1. The Local Plan – The Bigger Picture

Introduction

What is the Local Plan?

1.1 All planning authorities have a strategic plan which provides a framework for the future planning of their area. Our Local Plan is made up of two main documents – the Core Strategy and a Site Allocations Document – which together will guide future development in the district up to 2028. The new Local Plan must address social, environmental and economic issues through land use and other planning policies. There are also other documents that provide guidance to the policies in the Local Plan and these are called Supplementary Planning Documents (SPDs), such as the Affordable Housing and Housing Mix SPD. Overall the Local Plan provides the blueprint for future development in the district.

1.2 The Core Strategy is at the heart of the Local Plan and lays the foundations for the Site Allocations document. It sets out our vision for what we want to achieve in the district up to 2028. It also contains a range of policies to guide development, covering new housing, employment, community facilities and environmental protection. These policies are used to determine planning applications.

1.3 The Core Strategy has been subject to extensive consultation over 6 years, and after Independent Examination was found to be sound and formally adopted by Council Members in December 2012. It replaces the old Local Plan which was adopted in 1996.

1.4 A legal challenge was lodged in the High Court against Core Policy 6: Housing Delivery after the Council adopted the Core Strategy. In December 2013, the Council received the judgement from the High Court which comprehensively dismissed the challenge and therefore the Core Strategy is now fully adopted.
2. **What is the Site Allocations Document?**

2.1 The Site Allocations Document (SAD) is the second part of the Local Plan, which allocates land and identifies specific sites for different types of development throughout the district. It considers different land uses, including housing, gypsy and traveller provision, employment, open space, sport and recreation and will also protect environmentally sensitive areas of land. It will identify the sites needed to meet the housing numbers set out in the Core Strategy, and also safeguard land for housing and employment development for 10 years post 2028. This will provide some certainty to the community, service providers, the local authority and developers about the future use of land in their area. There will also be new policies, in addition to those in the Core Strategy, to help us manage the changes brought about by the new planning strategy.

2.2 Fundamentally, the Site Allocations Document must conform to the principles and policies in the Core Strategy and is the means by which development is delivered. Although it deals principally with site specific issues, it follows the strategic objectives in the Core Strategy and therefore the two must be considered in tandem.

2.3 The responses to this consultation will help us to assess the suitability of sites for housing, employment, leisure, recreation and community facilities to deliver the planned growth and to meet the strategic objectives in the Core Strategy. The role of the Site Allocations Document is to establish the principle that a particular form of development can be located on a specific site. Once the Site Allocations Document has been through the formal processes, the inclusion of a site within it means that the Council will, in principle, support the development or use of that site in accordance with the document. However, it does not grant permission for any particular proposal; this will still need to be secured through the planning application process and further consultation will need to be carried out.
3. **The purpose of this Paper**

3.1 The purpose of this paper is to set out the proposed methodology for site selection that will be undertaken as part of the preparation of the Site Allocations Document (SAD). It will fully set out the whole site allocations process, and how the document will be progressed through each stage, including the criteria that will be used to assess sites and the background work undertaken to help justify decisions.

3.2 This methodology identifies 13 stages to site selection, including those which are statutory requirements for preparing a Local Plan document as set out in the Town and Country Planning Regulations 2012. This paper provides full justification for each stage, from assessment of all suggested sites against key policy considerations, through to identifying preferred sites to be submitted to the Secretary of State.

3.3 Alongside this paper, and at each subsequent stage of public consultation, the Council will produce a 'Discounted Sites Paper' that references all sites discounted to date, the stage at which they were discounted and the reasons why. Both papers should be read in tandem.

3.4 It is our view that this methodology takes the most comprehensive, objective and logical approach to selecting sites, in order to accommodate the Council’s housing requirement over the plan period. We believe that this approach will 'sieve' the least appropriate sites and leave us with the most sustainable option – the best and least harmful sites. We therefore want your views on whether you think our approach is the right way forward, and if not, what amendments you think would make our approach more robust. Details of which stages of site selection involve public consultation can be found in Appendix A. Should you have comments to make on this methodology paper or any of our other consultation documents then please send your comments to:

Local Plans Team  
South Staffordshire Council  
Council Offices  
Wolverhampton Road  
Codsall  
South Staffordshire  
WV8 1PX

Email: sadconsultation@sstaffs.gov.uk
4. Stages of Site Selection

**Stage 1 - Conformity to the Spatial Strategy and categorisation in the SHLAA.**

4.1 The Council has undertaken many ‘Calls for Sites’ consultations over a number of years. This invites landowners/agents to submit details of their sites including location, size of site, details of any constraints and which have a willing landowner. These sites form the basis of the Council’s Strategic Housing Land Availability Assessment (SHLAA) which lists all the sites formally suggested to the Council for housing.

