

## Your views

Please complete a separate copy of pages 3 and 4 of this questionnaire for each individual site or section that you wish to comment on.

**Which consultation document does your comment concern?** Please tick one option only:

- Site Allocations DPD       Sustainability Appraisal Report       Habitat Regulations Assessment  
**or**  General comment (not specific to any one of the consultation documents)       Suggest a new site

**Which site or section of the document does your comment concern? (if applicable)**

Please state all that apply:

Site reference: (please select and note number) UA / GB **GB4 & GB5**

Section title **Sustainability Appraisal**

Page number **Various**

Paragraph number **Various**

**Are you?**  Supporting       Objecting       A combination of these       Neutral

### Your comment

In order for the Site Allocations Plan to be found sound it is critical for the Council's chosen strategy to have been informed by a rigorous Sustainability Appraisal to confirm it is the most appropriate strategy when assessed against reasonable alternatives. The NPPG provides guidance on the assessment of alternatives, which are defined as being:

*"Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies of the plan. They must be sufficiently distinct to highlight the different implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. The 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 alternatives."*

We contend that not all reasonable alternatives have been tested in arriving at the Council's preferred Site Allocations Strategy. For example, testing of reasonable alternatives would have required testing the option of the Council's chosen strategy of safeguarding Green Belt land versus comprehensive release of all the sites in the current plan period to objectively assess the sustainability merits of both.

It is evident from a review of the SA that this has not been done and the decision to safeguard land has been taken in advance or outside the SA process. The SA process therefore only focuses on the merits of each individual site but not, crucially, on the decision to safeguard instead of seeking to meet a higher proportion of housing need during the plan period.

Aligned to this is the associated issue of how the Council has gone about selecting its preferred approach for Green Belt release in this plan period. The SA does not provide any supporting evidence in the SA to justify why the chosen sites were selected ahead of others or indeed, why the preferred options put forward in the Green Belt Review were rejected. This is a further fundamental flaw in the SA process as there is no evidence presented that shows that the preferred approach is the most sustainable and the result of a fair and transparent process.

In the absence of the testing of reasonable alternatives the overarching strategy set out in the plan is fundamentally

unsound as it fails the justified and effective NPPF tests as well as being contrary to the SA /SEA regulations.

**Proposed modifications** – please explain what changes you consider should be made, if any (for example, changes to the text, a site boundary, etc.)

The Sustainability Appraisal needs to be undertaken again with a full assessment of the alternative development options tested.

These comments are page \_\_\_\_ of \_\_\_\_ pages.

### **More comments?**

If you would like to make additional comments about other proposed sites or sections of any of the consultation documents, please complete further copies of pages 3 and 4 of this questionnaire. Please ensure that these are firmly attached with the main questionnaire - including pages 1 and 2 providing your details - and return this by email or post to the Council (contact details on page 2).