EXAMINATION IN PUBLIC OF

THE BASINGSTOKE & DEANE LOCAL PLAN

HEARING STATEMENT

ON BEHALF OF

THE BASINGSTOKE

SOUTH-WEST ACTION GROUP (SWAG)

Hearing Session: Issue 10 – Environment

Hearing Date : 10 Nov 2015

Addressing: EM4 EM5 EM6 EM7

Chris Rose represents Basingstoke South West Action Group (SWAG)

Inspectors Questions

20.1 Do policies EM4-5 provide a clear and integrated framework for conserving, managing and increasing the Borough's green infrastructure, bio-diversity and other environmental assets?

20.2 Other environmental policies: Are the policies addressing water quality (EM6), for example in relation to the River Loddon; sustainable water use (EM9); and pollution (EM12), justified and effective?

1. Policy EM4 – Biodiversity, Geodiversity and Nature Conservation and EM5 Green Infrastructure

1.1 EM4.4 and EM4 para 6.22 are unsound because they are not consistent with National Policy They fail NPPF114 as there is no strategic approach

1.2 They could be made sound by amending the council's green space standards and Green Infrastructure strategy which are used as a basis for this policy.

2. Detailed reasoning on why each of these Policies in unsound

2. 1 EM4 .4[1].states

In order to secure opportunities for biodiversity improvement, relevant development proposals will be required to include proportionate measures to contribute, where possible, to a net gain in biodiversity, through creation, restoration, enhancement and management of habitats and features including measures that help to link key habitats.

This can be provided through:

a) On-site and/ or off-site provision linked to new development in accordance with the council"s adopted green space standards; and be

b) Focussed on identified Biodiversity Opportunity Areas and Biodiversity Priority Areas as identified in the council's Green Infrastructure strategy and updates where appropriate.

2.1.1 NPPF 114. requires Local planning authorities to "*set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure*

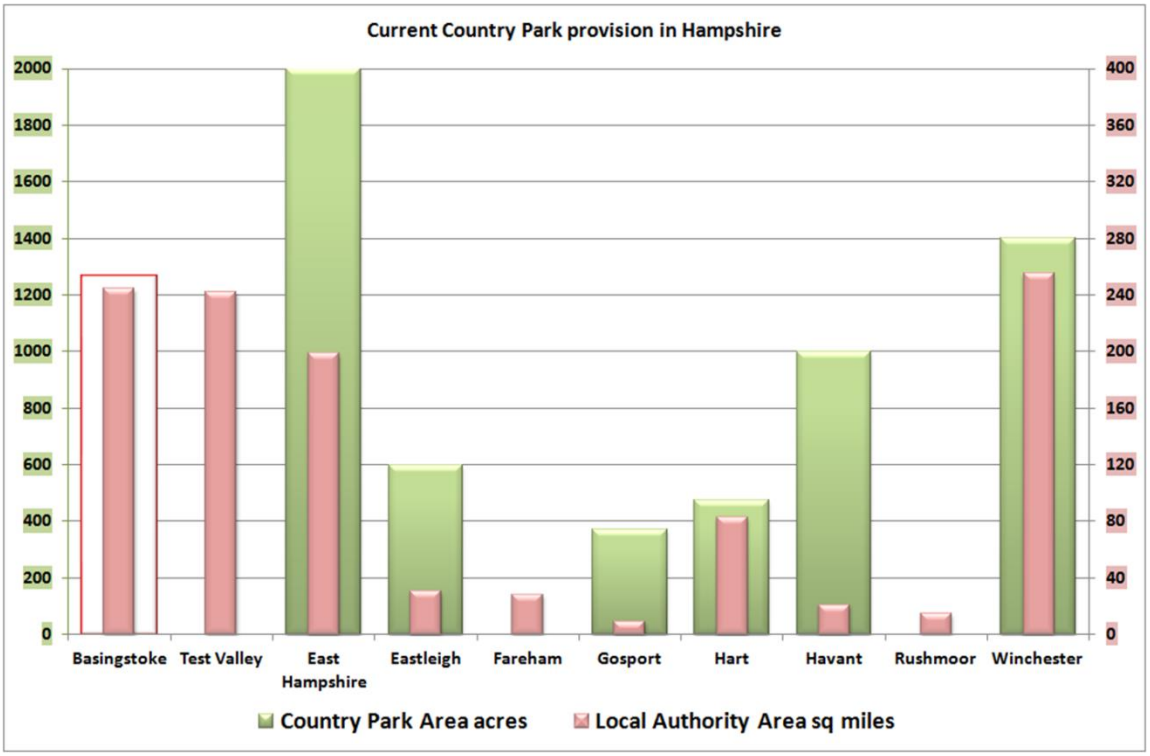
2.1.2 Policy EM4 fails because the adopted green space standards are inadequate as they define space and distance only for multifunctional green spaces and make no separate provision for natural green space which is the key for biodiversity