4.2 The starting point for identifying potentially suitable sites is those that have been identified in the SHLAA under the following categories:

- **S1:** Deliverable
- **S2:** Developable 2013-2018
- **S3:** Developable 2018-2023
- **S4:** Developable 2023-2028
- **NCD1:** Not Currently Developable
- **NCD2:** Not Currently Developable.

4.3 For sites to be categorised as any of the above, they would need to be in general compliance with the Council’s spatial strategy set out in the adopted Core Strategy. In order to retain and reinforce the current pattern of villages, only those sites that adjoin the village boundary of the Main and Local Service Villages which have been identified for growth (as set out in Core Policy 1 of the Core Strategy) have been considered. Sites directly adjacent to village boundaries are less likely to have as great an impact on the openness on the Green Belt and are likely to be closer to existing village centres and facilities, and therefore be a more sustainable option. Furthermore, there is sufficient capacity on land adjoining each of these village boundaries to meet the housing numbers in the Core Strategy several times over. Therefore, there is no justification for identifying sites away from the village boundary and for this reason, sites that are disassociated, have been discounted. This approach was agreed by the SHLAA Panel in 2011. Sites that fall under SHLAA categories **NCD1** or **NCD2** whilst classified as ‘not currently developable’, are developable in principle, but have constraints on the site. Typically, NCD1 sites are those which have a policy restriction such as Green Belt, Open Countryside or are areas of Safeguarded land. NCD2 sites are those which have other constraints such as accessibility, which theoretically could be addressed.

4.4 There are other reasons for discounting sites in the SHLAA for example where there are ‘showstoppers’ on the site that would render development of the site inappropriate. These include:

---

1 Please note that in considering this, the Council will be examining sites in relation to the spatial pattern of built development, rather than which parish boundary the site falls within.
Where the site is in Flood Zone 3b
Historic Parks and Gardens
Environmentally sensitive areas such as SSSIs, Local Nature Reserves, Special Areas of Conservation
Lack of a suitable access
Site that contain Ancient Monuments

4.5 Full details of the SHLAA methodology can be found in the 2013 SHLAA which can be accessed via the Council’s website at www.sstaffs.gov.uk/SHLAA.

4.6 Sites discounted during Stage 1 where sites are disassociated from the village boundary, or do not conform to the Council’s Spatial Strategy, or where ‘showstoppers’ exist on site, fall under the SHLAA category NS: Unsuitable/Discounted. Details of the sites discounted can be found in the Discounted Sites Topic paper that should be read in conjunction with this document.

**Stage 2 – Site size threshold**

4.7 The next stage of the site selection process is to consider the remaining sites and discount SHLAA sites that are considered ‘developable’/‘not currently developable’, but in terms of site size would fall below the thresholds in Policy H2 of the Core Strategy that would require a proportion of affordable housing.²

4.8 Achieving a balanced housing market, including the provision of affordable housing, is a key objective of the Council and of the Council’s Core Strategy. Although affordable housing may come forward through exceptions sites, the allocation of small sites where no affordable housing is required would fail to deliver this key objective and continue to perpetuate the housing stock imbalance currently in the district, which the Core Strategy seeks to address. Therefore to consider sites below these thresholds through the Site Allocations Document would be contrary to the approach set out in the adopted Core Strategy.

The size thresholds for Main and Local Service Villages are contained within Core Strategy Policy H2 and state that in Main Service Villages a development of 10 or more dwellings (or sites of 0.3 hectares or more in size) will require a proportion of affordable housing. Meanwhile, in Local Service Villages, a development of five or more dwellings (or sites of 0.2 hectares or more in size) will require a proportion of affordable housing. Strategic Objective 8 of the Core Strategy looks to ‘ensure the delivery of a minimum of 644 decent homes ...’. 644 equates to approximately 40% of the residual requirement in CP6 of the Core Strategy, of 1610 homes.

²The capacity of each suggested site is calculated at a broad average density of 25/30 dwellings per hectare, as per the SHLAA
EVIDENCE BASE

Stage 3 – Green Belt Review

It is not only the role of the final Site Allocations Document to allocate sites to meet our housing/safeguarded land requirement, but is the means by which alterations will be made to Green Belt boundaries. NPPF is clear that ‘Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.’ This ensures that when planning applications are submitted for allocated sites, that they have been removed from the Green Belt (where required) and are no longer subject to Green Belt policy.

Paragraph 6.20 of the Core Strategy sets out the Council’s sequential approach to guide housing site selection, with a preference for sites within a village’s development boundary. The protection of our Green Belt is a high priority and the allocation of Green Belt sites is the least preferable option in the sequential test. However despite this, we know that many of our villages have insufficient non Green Belt land available and therefore some changes to Green Belt boundaries will have to be made. It is for this reason that the Core Strategy committed to a partial review of the Green Belt to help identify which land performs a strong Green Belt function and that which plays a more limited role.

The Green Belt review analyses sites against the five purposes of the Green Belt (as set out in paragraph 80 of the NPPF) only. The intention is that this is a ‘pure review’, and other criteria such as impact on landscape quality, accessibility etc will be considered on a site by site basis, following the Issues and Options consultation.

