

## **CED014 Council's Response to Issue 11 – Other Appendix 1 Sites**

***Are the other Development Opportunity Sites in Appendix 1 justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy?***

- 1.1 Detail about the site allocations is considered adequate for Local Plan purposes. Note the Council's response to Inspector's Preliminary Questions in response to the detail about the site allocations use, form, scale, access and quantum of development (see LBR2.06 and LBR 2.06.1). In terms of deliverability note Council response to Issue 5, question ix.
- 1.2 A range of growth options have been tested through the Sustainability Appraisal process. In 2016, the Local Plan Sustainability Appraisal (LBR1.11) tested a total of 12 options for growth. These options can be seen in table 6.2 and 6.3 of LBR1.11 This appraisal highlights the pros and cons of each option, and as such informs and supports the Council's preferred strategy. As set out in paragraph 8.2.3 of LBR1.11, particular considerations included that:
- A lower growth option would compromise the achievement of important housing delivery objectives without leading to a plan that performs notably better in terms of other strategic objectives.
  - A higher growth approach would help to meet objectively assessed housing needs more fully, but would compromise achievement of other important objectives (e.g. higher density development would lead to challenges from a community infrastructure delivery perspective).

Further reasonable alternatives were assessed in the Local Plan Sustainability Appraisal Interim Report 2017 (LBR1.11.2). As set out in table 2.4 of LBR1.11.2, the SA appraised four reasonable alternatives. The reasonable alternatives (other than the Council's 'preferred' approach – Option 2) are summarised below:

- Option 1 - Higher urban densification / no GB release - this approach seeks to exhaust all densification opportunities and avoids removing land from the Green Belt. This would mean that other sites in appendix 1 need to increase in density from that proposed in the Local Plan to accommodate the required level of housing growth.
- Option 3 - Higher urban densification / GB release - this approach involves both maximising urban densification and releasing an element of Green Belt. This would mean that other sites in

appendix 1 need to increase in density from that proposed in the Local Plan to accommodate the required level of housing growth

- Option 4 - Higher urban densification / higher GB release – a higher growth option which would involve both maximising urban densification and releasing additional green belt land in addition to parcels identified in the Local Plan. This would mean that other sites in appendix 1 need to increase in density from that proposed in the Local Plan to accommodate the required level of housing growth.

- 1.3 All reasonable alternative options would result in increasing densities and thus development capacity on these other sites in appendix 1. The SA assessed that Option 1 would be beneficial in terms of impact on biodiversity, traffic environment and providing a reliable transport network. However, it would provide the least number of new homes, be less sustainable in terms of addressing poverty, promoting economic growth, providing community services and have a significant negative effect on education provision. Given this, the other sites (and development capacity assessed) in appendix 1, are considered to be justified when compared to this alternative option.
- 1.4 The SA assessed that Option 3 would be beneficial in terms of biodiversity, climate change and traffic environment. However it would be less sustainable in terms of the traffic environment and conserving the quality of landscapes and townscapes. Given this, the other sites (and development capacity assessed) in appendix 1, are considered to be justified when compared to this alternative option.
- 1.5 The SA assessed that Option 4 would be beneficial in terms of delivering the most homes and promoting economic growth, however it would be less sustainable in terms of biodiversity, traffic congestion, and reliable transport network and have a significant negative effect on conserving the quality of landscapes and townscapes. Given this, the other sites (and development capacity assessed) in appendix 1, are considered to be justified when compared to this alternative option.
- 1.6 Other sites in appendix 1 are considered deliverable within the plan period having regard to constraints and national policy. The Council considers that the main constraints to the delivery of other sites in appendix 1 are:
  - Impact the impact on character and context; and
  - Development viability.
- 1.7 The approach to other sites in appendix 1 is consistent with NPPF paragraph 58 which states that development should, “optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public

space as part of developments) and support local facilities and transport networks”; and should respond, “to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation”. It is considered that the indicative development capacities of other sites within appendix 1 have been set to respond to the existing context and character of the area.

- 1.8 In relation to development viability, the Local Plan is supported by a revised Local Plan Viability Assessment (CED111). This document concludes that the ‘cumulative impact’ of policies in the Local Plan will not threaten viability. Therefore, the Council considers that its approach to other sites in appendix 1 is consistent NPPF paragraph 173 which states, “therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”