

'MATTER 1 HOMEWORK - IDENTIFYING THE METHODOLOGY FOR THE EXCLUSION OF SITES AS REASONABLE ALTERNATIVES' 10/04/19

- 1.1 The methodology for the Strategic Housing Employment Land Availability Assessment (SHELAA) is set out in the SHELAAA Methodology, November 2017 (LP11.01). It was subject to stakeholder consultation, involving the development industry, between 4th August and 8th September 2017.
- 1.2 Assessments have been carried out objectively in accordance with the methodology by a member of the Planning and Housing Policy Team. This has included undertaking site visits together with an assessment of the Council's wider evidence base. The assessment did not start from a presupposition of restrictive policies being carried forward into the emerging plan and was therefore "policy on".
- 1.3 The assessments have been carried out positively by taking into account realistic potential opportunities for mitigation and in certain cases to allow for partial development of sites where much of the site could be constrained.
- 1.4 The published 2018 SHELAA represents a summary of the assessment and is supported by more detailed assessments and evidence covering a number of factors:- highways, flood risk, landscape, ecology, heritage, open space, utilities, hazards, trees/hedges and neighbouring land uses.
- 1.5 The SHELAA process is policy neutral. It makes decisions on the deliverability of sites based on consideration of their suitability, availability and achievability for development. It leaves the policy judgements as to which sites to allocate to the Local Plan process.
- 1.6 The SHELAA effectively provides the first sieve of sites, providing officers of the Planning and Housing Policy Team with the details of sites which are considered to be realistically deliverable.
- 1.7 The Council recognises that there are a number of sites which have been identified in the SHELAA as potential development sites but which have not been taken forward for allocation in the Local Plan with an alternative designation applied. The justification for making such decisions is explained in appendix C of the SHELAA 'Post Assessment Paper'.
- 1.8 Of those sites that were not taken forward, some were identified as undeliverable and reasons for this are provided in the SHELAA. For those reasons sites which were concluded to be undeliverable were not considered as "reasonable alternatives" in terms of the Sustainability Appraisal (SA) which is required to consider alternatives to the proposed plan which are reasonable, realistic and relevant (ODPM Practical Guide to the SEA Directive). Those sites which passed through that initial sieve were considered in the SA as either proposed allocations or as reasonable alternatives. The latter comprised those which were rejected by the Council for inclusion in the Local Plan. It is important to note that the SA is just one decision-aiding tool which informed the decision of the Council to determine whether a site should be included as an allocation. The rejected "reasonable alternatives" were appraised in the SA in exactly the same manner as the preferred options and are presented in Appendix G of the submitted SA Report. Reasons for why these sites were not taken forward as preferred options are also provided in the SA.

- 1.9 Site LPSA_370 Land South of Lune Business Park was assessed as being undeliverable in the SHELAA and was not assessed as a reasonable alternative in the SA. Essentially it did not pass through the sieve to the next stage.
- 1.10 This was on the basis of earlier SA work undertaken as part of the 2011 Options Assessment where potential options for this site were explored. The accompanying SA report noted the site's current status and stated that if residential/employment uses were to be considered the scale should be carefully considered to prevent the loss of the open space.
- 1.11 Following this assessment the Council continued to compile its wider evidence base. This included more detailed work on recreation and open space provision and needs within the district. Following the publication of the 2012 NPPF the Council also investigated the identification of potential Local Green Spaces across the district. A methodology was published in March 2015 and a call for sites was undertaken.
- 1.12 Following the conclusion of this work the site was identified as a LGS in the 2017 Draft Land Allocations Document.
- 1.13 On the basis of the council's wider evidence base and a negative assessment within the SHELAA the Council determined via its policy development that housing development at this site was not appropriate with an alternative designation proposed. On this basis the site was not viewed to be a reasonable alternative and as such was not assessed as one under the SA. The subsequent identification of the site as LGS did not inform the SHELAA exercise¹.
- 1.15 Appendix C notes that there has been no conflict identified between the SHELAA and the Local Green Space designation. This is correct. No sites within the SHELAA have been positively assessed for housing and then subsequently taken forward for an alternative Local Green Space in the Local Plan.

¹ It is noted that comments were made on day 1 of the hearing in relation to appendix C of the SHELAA in relation to Local Green Space. Having reviewed this it is the Council's view that the intention of the appendix in relation to this issue has been miss-interpreted.