It is important to stress that the Green Belt review did not simply analyse specific sites which emerged following stage 1 and 2 of the site selection process. Rather, it identified parcels of land defined by natural boundaries, considering land adjacent to village boundaries in every direction. These parcels were then assessed against the purposes of the Green Belt and placed into one of the following bands:

- Makes a considerable contribution to Green Belt Purposes (dark green)
- Makes a contribution to Green Belt Purposes (mid green)
- Makes a more limited contribution to Green Belt Purposes (light green)

To differentiate parcels falling within the same band, the Green Belt review also added a secondary ranking to each parcel (A, B, C, D etc.) with a ranking of A indicating less contribution.

In certain instances, the Green Belt review indicated that a parcel of land which had not been suggested to us made a more limited contribution to the Green Belt than other parcels of land. Where this was the case, the
Local Plans team made every effort to contact the landowners to see whether less harmful sites might be available. However, in some circumstances this was not possible. Only sites where landowners agreed to put their land forward were included in the Issues and Options consultation.

The full methodology paper for the Green Belt review can be found on the Council’s website at: www.sstaffs.gov.uk/siteallocations

Stage 4 – Site Allocations Issues and Options consultation

4.9 The Issues and Options consultation is a public consultation that asks for public and stakeholder views on various issues to be addressed through the Site Allocations Document, including locations for housing/safeguarded land, options for employment, open space and the need for and provision of community facilities. As part of this consultation the Council will also provide opportunities to consult on the site selection methodology paper and the discounted sites topic paper. The consultation will last 9 weeks, and will be widely publicised and provide residents and stakeholders with the opportunity to attend workshops setting out the Issues and Options for future development.

4.10 There is a separate consultation document for each of the five localities within the District, with an appendix in each providing a proforma for each of the potential sites. The consultation will invite residents and stakeholders to comment on which site or sites they favour and will ask that they provide reasoned planning justifications for their views. It is envisaged that this process will highlight constraints on individual sites which the Council may not have been previously aware of. The consultation will also invite representations on the proposed site selection criteria contained in this paper.

4.11 In addition to the Issues and Options consultation document, Infrastructure and Service Providers will be sent a separate consultation document with greater focus on what infrastructure and service provision may be required in each village to support new development coming forward. This will also provide bodies such as the Environment Agency and County Council Highways with an opportunity to give their professional advice, including where they feel ‘showstoppers’ exist that may render a site undeliverable.

4.12 The Council is required to produce and consult on a Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA) in tandem with the Site Allocations Issues and Options consultation. The Sustainability Appraisal is a statutory requirement and incorporates a Strategic Environmental Appraisal (SEA) and is an effective way of ensuring that sustainable development principles are taken into account during the plan-making process. The SA to accompany the Issues and Options is a scoping report and involves predicting and evaluating the effects of the proposals in the Site Allocations Document. This will assist in the development and
refinement of the options through the identification of potential effects and determining whether they meet the plan objectives. The SA consultation will run in tandem with the Issues and Options consultation for the full 9 weeks.

4.13 During the consultation the Council will provide residents and stakeholders with an opportunity to suggest new sites that may not have been considered through the Issues and Options consultation. Where they meet the same site selection criteria and have a willing landowner, these sites will form part of an addendum consultation to ensure that residents and stakeholders are able to share their view on all the options.

**Stage 5 - Analysis of consultation responses and refine methodology**

4.14 Following the consultation the Local Plans team will read through all of the representations (from the Issues and Options, potential addendum and SA consultations) and refine the methodology where representations demonstrate this to be justified. Where amendments to the site selection criteria are to be made the justification for this will be set out in the summary of representations document, which will set out the Council’s response to representations. The Council will then publish the amended site selection criteria alongside the summary of representations on the Council’s website.

**Stage 6 - Assess remaining sites against the 1st tier of site selection criteria.**

4.15 Sites will be assessed against two tiers of site selection criteria. At this stage, officers will undertake site visits objectively assessing each site against the first tier of site selection criteria (see Appendix B). Following this, sites will be ranked based on how they have performed against all the tier 1 criteria considered collectively. The outcomes of this, alongside Sustainability Appraisal, Habitat Regulations Assessment and flood risk Sequential Test outcomes will be considered holistically to determine which sites should be taken forward for further consideration. Following this assessment, it is envisaged that the top 2 or 3 sites\(^3\) will be taken forward to the next stage with the remaining sites discounted. Justification for discounting sites will then be given in the discounted sites paper to be published alongside the Preferred Options consultation document.

---

\(^3\) This may vary depending on how many sites have been put forward for a village, what the village’s allocation is, consultation responses and how they have scored against site selection criteria tier 1.
EVIDENCE BASE

Stage 7 – Strategic Viability Assessment

The Council will commission consultants to undertake high level viability work on notional sites to demonstrate plan deliverability. This work will be undertaken prior to the publication of the Preferred Options document and should highlight issues that may impact on the viability of sites. This will be incorporated into our wider viability work for developing a Community Infrastructure Levy (CIL) charging schedule.

