

Selby District Council
PLAN Selby Site Allocations:
A Framework for Site Selection

DRAFT FOR STAKEHOLDER ENGAGEMENT: SUMMER
2015

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This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1 Introduction

1.1 Overview and Summary

The PLAN Selby Site Allocations: A Framework for Site Selection was produced by Ove Arup and Partners Limited in 2015. It contains draft detail and recommendations for discussion as part of the Let's Talk PLAN Selby Summer engagement 2015 with stakeholders. The methodology includes the processes involved in selection of land allocations for housing, retail and employment.

Following this engagement the finalised recommendations and conclusions will inform, but not predetermine, decision-making regarding site allocations for inclusion within emerging PLAN Selby. This evidence will be used to inform the Preferred Options draft of PLAN Selby, which will be consulted on in early 2016.

The site selection methodology proposed within this study broadly comprises the following 4 stages:

- **Stage 1: Initial Sift of sites:** considered against fundamental constraints both in physical terms and policy terms, for example flood risk and conformity with the settlement hierarchy respectively.
- **Stage 2: Quantitative Assessment:** sites would be considered against their relative sustainability, for example their proximity to local services and employment, infrastructure constraints and various other factors.
- **Stage 3: Qualitative Assessment:** All sites would subsequently passed to Stage 3 which would seek to assess the more qualitative elements focusing on environmental, social and economic criteria. This stage will incorporate impacts upon amenity.
- **Stage 4: Deliverability:** assessing factors such as ownership and availability and achievability, as well as highway capacity issues.

A Critical Flowchart explaining the proposed process can be found at Figure 6.1.

1.2 Structure of Report

This report has been structured in the following manner:

- Section 2: National Guidance on identifying sites for allocation.
- Section 3: The Local Planning Policy Context including adopted Core Strategy, emerging PLAN Selby and previous consultations on site allocations.
- Section 4: A summary of the existing and emerging evidence base to support the site selection assessment.
- Section 5: A peer review of how a sample of LPAs have approached site selection.
- Section 6: A draft framework for site selection.
- Section 7: Next steps and further work.

2 National Guidance

2.1 National Planning Policy Framework

2.1.1 Considerations in allocating sites

The National Planning Policy Framework, 2014 (NPPF) provides the overarching national planning guidance on Local Plan making and identification of sites for allocation.

The NPPF noted that crucially, Local Plans should *'allocate sites to promote development and flexible use of land, bringing forward new land where necessary'* and *'be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements'* [Paragraph 157 of NPPF]. The Local Plan must allocate sufficient land in the correct locations to ensure a continuous supply of land for housing, employment and other uses of the plan period.

The NPPF requires Local Plans to be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area and represent the most appropriate strategy when considered against the reasonable alternatives [Paragraph 182].

The consideration of reasonable alternatives is therefore one of the key tests of soundness. How the various sites that have been put forward for consideration and how they have performed against each other when measured against a range of set criteria is therefore relevant to satisfying this test.

2.1.2 Site Selection Criteria

NPPF references a range of criteria that must inform the selection of sites for allocation. These are:

- **Accessibility** (opportunities to use transport modes other than the private car such as public transport / rights of way and promote access to jobs and services, such as shops, community facilities and open space).
- **Environmental and physical constraints** (i.e flood risk, contamination, protection of nature resources and historic assets, avoidance of high quality agricultural land and reducing pollution).
- **Protection of the Green Belt and open countryside** (except in exceptional circumstances).
- **Townscape and landscape character.**
- **Prioritising the re-use of previously developed land and that of lesser environmental or amenity value.**

Additionally, the NPPF contains a number of more specific policy criteria that a local planning authority must take into consideration when constructing a site selection methodology. Paragraph 99 of the NPPF requires Local Plans to take account of climate change over the longer term. It states: "**Local Plans should take account of climate change over the longer term including factors such as flood risk, coastal change, water supply and changes to biodiversity and**

landscape. New development should be planned to **avoid increased vulnerability** to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure” [Arup emphasis].

Paragraph 110 states that local planning authorities in preparing plans to meet development needs should allocate land with the least environmental or amenity value. Paragraph 111 encourages the use of previously developed (brownfield) land provided that it is not of high environmental value, whilst paragraph 112 advises local planning authorities to consider the economic benefits of the best and most versatile agricultural land, and direct development to areas of poorer land quality in preference of higher quality.

Paragraph 123, bullet 4 of the NPPF requires planning policies to “identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”.

Paragraph 152 of the NPPF requires Local Planning Authorities to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development. Significant adverse impacts on any of these dimensions “should be avoided”.

It is therefore imperative that the site selection methodology ensures that proposed allocations do not cause significance adverse harm socially, environmentally or economically.

2.1.3 Deliverability

The NPPF focuses on the importance of Local Plans to ‘be aspirational but realistic’ [Paragraph 154 of NPPF], with the identification of sites for allocation that are deliverable and developable.

The NPPF also states that *‘to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable’* and *‘to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viable at the point envisaged’*[Paragraph 47 of NPPF]. For plan making purposes this would be within the plan period unless it related to safeguarded land.

The Local Plan in its entirety should be deliverable. This means that *‘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’* [Paragraph 173 of NPPF]. The constraints of individual sites proposed for allocation will impact on the site viability.

2.1.4 Employment

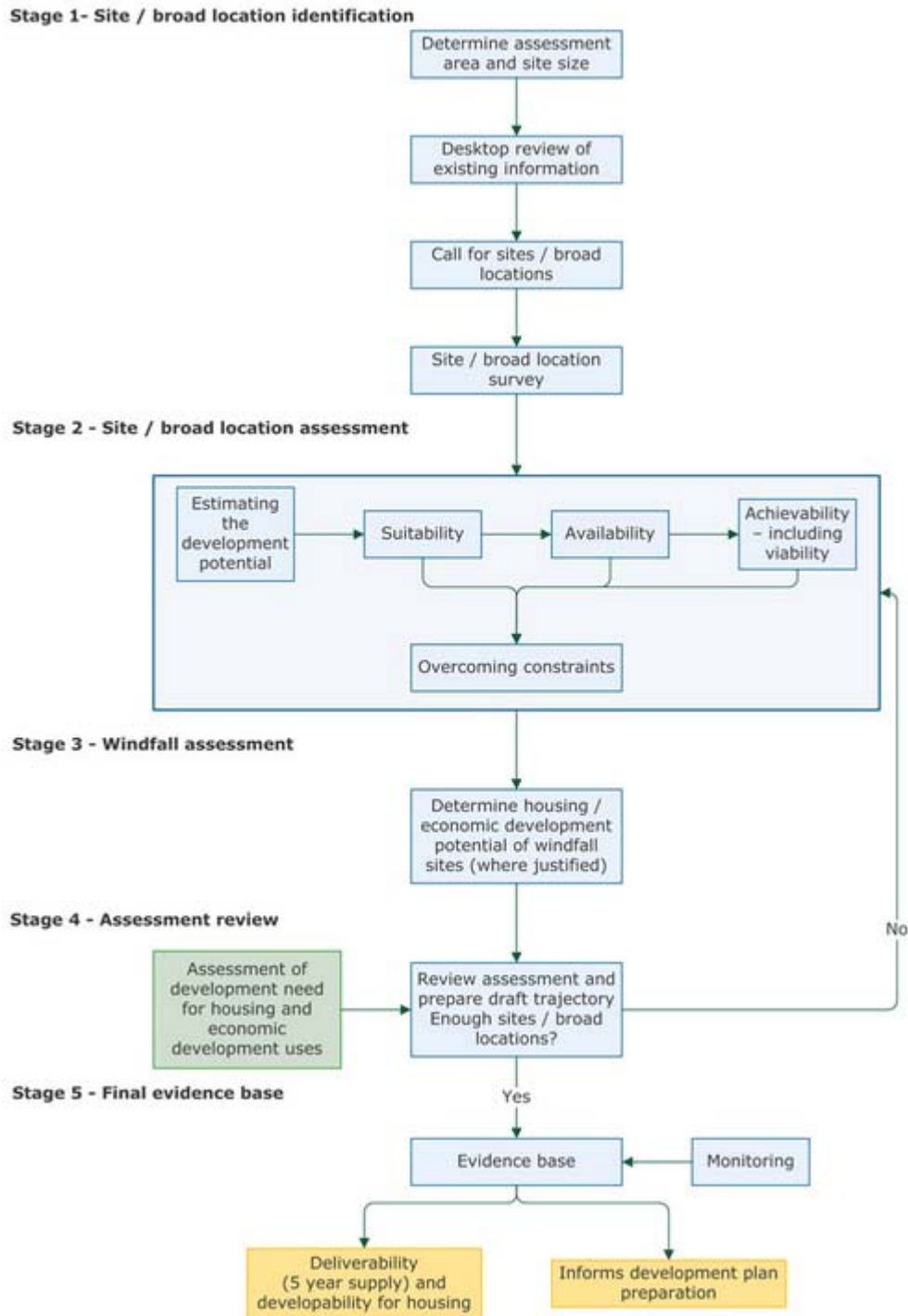
The NPPF notes that ‘Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed’ [Paragraph 22 of NPPF]. Therefore existing employment sites should be considered for their suitability for different uses if there is no prospect of a site being used as an employment site.

2.2 National Planning Practice Guidance

The online only Planning Practice Guidance provides an additional interpretive layer that guides the direction and application of policy within the NPPF. With reference to the assessment of housing and economic land availability, the PPG advocates a 5 stage approach in constructing a site selection methodology, as shown on Figure 2.1.

- Stage 1: Identification of sites and broad locations.
- Stage 2: Site/broad location assessment.
- Stage 3: Windfall assessment (where justified).
- Stage 4: Assessment review.
- Stage 5: Final evidence base.

Figure 2.1: Housing and Economic Land Availability Flow Chart



The Stage of interest for this commission is Stage 2. The PPG advises that at Stage 2 plan makers should identify¹:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

At Stage 2 plan-makers are required to assess a site's physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas; and environmental/amenity impacts experienced by would be occupiers and neighbouring areas².

¹ Paragraph: 011 Reference ID: 3-011-20140306

² Paragraph: 020 Reference ID: 3-020-20140306

3 Local Policy Context

3.1 Overview

This section of the report summarises the existing and emerging Local Planning Policy in Selby.

The existing Development Plan for Selby consists of the Core Strategy (2013) and Saved Policies from the Selby Local Plan (2005) and Saved Policies YH9C and Y1C1 from the former Yorkshire and Humber Regional Spatial Strategy.

3.2 Existing Local Policy

3.2.1 Core Strategy, 2013

The Core Strategy (2013) sets the vision and growth distribution across the Selby District. The emerging PLAN Selby Document will identify specific sites for accommodating housing and employment. Core Strategy policies with specific bearing on the overall site selection methodology include:

- Core Strategy SP2, Spatial Development Strategy; and
- Core Strategy SP5, The Scale and Distribution of Housing.

