

**EXAMINATION IN PUBLIC OF
THE BASINGSTOKE & DEANE LOCAL PLAN**

**HEARING STATEMENT
ON BEHALF OF
THE BASINGSTOKE
SOUTH-WEST ACTION GROUP (SWAG)**

Hearing Session(s): Issue 8 – Infrastructure

Hearing Dates: 4 November 2015

Addressing: Inspector’s Questions

17.2 Which schemes are critical to the successful implementation of the Plan? Are these schemes viable? Are there any showstoppers?

Geoff Burnes will represent the Basingstoke South West Action Group (SWAG) at the Examination.

1. Summary of Tests of Soundness

Question	Test of Soundness	Suggested Modification
17.2	Not positively prepared Not justified	Unless there is certainty that the off-site transport and education infrastructure critical to the implementation of development sites SS3.11 and SS3.12, these sites should be withdrawn from the Plan and alternative sites in the east of Basingstoke should be added.

2. Introduction

2.1 SWAG holds the view that detailed examination of the IDP Addendum¹, the original Infrastructure Delivery Plan April 2014², the Golf Course and Hounsme Fields Viability Study³ and the Statements of Common Ground for these sites⁴ reveals a level of uncertainty and inadequacy in the funding of vital infrastructure that will result in a significant risk of both sites being unviable. Without such certainty, the sites and the surrounding existing communities will be left with inadequate road infrastructure, social facilities and educational provision, resulting in increased

¹ Examination Library PS/02/20

² Examination Library CD11

³ Examination Library PS/02/21

⁴ Examination Library PS/02/49 and PS/02/50

car-commuting, school journeys and **severe residual transport congestion**. It is SWAG's view that the uncertainty and inadequacy within the Infrastructure Delivery Plan is indeed a "showstopper", as defined by the Inspector, for the sites covered by Policies SS3.11 and SS3.12.

3. Infrastructure Delivery Plan (April 2014) and Policy CN6

3.1 In meetings of residents across the Borough, held by organisations such as SOLVE and SWAG, and as communicated to Maria Miller MP by her constituents, by far the most frequently expressed concern was the uncertainty of infrastructure provision. The breakdown of projects in the Infrastructure Development Plan (April 2014) shows an acknowledged funding shortfall for "Necessary" roads infrastructure across Basingstoke, before Hounsome Fields was added, of over £53M. (Most of this would appear to be in addition to the £34M shortfall identified in the IDP Addendum for Hounsome Fields, of which nearly £12M is specifically for roads).⁵

3.2 The IDP Addendum for Hounsome Fields⁶ provides a breakdown of the required infrastructure funding for this recently-included site. The table appears to contain errors, in that the total infrastructure which Hounsome Fields will part-fund is shown to be £35,460,500 of which £26,960,500 is currently unfunded. In fact, re-totalling the numbers in the table shows a reliance on Hounsome Fields to part fund some £42,873,500, of which all but £8.5M is unfunded. Over £11.6M of this unfunded requirement is specifically for roads infrastructure.

3.3 The most recent CIL Draft Charging Schedule Report⁷ reveals a Borough-wide funding gap of £141M for "Necessary" Infrastructure, after taking into account all known and committed funding from the LEP, Pinch Point funding and New Home Bonus. It also admits frankly that CIL will not begin to address this shortfall. Furthermore, this still doesn't include factors such as GP surgeries, open space infrastructure improvements and off-site habitat mitigation measures.

3.4 According to the IDP, potential sources of revenue include S106 and CIL, as well as money from central government. CIL and S106 payments are by no means guaranteed, especially given the land prices being demanded on sites such as the Golf Course. The apparent reliance on CIL within the IDP of April 2014 was almost total; of the road improvement projects, only the Black

⁶Examination Library PS/02/20 table pp 2-4

⁷ CIL Draft Charging Schedule Report to Economic Planning and Housing Committee 11 September 2014 para 3.3

Dam roundabout (currently in construction) and £10,000 of improvements to Basingstoke Station car-parks were not identified as partly or wholly funded by CIL. Given that the funding shortfall from the road projects identified as “Essential” or “Necessary” alone is (according to a careful re-calculation from the IDP table) in excess of £53M, and the unfunded “Necessary” Education programmes account for a further £78M, expecting CIL (estimated to produce a total of only £27M) to make a major contribution towards this must be considered wishful thinking. Moreover, a strong reliance on Central Government funding is highly unrealistic, particularly given recent major cutbacks. Only recently does the Council appear to be taking note of this shortfall, moving emphasis onto S106 funding.

