
Basingstoke & Deane Local Plan Hearing Statement on behalf of Mr & Mrs Bowater

Issue 2: Sustainability Appraisal and Habitats Regulations Assessment

Sherfield Hill Farm, Basingstoke

Representation Reference 910139

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Issue 2: Sustainability Appraisal and Habitats Regulations Assessment



1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Savills on behalf of Mr & Mrs Bowater in response to the Inspectors questions concerning Issue 2 'Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)'.
- 1.2 This statements should be read alongside:
- the representations by Savills on behalf of the landowner to the Basingstoke and Deane Local Plan Mid-examination Consultation in June 2015. These earlier representations were supported by an Urban Design Capacity Assessment by Savills Urban Design Team and Transport Technical Note by Peter Brett Associates; and
 - the separate Hearing Statements submitted on behalf of Mr & Mrs Bowater in response to Issue 3 'Spatial Strategy and Housing Need' and Issue 6 'Omission Sites'.
- 1.3 This statement provides evidence in respect of the Soundness of the Plan as submitted for Examination and focuses specifically on question 3.2.

2.0 Question 3.2: *Have reasonable alternatives been considered in the SA? Is there a clear audit trail from the consideration of option to the preferred strategy in the Plan?*

- 2.1 Basingstoke and Deane Borough Council's Strategic Housing Land Availability Assessment (SHLAA) is divided into sites which the Council deem to be Category 1 (development potential worthy of further consideration through the Local Plan) and sites the Council deemed to be Category 2 (not suitable for strategic allocation through the Local Plan).
- 2.2 The Council's Consultation on the main modification to the Local Plan sought to increase the housing target from 748 - 850 dwelling per annum. This represents an increase of an additional 102dpa and an additional 1,836 dwellings over the plan period. In proposing to meet the additional housing requirement, the Council's SA only reviewed individually and cumulatively (as part of existing or proposed larger allocations) all the remaining unallocated sites within the SHLAA deemed to be Category 1 sites. The Council's decision was to allocate one additional large Greenfield allocation for 750 dwellings – 'Hounsome Fields'.
- 2.3 This action omitted from the SA process the assessment of any sites the Council had previously deemed Category 2, either in isolation, or in combination with other Category 1 sites.
- 2.4 The NPPF makes clear that in order to be sound a plan should be justified being the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence. Furthermore, the NPPG states that: *"The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should be documented"* (NPPG, Paragraph 018, Reference ID: 11-018-20140306).
- 2.5 We would question whether the exclusion of the Category 2 sites from the SA process meets this test. In our view, and to be considered sound, the SA should have reviewed sites both within the self defined

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Category 1 and 2 in isolation and in combination where necessary, particularly given that the SA enables these sites to be tested cumulatively. A comprehensive review of these Category 1 and 2 sites could have yielded a different conclusion with regard to the most suitable and sustainable sites for accommodating further growth in the Borough, particularly where Category 2 sites lie adjacent to Category 1 sites.

- 2.6 To this end, Sherfield Hill Farm has been deemed by the Council as part of its SHLAA (Version 10, August 2015) to be a Category 2 site, and thus was not afforded the same assessment as adjacent sites, in particular the proposed strategic allocations directly to the south of the site at Redlands (SOL002) and East of Basingstoke (BAS121), or in combination with these sites.
- 2.7 Furthermore, in allocating Hounsome Fields, the SA assessed as an alternative option a larger allocation of housing to the east of the Basingstoke (cumulatively with Redlands and East of Basingstoke) drawing upon the remaining unallocated Category 1 site in this area. Despite Sherfield Hill Park adjoining at its southern boundary the allocation at Redlands (SOL002), the site was not afforded the same assessment simply as a result of the Council's previous categorisation of the site as a Category 2 site. Whilst the SHLAA discounted the site on the basis that it would extend development further into the countryside, this principle applies to all of the Greenfield Category 1 sites identified by the Council within its SHLAA. A review of the site through the SA, particularly in combination with the proposed strategic allocations to the south, may have concluded an alternative approach was indeed a sustainable option.
- 2.8 Notwithstanding the fact that this is considered to have been overlooked in the current SA, Savills has contended in a separate paper on Issue 3 that the Borough's Objectively Assessed Housing Need is much higher than provided for and that the Council do not currently have a 5 year supply of deliverable sites. The Council will therefore need to provide additional housing sites to meet the outstanding need. On this basis, rather than just revisiting the remaining unallocated Category 1 sites that are remaining, the Council should undertake a wider comprehensive assessment of Category 1 and 2 sites, particularly where these adjoin proposed strategic allocations already, to assess the best sites available in the wider context.

3.0 Summary

- 3.1 In order to be considered sound, the SA that underpins the Local Plan should have undertaken a more comprehensive review of the options available to meet the Council's additional housing need and made a judgment of all of the reasonable alternatives. In order to demonstrate this, and be considered sound the SA should undertake a robust assessment of all sites put forward for development, both in isolation and in combination.