Table 3.1: Spatial Strategy³

| | Employment | Housing Requirement from Core Strategy | Completions between 1 st April 2011 and 31 st March 2015 | Outstanding plots with PP 1 st April 2015 ⁴ | Housing Allocation required (based on housing delivered since 2011) |
|-----------------------------|--|--|--|---|---|
| Selby | 22-27ha (focused on B1 and Olympia Park) | 3700 | 589 | 1050 | 1061** ⁵ |
| Sherburn in Elmet | 5-10ha (focus on manufacturing) | 790 | 91 | 645 | 54 |
| Tadcaster | 5-10ha (focused on office stock) | 500 | 5 | 19 | 476 |
| Designated Service Villages | 5ha (focus on Eggborough and A19) | 2000 | 461 | 770 | 769 |
| Secondary Villages | | 170 (based on local need or Rural Exception Sites) | NA | 247 | NA |

³ Reproduced from Selby Core Strategy Policy SP5 and data from Selby District Council

⁴ incorporating 10% deduction for non-implementation

⁵ Less the no. of dwellings allocated at Olympia Park

The Core Strategy noted that in addition to the locational strategy above the following factors will also influence the allocation of sites in the Local Plan⁶:

- **Previously Developed Land (PDL):** Within individual settlements a sequential approach will be adopted to allocating suitable sites for development in the following order of priority:
 - Previously developed land and buildings within the settlement.
 - Suitable greenfield land within the settlement.
 - Extensions to settlements on previously developed land.
 - Extensions to settlements on greenfield land.

The Core Strategy includes a target of 40% of new dwellings on previously developed land⁷ including conversions is proposed between 2004 and 2017.

- **Flood Risk:** sequentially preferable sites should be targeted for allocation⁸.
- **Accessibility:** focus on new development being accessible by public transport⁹(rail / bus).
- **Environment and Natural Resources:** protection and enhancement of biodiversity and natural resources¹⁰.
- **Green Belt¹¹:** the importance of protecting open character of Green Belt, and that ‘inappropriate’ forms of development will be resisted unless very special circumstances can be demonstrated. *Note: A Green Belt Study is under way to confirm potential for releasing land from the Green Belt should it be needed.*

Character of Individual Settlements¹²: important to maintain the character of individual settlements outside the Green Belt by safeguarding ‘strategic countryside gaps’ between settlements, particularly where they are at risk of coalescence or subject to strong development pressures as is the case with Selby and the surrounding villages. A separate study commissioned by SDC is assessing the justification for strategic countryside gap designations in PLAN Selby and where they might be located. This is also available for comment during the Summer 2015 Consultation.

3.3 Emerging Local Policy

3.3.1 PLAN Selby

In early 2015 Selby District Council carried out an Initial Consultation on PLAN Selby. This posed questions about every aspect of the proposed Local Plan, including where growth should be focused in Selby, Tadcaster and Sherburn in Elmet and the distribution of growth across the Designated Service Villages.

⁶ Reproduced from Selby Core Strategy paragraph 4.34

⁷ Selby Core Strategy Paragraph 4.35

⁸ Selby Core Strategy Paragraph 4.36

⁹ Selby Core Strategy Paragraph 4.37

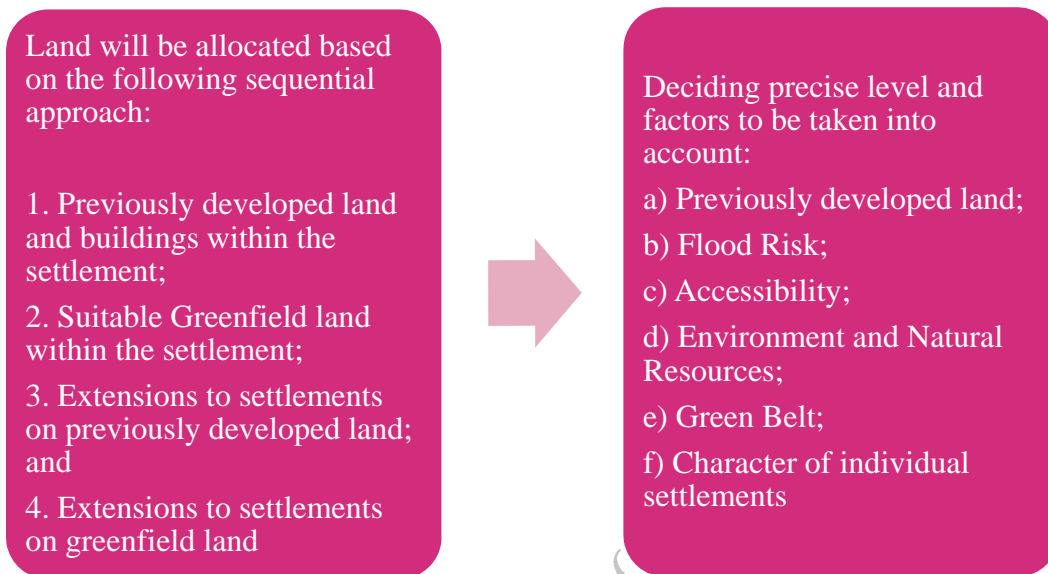
¹⁰ Selby Core Strategy Paragraph 4.38

¹¹ Selby Core Strategy Paragraph 4.39

¹² Selby Core Strategy Paragraph 4.40

Additionally it posed a range of consultation questions regarding the PLAN Selby approach to housing distribution.

Additionally the plan sought to determine the best possible way by which to select sites in the Designated Service Villages. The following figure reproduced from PLAN Selby demonstrates the approach to determining allocations in DSVs:



Approach to allocations, reproduced from Figure 5 January 2015 PLAN Selby Initial Consultation

Following the approach set out above, candidate sites would then be assessed against the context of up-to-date technical constraints, evidence and analysis, the majority of which will have been developed through the SHLAA process. This part of the process would also include an assessment of viability.

The initial round of consultation requested comments upon the approach, namely whether respondents had any views on the relative importance or weight to be

PLAN Selby also acknowledges that rural areas within Selby record a high proportion of small businesses and therefore the plan suggests that additional employment space may be needed in the Designated Service Villages to support some growth in local enterprise.

3.4 Past Consultation: Site Allocations 2011

In 2011 Selby District Council carried out a formal consultation on a Site Allocations Development Plan Document. This consultation included proposed site allocations across Selby, Tadcaster, Sherburn in Elmet and the Designated Service Villages. However the Designated Services Villages included in the Core Strategy differ slightly to those included in the Site Allocation consultation. This document is not being progressed, but is of note when considering future proposals for site allocations.

4 Evidence Base Review

4.1 Overview

Selby District Council has a detailed evidence base prepared to inform the Selby Core Strategy (2013). Selby District Council are refreshing and updating this evidence base to inform PLAN Selby. The existing and emerging evidence base relevant to determining site allocations is set out below. The exact timing of future evidence base documents is important as it impacts on the evidence that can be used to determine site allocations.

4.2 Selby District Council Evidence Base

The Selby District Council evidence base that will be used to inform the site allocation process is outlined in Table 4.1 below. Table 4.1 also includes a number of emerging documents.

Table 4.1: Existing and Emerging Evidence Base

| Evidence Base Theme | Document | Summary |
|-----------------------------------|--|---|
| Characteristics and Accessibility | Strategic Flood Risk Assessment (2010). | Provides a detailed Flood Zone classifications within the Selby District |
| | Core Strategy Background Paper Village Growth Potential (2010). | The background paper provides further evidence and analysis to inform the distribution of future housing growth and to identify villages that can accept a proportion of that growth. This includes a summary of constraints in each village. |
| | Core Strategy Background Paper Sustainability Assessment of Rural Settlement (2010). | This background paper assesses the relative sustainability of the Designated Service Villages based on settlement size, access to public transport, services and employment. |
| | Parish Facilities Surveys (2014). | These provide details of the services available in each DSV. |
| | Landscape Assessment of Selby (1999). | Outlines the baseline landscape context of the district against which changes can be measured and splits the District into Local Landscape Character Areas. |

| | | |
|---|--|--|
| | Landscape Appraisal (2011). | Appraisal considers the sensitivity of the land surrounding the Designated Service Villages as well as potential Strategic Development Site options. |
| | GIS data on environmental and policy constraints. | Highlights the proximity of settlements to identified areas of environmental and policy constraint/ |
| Land Availability, Supply and Needs | Strategic Housing Market Assessment (SHMA), 2010 | The SHMA provides a detailed analysis of the current & future housing market and the types of housing requirements specific to the district. |
| | Strategic Housing Land Availability Assessment (SHLAA), 2015 | The SHLAA identifies sites with potential for housing within Selby and assesses their housing potential. |
| Highways Capacity | Highways Study (June 2014) | Baseline position (2014) of current traffic flows and road capacity |
| Retail & Commercial needs | Retail, Commercial and Leisure Study | The Retail, Commercial and Leisure Study (May 2015) provides an assessment of district-wide retail and commercial leisure needs |
| Emerging land availability and supply | Retail, Commercial and Leisure Study (available as part of the Summer 2015 stakeholder engagement) | The emerging Retail, Commercial and Leisure Study (May 2015) will provide an assessment of district-wide retail and commercial leisure needs |
| | The Strategic Housing Market Assessment: SHMA (available for consultation as part of the Summer 2015 Consultation) | The 2015 SHMA will provide an update to the 2009 assessment and provide an updated analysis of the current & future housing market and the types of housing requirements specific to the district. |
| Emerging Landscape, Green Belt and Heritage documents | Study of Green Belt/Safeguarded Land, Strategic Countryside Gaps and Development Limits (available as part of the Summer 2015 Stakeholder Engagement | Study determines how strongly the Green Belt within the Selby District is performing. |
| | Landscape Assessment. (August 2015). | Update to the earlier landscape assessment work. Study will detail changes to landscape sensitivity occurring since last 2011 assessment. |

| | | |
|-------------------------------|---|---|
| | Habitats Study (August 2015). | Study will provide an understanding of the importance of the different habitats within Selby and help inform the suitability of different sites. |
| | Heritage Study (August 2015). | [Scope still to be determined] |
| Emerging Flood Risk documents | Refresh of Strategic Flood Risk Assessment: SFRA: Level 1 District Wide; Level 2 Selby Town; Site Option Exception Testing (due in August/September 2015) | Study will refresh the previous SFRA and will provide an updated picture of flood risk in Selby. |
| Highways capacity documents | Highway Study (Autumn 2015) | The Stage 2 highway study will forecast the traffic impacts of the options for growth across the district. |
| Sports strategy | Indoor and outdoor sports strategy (Autumn 2015) | This evidence will provide the Council with information on the demand and supply of sports facilities and identify any needs for and surpluses in sports facilities |
| School capacity | Ongoing formal discussions | Discussions taking place with North Yorkshire County Council education and others to understand capacity across the district's schools. |

5 Peer and Neighbourhood Review

5.1 Overview

A peer review of other Local Planning Authorities Site Selection Methodologies has been carried out and is documented in full in Appendix B. Specifically this focused on the methodologies used by East Riding of Yorkshire Council, Barnsley Metropolitan Borough Council and South Kesteven District Council.

The three approaches that have reviewed have each approached the determination of their portfolio of site allocations in a slightly different manner. However there are some common themes, including:

- All LPAs have carried out a staged process to site allocation;
- They have generally all considered the same criteria, but just using different mechanisms to determine the outcome (scoring or a traffic light system); and
- They have all included a deliverability stage as their last stage.

5.2 Method and Criteria

Method used to generate site options for different land uses: South Kesteven and East Riding have used a common site selection methodology for all land uses, but have tweaked criteria for non- residential land uses.

