

## Statement for EiP Hearing on Issue 8

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### Policy CN6 – Infrastructure

#### Why the Local Plan is unsound

The opening paragraph of Policy CN5 is very good.

However, the rest of the proposed policy is not sufficient to ensure that the opening paragraph can be delivered.

The policy is wrong to say that “CIL will be the primary mechanism to secure the necessary financial or equivalent contribution” when the current draft IDP and proposals for CIL show that there is a substantial shortfall in funding for essential infrastructure which is much greater than the total projected CIL.

The fifth paragraph sets out the correct objective: that “New infrastructure should be provided prior to occupation of the development, or in larger schemes, prior to the occupation of the phase of the development for which it is needed”. However, the following sentence – that “This will be secured by appropriate planning conditions, S106 planning obligations including bonds and the council’s procedures with respect to the use of CIL revenue” – is inadequate because it is clear from the draft IDP that considerable sums to fund essential infrastructure will need to be found from sources other than those listed in that sentence.

#### Draft IDP

Following the proposal to add Hounsome Fields to the list of strategic greenfield sites, the IDP Infrastructure Schedule was updated - Appendix H to the paper presented to the Economic Planning & Housing Committee on 4<sup>th</sup> March 2015, available here:

<http://www.basingstoke.gov.uk/rte.aspx?id=1504&MeetingId=2140>

That shows a total funding shortfall of £191 million out of a total infrastructure cost of £248 million. The shortfall on items described as “Necessary” is £159 million, including £38.5 million for transport, £86.7 million for education, £6.3 million for community facilities, £8.6 million for sports facilities and £15.2 million for green infrastructure.

In addition there are two “necessary” transport schemes which are unfunded and for which costs are not yet available – improvements to the A3010 Eastrop Roundabout and Junction 7 of the M3.

#### CIL

The council’s draft charging schedule for CIL was published in November 2014. The report to Cabinet prior to the consultation (30<sup>th</sup> September 2014) estimated that CIL would generate around £27 million over the plan period (paragraph 7.6).

Since that consultation, Hounsome Fields has been added to the list of strategic greenfield sites. But the Golf Course and Hounsome Fields Viability Report (May 2015) suggests that there is no viability headroom to support a CIL charge on that site (paragraph 5.9).

This means that receipts from CIL are predicted to be around £27 million compared with a funding shortfall of £159 million for “Necessary” expenditure on infrastructure.

It is clear that CIL will not be “the primary mechanism to secure the necessary financial or equivalent contribution” and the Plan is unsound when it makes that assertion.

### Transport

The Position Statement on the Transport Assessment agreed by the LPA & the LHA says (penultimate paragraph) that “individual proposals to bring forward development in the borough will require a detailed site based Transport Assessments to consider the impact of the development on the highway network, and to identify appropriate mitigation, where required. These will be considered by the Highway Authority through the development planning process.”

This site by site approach carries a serious risk that the LHA will fail to identify the cumulative impact of developments with a result that funding will not be obtained for some of the infrastructure required to deliver Policy CN6 in practice.

The Transport Assessment (February 2015) and the IDP Infrastructure Schedule (March 2015) identify two junctions that require improvement to mitigate the impact of development at the Golf Course and Hounsome Fields for which there is a funding shortfall of £11.7 million (Wallop Drive & Kempshott roundabouts). The Viability Study for the two sites shows that they are each expected to contribute only £2 million for strategic transport improvements. Neither of these junctions was included in the draft Regulation 123 List (November 2014). That leaves a net shortfall of £7.7 million.

Similarly the TA and IDP infrastructure schedule identify improvements to seven junctions on the B3400 and A339 to the west of the town which are necessary to mitigate the impact of the development at Manydown. The funding shortfall is £5.2 million. The Manydown and Golf Course Viability Study (July 2014) does not include any S106 contribution by Manydown towards strategic transport (page 13) and none of the junctions is included in the draft Regulation 123 List.

There is no evidence that it will be possible to find the missing funding and without that funding it would be impossible to both deliver these sites and comply with Policy CN6. Trying to deliver the sites without these necessary improvements would result in residual cumulative impacts of development which would be “severe”, contrary to NPPF 32.

### Sewerage

The SoCGs for the Golf Course & Hounsome Fields confirm that sewage would be treated at the Basingstoke Sewage Treatment Works. That is at Chineham – about nine miles away on the opposite side of Basingstoke.

It has been agreed with Thames Water that the existing sewers though Basingstoke would be unable to cope with the necessary additional effluent. Accordingly the Site Assessment (page 151) concludes that “Major infrastructure is needed to convey the sewage effluent to the STW because of insufficient capacity in the network”.

No attempt has been made to cost this infrastructure and there is no evidence that it could be funded. The Golf Course and Hounsome Fields Viability Report (May 2015) does not include any contribution by these sites to the cost of that infrastructure.

### Summary

There is not yet enough evidence that it will be possible to meet all the infrastructure needs expected to arise from all the development proposed in the Plan. There are uncertainties over the viability of some infrastructure requirements and over the ability

to deliver them within the timescales set out in the fifth paragraph of the Policy. Accordingly, the Policy may not comply with NPPF 177. If the infrastructure cannot be delivered on time, the Policy would not be "deliverable" and the Plan would not be "effective" (NPPF 182).

### Proposed change to Local Plan

Proposed Policy CN6 should be amended as follows:

- Amend the fourth paragraph to make it clear that CIL won't be the "primary mechanism" to secure funding for off-site infrastructure but that the majority of funding will come from other sources which have yet to be identified.
- Expand the fifth paragraph to say that new infrastructure will be secured through the council's procedures with respect to the use of CIL revenue and the use of external funding.
- Amend the second paragraph to provide that planning permission will not be granted until reliable sources of funding have been identified for all the infrastructure required to comply with the first & fifth paragraphs.
- Add something to make it clear that, when identifying the infrastructure required for any particular development, account must be taken of the cumulative impact of that development and other proposed or approved developments in the same area.