Ultimately this piece of work should highlight those sites where the constraints that exist render them unviable (if any).

Stage 8 – Provide representatives of selected sites the opportunity to set out what can be delivered on site.

4.16 This stage will provide representatives of the remaining sites the opportunity to broadly set out what can be delivered on their site in the form of an ‘indicative proforma’ taking on board appropriate representations, accompanied by any relevant supporting information. This will involve officers actively contacting site representatives and asking for further information and they will be given 6 weeks to provide details. Site representatives will be advised that their proposal should have strong regard for community preferences as revealed through the Issues and Options consultation and set out in the published summary of representations. This will enable them to set out any community facilities/benefits that they could deliver as part of the site proposal (see stage 9). Equally, they should have regard to the steer from the Council’s Infrastructure Delivery Plan, which sets out what Infrastructure and Service provision is required to help support new development. When drawing up proposals, site representatives will be advised to consider tier 2 of the site selection criteria (Appendix C) which will be used to help determine the final ‘preferred option’ site to be consulted on as part of the Preferred Options consultation (Stage 11). It is important to note however that the selection of the ‘preferred option’ will not be solely based on the site delivering the greatest level of community benefit. Proposals should be realistic and viable and be in conformity with the Core Strategy reflecting its strategic objectives.

4.17 Housing numbers for each village have already been set in Core Policy 6 of the Core Strategy. Therefore if a proposal was to exceed these numbers, robust justification would be required. Site proposals that significantly exceed the housing allocation for a village will be discounted immediately on the basis of not conforming to the adopted Core Strategy. However, there is some flexibility for allocated sites to exceed the minimum housing numbers set out in Core Policy 6, where doing so will help to deliver community facilities and where such proposals are supported by the community.
EVIDENCE BASE

Stage 9 – Demonstrating community benefits are deliverable

Where a site representative is proposing additional community benefits (i.e. those that go beyond the minimum policy requirements e.g. Affordable Housing requirements as set out in Core Strategy policy H2) then they will need to demonstrate to the Council that the proposed benefits are viable in order to show that the sites will still be deliverable. This is to ensure that any additional community benefits provided are realistic in their scope and do unduly burden the proposed development.

Stage 10 – Assess remaining site proposals against the 2nd tier of site selection criteria

4.18 Officers will then assess proposals for the sieved sites against the 2nd tier of site selection criteria (Appendix C). The outcome of this process, along with how sites performed against the 1st tier of site selection criteria, will be considered in the round when determining the preferred site. In some circumstances, more than one site may be considered to meet the allocation for a village where there is proven community support and is clearly justified4. Remaining sites will be discounted.

4.19 Justification for discounting sites will then be given in the discounted sites paper to be published alongside the Preferred Options consultation document. Where sites in a village are judged to be equally suitable, a judgement will need to be made; the balance is likely to be in favour of those sites with greater community support.

Stage 11 - Preferred Options Consultation

4.20 These preferred sites will then form part of the Preferred Options public consultation. This will include a proforma of each site providing an indicative outline of what the landowner/developer would look to deliver as part of the development. The consultation will invite residents and stakeholders to comment on the proposals.

4.21 The Preferred Options document will be a single consultation document for the entire District. The consultation will last a minimum of 6 weeks, and will be widely publicised and provide residents and stakeholders with the opportunity to attend workshops where details of the preferred sites and proposals will be exhibited.

4.22 The Council is required to prepare and consult on a Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA) to be published for a minimum of 6 weeks in tandem with the Site Allocations Preferred Options consultation. The consultation will involve public and statutory

4 In fact, most villages will have more than one site taken forward in order that enough land is identified to meet both the allocation and the safeguarded land requirement.
bodies to ensure that all issues and aspects of sustainability have been covered.

4.23 Alongside the Preferred Options document the Council will publish an updated ‘Discounted Sites Topic Paper’. Here, published findings of the site selection process will be drawn together to give a clear conclusion of the performance of each of the sites consulted on at the Issues and Options against the SA, and the two tiers of the site selection criteria. This paper will provide clear justification for discounting sites and instances where only part of a larger site has been chosen. The methodology paper will also be updated to set out next steps towards adoption of the Site Allocations Document.

**Stage 12 – Analysis of representations**

4.24 Officers will consider all representations received during the Preferred Options consultation and will set out the Council’s response in a summary of representations table. If as a result of representations made, it is necessary to revisit the preferred sites then the Council will, where necessary, undertake an addendum preferred options consultation containing any amendments to the original consultation document, including justification for the amendments.

