

## **Report to Basingstoke and Deane District Council:**

### **Quality assurance review of the Sustainability Appraisal (inc. Strategic Environment Assessment) Report of the updated Basingstoke and Deane Submission Local Plan – April 2015**

**Levett-Therivel Sustainability Consultants**

**30 June 2015**

Contact: Roger Levett [roger@levett-therivel.co.uk](mailto:roger@levett-therivel.co.uk) tel 0117 973 2378

## **1 Introduction**

Basingstoke and Deane District Council commissioned Levett-Therivel to assess whether the SA Report and appendices for the updated Local Plan are robust and compliant with the SEA Directive, and specify any further action needed, with particular reference to the changes made in response to the Inspector's concerns at the Exploratory Meeting.

This is the report of this assessment. It takes into account changes to the SA Report and appendices made by the Council in response to informal feedback and an earlier version of this report. For clarity and brevity, it focuses on the final documents now published for consultation, and summarises rather than repeating in detail the concerns we raised and recommendations we made earlier which the Council has now addressed.

Two caveats:

- This assessment is of the SA/SEA consequences of the Council's response to the Inspector's concerns, as shown in the documents sent to Levett-Therivel and available on the Council website between 2 April and 4 June. It does not assess how well the Council's response meets the Inspector's concerns;
- It does not constitute or replace a formal legal opinion on the soundness or otherwise of the SA or the Local Plan.

The rest of this report consists of:

- 2 An overall assessment
- 3 A table summarising the position on the soundness issues raised by the Inspector

## **2 Overall assessment**

The most important and contentious issue raised by the Inspector was total housing allocations. This review found that further work the Council did since the Exploratory Meeting responded to the Inspector's concerns and was consistent with good planning practice and with the SEA Directive and guidance. This was documented clearly and thoroughly in Council reports but not in the SA Report and its appendices. To remedy this we recommended that Appendix 9 should be rewritten to set out the logical chain of reasoning that leads to the choice of 850 over other

alternatives. The Council has done so, and made substantial related changes to chapter 8 of the SA report, which we believe fully address these concerns.

The other major substantive issue raised by the Inspector was ‘the soundness implications of the east/west housing balance in the Local Plan’. Officers believe this was prompted by respondents to Local Plan consultations stating that some of the sites allocated in the south west and west of Basingstoke are too far from employment sites and the town centre. SA Appendix 15 was modified to address this, but the Review did not find it addressed the point. After several exchanges on the point, officers have now added Appendix 13a which we think does.

Our assessment is that the SA responses to the Inspector’s other issues are Directive compliant, provided two minor outstanding responses to issues (vi) and (vii) in the table in section 3 below are implemented as officers have told us they will be..

We found the SA documentation is very wordy, with too much detail making it hard to see the overall picture or important messages. The Council have followed some of our suggestions for improvements. It still falls short of good practice standards but we do not believe it constitutes a noncompliance with the SEA Directive.

### 3 Response to the Inspector’s concerns

The following table summarises:

- The Inspector’s concerns as recorded in his 19 December 2014 letter following the Exploratory Meeting;
- The position before this review;
- The implications for the SA/SEA process;
- The position after the review, at 4 June 2015.

<b>Issue in Inspector’s letter</b>	<b>Position before this review</b>	<b>Implications for SA/SEA</b>	<b>Position at 2 June 2015</b>
(i) A revised OAHN for the Borough, based on the considerations that are already set out in this letter.	Revised to 850. Reasoning set out in 15 Jan report.	Need to appraise new 850 option, compare with others, explain why it was chosen over the others	May 2015 version of Appendix 9 now compares 850 with an adequate range of reasonable alternatives and explains why it is preferred.
(ii) Sustainability Appraisal (SA) – Addendum to demonstrate clearly the sustainability implications for both option 3 and option 4, and ...	No formal Addendum, instead addressed in the discussion of revised OAHN.	The single head-to-head comparison of 750 with 1000 is now less important given adoption of 850. However the underlying message remains valid that the SEA needs to show more clearly why the chosen option (now 850) is better than others.	May 2015 version of Appendix 9 now compares 850 with an adequate range of reasonable alternatives and explains why it is preferred.
... the soundness	No specific	If the concern is	Appendix 15 compares

implications of the east/west housing balance in the Local Plan ['especially in relation to employment', according to the EM minutes]	discussion of the E-W balance. It was not clear from the documentation exactly what the Inspector's concern is.	related to any of the SA objectives (eg balance of employment and housing and consequences for travel generation?) SA should provide some evidence on this.	spatial options for greenfield development around Basingstoke. New appendix 13a compares 3 options: eastern focus, western focus and distributed around Basingstoke. This reveals that on many criteria the options are similar, and that many impacts will depend on details of implementation, but does provide a justification for the choice of the distributed option.
(iii) An assessment whether the provision of around 850 dpa would be acceptable environmentally in relation to potential pollution on the Rivers Loddon and Test.	17 March report and its Appendix B confirm acceptability for Loddon. No info for Test.	Results of further assessment need to be reported and reflected in SA of 850	River Loddon material reflected in SA. Officers advise Test is unlikely to be problematic since none of the proposed major housing developments will drain into it.
(iv) An assessment on whether any of the changes to accord with the Inspector's concerns would require major new SA/HRA work, an SA/HRA addendum, or no new SA/HRA work at this stage.	SA/SEA: No explicit assessment, but implicit judgement that best handled by updates to previous SA/SEA.	Changes to relevant text discussed in appropriate place	See specific points in this table.
	HRA: Para 4.26 of the 17 March report says screening assessment concludes no significant impacts	No action needed (given conclusion of screening.)	No action needed.
(v) An assessment as to whether the existing and proposed infrastructure would be able to satisfactorily accommodate the proposed growth to the south-west of Basingstoke.	Paras 4.20-4.25 discuss the infrastructure needed	May 2015 IDP Addendum responds to this request.	No action needed provided Inspector is satisfied that the IDP Addendum addresses the issue.
(vi) Inclusion of the	Agreed to insert	Policy will need to be	Officers advise that the

model policy on sustainable development in the Local Plan.	but not mentioned in the 17 March report or its appendix E with other proposed policy changes.	appraised.	model policy will be added and appraised as part of the proposed mods later in the process.
(vii) Inclusion of the housing trajectory in the Local Plan.	Agreed to include.	If and only if the trajectory is expressed as a plan objective or policy, it would need to be appraised like the other objectives or policies. This appears unlikely.	Officers advise that the trajectory will be included in the plan and assessed as part of the proposed mods following the hearings.
(viii) Inclusion of an employment target or range in the Local Plan.	Added to policy EP1	Review appraisal of policy EP1, change if necessary.	No change made.
(ix) Strengthen the Local Plan policy on gypsies and travellers in line with Government policy, possibly along one of the three options discussed at the Exploratory Meeting.	One site added to Policy CN5, but no broader changes to address the Inspector's concerns.	Review appraisal of policy CN5 if any significant changes made.	No change made.