

Exploratory Hearing - Housing need

The NPPF requirement to meet objectively assessed housing need cannot displace the obligations imposed by the EU Water Framework Directive (WFD).

The South East Plan recognised the constraints imposed by water quality in the River Loddon. On pages 244/245 – which set the target of 915 dpa for the “Western Corridor and Blackwater Valley” part of the borough - Footnote 1 says that “Provision levels at Basingstoke, for locations within the catchment of Blackwater Sewage Treatment Works and any other locations where potential water quality, supply or treatment issues are identified will need to be informed by a water cycle study.”

The evidence from the Water Cycle Study (WCS, October 2009) and subsequent briefing to councillors by Halcrow is as follows.

The Basingstoke STW is using the best available technology to remove pollutants from its effluent. So any increase in the number of people whose sewage goes to the Basingstoke STW will lead to some increase in pollution of the River Loddon unless there is a major change in technology at the STW.

The Water Cycle Study covered the period from April 2006 to March 2026. It concluded that it would be possible to build 945 dwellings per annum over that period – a total of 18,900 dwellings. Pollution of the Loddon would increase but without a deterioration in band status.

However, building 18,900 dwellings would take the borough very close to a deterioration in band status for orthophosphates (Figure 5-9, page 66).

5,479 dwellings were built in the borough from April 2006 to March 2011 (the start date for this Local Plan). So the WCS only provides clearance to build a further 13,421 (18,900 – 5,479) dwellings in the Local Plan period. That would be 745 dwellings per annum over the 18 year Local Plan period to March 2019.

The position is complicated by the fact that some of the dwellings proposed under this Local Plan would not be linked to the Basingstoke STW. But that was equally true of the 945 dpa target considered by the WCS. In particular, the South East Plan target included 30 dpa in the “Rest of Hampshire” (page 278) – notably Overton & Whitchurch. The total dwellings proposed for that area in this plan is not significantly different from the totals envisaged in the WCS.

Under EU law, we are required to avoid a deterioration in band status for each element making up the Water Framework Directive classification. Any increase in the housing requirement above 748 poses a very serious risk of a deterioration in the WFD band status for orthophosphates which is not permitted.

Proposed Policy EM6 (page 96) provides that development would cease if monitoring indicated that there was likely to be a deterioration in an individual element’s band status. Setting a higher target that made it likely that development would have to be stopped because of a potential deterioration in band status would render the Plan “unsound” as it would not be “deliverable”.

Building an additional STW would not help if, as seems likely, its effluent still had to be discharged into the River Loddon.