3.5 However, even this summary of the IDP does not give the complete picture. Many major projects, which are deemed “Necessary” for the developments west of Basingstoke **do not even have a cost against them; they’re simply shown as ‘TBC’**. This includes the provision of Gypsy and Traveller Sites, improvements to the Hatch Warren and Brighton Hill roundabouts and to Junction 7 of the M3⁸.

3.6 It has also been pointed out by HCC in their comments on the Revised Pre-Submission Plan⁹, and reiterated by Peter Wilson in his submission to this EiP¹⁰, that that no practical solution exists for improvements to the Fiveways junction in Kempshott without the compulsory purchase of additional (built) land. It is therefore very surprising that the Infrastructure Delivery Plan (April 2014) budgets a mere £151k for this, stating that the dependent (and therefore contributing?) developments are solely in Oakley and Overton. It is apparent that HCC believes improvement to this junction is critical to the development of the 3,400 dwellings on the adjacent Manydown site, especially the 300+ at Area 6.

3.7 Paragraph 9 of the National Planning Policy Framework states that *“pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (inter alia)... improving the conditions in which people live, work, travel and take leisure”*. As shown above, Policy CN6 and

⁸ Examination Library CD11 pp 76 and 77

⁹ Examination Library CD13 <http://basingstoke-consult.limehouse.co.uk/file/2997732> “It has not been demonstrated to our satisfaction through the Local Plan Transport Assessment that a suitable capacity solution at the Fiveways junction can be delivered (Pack Lane/Kempshott, Old Kempshott Lane/Buckskin Lane).” Hampshire County Council

¹⁰ Examination Library PS/04/38a

the Infrastructure Development Plan are both drastically under-funded and lacking in detail around certain key elements, so how the Plan will improve the quality of life for either current or future residents of Basingstoke is hard to understand.

3.8 Furthermore, the Plan is inconsistent with national policy, since it:

- Fails to demonstrate how “Essential” and “Necessary” infrastructure will be ready in line with the timing and phasing of site development;
- Lacks any credible evidence that the infrastructure will be funded;
- Fails to consider the impact of the inevitable disruption caused by the cumulative works that will be required to deliver the necessary infrastructure on local residents.

3.9 Policy CN6 states that *“development will be permitted where it can be demonstrated that infrastructure can be provided and phased to support new development, and that new infrastructure should be provided prior to occupation of the development”*.

3.10 Whilst this might appear to be an adequate safeguard, it is not enough, given a significant catalogue of past failures on the part of the Council to deliver infrastructure essential to **sustainable** development. For example, in Rooksdown, the lack of schools and doctors’ surgeries is only now being addressed, 15 years after the estate was built. A primary school was likewise promised for Taylor’s Farm, community facilities for Beggarwood, a railway station for Chineham, etc – all of which have never materialised. Public transport facilities for Beggarwood were delivered too late, and then withdrawn when funding ran out.

3.11 Given the lack of trust in a Plan produced by a Council with a track record of non-delivery of infrastructure, this clause must be strengthened if **sustainable** development is to take place. The clause should simply be modified to start *“development will **only** be permitted where it can be demonstrated that infrastructure can be provided and phased to support new development”*.

3.12 Policy CN6 must have “real teeth” such that development can only occur when the necessary on and off-site infrastructure is in place, or is at the very least committed and funded with a clear time limit for completion. This is especially critical in the areas of education, health and, most importantly, transport and roads. Any development that is allowed to proceed without this

stipulation being met is by definition **not sustainable** and undermines quality of life for current and future residents.

3.13 Inevitably, major disruption will be caused by the proposed developments. The poor track record of overruns and delays, such as currently experienced in the improvements to the Black Dam roundabout (due to unforeseen problems as a result of inaccurate historical mapping of utilities) calls into question the Council's ability to manage such schemes and minimise such disruption.

3.14 The Plan calls for numerous road improvements to be undertaken across the local network, as well as construction of many major sites, so it is essential that the necessary preparatory work, as well as timing and phasing, is carefully planned and executed to minimise disruption. Of critical importance is proper public consultation on this key matter, to ensure that residents are aware of proposals and are able to make positive suggestions to minimise their impact.