2.1.3 It fails because there are no adequate standards for compensation where policies are over ridden by perceived requirement for development

[1] Examination Library CD01 p. 85

2.1.4 The creation of a country park of 100 Ha is inadequate for the current and increasing population.

2.1.5 The Green Infrastructure strategy[2] referenced in Policy EM5 provides for a minimum of 100Ha size of country park. This is the size quoted by HCC 10 years ago. A size proportionate to the rest of Hampshire should in fact be five times larger than this proportionate to the area of Basingstoke and Deane



This chart highlights the lack of country park provision in North Hampshire. In addition South Hampshire also has two National Parks

2.1.7 Green Infrastructure Strategy[3] states *"To ensure that improvements to green infrastructure are considered at an early stage of the development process and when allocating existing and future funding streams."* There is no strategy for improvement. Hounsome Fields the Golf Course Kennel Farm and the Manydown development are all considered in isolation

2.1.8 Policy K of SS3.12 Hounsome Fields plans to put a road through the last remaining 2 mile section of the ancient Silchester to Winchester Roman Rd which was documented in the 4th Century and is still widely used as a public footpath.

2.1.9 There is no reference to what is locally significant and important. Brown hares, lapwing, the grey partridge and the skylark are all UK priority species in the UK Biodiversity Action Plan and

[2] Examination Library EV09 p 70
[3] Examination Library EV09 p.7

still occur on the fields of Manydown. The Plan should provide for habitat to be set aside for them.

2.2 EM4 para 6.22[4] states

"The council has set meaningful, time-bound targets for habitat creation and restoration within the council's Green Infrastructure Strategy, and where appropriate, will seek improvements to biodiversity through development proposals. The council will also seek habitat creation and management proposals which will expand existing habitats, or link them, either through direct physical connection or by providing „stepping stone" features. Through this approach the council will seek to avoid a net loss in biodiversity and actively pursue opportunities to achieve a net gain in biodiversity across the borough."

2.2.1 Targets are set for multifunctional green space but there are none for natural green space

2.2.2 There are aspirations but no targets for habitat creation nor for green corridors.

2.2.3 Green corridors are only included for woodland and hedgerow species with no reference to grassland species.

2.2.4 There is reference to the opportunity to link Oakley woodlands to already existing green corridors which lead to Old Down Park but no commitment to do so (This is endorsed in Oakley Neighbourhood plan currently awaiting approval)

2.2.5 Targets are set for different types of habitat but these are notional and only linked to BPAs in accordance with Policy EM4.4b not for the borough as a whole

2.2.6 Conclusion

Policies do not form a coherent whole. There is no evidence of a landscape scale strategy to conform with NPPF114

Recommendations

[4] Examination Library CD01 p.86

a) Green corridors and networks of biodiversity must be identified and included in the green Infrastructure strategy to link current SINCs in the borough with the wider landscape and ensure that areas such as Old Down and Beggarwood Parks, Peak Copse, the Golf Course and Hounsome Fields woodlands are not isolated.

b) Locally significant and important species which still occur on the fields of Manydown (brown hares, lapwing, the grey partridge the cuckoo yellowhammer and the skylark) which are UK priority species in the UK Biodiversity Action Plan and should have habitat reserved for them.

c) A target should be set for the creation of new habitat including Local Nature Reserves

d) That the councils green spaces policy is amended to recognise that natural green space should be considered separately from and in addition to other multifunctional green space because of its impact on biodiversity and its emotional and physical effects on well being

d) Insert a proviso for the next plan for linking Old Down (SINC) to Oakley Woodlands (SINCS) to form an additional country park in South Manydown as part of master planning process

3. Policy EM6 Water Quality

3.1 This Policy is neither positively prepared or effective as the actions to be taken are barely meeting current water quality standards and recognises there will be a fall in quality during the plan period.

3.2 Restrictions should be placed on the rate of development unless appropriate improvements to Basingstoke STW thermal hydrolysis and phosphate trials are expedited.

