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# Local Plan Part 2: Examination

## Further Written Representation

### Matter 1: Sustainability Assessment

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Savills on behalf of Alfred Homes (51580)

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## 1. Introduction

- 1.1. Throughout the production of the LPP2 and specifically the Sustainability Appraisal, Savills has highlighted factual flaws to the City Council in respect of the assessment concerning land adjacent to Arlebury Park, New Alresford (SHLAA Reference 2552), which remain, and thus have been material in the conclusions drawn within the SA and the testing of alternatives.
  
- 1.2. This submission of further written evidence, responds to the question raised within Matter 1 and specifically, Qiv) **Has the plan been the subject of suitably comprehensive and satisfactory sustainability appraisal [SA] strategic environmental assessment [SEA] and habitats regulations assessment [HRA]?**

## 2. Has the plan been the subject of suitably comprehensive and satisfactory sustainability appraisal [SA] strategic environmental assessment [SEA] and habitats regulations assessment [HRA]?

- 2.1. In February 2014, Savills informed the Local Planning Authority of an error with its then emerging SA, and the listing of SHLAA site 2552 as having been purchased for the use of Rugby Pitches. The presence of this error was repeated to the City Council in December 2014, and yet, the error continues to be made within the Pre-Submission Draft SA, despite being informed twice of the need to make the correction.
- 2.2. The land in question that was purchased and is now used for the provision of Rugby Pitches lies to the north of site 2552, as recognised in the removal of the Policy RT5 designation from the subject site, as part of the new Proposals Map for New Alresford contained within the LPP2.
- 2.3. However, in seeking to underpin the approach adopted within the LPP2, the SA still reports under 'Key Negative Effects' that Site 2552 ..... *will result in the direct loss of a sports pitch*, which has and continues to be an inaccurate statement. The Negative Effects should be updated to remove reference to SHLAA site 2552.
- 2.4. This incorrect statement is also repeated within Appendix VIII, where the SA concludes that Residential or employment development at site option 2552 could hinder the future delivery of the sports pitch with the potential for major long-term negative effects. This is factually incorrect, and therefore undermines the legitimacy of the SA.
- 2.5. This error is further compounded by the weight the City Council gives to a non-designated Parks & Garden designation that applies to Arlebury Park, and to which the City Council has scored the Site 2552 negatively against, despite not providing any evidence that shows either the extent of this non-designated asset, nor how it would have a negative impact. The importance of this assessment of heritage impact within the SA cannot be overestimated given that in all other respects, Site 2552 scored 'green' against all other criteria in the Council's site sieve process, with the exception of heritage, where it scored amber.
- 2.6. On the contrary, as per the Pre-Submission representation submitted to the City Council, a Heritage Assessment has been submitted in evidence to support the delivery of site 2552, within which Historic mapping shows that site 2552 has always been in use for arable farming, and has never formed part of the gardens associated with Arlebury House. The wider arable land within which site 2552 lies has in recent years been used to accommodate a caravan site and the Alresford Recreation Centre.
- 2.7. The Heritage Assessment concludes that given the existing character of land to the east of Arlebury Park House (in farming use throughout the 19th century and currently in mixed use with farmland, a caravan park and recreation space), site 2552 **would not be considered** part of the non-designated historic park and garden, and yet, in the absence of any evidence to the contrary, the SA scores the site negatively in this regard.

- 2.8 We would draw to the attention of the Inspector Section 3 of the Pre-Submission Representation concerning Policies NA2, NA3 and the SA, which sets out in full the critique of the Council's SA inputs and the errors that have occurred.
- 2.9 The PPG sets out that the role of SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. Should incorrect information be inputted into the SA, then this will lead to distorted outputs and false conclusions drawn in respect of the objections, when compared against the alternatives.
- 2.10 The SA needs to compare all reasonable alternatives including the preferred approach. It should predict and evaluate the effects of the preferred approach and reasonable alternatives, and clearly identify the positive and negative effects of each alternative.
- 2.11 In this regard, it is of significant concern that the Council has not provided individual site assessments against the SA objectives, resulting in very little comparative evidence of how each alternative performs against the next. This in our view is a significant failing of the SA, and masks the failings of the preferred approach under a publically acknowledged desire to see a single site deliver the majority of the housing within New Alresford. With regard to the proposed employment allocation at Sun, we are not aware of any alternative strategy having been tested.
- 2.12 In order to be considered comprehensive, the SA should have assessed each site/ alternative individually, in order to be transparent and importantly, to the same level of detail as the preferred approach. In the absence of such an assessment, it cannot be considered robust or comprehensive.
- 2.13 To conclude, there are many failings with the SA and a lack of evidence to underpin its conclusions, notably heritage analysis, which has led to a number of flawed judgements within. Of particular concern is the presence of errors which Savills has advised the City Council of many times, and which remain and materially affect the conclusions of the SA process.
- 2.14 It has been well documented that the City Council's preferred approach has been to deliver the vast majority of housing at Alresford at a single site, based on the premise that this is the only strategy to deliver the quantum of new employment land sought. We contend this position has influenced the production of the SA, and not as best practice dictates, the SA shaping the preferred approach.

END

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