**Stage 13 – Publication Document consultation and submission to the Secretary of State**

4.25 Following consultation on the Preferred Options Document officers will draft a Publication document. The publication document will set out the final sites to be allocated, and where applicable, make amendments to Green Belt or Open Countryside boundaries. The document will set out what community facilities/benefits will be required as part of any future planning application on the site, and at what point in the plan period the site will come forward for development to ensure phasing over the plan period. The document will include all site allocation proposals, including those for non-residential use such as employment/recreational uses. In addition, the Publication Document will include any policies that have emerged through the Issues and Options and Preferred Options consultations.

4.26 The Publication document will again be subject to a minimum 6 week consultation, however in line with the Town and Country Planning Regulations 2012, representations at this stage should directly relate to the soundness (or otherwise) of the document. The Council may wish to produce a schedule of proposed modifications that address some of the objections raised during the Publication stage consultation. Following this, the Publication document, representations made during the consultation period and a schedule of proposed modifications (if applicable) will be sent to the Secretary of State. The ‘soundness’ of the submitted Site Allocations Document will then be considered by the Planning Inspector (PINs) at an Examination in Public.
5. Allocating sites for gypsies and travellers and non residential use.

Gypsy and Travellers

5.1 The Council is required to plan for gypsy and traveller needs over the plan period and therefore will allocate gypsy and traveller sites which have been identified through the site allocations process. The Council has previously undertaken a ‘call for sites’ which asked for details of sites which would be suitable for gypsy and traveller pitches. The sites suggested to us will form part of a separate gypsy and travellers Issues and Options document that will be published following the main locality based Issues and Options document. The findings from this consultation as well as the findings from the 2013 Gypsy and Travellers Accommodation Assessment (GTAA) will help determine the preferred size and location of new Gypsy and Traveller pitches. These preferred sites will then be incorporated into the main Preferred Options consultation document (stage 11).

Employment

5.2 The Core Strategy makes allowance for ‘modest extensions’ to the four Freestanding Employment Sites (i54, ROF Featherstone/Brinsford, Hilton Cross and Four Ashes) where robust evidence and reasoned justification is provided to support their expansion. In addition, the Core Strategy makes further allowance for employment as part of a mixed use development in the Main Service Villages where justified. The intention is that where there is evidence to support a ‘modest extension’ and or mixed use development that this would be allocated through the Site Allocations Document.

5.3 Since the Core Strategy was adopted, the Council has revised its Employment Land Study which revealed a slight oversupply of employment land in the district. As a result, no evidence to support ‘modest extensions’ to any of the four Freestanding Strategic Employment Sites, nor the allocation for a mixed use development incorporating employment within the Main Service Villages, has so far been demonstrated. The Council intends to undertake further evidence gathering under Duty to Cooperate to explore the sub regional nature of employment provision; particularly the relationship between South Staffordshire and the Black Country. Therefore, it is still the Council’s intention to consult on employment provision at each stage of the Site Allocations process, with a view to allocating employment land if emerging evidence demonstrates a need. It is envisaged that if a sub regional employment study demonstrates evidence of need to expand one or more of the four freestanding employment sites, that stage 2 of a study would look at options for expansion. This will look at options around each employment site and assess sites in terms of market preferences, accessibility etc. as well as how the site performs as part of the Green Belt
review. Whilst the Council will consider representations on preferred locations for modest extensions (if justified), this will need to be balanced with the recommendations from the study when determining the most suitable location for an extension to the existing employment site.

**Open Space**

5.4 It is envisaged that open space will be provided as part of most new residential development, with the level and type of provision informed by the Council’s Open Space Audit and subsequent Open Space Strategy. Linkages between new open spaces and existing spaces will be crucial, and therefore regard must also be had to the Green Infrastructure Study. Any new residential development within 15km of Cannock Chase SAC may also need to provide Targeted Additional Open Spaces (TAOS) to mitigate adverse effects on the European protected site, mainly from recreation pressure. This is set out in the Cannock Chase SAC Mitigation Report. The need to allocate stand-alone open space will be informed by all relevant documents.

**Methodology Paper consultation questions**

1) Do you consider the Site Allocations site selection methodology to be appropriate for selecting sites for new development? If not, then please provide detailed justification for why you consider the methodology fails in its objective to identify the most appropriate sites?

2) Are there any amendments that should be made to the site selection methodology? If so, please provide details of these, along with reasoned justification for the amendment(s).
Appendix A

Key stages of public consultation through to submission of the SAD to the Secretary of State

1. Site Allocations Issues and Options Document consultation (see Stage 4)
2. Site Allocations Issues and Options Document addendum consultation – if required (see Stage 4)
3. Preferred Options Document consultation (see Stage 11)
4. Site Allocations Preferred Options Document addendum consultation – if required (see Stage 12)
5. Publication Document consultation (see Stage 13)

In addition to the main consultation document(s) set out in the flow chart above, we will also ask for views on the latest versions of a number of other documents to be consulted on in tandem with each Site Allocations consultation document, these are:

- Methodology paper
- Discounted sites paper
- Sustainability Appraisal
- Habitat Regulations Assessment
- Infrastructure Delivery Plan (including five separate appendices for each Locality)
Appendix B