Criteria used to Screen Sites out:

There is a reasonably consistent approach to the criteria used to screen sites out, which relate to:

- **Consistency with settlement hierarchy.**
- **Relationship to the built form** (in terms of distance to edge of existing settlement).
- **Flood Risk** (Flood Risk Zone 3b).
- **Site size**, however the size varies with Barnsley considering a minimum site size for allocation of 0.4ha, South Kesteven using 0.3ha (10 units) and East Riding considering sites larger than 0.17ha (5 dwellings) for allocation.
- **Heritage Designations:** exact scope varies across LPAs however if the site includes a Scheduled Monuments and Parks and Gardens with Historic Interest then the site has been excluded by all reviewed LPAs. East Riding considered the setting of Listed Building as a screening criteria.
- **Environmental Designations:** site that fall within International or National designations have been removed by all reviewed LPAs.

Barnsley consider availability of the site as an exclusion criteria. However from review of other approaches this fits better at later stage.

Evaluation of Site Options: All reviewed site allocation methods used a staged process with exclusion criteria and then a number of stages. East Riding included a scored stage, which included scoring relating to flood risk, focusing on previously developed land and accessibility by public transport and walking and cycling using Accession modelling. The final stage was carried out using a

sustainability appraisal scoring mechanism to consider more detailed considerations. Following the initial sift South Kesteven carried out a Sustainability Appraisal of all site options followed by a detailed site analysis using traffic light system. Barnsley focused on a scoring approach for all their stages. All methods included a deliverability stage as the final stage, where they took the opportunity to confirm the availability of the site for development.

Mitigation of Impacts: the later stage of South Kesteven (Stage 4 and 5) and East Riding (Stage 4) considered if the constraints could be mitigated. This appears to have been based on officer judgement and information provided by developers / agents promoting the site.

Non-Sustainability Appraisal Issues: all reviewed LPAs have considered non-sustainability appraisal issues e.g. site viability / type and quality of development likely to be attracted. Barnsley focused on this to the largest degree. This is because the Barnsley Economic Strategy focuses on delivering a step change to the housing stock in Barnsley by potentially diversifying the stock to larger higher quality properties. Therefore the degree to which sites would meet the objectives of the Economic Strategy feature strongly in the Barnsley site selection methodology. All reviewed approaches consider deliverability and viability. In some cases this relates purely to comments from the SHLAA working group or developer group; however Barnsley carried out specific viability work on each shortlisted site at Stage 4.

5.3 Constraints and Phasing

Impact of Constraints on Deliverability and Phasing: Based on a desk based review it has not be possible to confirm how constraints have been considered against deliverability and phasing. However based on phone discussions with Local Plan officers that Arup have an existing relationship with it would appear that the following approach has been taken. Any 'show stopper' constraints are filtered out in the initial sift, after this the constraints associated with a site will be identified as part of the qualitative assessment (stage 2 of our method) and assessed as part of the deliverability assessment at stage 4. A judgement based on potential mitigation measures will inform the conclusion regarding whether the constraint requires mitigation and at what point in the plan period the mitigation measures could be delivered. This enables a judgement, based on the evidence available, about any impact on phasing and the delivery trajectory

The need to revisit site options where housing / employment needs not met: Based on a desk based review it has not be possible to confirm how the LPAs set out above approached revisiting options. However subsequent discussions with other local authorities have confirmed that this has largely been a qualitative exercise based on the balancing of a number of factors. Leeds City Council utilised a series of Officer and then Member workshops to discuss the relative merits of sites, including those previously discounted. LCC had particularly struggled to find sufficient sites in its 'East Housing Market Characteristic Area' and subsequently a number of sites that had been discounted were reconsidered against new information submitted in support of the site during the Issues and Options public consultation. The workshops centred on an assessment of the new information received to determine whether the mitigation measures proposed were sufficient to overcome the site constraints identified at Issues and Options stage. Where a site was subsequently revisited having previously been discounted a

narrative detailing the reappraisal of the site in light of new information arising has been included as part of the site assessment for the next stage of public consultation. This explains clearly the rationale behind the reassessment and how the suggested mitigation factors have influenced the reappraisal. It is important however to note that the LCC Site Allocations DPD has not yet been examined and thus there is no formal indication as to whether this approach would be considered sound.

Final selection of /‘cut off’ point for land allocations to meet a housing / employment need:

It has been difficult to ascertain definitive examples of the methodology employed by other LPAs in determining the final selection of sites to meet both employment and housing need. Further research conducted by Arup has however found that many authorities utilise a qualitative ‘planning-judgement’ exercise whereby all material relating to a site is considered at a workshop or similar event. As with LCC’s approach to the reappraisal of sites, Sefton Council is another example of an authority that has relied heavily upon this more qualitative approach in their site selection methodology in order to select their final land allocations. Their site selection methodology states that the final selection of sites to be allocated was largely based on planning judgement. This degree of flexibility allowed officers to take a pragmatic view on the relative weighting of scores, which has enabled consideration of the importance and magnitude of the specific scores during the earlier part of the process. Paragraph 3.2 of the 2014 Sustainability Appraisal and Site Selection Methodology states that this flexible approach has facilitated the allocation of “some sites that can offer ‘wider or site specific benefits’ ...in preference to more accessible sites”. As with the Leeds City Council example, it is important to stress that this methodology also has not been tested at Examination. However, the experience of plans at examinations indicates that a clear method, and clearly explained justifications for judgements are generally seen as robust. The choice of site cannot be an entirely mechanical exercise and does require judgements to be made.

Use of different professionals: From a desk based review it is difficult to confirm if LPAs have used external consultant or in-house expertise. However it is clear that expertise has been used in relation to determining the:

- Accessibility of sites by public transport (e.g. East Riding have used Accession Modelling to determine this).
- Landscape impact of proposed sites and whether they are acceptable.
- Impact on biodiversity and wildlife.
- Impact of proposed sites on above ground heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments and Parks and Historic Parks and Gardens).
- Viability of sites for the proposed allocation.
- Capacity of highway network to accommodate proposed development on proposed sites.

Timing and Order of above processes: This is considered in more detail on the Critical Flowchart included in Section 6.

6 Framework for Site Selection

6.1 Overview

The Peer Review of how other Local Planning Authorities have identified sites for allocations has found that sites have been assessed in a number of stages. This is a sensible approach and fits well with the fact that Selby District Council are in the process of completing a range of evidence base documents, the timing of which should fit well with a staged approach. We have produced a Critical Flow Chart showing: the programme for identifying the site allocations; how this fits with consultation on the PLAN Selby and other evidence base documents; and what will be covered under each stage of the site allocation process.

We have then considered the detailed approach to site allocations below and reflected on questions posed in the brief in relation to the site allocation process.

6.1.1 Land Supply

Selby District Council carried out a Call for Sites exercise in 2013. This exercise alongside the Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review (ELR) will provide the land supply that will feed into the Site Selection Methodology.

6.1.2 Green Belt Land

Green Belt Study

Paragraph 83 of the NPPF states that “Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”. A Draft Stage 1 Green Belt Study has been completed by Ove Arup and Partners Limited. The Green Belt Study will be completed to support PLAN Selby Preferred Option in early 2016.

If the required quantum of land defined in the Core Strategy can be identified and allocated for on non- Green Belt Land then there is unlikely to be a case for ‘exceptional circumstances’. When the portfolio of potential site allocations is known Selby District Council will consider whether Green Belt release is required to deliver sustainable patterns of development and the associated case for ‘exceptional circumstances’.

Any ‘potential land release from the Green Belt’, which will be identified at a later date will be fed through the site selection methodology only if needed and where exceptional circumstances can be justified. Green Belt sites will only be considered for their potential allocation if after exhausting all non-Green Belt it is not possible to deliver the quantum of development proposed in the Core Strategy or Core Strategy settlement hierarchy. In the event that this is the case, the suitability of the ‘potential land release from the Green Belt’ identified through the Green Belt Study will be considered through the same sieving process as all non-Green Belt Sites.

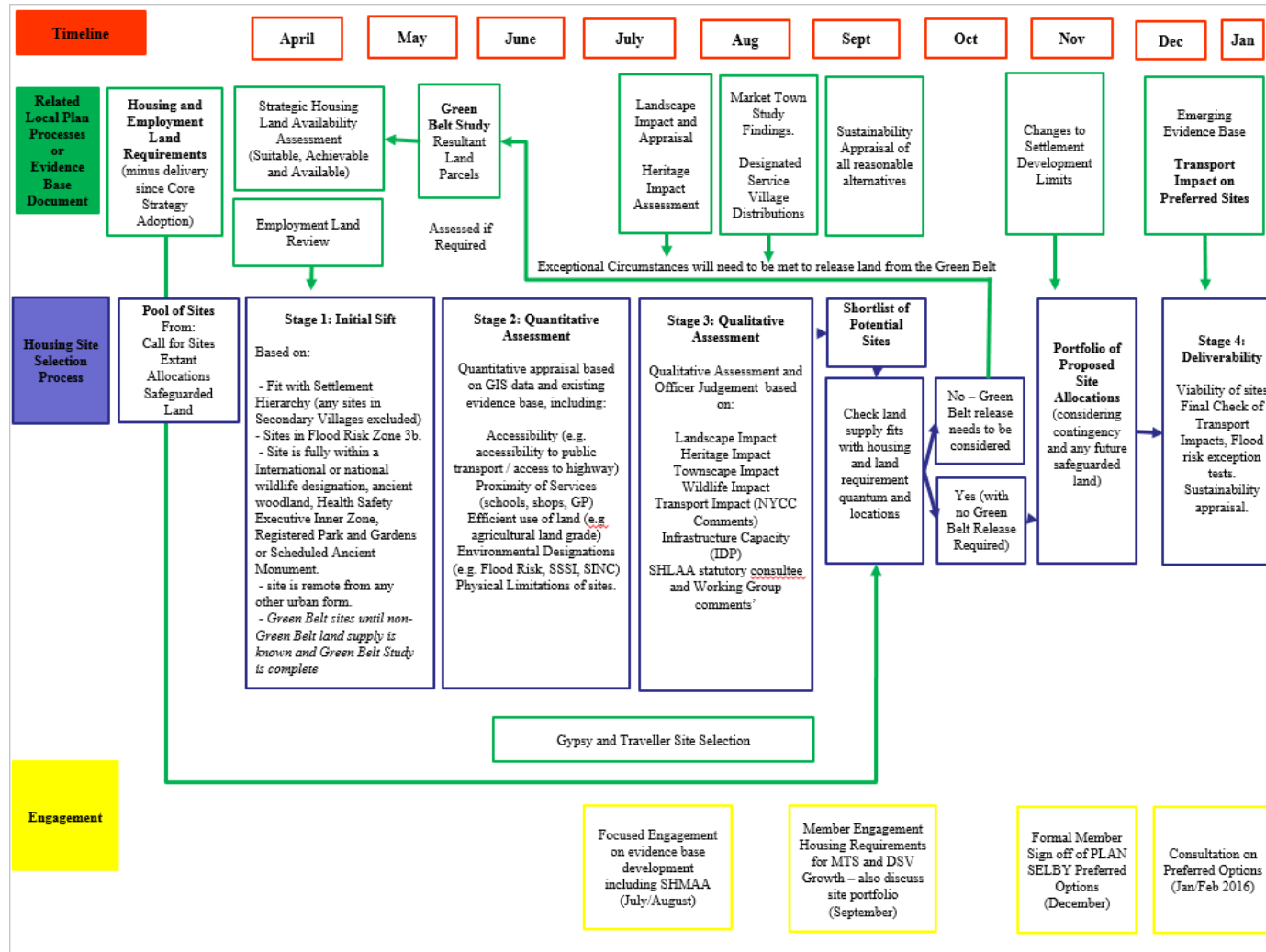
Safeguarded Land

There is also a requirement for Green Belt boundaries to *‘where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period’ (NPPF - paragraph 85)*. A draft Method Statement for Identifying Safeguarded Land has been produced by Ove Arup and Partners Limited and is available for comment as part of the Summer 2015 Consultation. The quantum of safeguarded land required is related to potential future land release from the Green Belt and will be confirmed by Selby District Council prior to consultation on PLAN Selby Publication Draft in early 2016 as the exact requirement will depend on the need to remove land from the Green Belt.