3.3 Detailed reasoning

3.3 This Policy seeks to *"protect, manage and improve"* water quality, for example in relation to the River Loddon. However in the Statement of Common Ground between Environment Agency, Thames Water and Basingstoke and Deane Borough Council[5] it is stated that *"there will be deterioration in water quality but not sufficient to fall from poor to bad."* Although it says that there are no insurmountable difficulties in respect of phosphate the results of the Thames water phosphate trial will not be available until 2017

[5] Examination Library PS/02/38

3.4 The Statement of Common Ground[5] section 2.8 also states that as well as preventing deterioration of water quality under the Water Framework Directive, the EA also has to work with partners to seek to ensure that the water environment will reach Good Ecological Status. For the river Loddon, modelling indicates that to reach Good Ecological Status a phosphate limit of 0.1 mg/l would be needed at Basingstoke STW. This is currently deemed to be technically infeasible

3.5 Future revised effluent limits for phosphate will be identified in the review of the permit limits that will take place as part of the 6 year river basin planning cycle. Actions to ensure that there is no deterioration in current class status will be identified and included in the 2021 River Basin Management Plan (RBMP). Subject to the adoption of revised effluent limits for phosphate, a scheme for improvement work at Basingstoke STW should be put forward by Thames Water in the 2020-2025 business planning period. Therefore it is likely that an enhanced plant will be in place at Basingstoke STW before any deterioration has occurred.

3.6 Recommendation

Insert a clause that states that development will be delayed or housing numbers reduced after 2021 unless the enhanced thermal hydrolysis plant is operating effectively and the phosphate limit of 0.5 mg/l has been reliably achieved

4. Policy EM7 Managing Flood Risk

4.1 This policy fails as there is no surface water management plan which means it fails NPPF103 'When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere'

4.2 A strategic surface water management plan is required for west and south west Basingstoke

Detailed reasoning for failure

4.3 The policies all relate to the flood risk for the developments themselves. There is no direct reference to flooding downstream except in paragraph e) "*to attenuate surface water run-off so that the run-off rate is no greater than the run-of prior to development taking place or, if the site is previously developed, development actively reduces run-off rates and volumes."* This is inadequate.

4.4 The Plan has **no Surface Water Management Plan** for Area 1 (Manydown North and South) Area 2 (Hounsome fields and the Golf Course and Kennel Farm which will all affect the groundwater levels and the surface run off to the low lying land at Buckskin and Kempshott. (See appendix a b and c attached for maps) Even though the Surface water management plan guidance 2010 [6] states 'The cumulative effect, on surface water flood risk, of numerous new development and redevelopment sites within an urban area should be examined through a SWMP study'.[7]This is repeated in Strategic Flood Risk Assessment 2010/12[8]. This document also suggests that storage requirements for developments of more than 5 Ha can be met by large scale ponds or tanks.

4.5 Phase 2 water study cycle executive summary section 8.2.4 also voices concerns about drainage to north west and west of Basingstoke. The requirement for water storage is not met **In 8.2 it states for Area 2: South West of Basingstoke-[9]** high permeability areas with low run –'*We estimate that the storage requirements for this area will be approximately 428m^3/ha of developed area'*

4.6 Oddly the risk of surface flooding is not identified as a constraint in the Statement of Common Ground appendix 3 for the Golf Course development released Aug 2015 even though the Environment Agency show it on their flood Risk Map[10] which is available on line.

4.7 The flooding which occurs on the A30 at the junction with the A33 is not addressed. Nor is the flooding at Kempshott and Brighton Hill roundabouts where a lane is regularly closed due to flooding during any periods of heavy rain. There is no reference to this frequent flooding in the Strategic Flood Risk Assessment of 2010[11]

4.8 Recommendation

- Specific attention should be given to the possibility of downstream flooding and addressed by master planning for the west of Basingstoke. At this time there is no information in the public domain as to the progress of HCC strategic planning being undertaken at the

[6] DEFRA Surface Water Management Plan Technical Guidance March 2010
[7] Appendix E
[8] ENV05 HALCROW Strategic Flood Risk Assess,ment
[9] ENV06 Phase 2 Watercycle Study 8.2
[10] Attached as Appendix C
[11] ENV05Strategic Flood Risk Asseesment table 10

moment in relation to flooding at Buckskin and Kempshott and the wider Loddon catchment area

- Insert intention to assess the condition of the ageing culverts which run under Basingstoke town centre repair or replaced by above ground drainage routes as recommended in 8.2.4
- Insert water storage requirement for each development site based on the area of land to be developed and the permeability of the surface and produce strategic solution for the whole of the south west of Basingstoke
- Amend paragraph e) of Policy EM7 to read "*to attenuate surface water run-off so that, **even up to a 1 in 100 year event plus climate change**, the run-off rate is no greater than the run-of prior to development taking place or, if the site is previously developed, development actively reduces run-off rates and volumes"*

5. Policy EM9 Sustainable Water Use

This policy fails as it focuses almost entirely on building standards and makes no reference to issues such as climate change and the nature of the water supply. It relies entirely on South East Waters ability to import water into the area and makes no allowance for any changes to the rate recharging the aquifer

Detailed Reasoning

5.1 This Policy omits any reference to water supply issues. The water companies have a statutory duty to provide water. That would seem to be the case early in the plan but there are no long term strategies to provide water towards the end of the plan. The water companies and BDBC and HCC need to provide a strategic approach to the issue.

