



Gladman Developments Ltd

Basingstoke and Deane Local Plan Examination

Issue 2 – Sustainability Appraisal and Habitats Regulations Assessment

Question 3: Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)

3.1 Is the Spatial Strategy supported by the SA and HRA?

3.1.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against all reasonable alternatives.

3.1.2 The Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives, the Council's decision making and scoring should be robust, justified and transparent.

3.1.3 Gladman remind the Council that there have now been a number of instances where the failure to undertake a satisfactory SA has resulted in Plans failing the test of legal compliance at Examination (South Somerset) or being subjected to later legal challenge (Heard vs Greater Norwich Development Plan).

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?

3.2.1 Gladman question whether the Local Plan is based an adequate SA of the reasonable alternatives to the Council's Strategy. We particularly question the consideration given to

providing a higher level of development in the borough's rural towns and villages, and the attention paid to the Council's assessment of Local Plan Policy SS7.

- 3.2.2 As part of modifying its Local Plan housing requirement the Council were asked by the Local Plan Inspector to consider setting a target for the delivery of homes through Neighbourhood Planning. Dismissing this strategy on the basis that it could undermine the community-led planning work being undertaken in these settlements and a lack of supporting evidence, it instead chose to meet the majority of the Council's revised housing target through an additional allocation on edge of Basingstoke town.
- 3.2.3 Gladman strongly object to the Council's reasoning for failing to direct additional housing to the borough's rural communities. Whilst recognising the affect this could have on the Neighbourhood Planning activities being undertaken within these parts of the authority area, we question whether it is appropriate to allow these documents to dictate the overall strategic direction of growth in the borough. Gladman submit that it would be entirely reasonable to have considered a higher housing requirement for the borough's rural areas as a strategic alternative to the Local Plan's strategy.
- 3.2.4 The Council's SA of Local Plan Policy SS7 refers to a number of negative consequences associated with the restrictive approach to Tadley. It highlights that the restriction on new housing around Tadley will have a significant adverse impact on providing housing to meet local needs, with a lack of investment likely to affect the amenities, services facilities to the town's residents need. It describes how natural growth in the community will be stifled, with families growing up and unable to live in the same area.
- 3.2.5 Providing further housing in Tadley would help to address a number of the negative sustainability impacts that the Council's SA currently identifies would arise from the authority's decision to exclude the town the Local Plan's spatial strategy. It would lead to more sustainable patterns of travel, allowing the significant number of workers that are likely to travel into the

AWE to live locally to their place of work. All of the benefits point to the need to progress a more proactive strategy to meeting Tadley's development needs.

3.3 Which adverse effects identified by the SA require significant mitigation, and how is the Council addressing these issues?

3.3.1 We have no specific comments on this question.