6.2 Critical Flow Chart

The Critical Flow Chart provides a graphical representation of the Site Selection Process. This is based on a staged approach and is also linked to where evidence base documents will be available to inform the Site Selection Process.

Figure 6.1: Critical Flow Chart



6.3 Proposed Site Selection Process

6.3.1 Overview

A four stage Site Selection Methodology is proposed, including:

- **Stage 1: Initial Sift**
- **Stage 2: Quantitative Assessment**, focusing on flood risk, accessibility and focus on PDL / lower grade agricultural land.
- **Stage 3: Qualitative Assessment**, focusing on environmental, social and economic criteria. This stage will incorporate impacts upon amenity.
- **Stage 4: Deliverability**, focusing on the availability of the land candidate site for development, its viability and its impact upon traffic. This stage will also assess when in the plan period the site could be developed should it be considered as available.

Stage 1: Initial Sift

The first site selection will involve an initial sift to remove sites that have a significant constraint to development and do not conform to the Core Strategy settlement hierarchy. The Initial Sift criteria include:

- **Core Strategy Settlement Hierarchy:** The site is located in or near a settlement that has a housing target in the Core Strategy. This means any sites in Secondary Villages are excluded.
- **Proximity to Settlement:** The site is either within or adjacent to a settlement. The term adjacent refers to sites that lie immediately next to the built form of the settlement, as well as sites that lie so close to the built form that it is reasonable to consider them as a possible extension to the urban boundary. The latter may include sites that are detached from the built form by a small field boundary or an area of open space (e.g. playing field).
- **Flood Risk:** any sites falling within Flood Risk Zone 3b will be removed.
- **International and National Environmental Designations:** The site is fully within an International or national designation sites including:
 - Special Protection Areas (SPA).
 - Special Areas of Conservation (SAC).
 - Ramsar Sites.
 - Candidate SPAs, SACs and Ramsar sites.
 - Sites of Special Scientific Interest (SSSI).
 - National Nature Reserves.
- **Ancient Woodland:** The site is fully covered by ancient woodland.
- **Health Safety Executive Zones:** If a site fully within the HSE Inner Zone will be excluded.
- **Heritage Assets:** If the majority of site is within a Park and Garden of Historic Interest, a Scheduled Monument or a Historic Battlefield it will be

excluded at this stage. The impact of development on the setting of listed buildings will be considered at a later stage of this assessment, as it is not considered to be a reason for exclusion at this stage.

Part of this stage will include planning judgement to be exercised in order to sense check site boundaries. This will enable an understanding of whether sites failing on any of the above criteria would benefit from the redrawing their site boundaries to enable them to progress through the sifting process.

Stage 2: Quantitative Assessment

The criteria included in Stage 2 is based on National Guidance, the broad criteria included on the Selby Core Strategy (2013) and findings from the Peer Review:

- Accessibility by Public Transport.
- Proximity of Primary School.
- Proximity of GP surgery.
- Proximity to a shop.
- Proximity to Employment centre.
- Agricultural Land.
- Greenfield and Previously Development Land.
- Flood Risk.
- Physical / infrastructure constraints/permanent features or legal constraints.
- Impact on nationally and internationally protected sites (SSSI, SAC, SPA).

The proposed criteria for both housing and employment has been included at Appendix A. This shows the proposed traffic light ranking system for sites, and highlights where housing and non-housing selection methodologies criterion is shared and where they diverge.

Selby District Council have been working closely with the Environment Agency on the approach to factoring flood risk into the Site Selection Framework. SDC are seeking to progress an approach where the sequential test is applied to each settlement (based on Core Strategy hierarchy), rather than a District wide sequential approach. This is currently being discussed with the Environment Agency.

A measure from the centre of each site will be used to confirm proximity to services and public transport hubs. A narrative will be included on larger sites to allow consideration of part of site having better accessibility.

All sites will be passed through to Stage 3.

The sites that 'pass' this stage should be fed into the Sustainability Appraisal, reflecting the methodology employed by ERYC and thus ensuring that once the final allocation decisions are made, all reasonable alternatives have been considered.

Stage 3: Qualitative Assessment

This stage includes a qualitative Assessment and Officer Judgement based on a traffic light system. An example is set out below and the exact criteria and traffic light criteria are included in Appendix A. The following criteria are considered:

- Biodiversity and Geological Value.
- Wildlife and Natural Environment.
- Heritage Assets.
- Settlement Character.
- Strategic Countryside Gaps.
- Landscape Capacity.
- Physical Point of Access.
- Amenity Impact.
- Air Quality.
- Groundwater.
- Contamination.
- Mineral Resource.
- Provision of Open Space.
- Infrastructure Capacity.
- Highway Network Capacity.
- Town Centre Viability.

Figure 6.2: Extract from Proposed Stage 3 Methodology

| Criteria | Question | Impact | | | |
|--------------------------|---|---|---|--|---|
| Heritage Assets | Is the development in a Conservation Area? Would development affect a Listed Building? Would development effect the setting of a Listed Building or Conservation Area? Would development effect Scheduled Monuments or Parks and Gardens of Historic Interest? | (+) Development would result in an enhancement to an existing heritage asset | 0 Will have no impact on the heritage asset. | (-) Development within a Conservation Area / adjacent to a Listed Building / other heritage asset OR Development affecting setting of Listed Building and / or Conservation Area / other heritage asset. | (--) Significant adverse impact on setting of heritage assets. |
| Physical Point of Access | Is there a physical point of access into the site? Is there the possibility of creating an access | (+) Existing access into the site | 0 Access can be created within the landholding | (-) Access can be achieved through third party land and an | (--) No apparent means of access OR No possibility |

| | | | | | |
|--|-------------------------|--|--|------------------------|--------------------|
| | within the landholding? | | | agreement is in place. | of creating access |
|--|-------------------------|--|--|------------------------|--------------------|

Stage 4: Deliverability

The suitability of the site for development has been assessed through Stages 1, 2 and 3 of the assessment. This stage confirms the site is viable and deliverable as required by NPPF.

Ownership and availability for development: SDC Officers to confirm that site is available for development - reconfirming through agent / SHLAA group

Achievability:

- Detailed session with the SHLAA Working Group to confirm marketability of the sites.
- Further assessment of site viability as part of PLAN Selby viability testing.
- Statement confirming the site has no insurmountable constraints (confirmed through stage 2 and 3).
- Assessment of traffic impacts.
- Statement confirming if the site is available, achievable and suitable in the next five, ten or fifteen years and feed back into SHLAA.

As at stage one, planning judgement will be utilised throughout subsequent stages to understand whether alterations to a site's boundary would enable the site to progress further rather than being discounted.

6.3.2 Approach to Employment Allocations

In terms of the methodology for employment sites, as set out in the Critical Flow Chart in Figure 6.1 there are broad parallels with the approach taken for housing site selection. Dependent upon the Core Strategy approach notable differences in approach during the qualitative assessment at stage 3 might include a higher weighting towards transport and accessibility (see criteria appended at Appendix A) and a preference towards the expansion of existing sites where practical instead of new allocations. There may also be a marginally different approach to flood risk, recognising that many Employment uses are classified as 'Less Vulnerable'. However, notwithstanding the acceptability of locating employment uses in Flood Zone 3a, preference should still be given to allocating employment sites outside of Flood Zones in the first instance. It will be important to agree an approach that is most suitable for the Selby district that balances emerging data from the updated SFRA with the employment needs and aspirations of the district.

7 Next Steps

Following comments on the PLAN Selby Site Allocation: A Framework for Site Selection Arup will update the site selection methodology. Arup will carry out a sense check of the methodology on 15 development sites to road test the method and review the results with the team identifying the nuances of the particular sites.

The Site Selection Methodology will then be used to identify sites for allocation in the PLAN Selby Preferred Option Draft, which will be consulted on in early 2016.

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Appendix A

Proposed Site Assessment (Stages 1 and 2)

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A1 Approach to Site Selection Methodology Stages 1 and 2

| Stage 2: Quantitative Assessment | | Criteria | | | | Data Sources | Comments on Data Sources | Potential Future Checks |
|-----------------------------------|-------------|--|---|--|---|--|--|-------------------------|
| Accessibility by Public Transport | Housing | (++) Within 30 minutes by public transport of a Major Centre and Intermediate Centre (as defined by employment). | (+) Within 45 minutes by public transport of a Major Centre and Intermediate Centre (as defined by employment). | (0) Within 60 minutes by public transport of a Major Centre and Intermediate Centre (as defined by employment). | (-) Over 60 minutes by public transport of a Major Centres and Intermediate Centres (as defined by employment). | Major Centres (8000+ jobs) Selby, York, Castleford, Pontefract, Goole Intermediate Locations (3000 – 6000 jobs) Tadcaster, Sherburn, Kellingley / Eggborough / Hensall / Heck, Knottingley, Thorpe Arch | Sugar Access would be used to confirm how site performs against this criteria. | |
| | Non-Housing | (++) A population of more than 30,000 people within 40 minutes from destination (30 minutes by bus and /or train and 10 minutes walking). | (+) A population of 20,000 to 24,999 people within 40 minutes from destination (30 minutes by bus and /or train and 10 minutes walking). | (0) A population of 19,999 to 5,000 people within 40 minutes from destination (30 minutes by bus and /or train and 10 minutes walking). | (-) A population of less than 5,000 people within 40 minutes from destination (30 minutes by bus and /or train and 10 minutes walking) | | Sugar Access would be used to confirm how site performs against this criteria. | |
| Accessibility by Cycling | Housing | (++) Within 1.2km from major centres or Intermediate Locations. | (+) Within 3.6km from major centres or Intermediate Locations. | (0) Within 5km from major centres or Intermediate Locations. | (-) Over 5km from major centres or Intermediate Locations. | The former Planning Policy Guidance 13 highlighted that cycling has the potential to substitute for short car trips, particularly those under 5km | Sugar Access would be used to confirm how site performs against this criteria. | |
| | Non-Housing | (++) A population of more than 20,000 people within a 5km destination. | (+) A population of 10,000 to 19,999 people within a 5km destination. | (0) A population of 9,999 to 4,999 people within a 5km destination. | (-) A population of less than 2,000 people within a 5km destination. | The former Planning Policy Guidance 13 highlighted that cycling has the potential to substitute for short car trips, particularly those under 5km | Sugar Access would be used to confirm how site performs against this criteria. | |

