

Basingstoke and Deane Borough Council Local Plan (2011-2029)
Consultation on the Proposed Modifications to the Local Plan

Representation by the Rt Hon Maria Miller, MP for Basingstoke

I note that this consultation being carried out by the Borough Council relates only to the proposed Modifications to the Local Plan, which respond to issues raised by the Inspector before and during the Examination hearings in October and November 2015. I will not therefore restate my comments in my three previous representations, of October 2103, June 2014 and June 2015.

2. I also note that, following consideration of the responses to this consultation, it is hoped that the Inspector will be able to issue his report in March, with adoption of the Local Plan by the Cabinet and the Council in the spring. I very much support the Borough Council's aim to keep to this timetable, so as to have an agreed Local Plan in place and thereby ensure that there is more clarity about where housebuilding will take place.

3. My key concern regarding the proposed Modifications to the Plan remain whether the scale of new housing development is sustainable, in terms of the provision of infrastructure, including roads and transport, local services, and environmental issues including water quality.

4. In this respect, I very much welcome the proposed Infrastructure Delivery Strategy, introduced by way of a Glossary amendment, and PM 207 in the Minor Modifications documentation. The Infrastructure Delivery Strategy is intended to reflect a co-ordinated approach to infrastructure delivery in South-West Basingstoke and is accordingly specified in the Policies relating to Manydown and the allocated sites to the south-west of the town.

5. This new Infrastructure Delivery Strategy should be capable of addressing my concerns regarding the need to have a clear understanding of exactly what infrastructure is needed, at what locations, and when it needs to be delivered, so that the provision of infrastructure is phased in line with the delivery of development sites. The Plan still does not identify how funding for such infrastructure will be secured and this has to be addressed before new homes are given the go-ahead.

6. I welcome this acknowledgement of the need to plan for infrastructure provision in this way for the South-West of the Basingstoke, but it is difficult to understand why the same approach is not being adopted by the Borough Council for the whole of the Borough, given that the same issues of infrastructure arise in respect of all sites across the town and indeed the whole Borough. It is clear that there will be a cumulative impact of the development of sites to the north and east of Basingstoke too, for example, the chronic congestion of the A33 which we know will increase as a result of development.

7. I therefore believe that, to be sound, the Plan needs to specify an Infrastructure Delivery Strategy for every Site Allocation in the Borough.

8. I note the modifications to Policy SS4 (PM 139 and PM 140) which the Borough Council states have been made to ensure that the policy is sound and does not impose a blanket ban on development; and that there are no proposed Modifications to Policy EM 6 (Water Quality).

9. It remains disappointing that action will only be taken when there is already “likely deterioration” in water quality; and that annual reporting of monitoring is deemed to be sufficient. The proposed Modification PM 140, which states that once there is an indication of likely deterioration, development proposals will have to demonstrate that they would not exacerbate deterioration, does not give enough protection to the water quality. It is unacceptable that there remains no ambition to improve water quality. While it is welcome that further allocated sites will not be released until the Council, Environment Agency and other partners have identified means of reversing further deterioration, this also does not include any ambition to improve water quality, merely to reverse deterioration. As such, I consider these two modifications unsound and need further consideration.

10. The proposed Modifications relating to cycling and cycle routes do not properly reflect the representations made at the Inspector’s hearings. In order to ensure that the policies support and encourage more cycling, there needs to be provision for developers to contribute to cycling facilities off-site, such as direct and useful cycle routes to the town centre and to local amenities. It is also important that cycling facilities are in accordance with the Cycle Strategy. Therefore, in order to be sound, cycling provision should form part of the broader Infrastructure Delivery Strategy for each allocated site, so that the costs and funding for cycle provision are clearly identified, and the policy for each allocated site should include provision for direct cycle routes to the town, and for facilities to be in accordance with the Cycling Strategy.

11. In respect of Green Infrastructure and biodiversity, the proposed Modifications still do not go far enough. While PM 173 provides more information on the relevant Council strategies, the Plan still lacks a comprehensive green infrastructure plan to include wildlife mapping, ecological networking (including sub-regional corridors) and compensatory habitat for development sites, for example at Houndsome Fields or Manydown. In order to ensure that this important environmental and ecological work is embedded in planning for all the Greenfield sites, green infrastructure needs to be included in the Infrastructure Delivery Strategy, so that it is comprehensively planned and delivered. Therefore, to be sound, the glossary definition in PM207 needs to specify the inclusion of these matters; and individual site allocation policies need to include appropriate undertakings and key performance indicators.

12. I welcome the Council's commitment to meeting the national targets for carbon reduction and provision of energy demands from renewable sources, as set out in PM 103. However, modifications to Policies EM 8 and EM 9 mean there is now no clear strategy to show how these targets will be achieved. In order to demonstrate the strategy, and for the Plan to be sound, there should be a clear policy that all new developments must demonstrate how they will contribute to achieving the Council's carbon reduction and renewable energy provision targets.

Conclusion

13. The development of the Local Plan has been an important opportunity for people in Basingstoke and the wider Borough to express their views on how the local area should develop. The overwhelming concern expressed has been the need to ensure that, unlike in the past, infrastructure that is necessary will actually be provided – and in a timely way. Given the high level of housebuilding envisaged over the Plan period, it will be essential that the infrastructure required to support it is comprehensively planned, with funding identified in advance, and is then delivered, phased in line with development. The Plan states very clearly that new infrastructure should be provided prior to occupation of new housing. It is of the utmost important that the Borough Council ensures that this commitment is upheld without exception.

Rt Hon Maria Miller MP
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