

Basingstoke and Deane Borough Council Mid-Examination Local Plan Consultation

Representation by the Rt Hon Maria Miller, MP for Basingstoke

I note that this public consultation being carried out by the Borough Council relates only to the proposed modifications to the Submission Local Plan, informed by further work and updated background evidence, which follows on from the exploratory meeting with the Planning Inspector. I will not therefore restate my comments in my two previous representations, in October 2103 and June 2014. I note that this is not a formal stage of the plan-making process and I welcome the opportunity to respond to this consultation,

2. I note the timetable envisaged for the forward progression of the Local Plan, and very much support the Borough Council's aim to adhere strictly to this timetable. It is very important that an agreed Local Plan is put in place as soon as practicable, in order to give certainty to the location and phasing of new housing development within the Borough, and also to ensure that the necessary infrastructure can be provided in line with that development.

3. My key concerns regarding the proposed modifications of the Plan remain as before; whether the scale of new housing development envisaged is sustainable, in terms of the provision of infrastructure, including roads and transport, local services, environmental and biodiversity matters, including water quality and sewage treatment.

4. With the higher level of housing proposed, it is all the more important that funding is identified and secured for all the required infrastructure, and that provision of the infrastructure is phased in line with the delivery of development sites, with a clear understanding of exactly what infrastructure is needed, at what locations, and at what point in the process it needs to be delivered. Also, it is essential that technical solutions exist and can be implemented in a timely way, in respect of transport and water quality concerns. Clearly, in the light of the disruption that many residents and other road users are experiencing during the upgrading of the Black Dam roundabout/M3 junction 6, it is also important that residents are made aware of how infrastructure improvements may cause inconvenience and disruption. The plan makes clear that infrastructure needs to be in place prior to the occupation of new housing development. This is a key commitment that must be upheld.

5. In some areas, the updated evidence supporting the modifications to the Local Plan falls short of providing the necessary assurances, and for that reason, I do not consider the Plan to be fully sound.

6. I am also concerned to ensure high quality design of new housing developments, with significantly lower housing densities than have been delivered in the past. With the high volume of housebuilding envisaged, it is also vitally important to ensure that all construction of new homes is carried out to the highest quality standards. From my constituency caseload I am aware of many cases locally where newly built homes have fallen far short of an acceptable standard of construction. The lack of skilled and qualified tradesmen is clearly a significant factor in this. According to a Home Building Skills Research Report (2013), there are serious and widely held concerns about the shortage of skilled people in UK home building, with one in five industry respondents thinking there was already a major skills shortage, and 87% thinking there would be problems in the future. Against this background, the Borough Council should develop a process, including a rigorous inspection regime, to ensure that the building of new homes in the Borough is of the highest quality and that there is proper recourse to having any such problems recognised and remedied.

7. I note the update to the Water Cycle Study, provided by the Environment Agency's Water Quality Modelling Summary (February 2015), and in particular note its assessment that "without upgrades to Basingstoke STW, phosphate levels in the Loddon could potentially deteriorate by more than 10% by 2025 if 796 homes are built per year, or by 2020 if 918 homes are built per year". This is deeply concerning. I note the EA's view that this could be addressed through a tighter consent regime at the STW of 0.5mg/l (rather than the current 1.0mg/l). However, Thames Water have told me that they have been operating at around 0.6mg/l for at least the last year, and phosphate levels in the Loddon are still unacceptably high. Against this background it is difficult to see how reducing the consent level would protect the river against increased levels of sewage from new housebuilding. While new phosphate removal measures are currently being trialled at Basingstoke STW, it is premature to rely on the successful outcome of this trial.

8. The EA recommends that "continuous environmental monitoring is undertaken during the construction of the new developments to ensure there is no significant impact on the water environment". I note that provision is already in place in the draft Local Plan through draft policies SS4 and EM6 to ensure that where there is likely to be deterioration in band classes further allocated sites will not be released, or planning permission will not be granted until measures have been taken to improve water quality. While this is welcome, given that the EA is calling for continuous monitoring, I do not believe that the annual monitoring detailed in the draft Plan is sufficient. This needs to be much more frequent, and the cost and funding for such monitoring needs to be identified in the Infrastructure Delivery Plan.

9. I note the overall conclusion of the updated Transport Assessment that the increase in traffic as a result of proposed residential and commercial development

could be accommodated on the highways network if a range of mitigation measures are introduced. Clearly, the technical solutions and funding for these mitigation measures need to be identified to provide assurance that the mitigation measures can be effectively delivered. I also note however, the position statement between BDBC and HCC, which includes concerns over elements of the methodology of the Transport Assessment, including the fact that trip rates used in the model are lower than accepted by HCC in considering proposals for development elsewhere in the Borough and there is potentially too much allowance made for sustainable travel measures, which could result in higher car use than suggested. The position statement notes that further detailed site-based assessments will be needed as development proposals are brought forward. This further work should happen as soon as practicable in order to ensure a joined-up approach.

10. I would also reiterate my earlier point about the impact on residents and other road users of major roadworks. There is a significant range of mitigation measures detailed in the Transport Assessment, many of which will have a cumulative impact, for example work to a number junctions on the A33 or the A30. These will need to be properly phased, not only to support the new developments, but also to minimise disruption to residents and other road users. .

11. All of the above infrastructure issues depend on funding being identified to ensure their provision. I appreciate that the Infrastructure Delivery Plan (IDP) is a living document, but I am very concerned to see that there is still a very major funding gap, amounting to some £190,903,315. While S106 and CIL are identified as potential sources for some of this funding, this is far from assured, and for significant elements of the shortfall no potential source of funding is identified. Furthermore, the £191 million takes no account of measures that will be needed to expand GP practices, improve open space infrastructure, provide offsite habitat mitigation measures, or pay for any flooding or water quality measures (all designated as costs “tbc”).

Conclusion

12. As I have previously stated, it is essential that the draft Plan is able to proceed and secure agreement without delay. While I currently consider it unsound for the points highlighted in this representation, I very much hope that these will be dealt with before and during the examination process, and that we will have the assurance that new housing development in the Borough will be of the highest quality, and sustainable in terms of infrastructure and our environment.

Rt Hon Maria Miller MP
June 2015