

Home Builders Federation

ID:2007

Matter 2

SEVENOAKS LOCAL PLAN EXAMINATION

Matter 2: Soundness of the Local Plan

Issue 3: Is the Plan based on a sound process of Sustainability Appraisal?

Q16. Has the Sustainability Appraisal been undertaken at each stage of the Plan's preparation to clearly justify the Council's policy choices?

No comment.

Q17. Does the Sustainability Appraisal process represent the only site selection methodology or has the Council used any other process?

For Council.

Q18. Does it test reasonable alternatives?

The SA does test reasonable alternatives, but we are concerned that the Council has limited itself to too few options when considering its spatial strategy in SDC003. A broader range of options could have been considered at this stage and allowed the Council to obtain an improved understanding of the potential for other options to deliver a more sustainable approach to development than those considered in the SA. For example, the Council could have considered:

1. Delivering above local housing needs on the basis of paragraph 60 of the NPPG states that this is a minimum and that where possible the Council should take account of needs that cannot be met in neighbouring boroughs.
2. A strategy that seeks allocates sites adjacent to urban areas as an alternative to the allocation at Pedham Place.



The approach taken by the Council with regard to the spatial strategy options in chapter 5 seemingly builds in the consideration that adjustments to Green Belt boundaries are inherently unsustainable unless specific criteria have been met. This will inevitably limit the options considered and rules out consideration of other reasonable alternatives through the SA.

Q19 and 20. Has the Sustainability Appraisal been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative? Is the Sustainability Appraisal decision making and scoring robust, justified and transparent?

As outlined in our representations, we are concerned that the assessments of the four spatial strategy options set out in chapter 5 of the Sustainability Appraisal (SA) (SDC003) have not been assessed on an equal and comparative basis. It would appear that some of the positive aspects of the option 4 (which would meet housing need in full) have been under played whilst the environmental impacts have been overstated when compared to option 3 - the Council's favoured option. We have set out in our representations a number of discrepancies within this assessment which suggests that the Council are seeking to downplay the positive impacts of meeting housing needs and over playing the negative impacts when compared to the Council's preferred option. As such we do not consider the SA to be a robust consideration of the likely impacts resulting from the four spatial strategy options.

Q21. Does it represent the most appropriate strategy in the circumstances?

No. We do not consider the proposed spatial strategy, which is represented in option 3, to be the most appropriate strategy. The negative impacts arising from option 4 are similar to those of option 3 but with improved social and economic outcomes. There has not been a robust consideration of consequential impact from not meeting housing need and therefore we would suggest that the most appropriate strategy in the circumstances is for housing needs to be met in full.

Q22. Does the final report set out the reasons for rejecting earlier options?

No comment

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