3.15 Suggested Modifications

In order to pass the test of soundness, the following changes are required to Policy CN6:

- It must state that *“development proposals will **only** be permitted where it can be clearly demonstrated that infrastructure will be provided and phased to support the requirements of proposed development, **including where multiple development sites exacerbate the infrastructure requirements.**”*
- The penultimate paragraph of the Policy also needs to underline the need for infrastructure to be in place prior to occupation. *“New infrastructure **must** be provided prior to occupation of specified phases of any development...”*
- There must also be a commitment to consult residents on infrastructure planning, for example through an additional paragraph, stating:

“Development proposals will be required to include a detailed analysis of the infrastructure requirements, together with details of how this is to be funded, and the timing and phasing of its implementation. Provision of such details should form part of the planning consent process, in order to ensure that residents are fully consulted and have the opportunity to comment on the proposals. The planning authority should use a planning condition to prohibit occupation of developments until such time as the supporting infrastructure has been provided.”

4. Infrastructure Delivery Plan Addendum May 2015

4.1 The Infrastructure Delivery Plan Addendum for Hounsome Fields, published in May 2015¹¹, identifies all but one of the infrastructure projects associated with this development as being either “Essential” or “Necessary”. (One item, “Enhancement of South Ham Library” is deemed as being only “Desirable”).

4.2 The table in the IDP Addendum identifies a shortfall in infrastructure funding, related specifically to the Hounsome Fields site, of £7.413M. The presentation of these figures masks the fact that there is actually a shortfall of some £18.626M between what is required for the “Essential” and “Necessary” projects and the total contribution from the Golf Course and Hounsome Fields sites combined. The shortfall for projects where the cost is to be shared with, for example, Kennel Farm or Manydown, is even greater - of the order of £34M, excluding the cost of the Gypsy and Traveller provision, which is not even costed. The table identifies that as much as £14.615M is needed for education-related expenditure.

4.3 The only money so far committed is the £8.5M allocated for the Winchester Road roundabout, which is not included in the shortfall figures. The acknowledged shortfall for improvements to the Brighton Hill roundabout also glosses over the fact that the Council has so far offered no practical solution for the traffic impacts on this critical junction.

4.4 Because of issues with viability with respect to affordable homes on sites like Manydown, and also perhaps in anticipation of the funding shortfall highlighted above, the Council has changed its emphasis to using S106 funding, rather than CIL, to pay for key infrastructure projects¹². As the level of S106 funding will not be known until the various planning applications, this simply serves to exacerbate the uncertainty of funding. It could also be seen as an attempt to side-step the embarrassing reality of the inability to provide necessary infrastructure until after the Plan, and the proposed developments, have been approved.

¹¹ Examination Library PS/02/20

¹² CIL Draft Charging Schedule Report to Economic Planning and Housing Committee 11 September 2014

4.5 It would seem to be almost certain that the acknowledged funding gap will never be bridged, and that the Council's intention is to proceed without commitment to the necessary infrastructure. This throws into question the viability of both sites, and the ability to develop these sites in a sustainable manner.

4.6 It is also interesting to observe that the current Plan will not seek to rectify historic under-provision of infrastructure, such as the examples mentioned in paragraph 3.10, above. The IDP of April 2014 states that: *"It is not intended that the IDP provides for any historic deficits in infrastructure. The S106 regulations do not allow deficit funding and the Community Infrastructure Levy guidance advises that the Community Infrastructure Levy (CIL) funds should not be used to remedy pre-existing deficiencies in infrastructure provision unless those deficiencies will be made more severe by new development. In this regard there will be instances where making provision for the development proposed in the Local Plan, is most effectively achieved by upgrading an existing facility. Examples of this could range from improvements to the transport network, public transport, extensions to existing schools and expanded community halls."*¹³ This adds further focus to the need to ensure that all essential and necessary infrastructure for developments in the current Plan are fully funded and committed, as shortcomings will not, and cannot, be rectified by future Plans.

4.7 Suggested Modifications

Either the inclusion in the Policy for both sites that the education and off-site transport infrastructure should be subject to Grampian conditions.

Or the removal of both sites from the Plan in favour of alternative sites (BAS102, BAS103 and OLD005) where funding of off-site transport infrastructure is already committed.