Site Allocations Document – Site Selection Criteria (tier 1)

The first set of site selection criteria will be used to assess which sites considered as part of the Issues and Options consultation perform best, and as a result will be taken forward for further consideration to consider what can be delivered on the site. Assessment criteria attributed a higher impact in the table below are considered a more important factor in determining the most suitable sites for new development. **When assessing individual sites, the lower the impact when judged against an individual criterion, the more suitable the site** (for example, a site within the Green Belt that makes only a limited contribution to fulfilling the purposes of the Green Belt, will be deemed to have a lower impact on the Green Belt and against that criterion). For certain criteria, e.g. access to facilities, it is proposed that sites should be considered comparatively against other sites within the village when determining overall impact. The assessment criteria impacts will then be considered collectively with the findings of the Sustainability Appraisal, the HRA and the sequential test for flood risk. Following this, the two or three\(^5\) sites for each village with the lowest cumulative impact will be taken forward to the Site Selection Criteria (tier 2). There may be certain cases where the site selection criteria approach does not reflect certain site anomalies, in which case pragmatic decisions taking account of additional factors may be required. Where a site is taken forward that has not strictly followed the site selection criteria, then full justification for this will be made in the Preferred Options document.

<table>
<thead>
<tr>
<th>Assessment Criteria</th>
<th>Impact</th>
<th>Comments/Justification for inclusion</th>
</tr>
</thead>
</table>
| Green Belt review categorisation              | Extremely high impact | This criterion ensures that sites that are not in the Green Belt, or which make a more limited contribution to Green Belt purposes, are favoured. This is to reflect that some sites fall within parcels of Green Belt that perform a more considerable Green Belt function – when judged against the five purposes of Green Belt – than other parcels.  

The Green Belt categorisation mirrors the findings from the Green Belt review (see stage 3 of site selection methodology) taking account of both the primary and secondary categorisations attached to each Green Belt parcel that was assessed. The review placed parcels into one of the following bands

- Makes a considerable contribution to Green Belt purposes

\(^5\) This may vary depending on how many sites have been put forward for a village, what the village’s allocation is, and how they have scored against site selection criteria tier 1.
<table>
<thead>
<tr>
<th>Assessment Criteria</th>
<th>Impact</th>
<th>Comments/Justification for inclusion</th>
</tr>
</thead>
</table>
|                                     |                 | • Makes a contribution to Green Belt purposes  
• Makes a more limited contribution to Green Belt purposes                                                                                                                                                                                              |
<p>|                                     |                 | Each parcel was then assigned a secondary ranking (A-D) with A indicating that the parcel would be considered more suitable for Green Belt release (solely when considered against the five purposes of the Green Belt) through to D indicating that the parcel is considered less suitable for Green Belt release. |
|                                     |                 | The reason for this criterion being attributed an extremely high impact is to reflect the importance of the impact on the Green Belt as a site selection consideration. Sites that are not within the Green Belt (e.g. open countryside, safeguarded land, sites in Development boundary) will automatically be judged to have no impact against this criterion. |
| Sequential test                     | Very high impact | Paragraph 6.20 of the adopted Core Strategy sets out a clear sequential approach to guide housing site selection when consulting with local communities. This criterion ensures that brownfield sites in the development boundary are considered more favourably, whilst ensuring that sites in the Green Belt are considered less favourably in the site selection process. |
|                                     |                 | Land safeguarded from the 1996 Local Plan will be taken forward to the preferred option stage unless when considering all factors holistically, it becomes clear that an alternative site or sites would be a better and more sustainable option. |
| Countryside/landscape capacity      | High impact     | The purpose of including this criterion is to ensure that landscape character is preserved and new development is integrated into existing landform where possible; avoiding unacceptable visual effects. This is important in maintaining the attractiveness of the district. |
|                                     |                 | The effects on the countryside/landscape of a site coming forward will be considered against other sites. Sites that if they came forward would have a wholly unacceptable effect on landscape quality may be discounted at an earlier stage. |
| Potential for adverse impacts on a  | High impact     | This criterion will attribute a lower impact in locations that are further away from designated sites and ensures that sites nearer protected sites are disadvantaged. Where                                                                 |
| European Designated Site (Habitats) |                 |                                                                                                                                                                                                                                                        |</p>
<table>
<thead>
<tr>
<th>Assessment Criteria</th>
<th>Impact</th>
<th>Comments/Justification for inclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulations Assessment [HRA] outcomes)</td>
<td></td>
<td>the Habitats Regulations Assessment reveals that development on a site would have an unacceptable impact then the site will be discounted.</td>
</tr>
</tbody>
</table>
| Impact on Biodiversity                                  | Medium to high impact   | Ensuring that areas of rich biodiversity are protected is an objective of the Core Strategy, and is reflected in Core Policy 2 and Policy EQ1. Protecting, and thereby having access to area of rich biodiversity, can have a positive impact on the education and health and wellbeing of local residents. The impact on biodiversity of a site being developed will be considered against other sites.  