| | | | | | | | | | |
|----------------------------------|--|--|--|--|---|--|---|--|--|
| Proximity of Primary School | | (++) Site is within 800 metres of a primary school: | (+) Site is between 800 metres and 1200 metres of a primary | (0) There is no primary school within 1200 metres | | | The Urban Potential Studies and the Sustainable Settlement Guide (UWE/LGB, 1998) identified distances between 400m and 800m as 'easy walking distances'. | | |
| Proximity of GP surgery | | (++) Site is within 800 metres of a doctors surgery | (+) Site is between 800 metres and 1200 metres of a doctors surgery | 0 There is no GP surgery within 1200 metres | | | Sugar Access would be used to confirm how site performs against this criteria. | | |
| Proximity to a Convenience Store | | (++) Site is within 800 metres of a convenience store | (+) Site is between 800 metres and 1200 metres of a convenience store | (0) There is no convenience store within 1200 metres: | | | Sugar Access would be used to confirm how site performs against this criteria. | | |
| Proximity to Employment centre | | (++) within 2 miles of Major Employment Locations | (+) Within 5 miles of Major Employment Locations | 0 Within 5 miles of intermediate employment locations | (-) Within 5 miles of Smaller Employment Locations | | Major Employment Locations (8000+j jobs) Selby, York, Castleford, Pontefract, Goole Intermediate Employment Locations (3000 – 6000 jobs) Tadcaster, Sherburn, Kellingley / Eggborough / Hensall / Heck, Knottingley, Thorpe Arch Smaller Employment Locations (800 – 1000 jobs) Escrick, South Milford, Drax, Burn / Gateforth. | | |
| Agricultural Land | | | | (0) No loss of agricultural land | (-) Loss of grade 3 - 5 agricultural land | (--) Loss of grade 1 or 2 agricultural land | | | It has been confirmed that this is available in GIS. |

| | | | | | | | | | |
|--|---|--|--|--|---|--|---|---|---|
| Greenfield and Previously Development Land | | | (+) Previously developed land and buildings within the settlement | 0 Suitable greenfield land within the settlement | (-) Extensions to settlements on previously developed land | (--) Extensions to settlements on greenfield land:. | SHLAA / Officer knowledge of District. | Based on Core Strategy criteria for approach to site allocations and national guidance. | |
| Flood Risk | | | | (0) Site within Flood Zone 3a | (-) Site within Flood Zone 2 | (--) Site within Flood Zone 1 | GIS / Strategic Flood Risk Assessment | This can be confirmed through use of the SFRA (2010) and GIS layer from the Environment Agency. | The updated SFRA will need to be used to reviewed to check any changes since the 2010 SFRA. |
| Physical / infrastructure constraints/permanent features or legal constraints? | | | | (0) No constraints | (-) Major constraints which are difficult to remedy/overcome and which affect a large part of the site | (--) Constraints exist but potential for mitigation and/or constraints affect some of the site: | SHLAA / Developer Information / Officer knowledge | | |
| Impact on nationally and internationally protected sites (SSSI, SAC, SPA) | | | | (0) Site lies more than 800m from designation | (-) Site lies between 400-800m from designation | (--) Site is less than 400m from designation - 0 points [Consult with Natural England to confirm impact) | GIS data | GIS measuring tool could be used to confirm this. | |
| Stage 3: Qualitative Assessment | Questions | | | | | | Data Source | Comments on Data Sources | Potential Future Checks |
| Biodiversity and Geological Value | Would development affect a site of biodiversity or geological value or affect legally protected species? Reconfirm impact on International and National Designated Sites? Local Nature Reserves (LNR), Sites of Importance for Nature Conservation (SINCS), Priority Habitats as designated in the UK Biodiversity Action Plan. | | (+) Contains locally protected site or is adjacent to (<400m) of locally protected site Existing features and species could be conserved / retained and are likely to be enhanced or new features can be incorporated into the proposal. | 0 Site lies with 400-800m of locally protected site No effects / existing features could be conserved or retained. | (-) Contains locally protected site or is adjacent to (<400m) of locally protected site Features and species unlikely to be retained in their entirety. Any significant impacts can be mitigated. | (--) Features and species unlikely to be retained. No satisfactory mitigation measures possible. | Local Designation mapped in GIS and BAP habitats mapped in Magic (Defra). | Ecologist input may be required on sites where impacts are difficult to confirm. | The emerging Ecological / wildlife study would need to be used to check site impacts. |
| Wildlife and Natural Environment | Would development affect natural features that are important for wildlife or landscape character such as trees or hedgerows, or areas of ancient woodland not subject to statutory protection? | | (+) Existing features can be conserved / retained and there is an opportunity for their enhancement. | 0 No effects / existing features could be conserved or retained. | (-) Features and species unlikely to be retained in their entirety. Any significant impacts can be mitigated. | (--) Features and species unlikely to be retained. No satisfactory mitigation measures possible. | Ecologist input may be required. . | Ecologist input may be required on sites where impacts are difficult to confirm. | The emerging Ecological / wildlife study would need to be used to check site impacts. |

| | | | | | | | | |
|----------------------------|--|---|---|---|--|--|---|--|
| Heritage Assets | <p>Is the development in a Conservation Area? Would development affect a Listed Building? Would development effect the setting of a Listed Building or Conservation Area? Would development effect Scheduled Monuments or Parks and Gardens of Historic Interest></p> | <p>(+) Development would result in a enhancement to a existing heritage asset</p> | <p>0 Will have no impact on the heritage asset.</p> | <p>(-) Development within a Conservation Area / adjacent to a Listed Building / other heritage asset OR Development affecting setting of Listed Building and / or Conservation Area / other heritage asset.</p> | <p>(--) Significant adverse impact on setting of heritage assets.</p> | <p>All heritage assets mapped in GIS</p> | <p>Heritage expert required to confirm impact on setting of conservation area or listed building.</p> | <p>The emerging Heritage Assessment would need to be used to check site impacts.</p> |
| Settlement Character | <p>Would development here be detrimental to the character of the settlement?</p> | <p>(+) Development would result in a enhancement (e.g. through redevelopment of a derelict or rundown area).</p> | <p>0 Development unlikely to have an effect.</p> | <p>(-) Development could detract from the existing settlement character.</p> | <p>(--) Significant adverse impact on settlement character</p> | <p>The North Yorkshire Historic Landscape Characterisation includes data on settlement character. The Landscape Assessment (1999) and Landscape Appraisal (2011) also contains useful data. A broad allocation criteria included in the Core Strategy was the character of Individual Settlements: important to maintain the character of individual settlements.</p> | <p>Heritage and landscape impact likely to be required to confirm impact on settlement character.</p> | <p>The emerging Heritage Assessment would need to be used to check site impacts.</p> |
| Strategic Countryside Gaps | <p>Would development impact on an identified Strategic Countryside Gaps?</p> | <p>(+) Development would result in a enhancement of Countryside Gap (e.g. through redevelopment of a derelict or rundown area).</p> | <p>0 Development not within a Countryside Gap.</p> | <p>(-) Development would reduce the gap between two settlements with a Countryside Gap in place - however this level of development is considered acceptable.</p> | <p>(--) Significant adverse impact on identified Strategic Countryside Gap</p> | <p>If the site is within an Strtegic Countryside Gap it scores (-) and a landscape expert wil need to be used to confirm impact. The emerging Strategic Countryside Gap report including their extents will be available to inform this assessment.</p> | <p>Landscape input may be required.</p> | |

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| | | | | | | | | |
|--------------------------|--|--|--|--|---|---|----------------------------------|--|
| Landscape Capacity | Would development here be detrimental to the local landscape? | (+) Low Sensitivity: characteristics of landscape are able to accommodate development without significant character change. | 0 Low - moderate Sensitivity: Characteristics of landscape are resilient to change and are able to absorb development without significant character change. | (-) Moderate to High Sensitivity: characteristics of landscape are vulnerable to change and development can be absorbed only in limited situations without significant character change. | (--) High sensitivity to development; landscape vulnerable to change and unable to accommodate without significant character change. | The North Yorkshire Historic Landscape Characterisation includes data on settlement character. The Landscape Assessment (1999) and Landscape Appraisal (2011) include information on sensitivity to development. A broad allocation criteria included in the Core Strategy was the character of Individual Settlements: important to maintain the character of individual settlements. | Landscape input may be required. | The emerging Landscape Assessment will need to be used to review the sensitivity of the site to development. |
| Physical Point of Access | Is there a physical point of access into the site? Is there the possibility of creating an access within the landholding? | (+) Existing access into the site | 0 Access can be created within the landholding | (-) Access can be achieved through third party land and an agreement is in place. | (--) No apparent means of access OR No possibility of creating access | SHLAA data, developer information and officer judgement. | | |
| Amenity Impact | Is the proposed use compatible with neighbouring uses? Consider HSE Zones. | (+) Site within established residential area and proposed for residential use, OR Site within an established industrial area and is proposed for employment uses | (0) Area of, or partially within mixed use development (e.g. residential / industrial / open space) with opportunities to connect existing facilities. | (-) Site within area where residential (or employment) development would not be appropriate. However any significant impacts can be mitigated. | (--) Significant issues means that development would not be compatible with existing or proposed uses - no satisfactory mitigation measures. | Officer Judgement. | | |
| Air Quality | Does the site lie within an area of, or in close proximity to any significant source(s) of air pollution, or would development affect air quality? | (+) Site lies within an area where air quality is currently unacceptable and not approaching prescribed levels. Site unlikely to result in a significant reduction in air quality. | 0 Site lies within an area where air quality is over prescribed levels, but mitigation would prevent a further decrease in quality of would result in a partial improvement. | (-) Sites within an area where air quality is over prescribed levels or development may push air quality over prescribed levels. Any significant impacts can be mitigated. | (--) Sites within an area where air quality is over prescribed levels or development may push air quality over prescribed levels. No satisfactory mitigation measures possible. | Air Quality data collected by SDC. | | |
| Groundwater | Could development potentially affect any abstraction of groundwater intended for human consumption? | (+) Development would not affect public drinking water supply. | 0 Development has the potential to affect public drinking water supply. | (-) Development has the potential to cause pollution of groundwater and affect a public drinking water supply. Any significant impacts can be mitigated. | (--) Development has the potential to cause pollution of groundwater and affect a public drinking water supply. No satisfactory mitigation measures possible. | Ground Water Protection Zones. | | |