5.2 Three different water companies are involved in BDBC area. This leads to fragmented approaches. The availability of water from the aquifer depend on the rainfall, the permeability of the land, the provision of SUDS .

5.3 Thames water has already stated that surface drainage should be used because of the poor condition of the culverts which run beneath the town centre. Although there is no evidence that any action has been taken to address this. This will reduce the availability of water for the aquifer which is extracted by Southern water. The quantitative status of groundwater is predicted to be low in the Thames River Basin management plan and the Thames water strategy 2015-21 states

'In the longer term, we do not believe that reducing demand for water will be sufficient to meet the twin challenges of population growth and climate change. Our work suggests that new water resource options, including a new strategic resource, for our supply area – and the south-east of England – will be required in the late 2020s'

Both water companies express confidence in the deliverability of an increasing water supply within the plan period although this is a direct contradiction of their positions in their own business plans

5.4 Phase 2 water cycle study states[12]

> In the west and north-west, because the current infiltration regime is high, it will be difficult to maintain greenfield rate and volume from the site; this could lead to increases in runoff rate and volume to the culverted section of the Loddon, with a corresponding impact on surface water flood risk upstream of the culvert. Furthermore development West of Basingstoke will also probably lead to a reduction in groundwater recharge to aquifer, even with excellent implementation of the SUDS train. This will impact on the available developable land within these areas. It is recommended that a strategic approach to surface water drainage is adopted if development is allocated in this area, which will help to address some of the drainage concerns.

We have been unable to find any reference to a strategic approach

5.5 The South East Water Business plan 2015 states

'Despite these water supply challenges, government policies continue to support economic growth in the region, through the building of more homes to support a growing population. We will see a 24% increase in properties (212,500 more homes and businesses) and a 19% increase in population (400,000 extra people) living in our supply area by 2040.

That means peak demand for water in a dry year, typically during the warmer, drier Summer months, will increase from the current 709 million litres a day to 776 million litres a day.

To help, we will drive down individual water use from the current 165 litres per day to 148 litres per day by 2040, largely as a result of our metering programme and associated water efficiency initiatives.

Some 60% (500,000) of the homes we supply are already on a meter. This includes customers who have had a meter installed as part of our Customer Metering Programme which started in 2011, when only 42% of homes had a meter.

[12] ENV06

This programme of work is vital for securing existing and future water supplies, and will see the majority of our remaining 300,000 unmetered households fully metered by 2020, so that over 90% of customers will pay their water bill based on actual consumption.

However, on their own that is still not enough – we will be short of water by up to 137 million litres a day by 2040. In fact, some of our supply area shows a shortfall in water from as early as 2016, which is why we need to make investment now, and which is set out later in this plan'

None of their published suggestions are being implemented in our area . Two reservoirs (Kent and Sussex).In 3.40 they admit their output will reduce from 2020 so they will need other water sources and that WRZ4 (Basingstoke) is highly vulnerable to climate change[13]

5.6 Phase 2 water cycle study states that there should be a hydrological investigation to ensure that development on an aquifer maximises infiltration drainage infrastructure will not adversely affect groundwater recharge and flows in the River Loddon

5.7 Catchment Abstraction Management Strategies (CAMS) state no further abstraction should be allowed during low flow periods for the Upper Loddon

5.8 South East Water currently imports 8% of their drinking water from surrounding areas.

5.9 Basingstoke is linked to Farnham by a water supply system. The direction of travel is from Farnham to Basingstoke rather than two way. [14]This shows the aquifer is not supplying enough water for the current residents of Basingstoke so it is imperative that maintaining or improving the recharging of the aquifer is high priority

5.10 Conclusion

There is no strategic approach to providing a sustainable water supply. The piecemeal approach to development on the west of Basingstoke is inadequate. The provision of a reservoir at South Manydown or the low lying land at parcel 6 Giddings Field might provide

a. Control of surface run off reducing flood risk to Kempshott, Buckskin and West Ham
b. Water storage allowing controlled infiltration of water into the aquifer
c. Creation of a habitat with a resultant increase in biodiversity
d. Enhanced leisure opportunities for residents and visitors

[13] http://www.southeastwater.co.uk/media/1114488/3_SupplyForecast_WRMP_0614a.pdf see p47

[14] Appendix F attached

5.14 Recommendations

- A Grampian approach to the issue of water sustainability should ensure that construction should be limited unless an alternative water source has been decided upon
- A hydrological study should be prepared to ensure the combined effects of the development in West and South West Basingstoke do not affect ground water recharge
- A feasibility study should be conducted for a reservoir constructed on low lying land of South Manydown.