5. Golf Course and Hounsome Fields Viability Report May 2015 and Statements of Common Ground for Golf Course and Hounsome Fields August 2015

5.1 The Golf Course and Hounsome Fields Viability Study May 2015¹⁴ shows indicative S106 strategic transport contributions from both sites of only £4M. This leaves a shortfall of £7.7M. It is inconceivable that proportionate shares of subventions from other sources such as CIL, New

¹³ Examination Library CD11 para 1.6

¹⁴ Examination Library PS/02/21

Homes Bonus or Growth Bonus can possibly make up this shortfall, especially in the light of the Council's very recent re-focus on S106 funding, rather than CIL, to fund infrastructure. Recently, a view has been expressed by the Council that they will look to Central Government for additional funding – something that would seem, given recent drastic budget cuts and a declared focus on the “Northern Powerhouse”, to be wishful thinking.

5.2 The Statements of Common Ground Golf Course and Hounsome Fields August 2015¹⁵ published very recently, attempt to demonstrate a consensus between councils, landowners and developers on the creation of a coherent and sustainable new community to the south west of the Town. It includes statements such as *“Approximately 2060 new homes will be brought forward in south-west Basingstoke as part of a high quality, comprehensively planned, infrastructure-rich development. The sites will respect, respond to and enhance their landscape and biodiversity context and build upon the local green infrastructure assets to provide a high quality new gateway to the town”*.

5.3 However, an analysis of the education and transport infrastructure elements contained within the document show that the sites will only commit to what they are required to provide for education. With respect to the transport infrastructure, the developers and landowners will only commit to on-site transport works, including access.

5.4 As has been shown in previous sections, the funding shortfall for these two developments is considerable – approximately £34M. The “Common Ground” document makes no clear statements on funding, except for some vague assertions that some on-site and off-site infrastructure will be funded “for example, through CIL” (para 7.17). From the CIL Draft Charging Schedule Report September 2014 it is clear that the total estimate from CIL for the whole Borough is only £27M¹⁶, against an infrastructure budget shortfall variously put at between £96M and £191M depending on whether the infrastructure is considered “essential”, “necessary” or “desirable”. As clearly demonstrated under sections 3 and 4 above, this is woefully short of the figure required. The implicit assumption is that Central Government and the LEP will make up the difference – an assumption which seems highly unrealistic, given the current national financial

¹⁵ Examination Library PS/02/49 and PS/02/50

¹⁶ CIL Draft Charging Schedule Report to Economic Planning and Housing Committee 11 September 2014 para 7.6

situation. As stated in para 4.4, above, the Council appears to have finally recognised the scale of the CIL deficit, and is switching its focus to S106 instead. This simply allows the Council to delay the identification of funding until the individual planning applications are brought forward – when the Plan has already been approved.

5.5 At various points in the Statement of Common Ground, the Councils and the developers rely on the approval of the planning application and construction of the new Critical Treatment, Cancer Treatment and Maternity Hospital adjacent to Junction 7 of the M3 to justify statements concerning the provision of sustainable transport alternatives.

5.6 It is disingenuous on the part of all the parties involved for each to rely on the other to support an argument that developments which are so obviously individually unsustainable can be made sustainable by the approval of the other. The promoters of the Critical Treatment Hospital have used the inclusion of the Golf Course and Hounsome Fields in an unapproved Local Plan in support of their planning application, while Basingstoke Council and the developers of these two sites rely on the planning application for the Hospital as a justification for their inclusion in the Plan. **The Inspector should be aware that recent decisions by the funding authorities of the proposed hospital now make the building of this hospital less likely. This must have a further material impact on the sustainability of these two south western sites due to the reliance that has been placed on its completion by both the Council and developers.**

5.7 Suggested Modifications

The Common Ground statements for Hounsome Fields (SS3.12) and the Golf Course (SS3.11) do nothing to answer the strong and valid criticisms that infrastructure for these sites has not been properly considered, and that funding for this critical element of the Plan falls dramatically short of what would be required. We therefore propose:

Either the inclusion in the Policy for both sites a clear statement that the education and off-site transport infrastructure should be subject to Grampian conditions.

Or the removal of both sites from the Plan in favour of alternative sites (BAS102, BAS103 and OLD005), where funding for both education provision and off-site transport infrastructure is already committed.