| | | | | | | | | |
|--------------------------|---|---|---|--|---|--|--|---|
| Contamination | Would development of the site lead to the remediation of contaminated land or removal or an unacceptable risk to public health? | (+) Development is located on land that is likely to be contaminated and will remediate the site. | 0 Development is not located on land that is likely to be contaminated. | (-) Development is located on land that is highly likely to be contaminated, but this can be mitigated. | (--) Development is located on land that is highly likely to be contaminated, which due to physical constraints or economic viability cannot be remediated. | Officer Judgement / confirming with SDC if included in SHLAA. | | |
| Mineral Resource | Would development lead to the sterilisation of viable mineral resources> | (+) Site is not within a mineral safeguarding area. | 0 Site falls within a location where there is potentially viable mineral deposits that could be worked in the future. | (-) Site falls within an area of search, preferred area and mineral extraction is considered possible. | (--) Site falls within an area of search, preferred area and mineral extraction is considered possible. | NYCC Safeguarded Mineral Areas and engage with NYCC. | | |
| Provision of Open Space | Does the site provide publicly accessible open space, green infrastructure, recreation facilities or public rights of way? | (+) Development would create an opportunity for open space, green infrastructure, recreation facilities or public right of way to be created or improved, or public access improved. | 0 Existing open space, green infrastructure, recreation facilities or public right of way would be conserved, retained and access is maintained. | (-) Existing open space, green infrastructure, recreation facilities or public right of way would be lost or adversely affected and public accessibility reduced. Mitigation is possible. | (--) Existing open space, green infrastructure, recreation facilities or public right of way would be lost or adversely affected and public accessibility reduced. No satisfactory mitigation measures possible. | Officer Judgement / engagement with Selby SDC team. | | Confirmation required regarding whether emerging GI study would produce any useful data to inform the assessment. |
| Infrastructure Capacity | Does the site require significant infrastructure upgrades? Consult the Selby IDP - narrative about requirements. | (+) No capacity constraints identified and development would involve minor improvements to existing infrastructure | (0) No capacity constraints identified. | (-) Capacity limited but mitigation is possible. | (--) Capacity limited. Mitigation is not possible. | Consult Selby District Council Infrastructure Delivery Plan (IDP). | | |
| Highway Network Capacity | What is the capacity of the highway network to cope with the development of the site? | (+) No capacity constraints and development would result in improvement to capacity of highway network. | 0 Sufficient capacity and no infrastructure or access constraints identified. | (-) Limited / insufficient capacity or access constraints, but impacts including any significant constraints can be overcome. | (--) Limited / insufficient capacity or access constraints with no satisfactory mitigation measures.. | Pell Frischman Analysis and NYCC highway comments on SHLAA sites. | | |
| Town Centre Viability | Would the development support the vitality and viability of an existing town or district centre? | (+) Development would contribute to the vitality and viability of an existing town or village centre. | 0 Development would have no affect on the vitality and viability of a town or village centre | (-) Development would have an impact on the existing town or village centre, but mitigation is possible. | (--) Development would have an unacceptable impact on the existing town or village centre and there are other sites available that are better connected to the existing town or village centre. | Officer Judgement. | | |

Appendix B

Peer Review and Neighbouring Authority Review

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B1 Peer and Neighbouring Authority Review

B1.1 Overview

A peer review of other Local Planning Authorities Site Selection Methodologies has been carried out. This has focused on the methodologies used by East Riding of Yorkshire Council, Barnsley Metropolitan Borough Council and South Kesteven District Council.

B1.2 Barnsley Site Selection Methodology

Introduction

Barnsley consulted on their composite Local Plan in late 2014. This included their Site Selection Methodology. BMBC carried out a Green Belt Review which identified Resultant Land Parcels that were deemed to be weakly performing against the purposes of the Green Belt. The Resultant Land Parcels were assessed as sites through the Site Selection Methodology, but were only considered for allocation when it became apparent that the Borough did not have enough sites to meet their Objectively Assessed Housing Need without Green Belt release.

Site Selection Approach

Initial Exclusions

BMBC's Strategic Housing Land Availability Assessment (SHLAA) t specifically excludes sites which:

- fall within in Flood Zone 3b;
- contain part of a scheduled or nationally important monument;
- fall within any designated nature conservation areas (International and National Designations);
- lie on the route of a safeguarded former railway line;
- lie within area with extant permission for mineral extraction;
- are highly unlikely to be available during the 15 year period of the study; and
- Sites that are highly unlikely to be achievable during the 15 year study period.

Stage 1: Quantitative Assessment

The following criteria were considered as part of Stage 1. This data was collected from the SHLAA, GIS data held by BMBC and public transport accessibility analysis conducted by the South Yorkshire Passenger Transport Executive (SYPTE).

| Criteria Topic | Criteria |
|---|--|
| Transport | |
| Access to Rail and Bus | This was based on SYPT standards for reasonable walking distance to railway stations and bus stops. A site scored higher if it was located close to a bus stop or railway station. |
| Potential for the site to be accessed by public transport in the future | The site gets one point per ability to meet these criteria: Site within 2km of existing station (shuttle bus): 1 point Site 1km from existing bus route (potential for amended route): 1 point Site within 800m of railway line (potential for new railway station): 1 point |
| Proximity to strategic highway network | Site is within 0.8km of strategic road network: 5 points Site is over 0.8 - 1.6km from strategic road network: 3 points Site is over 1.6km from strategic road network: 0 point |
| Proximity to Services | |
| Proximity for key services | Sites has all essential facilities plus five other services: 5 points Sites has all essential facilities within 800 m: 3 points Site has two or less essential facilities (800m): 0 point |
| Proximity to Town Centres | 0.8km of a town, district of local centre: 5 points Site is less than 0.8km - 1.6km of a town, district of local centre: 3 point Site is over 1.6km from a town, district of local centre: 0 points |
| Efficient Use of Land | |
| Soil Quality | Loss of grade 1 or 2 agricultural land: 0 points Loss of grade 3 - 5 agricultural land: 3 point No loss of agricultural land: 5 point |
| Land Type | Greenfield: 0 point A mix of PDL and Greenfield: 3 points PDL: 5 points |
| Relationship to existing urban area | site is significantly detached from existing settlement area: 0 point site is bordered by at least one side by existing housing/settlement area: 3 point site is completely within existing housing/settlement area: 5 point |
| Environment | |
| Is the site identified as Green Space on the Green Space Register | Yes: Flag to Open Space Officer to confirm if there is adequate GS in this location. If site is required to be retained for Green Space then it scores 0 points. If the site is not required to be retained for green space it scores 3 points. No: 3 points |
| Impact on Conservation Areas | Site is within conservation area: 0 points Site is adjacent to (within 20m): 3 point Site not within 20m of conservation area: 5 point. |
| Impact of Listed Buildings | Site within 100m of a listed building: 0 point Site not within 100m of a listed buildings: 3 point |
| Impact on Registered Park and Gardens | Site within 500m of a registered park and garden: 0 point Site not within 500m of a registered park and garden: 3 point |

| Criteria Topic | Criteria |
|---|--|
| Flood Risk | Site within Flood Zone 3a: excluded at beginning of assessment. Site within Flood Zone 2: 0 point Site within Flood Zone 1: 3 point |
| AQMA | Site within or 200m of AQMA: 0 point Site 200m to 800m from AQMA: 3 point Site not within 800m of AQMA: 5 points |
| Physical Problems of Limitations | |
| Access Infrastructure | Extensive new access infrastructure required: 0 point Extensive new access infrastructure not required: 3 Point |
| Drainage infrastructure | Extensive new drainage infrastructure required: 0 point Extensive new drainage infrastructure not required: 3 Point |
| Ground condition | Treatment/remediation expected to be required: 0 point Treatment/remediation not expected to be required: 3 point |
| Geo-cavities | Site within area likely to contain geological constraints of mining cavities: 0 point Site not within area likely to contain geological constraints or mining cavities: 3 point |
| Bad neighbours | Major bad neighbour constraints which are difficult to remedy/overcome: 0 point Bad neighbour constraints, but potential for mitigation: 3 point No bad neighbour constraints: 5 point |
| Physical constraints/permanent features | Major constraints which are difficult to remedy/overcome and which affect a large part of the site: 0 point Constraints exist but potential for mitigation and/or constraints affect some of the site: 3 point no constraints: 5 point |
| Freedom from availability constraints | Site known to be in complex/multiple ownership: 0 points no information, but thought likely to be in private and/or multiple ownership because of the nature of the use or public ownership.: 3 point held by developer/willing owner/public sector: 5 point |
| Achievability | |
| Market/cost/delivery | Score as follows on basis of site visits and other known information: very poor or poor marketability and/or viability (assumed exceptional costs): 0 point moderate marketability and/or viability: 2 point good marketability and/or viability: 3 points very good marketability and/or viability: 4 points excellent marketability and/or viability (no known exceptional costs): 5 points |

| Criteria Topic | Criteria |
|----------------|---|
| Step Change | <p>Site unlikely to be able to be attractive location for high-quality, low-density or medium to high density housing: 0 points</p> <p>Site can accommodate high quality, medium to high density housing in a location likely to be moderately attractive to the market: 2 point</p> <p>Site can accommodate high quality, low-density housing in a location likely to be moderately attractive to the market: 3 points</p> <p>Site can accommodate high quality, medium to high density housing in a location likely to be highly attractive to the market: 4 points</p> <p>Site can accommodate high quality, low-density housing in a location likely to be highly attractive to the market: 5 points</p> |

Stage 2: Qualitative / Officer Judgement

The aim of stage 2 was to assess more complicated impacts, such as landscape and ecology and to confirm the availability of the sites and their deliverability.

Availability: an exercise of confirming the availability of the site was carried out. This is because BMBC wanted to be certain that any sites proposed for allocation were available for development.

Suitability:

- Following completion of ecological assessments for each potential site allocation, BMBC assessed if the site was considered to have adverse effects on ecological assets.
- Further analysis was also carried out on any sites that were identified in the BMBC Greenspace register.
- BMBC landscape expertise was used to consider the impact of development of sites on the landscape.

Achievability:

- The attractiveness of the site for development was considered by engaging with the development market.
- BMBC carried out an in-house viability assessment to consider if sites were viable for residential or employment development.

Commentary of Barnsley Approach

The BMBC site selection methodology set out above relates to housing. A slightly different site selection methodology was used for employment, focusing on proximity to the Strategic Highway Network (as logistics is one of Barnsley's priority sectors). A two stage process was used by Barnsley to allow the evidence base for ecology and viability to be completed while Council Officers carried out Stage 1. BMBC commissioned ecology surveys on all proposed sites to confirm impact on species on a site by site basis. BMBC have used a minimum site size of 0.4ha for allocation.

The Barnsley Local Plan was seeking to deliver the Council's Economic Strategy, which focused on delivering a step change in housing quality to support economic prosperity. Therefore the Barnsley site selection methodology includes some

criteria related to the ability of site to deliver a step change in housing quality and allow diversification of housing stock.

East Riding Site Selection Methodology

Overview

The Examination in Public for the East Riding of Yorkshire Council (ERYC) Local Plan took place in late 2014. East Riding of Yorkshire are consulting on Modifications to their Local Plan from March until May 2015.

ERYC approach to identifying sites for allocation is set out in the Site Assessment Methodology, updated January 2014. ERYC have used a four stage approach to identifying site allocations, including:

- Stage 1: Initial Assessment and Site Exclusion.
- Stage 2: Initial Ranking.
- Stage 3: Detailed Site Specific Considerations.
- Stage 4: Deliverability.

Following identification of the sites for allocation ERYC produced a Part 1 document to explain the methodology and a Part 2 including details of proposed site allocations in each settlement. The methodology is detailed below.

Site Selection Methodology

Stage 1: Initial Assessment and Site Exclusion

This constituted an initial sift including the following criteria:

- **Settlement Network:** would be appropriate when considered against the settlement's place in the Strategy Document settlement network or the strategy for locating development. The site is either within or adjacent to a settlement. The term adjacent refers to sites that lie immediately next to the built form of the settlement, as well as sites that lie so close to the built form that it is reasonable to consider them as a possible extension to the urban boundary. The latter may include sites that are detached from the built form by a small field boundary or an area of open space (e.g. playing field).
- **Environmental Designation:** would not cause a significant adverse effect on an international or national environmental designation¹³
- **Flood Risk:** would not be unsuitable due to the site's vulnerability to flood risk or coastal erosion (falls within Flood Risk Zone 3b) unless promoted for 'essential infrastructure or 'water compatible uses'.

¹³ International: Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar Sites and Candidate SPAs, SACs and Ramsar sites. National: Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR).

- **Heritage:** would not cause substantial harm to a nationally designated heritage asset¹⁴.