We will be guided by the advice of the Council’s Senior Landscape Officer and Natural England, with it anticipated that sites that have an unacceptable impact on biodiversity (if any) being discounted following consultation with Natural England at the Infrastructure and Service providers’ Issues and Options consultation. |
<p>| Impact on environmental quality                         | Medium to high impact   | This criterion will consider the impact on the environment of a site being developed. If there is ground contamination on site it may be that a site coming forward would see remediation work that would have a positive effect on the environment. Conversely, the loss of land of high environmental quality would be considered less favourably. The impact on the environment of a site being developed will be considered against other sites. |
| Highways (accessibility to the site.)                   | Medium to high impact   | The criterion ensures that sites that have no accessibility issues are favoured, whilst those that have accessibility constraints score a higher impact. Sites that are judged inaccessible will have been discounted either through their SHLAA categorisation or following the infrastructure and service providers consultation informed by representations from Staffordshire County Council Highways department. |
| Loss of existing facilities (including Best/Good employment) | Medium to high impact   | It is important where possible to avoid the loss of facilities, particularly sole facilities. Where sites coming forward would see the loss of facilities (e.g. where a site is in the development boundary and includes an existing facility) then these would be judged to have a greater impact when judged against this criterion. |
| Historic Environment/Heritage Assets                    | Medium impact           | The conservation and enhancement of the historic environment is an objective of the Core Strategy and is reflected in policy EQ3. Sites which would have a wholly unacceptable impact on the historic environment/heritage assets may be discounted at an earlier stage. The Council will be guided by the advice of English Heritage. It is anticipated that sites that have an unacceptable impact on the historic environment will be discounted following consultation with English Heritage at the Infrastructure and Service providers’ Issues and Options consultation. |</p>
<table>
<thead>
<tr>
<th>Assessment Criteria</th>
<th>Impact</th>
<th>Comments/Justification for inclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Options consultation.</td>
<td></td>
<td>Options consultation.</td>
</tr>
<tr>
<td>Accessibility to Amenities (inc.</td>
<td>Medium</td>
<td>To reflect sustainable development principles it is the Council’s intention that chosen sites are within</td>
</tr>
<tr>
<td>Employment)</td>
<td>impact</td>
<td>walking distance of village amenities, and therefore it is proposed that the distance from the site to</td>
</tr>
<tr>
<td></td>
<td></td>
<td>services and facilities is a consideration, with sites nearer services and amenities having a lower</td>
</tr>
<tr>
<td></td>
<td></td>
<td>impact. Accessibility to amenities will be considered against other site put forward for development in</td>
</tr>
<tr>
<td></td>
<td></td>
<td>and around that village.</td>
</tr>
</tbody>
</table>

**Flood risk, Habitat Regulations Assessment (HRA) and Sustainability Appraisal consideration**

Following consideration of sites against each individual criterion in tier 1, we will rank all the sites around each village based on how they have performed against the collective tier 1 criteria. We will then consider how the sites have performed against the Sustainability Appraisal and HRA. Should the Sustainability Appraisal and/or HRA reveal any ‘showstoppers’ on a site, then the site will be discounted regardless of how it has scored against the tier 1 criteria. At this stage we will also consider sites against the Sequential Test for flood risk, in accordance with the National Planning Policy Framework (NPPF). This will ensure that, where practical, sites within a lower risk flood zone are considered ahead of those in a higher risk flood zone. This will be informed by a refresh of the Council’s Strategic Flood Risk Assessment and through consultation with the Environment Agency. Following this, all sites will be considered against selection criteria (tier 1), the flood risk sequential test, the Sustainability Appraisal and HRA outcomes holistically, when determining which sites to take forward to tier 2.
Appendix C

Site Allocations Document – Site Selection Criteria (tier 2)

Following assessment of sites against Site Selection Criteria (tier 1), landowners/agents of the best 2 or 3\(^6\) performing sites per village will be asked for further information on what could be delivered on site taking account of the summary of representations from our Issues and Options consultation. Once those landowners/agents invited to put forward their plans for the site have done so, these proposals will be judged against the tier 2 criteria set out in the table below. Ultimately, the site within or around each village that has the lowest cumulative impact when judged against the tier 2 assessment criteria, will be taken forward to the Preferred Options document. There may be certain cases where the site selection criteria approach does not reflect certain site anomalies, in which case pragmatic decisions taking account of additional factors may be required. Where a site is taken forward that has not strictly followed the site selection criteria, then full justification for this will be made in the discounted sites paper. Where sites in a village score the same, a judgement will need to be made; the balance is likely to be in favour of those sites with greater community support.

