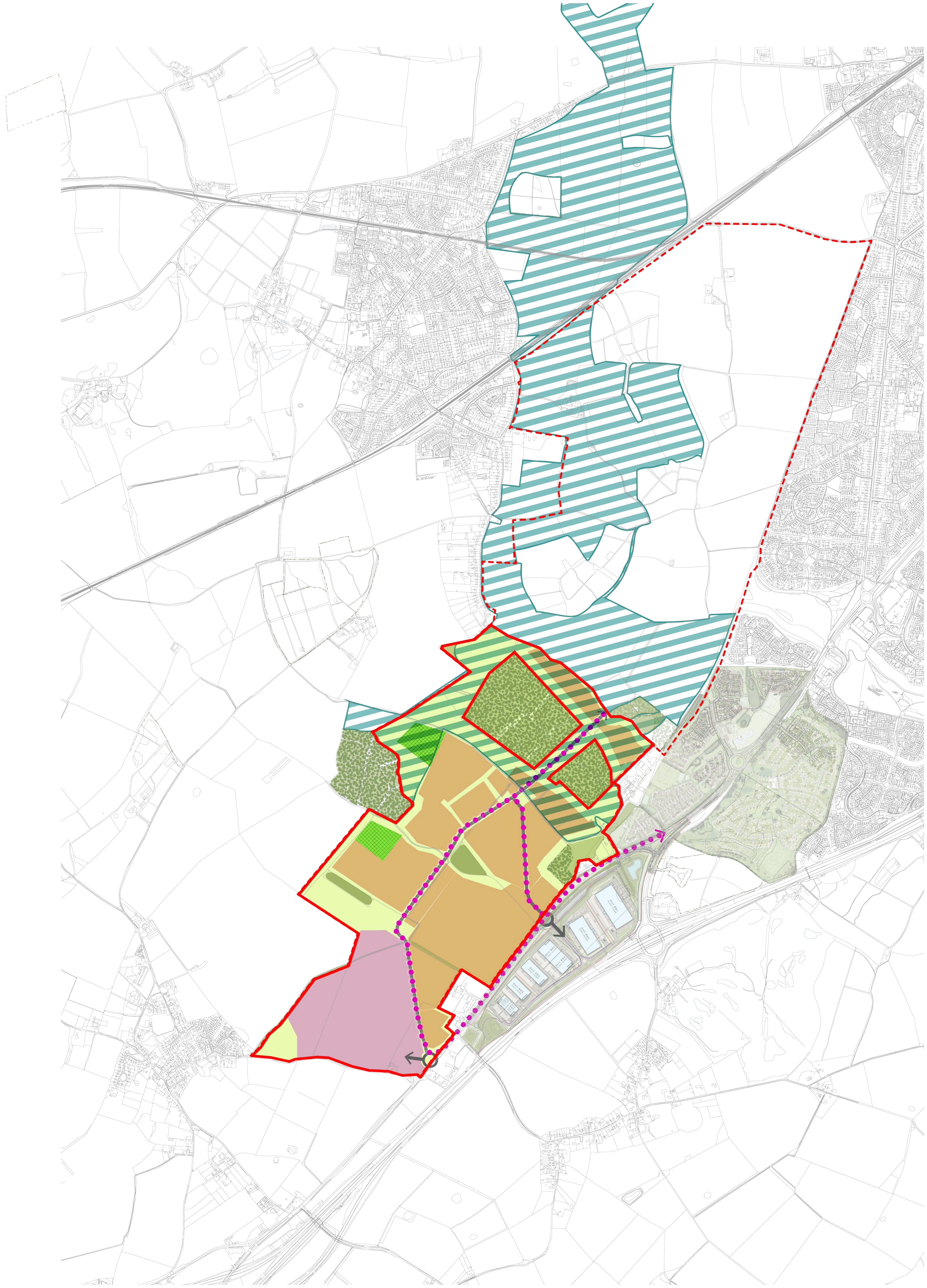
SMV sees the preparation of the LNRS as a positive step forward in ensuring that significant gains in local nature recovery are delivered. Whilst SMV is disappointed not to have been involved sooner, SMV would like to be involved and consulted further as part of the LNRS process in moving forward. More meaningful ecological enhancements can then be delivered whilst also ensuring that much needed new homes, along with industrial and logistics development plus job opportunities are provided in Basingstoke, which is a key objective of the emerging Basingstoke and Deane Local Plan.

Yours faithfully

A large black rectangular redaction box covering the signature area.A black rectangular redaction box covering the name of the signatory.



**APPENDIX 1
SOUTHERN MANYDOWN – EMERGING SOUTHERN MANYDOWN MASTERPLAN (WITHIN
SMV OWNERSHIP) WITH LOCAL NATURE RECOVERY STRATEGY OVERLAY**



- Emerging Southern Manydown allocation within SMV ownership
- Southern Manydown emerging allocation
- Existing woodland/vegetation/planting
- Ancient woodland
- Built form and ancillary uses
- Land safeguarded for hospital
- Green Infrastructure
- Indicative location for sports pitches
- Indicative alignment of multi-modal route
- Local Nature Recovery Strategy (LNRS) Hampshire overlay

The titles (ownership boundaries) shown in the plan above have been produced using a 'high level' OS Vector Map Local CAD Plan (1:10,000) rather than a local OS Master Map CAD Plan (1:2,500) and will need to be verified as the project moves forward. This drawing is intended for illustrative purposes and is not for legal use.