At this stage sites that fall within any of the exclusion criteria will be removed from the assessment.

Stage 2: Initial Ranking

The next stage considers the key planning objectives of East Riding, which include avoiding areas of high flood risk, locating development in the most sustainable locations and focusing on previously development land. Stage 2 considers the following criteria:

| Criteria | Assessment |
|---|--|
| Focus on Previously Development Land | The assessment results in 6 points for sites that are PDL, with lesser points for sites that contain Greenfield land and 1 point for sites that are 100% Greenfield land. |
| Accessibility of site by public transport | Housing sites: Accession software is used to confirm accessibility of each proposed site by public transport to major centres, employment locations, shopping locations, secondary health and secondary and tertiary education. Points are gained from proximity to each service and a total is gained for each site. Non-housing sites: for non-housing sites the population able to access the site within 40 minutes using public transport is assessed and a point provided. The larger the population able to access the site the higher the points received. |
| Accessibility by walking and cycling | Housing sites: assessed the proximity of the site for walking and cycling from shopping areas, main employment areas, primary schools, secondary schools, higher education and GP premises. Walking distances of 400m, 800, and 1200 metres are used and cycling distances of 1.2km, 3.6km and 5kms are used. Non-housing sites: for non-housing sites the population within 1200 metres of the site are used to confirm ability to access the site by foot and the population with 5km of the destination are used to confirm ability to access the site by cycling. The larger the population the higher the score. |
| Flood Risk | The Flood Zone vulnerability classifications from Planning Practice Guidance has been used to provide a score based on flood risk zones and the different proposed allocations. The sites score higher points if they fall in Flood Risk Zone 1 and minus points if they fall in Flood Risk Zone 3a (<i>Flood Risk Zone 3b have been excluded at Stage 1</i>). |

¹⁴ Scheduled Monuments, Sites of National Archaeological Significance, Listed Buildings, Parks and Gardens of Historic Interest and Historic Battlefields and Military Sites.

Stage 3: Detailed Site Specific Considerations

The aim of this stage is to assess all sites that were not dismissed at Stage 1. Under the ERYC methodology, only sites failing the initial sift were excluded from SA.

Stage 3 relates to a variety of social, economic and environmental issues, that alongside the stage 2 questions are considered relevant to achieving sustainable development.

Each question is scored based on the assessment below. The East Riding Site Assessment Methodology includes detailed guidance on how to score each question. Each question included a different number of potential scores ranging between 3 and 6. Details of how the score the site were provided in the East Riding Methodology. A couple have been included below for reference:

- (+++)** Significant positive benefits would result from the development of the site.
- (+)** Minor positive benefit.
- (0)** Neutral / no effects can be identified, or existing features could be retained on-site.
- (-)** Minor negative effect.
- (---)** Significant negative effects would result from the development of the site.

| Theme | Question | Criteria | | | | | | |
|--|--|--|-----|---|-----|--|-------|---|
| Settlement Vision | Would the development help achieve the vision for the settlement as set out in the Strategy Document? | (+++) | | (0) | | (---) | | |
| Biodiversity and Geological Value | Would development affect a site of biodiversity or geological value or affect legally protected species? | (+++) | (+) | (0) | (-) | (--) | (---) | |
| Wildlife and Natural Environment | Would development affect natural features that are important for wildlife or landscape character such as trees or hedgerows, or areas of ancient woodland not subject to statutory protection? | (+++) Existing features can be conserved / retained and there is opportunity for their enhancement or new features can be incorporated into the proposal. | | (0) No effect / existing features can be retained. | | (-) Features unlikely to be retained in their entirety. Any significant impacts can be mitigated (e.g by providing new / replacement features). | | (---) Features unlikely to be retained. No satisfactory mitigation measures agreed or possible. Site may be inappropriate for development. |
| Heritage Assets | Would development affect a heritage asset? | (+++) | | (+) | (0) | (-) | (---) | |
| Built Character | Would development affect the existing built character of the settlement? | (+++) | | (+) | (0) | (-) | (---) | |
| Landscape Character | Would the development impact on the visual amenity or character of the natural landscape? | (+++) | | (+) | (0) | (-) | (---) | |
| Air Quality | Does the site lie within an area of, or in close proximity to, any significant source(s) of air pollution, or would development affect air quality? | (+++) | | (+) | (0) | (-) | (---) | |
| Agricultural Land | Would development result in the loss of the best and most versatile agricultural land? | (0) | | (-) | | | (---) | |
| Groundwater | Could development potentially affect any abstraction of | (+++) | | (0) | (-) | (---) | | |

| Theme | Question | Criteria | | | | |
|--|--|--|---|---|---|-------|
| | groundwater intended for human consumption? | | | | | |
| Compatibility and neighbouring Uses | Is the development compatible with existing or proposed neighbouring uses, or would it create a nuisance that will affect existing residents? | (+++) Development would remove existing use that creates a nuisance (e.g. noise, dust, light or pollution). | (0) Development would be compatible with existing or proposed neighbouring uses. | (-) Development would not be compatible with existing or proposed neighbouring uses. Any significant impacts can be mitigated. | (---) Significant issues mean that development would not be compatible with existing or proposed neighbouring uses. No satisfactory mitigation measures possible. Site may be inappropriate for development. | |
| Contaminated Land | Would the development of the site lead to the remediation of contaminated land or removal of an unacceptable risk to public health? | (0) | (-) | (---) | | |
| Mineral Resources | Would development lead to the sterilisation of viable mineral resources? | (0) | (-) | (---) | | |
| Renewable and Low Carbon Energy | Would the development make provision for on-site renewable or very low carbon energy generation, or contribute to reducing greenhouse gas emissions? | (+++) | (0) | (-) | (---) | |
| Publicly Accessible Open Space | Does the site provide publicly accessible open space, green infrastructure, recreation facilities or a public right of way? | (+++) | (+) | (0) | (-) | (---) |

| Theme | Question | Criteria | | | | |
|---|---|----------|-----|-----|-------|-------|
| School Capacity | What is the capacity of existing schools to cope with the level of development proposed for the settlement? | (+++) | (+) | (0) | (-) | (---) |
| Utilities Infrastructure Capacity | What is the capacity of existing utilities infrastructure to cope with the level of development proposed for the settlement? | (+++) | (+) | (0) | (-) | (---) |
| Highway Network Capacity | What is the capacity of the highway network to cope with the development of the site? | (+++) | (+) | (0) | (-) | (---) |
| Wider Non-Road Transport Network | Would the development make use of the waterway and rail network? | (+++) | (0) | (-) | (---) | |
| Community Facilities | Would development result in the loss of any existing or proposed community facility or would it contribute to the construction of a new facility? | (+++) | (0) | (-) | (---) | |
| Town Centre Vitality and Viability | Would the development support the vitality and viability of an existing town or district centre? | (+++) | (+) | (0) | (-) | (---) |

| Theme | Question | Criteria | | | | |
|--|---|----------|-----|-----|-----|------|
| Regeneration of Economic Benefits | Would development of the site have a recognised regeneration or economic benefit? | (+++) | (+) | (0) | (-) | (--) |
| Affordable Housing | Would the site help meet affordable housing needs? | (+++) | | (0) | (-) | (--) |

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Stage 4: Deliverability

- This stage considers the deliverability of the sites, including:
- Any insurmountable physical, environmental or legal constraints that may prejudice the development of the site?
- Is the site subject to any ownership constraints and is it likely to be attractive to the market?
- Confirmation of the availability of the site in the next 5, 10 or 15 years?

Commentary of Approach

East Riding of Yorkshire Council (ERYC) have scored sites in relation to flood risk, accessibility and focus on previously developed land, followed by a traffic light / Sustainability Appraisal focused approach for a range of other environmental, social and economic considerations. ERYC have considered allocating sites that are capable of accommodating at least 5 dwellings and are at least 0.17ha. East Riding have excluded allocations in certain settlements due to flood risk implications.

ERYC have carried out a range of consultation including a fact checking exercise between March and September 2012 that involved contacting all the land bidders and their agents and asking them to review the site assessment methodology scores that had been produced for their sites and to confirm availability and deliverability for them. The site assessments were also sent to the Town and Parish Councils for review and comment in order to ensure that the information on which the scores were produced was as accurate and up to date as possible.

The proposed Allocations Document was subject to a Sustainability Appraisal in January 2013 following options being identified

South Kesteven Site Selection Methodology

Overview

South Kesteven District Council submitted their Site Allocations Development Plan Document for Examination in Public in 2012. The Inspector raised some concerns about the how the Council had determined which sites to allocate. A traffic light approach had been used, however the Council had not been explicit about what green, amber and red meant for each criteria and the Inspector considered the approach unclear. South Kesteven District Council therefore rechecked their allocation criteria and made them clearer, then reviewed the assessments made. The approach set out below was found sound by the Inspector.

Approach to Site Selection

Stage 1: Data gathering

South Kesteven carried out a desk top study using all known map based information about sites. Where additional information was submitted about a site

through the plan preparation and examination process this was used to update the base data.

Stage 2: Initial sift

Using the desktop information all sites were considered against the criteria listed below to sift out those sites which are clearly unsuitable for allocation at this time:

Policy

- Site or location is not in conformity with Core Strategy Policies SP1; H1 and; E1(settlement hierarchy).
- Site is not within or well related to (immediately adjacent) the existing built form of an identified (SP2) Local Service Centre (with development along two or more boundaries) or town

Site size/ previous permission

- Site is too small to allocate (i.e: less than 10 houses or 0.3ha)
- Site has planning consent, is under construction

Show stoppers

- Site is subject to international and national designation for biodiversity.
- Site is subject to international or national designation as a heritage asset.
- Site falls within Flood Zone 3, removal of the affected area would create a site of less than 0.3 ha or would accommodate less than 10 dwellings.
- Site has been identified by Anglian Water as within a cordon sanitaire. AW would object to development of the site

Stage 3: Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA)

To ensure that the assessment of all sites, not ruled out by stage 2 above, was carried out in a clear, consistent and robust manner an SA/SEA decision making framework was prepared using the SA/SEA objectives which were developed for the Core Strategy and which have evolved over that period since 2006. The SA/SEA objectives cover environmental, social and economic issues and are designed to ensure a complete assessment of all three strands of sustainability.

This is in accordance with the three strands of sustainable development set out in the National Planning Policy Framework, and reflects the advice within the Framework that these three roles are mutually dependant (paragraphs 7 and 8)

The SA/SEA Addendum Report - June 2013 sets out in detail the methodology used to assess the effect of site options on the sustainability objectives, a summary is provided below:

| |
|--|
| Environmental |
| Biodiversity: to protect / enhance the District's Natural Assets and Biodiversity (including Flora and Fauna). |
| Brownfield / Greenfield: to ensure that development is located on the most appropriate sites in relation to the development strategy. |

| |
|---|
| Soil: conserve soil resources and quality. |
| Water: conserve water resources and quality. |
| Air: to maintain air quality in the district. |
| Climate Factors: to manage prudently the natural resources of the district to reduce vulnerability to flooding. |
| Cultural Heritage: to protect and enhance cultural, built and archaeological heritage. |
| Landscape: to maintain / enhance the quality and distinctiveness of the Districts Landscape Character Areas. |
| Social |
| Fair and Healthy Communities: To ensure the needs of all sectors of the population of the District are met. To ensure that the housing needs to the community met, in particular the affordable housing requirements. To facilitate the provision of recreation facilities for all. To facilitate improved health provision where appropriate. |
| Employment: To encourage employment opportunities for all. |
| Economic |
| Economy: To facilitate the development of new technology to support a modern economic infrastructure. To improve the social and environmental performance of the economy. |
| Transport: to improve accessibility to jobs and service by increasing the use of public transport, walking and cycling |

Stage 4: Identification of additional factors which may affect the deliverability of a site

| Topic | Question | Criteria |
|--------------------------|--|---|
| Physical Point of Access | Is there a physical point of access into the site? Is there the possibility of creating an access within the landholding? | Existing access into the site |
| | | Access can be created within the landholding |
| | | No apparent means of access OR No possibility of creating access |
| Topography | Does the topography of the sites allow for development? | Flat |
| | | Undulating |
| | | Steep incline |
| Neighbouring uses | Is the proposed use compatible with neighbouring uses? | Site within established residential area and proposed for residential use, OR Site within an established industrial area and is proposed for employment uses |
| | | Area of, or partially within mixed use development (e.g. residential / industrial / open space) with opportunities to connect existing facilities. |

| Topic | Question | Criteria |
|---|--|--|
| | | Site within area where residential (or employment) development would not be appropriate (e.g retail, open countryside OR Not adjacent to any existing built form, no existing building to 3 or more sides OR Has poor / no connectivity to existing settlement and facilities. |
| Landscape Impact | Would development here be detrimental to the local landscape? | There should be no impact OR Development would improve existing |
| | Would development here be detrimental to the character of the settlement? | Development within a Conservation Area / adjacent to a Listed Building OR Development affecting character of settlement / landscape / setting of Listed Building and / or Conservation Area. |
| | Is the development in a Conservation Area? Would development affect a Listed Building? Would development effect the setting of a Listed Building or Conservation Area? | Landscape / settlement sensitive to development OR Development will represent a significant adverse impact on setting of Listed Building / settlement / landscape. |
| Current Use | Is the site currently in use? | Site is not currently in use. |
| | Is the current use the most appropriate? | The use if appropriate but other uses may be suitable. |
| | Should the current use be retained? | The current use should be retained (e.g. agricultural / countryside / open space / industrial). |
| Relationship with existing pattern of development | What is the relationship with the existing pattern of development? | Site is wholly within the settlement (infill) OR Site within a substantially built up frontage. |
| | Infill: defined as small site within substantially built up frontage. | Site is immediately adjacent to existing built form OR Site would round off the development. |
| | Linear: sporadic frontage / building line. | Large site on outskirts of village OR No relationship to existing form or pattern of village OR Topography separates site from settlement OR Development would change existing pattern / form of development (e.g. sporadic / linear development). |

Stage 5: Assessment of the deliverability of sites

Having completed Stages 3 and 4 a conclusion was drawn by South Kesteven Officers on the about the suitability of each site, based on the outcome of both the SA/SEA and the detailed sites assessments, to be considered for allocation for development.

At Stage 5 consideration was then given to the deliverability and developability of sites. To determine this, the following factors were taken into account:

- Site is available for development (owner is known to be willing for the site to be developed and the site has been actively promoted through the Strategic Housing Land Availability Assessment (SHLAA) or plan making process).
- There has been development interest in the site (site is promoted by or has the involvement of a developer; pre-application discussions have taken place and/or; further detailed planning reports have been prepared to support the sites development).
- There is no significant physical constraint on/adjacent to the site which would prevent it from being developed.
- There is no known impediment to development or redevelopment of the site which might affect the viability.

Peer Review Conclusion

The three approaches we have reviewed have all approached the determination of their portfolio of site allocations in a slightly different manner. However there are some common themes; for example:

- All LPAs have carried out a staged process to site allocation.
- They have generally all considered the same criteria, but just using different mechanisms to determine the outcome (scoring or a traffic light system).
- They have all included a deliverability stage as their last stage.

Method used to generate site options for different land uses: South Kesteven and East Riding have used a common site selection methodology for all land uses, but have tweaked criteria for non- residential land uses.

Criteria used to Screen Sites out:

There is a reasonably consistent approach to the criteria used to screen sites out, which relate to:

Consistency with settlement hierarchy.

Relationship to the built form (in terms of distance to edge of existing settlement).

Flood Risk (Flood Risk Zone 3b).

- **Site size**, however the size varies with Barnsley considering a minimum site size for allocation of 0.4ha, South Kesteven using 0.3ha (10 units) and East Riding considering sites larger than 0.17ha (5 dwellings) for allocation.
- **Heritage Designations:** exact scope varies across LPAs however if the site includes a Scheduled Monuments and Parks and Gardens with Historic Interest then the site has been excluded by all reviewed LPAs. East Riding considered the setting of Listed Building as a screening criteria.
- **Environmental Designations:** site that fall within International or National designations have been removed by all reviewed LPAs.

Barnsley consider availability of the site as an exclusion criteria. However from review of other approaches this fits better at later stage.

Evaluation of Site Options: All reviewed site allocation methods used a staged process with exclusion criteria and then a number of stages. East Riding included a scored stage, which included scoring relating to flood risk, focusing on previously developed land and accessibility by public transport and walking and cycling using Accession modelling. The final stage was carried out using a sustainability appraisal scoring mechanism to consider more detailed considerations. Following the initial sift South Kesteven carried out a Sustainability Appraisal of all site options followed by a detailed site analysis using traffic light system. Barnsley focused on a scoring approach for all their stages. All methods included a deliverability stage as the final stage, where they took the opportunity to confirm the availability of the site for development.

Mitigation of Impacts: the later stage of South Kesteven (Stage 4 and 5) and East Riding (Stage 4) considered if the constraints could be mitigated. This appears to have been based on officer judgement and information provided by developers / agents promoting the site.

Non-Sustainability Appraisal Issues: all reviewed LPAs have considered non-sustainability appraisal issues e.g. site viability / type and quality of development likely to be attracted. Barnsley focused on this to the largest degree. This is because the Barnsley Economic Strategy focuses on delivering a step change to the housing stock in Barnsley by potentially diversifying the stock to larger higher quality properties. Therefore the degree to which sites would meet the objectives of the Economic Strategy feature strongly in the Barnsley site selection methodology. All reviewed approaches consider deliverability and viability. In some cases this relates purely to comments from the SHLAA working group or developer group; however Barnsley carried out specific viability work on each shortlisted site at Stage 4.

Impact of Constraints on Deliverability and Phasing: Based on a desk based review it has not be possible to confirm how constraints have been considered against deliverability and phasing. However, a logical approach is that any 'show stopper' constraints are filtered out in the initial sift, after this the constraints associated with a site will be identified as part of the qualitative assessment (stage 2 of our method) and assessed as part of the deliverability assessment at stage 4. A judgement based on potential mitigation measures will inform the conclusion regarding whether the constraint requires mitigation and at what point in the plan period the mitigation measures could be delivered. This enables a judgement, based on the evidence available, about any impact on phasing and the delivery trajectory

The need to revisit site options where housing / employment needs not met: Based on a desk based review it has not be possible to confirm how the LPAs set out above approached revisiting options. However subsequent discussions with other local authorities have confirmed that this has largely been a qualitative exercise based on the balancing of a number of factors. Leeds City Council utilised a series of Officer and then Member workshops to discuss the relative merits of sites, including those previously discounted. LCC had particularly struggled to find sufficient sites in its 'East Housing Market Characteristic Area' and subsequently a number of sites that had been discounted were reconsidered against new information submitted in support of the site during the Issues and Options public consultation. The workshops centred on an assessment of the new information received to determine whether the mitigation measures proposed were sufficient to overcome the site constraints identified at Issues and Options stage.

Where a site was subsequently revisited having previously been discounted a narrative detailing the reappraisal of the site in light of new information arising has been included as part of the site assessment for the next stage of public consultation. This explains clearly the rationale behind the reassessment and how the suggested mitigation factors have influenced the reappraisal. It is important however to note that the LCC Site Allocations DPD has not yet been examined and thus there is no formal indication as to whether this approach would be considered sound.

Final selection of /‘cut off’ point for land allocations to meet a housing / employment need:

It has been difficult to ascertain definitive examples of the methodology employed by other LPAs in determining the final selection of sites to meet both employment and housing need. Further research conducted by Arup has however found that many authorities utilise a qualitative ‘planning-judgement’ exercise whereby all material relating to a site is considered at a workshop or similar event. As with LCC’s approach to the reappraisal of sites, Sefton Council is another example of an authority that has relied heavily upon this more qualitative approach in their site selection methodology in order to select their final land allocations. Their site selection methodology states that the final selection of sites to be allocated was largely based on planning judgement. This degree of flexibility allowed officers to take a pragmatic view on the relative weighting of scores, which has enabled consideration of the importance and magnitude of the specific scores during the earlier part of the process. Paragraph 3.2 of the 2014 Sustainability Appraisal and Site Selection Methodology states that this flexible approach has facilitated the allocation of “some sites that can offer ‘wider or site specific benefits’ ...in preference to more accessible sites”. As with the Leeds City Council example, it is important to stress that this methodology also has not been tested at Examination. However, the experience of plans at examinations indicates that a clear method, and clearly explained justifications for judgements are generally seen as robust. The choice of site cannot be an entirely mechanical exercise and does require judgements to be made.

Use of different professionals: From a desk based review it is difficult to confirm if LPAs have used external consultant or in-house expertise. However it is clear that expertise has been used in relation to determining the:

- Accessibility of sites by public transport (e.g. East Riding have used Accession Modelling to determine this).
- Landscape impact of proposed sites and whether they are acceptable.
- Impact on biodiversity and wildlife.
- Impact of proposed sites on above ground heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments and Parks and Historic Parks and Gardens).
- Viability of sites for the proposed allocation.
- Capacity of highway network to accommodate proposed development on proposed sites.

Timing and Order of above processes: This is considered in more detail on the Critical Flowchart included in Section 6.

B1.3 Doncaster MBC

Until June 2014, Doncaster MBC were progressing their Sites and Policies DPD and had submitted to the Secretary of State for independent examination. Following concerns that the council's site selection methodology did not include a sound approach to flood risk, the council subsequently withdrew their DPD from examination. This short note reviews the Inspector's report dated 3rd June and draws relevant advice, specifically regarding flood risk.

One of the primary reasons leading the Inspector to recommend the withdrawal of the plan was the council's approach to flood risk. Paragraphs 99-102 of the NPPF set out the way in which allocations in a Local Plan should be pursued. Areas of flood risk should be avoided where possible through the application of a sequential test. If, following the application of the test, it is 'not possible', consistent with the wider sustainability objectives of the plan, to locate development in those areas with a lower probability of flooding, the exception test may be applied.

In examining the plan the Inspector expressed anxieties that the full guidance of the NPPF had not been taken into account and he felt that the Doncaster MBC had instead pursued sites where it had a long-term commitment for the delivery of its regeneration efforts. This, he stated, was not an appropriate application of the exceptions test, and moreover the authority's approach to the selection of sites in areas of higher probability of flooding had been "too inflexible", and had not given due regard to sites consideration of alternatives such as developing in the countryside or Green Belt. The inspector noted that the exceptional circumstances test should only be where it is not possible to direct development to areas of lower flood risk, and even then its application is not that it "would be preferable "to locate development in the areas of the highest risk of flooding", but that it should be demonstrated that it was "impossible to do otherwise".