<table>
<thead>
<tr>
<th>Assessment Criteria</th>
<th>Impact(^7)</th>
<th>Comments/Justification for inclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community views</td>
<td>High impact</td>
<td>This criterion allows for the consideration of community preferences and supports the Council’s approach to community involvement in the Council’s Statement of Community Involvement (SCI). Communities can highlight ‘on the ground’ issues and constraints that otherwise may have been missed. However, community representations can only be given due weight where their views are substantiated by genuine planning considerations. Sites that have greater community support will be considered to have a lower impact when judged against this criterion.</td>
</tr>
<tr>
<td>Delivery of Affordable Housing (including a suitable housing mix)</td>
<td>High Impact</td>
<td>A key objective of the Council’s adopted Core Strategy is to deliver a suitable level of affordable housing (including suitable housing mix) and/or specialist housing through the Site Allocations process to meet local need. Landowner/developers invited to submit an indicative proposal will be directed towards the housing chapter of the Council’s adopted Core Strategy and the Council’s Housing Market Assessment (HMA) to guide their proposal. Proposals that do not deliver above the required level of affordable housing and set out a</td>
</tr>
</tbody>
</table>

\(^6\) This may vary depending on how many sites have been put forward for a village, what the villages allocation is, consultation responses and how they have scored against site selection criteria tier 1.

\(^7\) The lower the impact the more suitable the site when judged against each criterion. Ultimately sites will be considered against all the assessment criteria and the findings from the Sustainability Appraisal.
<table>
<thead>
<tr>
<th>Assessment Criteria</th>
<th>Impact</th>
<th>Comments/Justification for inclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>less appropriate housing mix (see Core Strategy policies H1 and H2) will be considered to have a neutral impact when judged against this criterion. Equally, proposals that deliver over and above the minimum level of affordable housing and deliver a more appropriate housing mix will be considered more favourably. Where sites fail to deliver the minimum affordable housing/housing mix requirements, there will be a presumption against them being taken forward, though this will be considered in the round with other factors. Where proposals set a proportion of affordable housing that is either above or below the requirements in Core Strategy policy H2, then the proposal would need to be accompanied by an independent viability assessment to demonstrate that the proposal was viable.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Community Infrastructure Benefits</td>
<td>High Impact</td>
<td>Proposals should look to provide community facilities/benefits appropriate to the village needs. Community Infrastructure requirements will be guided by the Council’s Infrastructure Delivery Plan and community representations from the Issues and Options consultation. Proposals will be viability tested and therefore the community facilities/benefits being proposed will need to be realistic. It is recognised that if allocated development is spread over a number of sites then the impact on viability would mean that less community benefits can be delivered. Dependent on the level of community infrastructure being proposed it may be that an independent viability assessment to demonstrate that the proposal is viable could be required. Proposals that look to deliver community facilities/benefits appropriate to the villages need will considered more favourably against this criterion.</td>
</tr>
<tr>
<td>Economic Opportunities</td>
<td>Medium to high impact</td>
<td>Providing access to employment opportunities benefits the economic sustainability of the district and residents seeking employment and reflects the Economic Vibrancy chapter of the adopted Core Strategy. Sites will be considered more favourably against this criterion where proposals offer new employment opportunities and/or has easy access to existing employment. Should new employment be proposed then a viability assessment would be required to accompany the proposal.</td>
</tr>
<tr>
<td>Opportunities for open space, Green Infrastructure and recreation facilities (e.g. MUGAs/play areas)</td>
<td>Medium impact</td>
<td>Open space provides areas for outdoor recreation, a more pleasant environment to live and happier healthy residents and reflects the Health and Wellbeing chapter in the adopted Core Strategy. Proposals that provide more limited opportunities for open space, Green Infrastructure and recreation will be judged to have greater impact.</td>
</tr>
<tr>
<td>Potential for onsite renewable energy solutions.</td>
<td>Medium impact</td>
<td>Renewable energy technologies can be incorporated into schemes and can help achieve our carbon emission targets as per Core Strategy Policy EQ5 as well as make the properties more attractive to potential buyers. Proposed schemes that incorporate renewable energy</td>
</tr>
<tr>
<td>Assessment Criteria</td>
<td>Impact</td>
<td>Comments/Justification for inclusion</td>
</tr>
<tr>
<td>---------------------</td>
<td>--------</td>
<td>-------------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>solutions, including carbon offsetting, and meet or surpass the requirements of Core Strategy Policy EQ5 will score a lower impact against this criterion. Where a site does not meet the Council’s renewable energy requirements set out in Policy EQ5, there will be a presumption against them being taken forward, though this will be considered in the round with other factors. Where proposals set out carbon emission targets that are either above or below the requirements in Core Strategy policy EQ5, then the proposal would need to be accompanied by an independent viability assessment to demonstrate that the proposal was viable.</td>
</tr>
<tr>
<td>Contribution to the public realm.</td>
<td>Medium impact</td>
<td>Creating an attractive public realm can provide a number of social benefits. Where the indicative layout of the scheme demonstrates good connectivity, legibility and integration with the existing settlement, then proposals will be considered more favourably against this criterion.</td>
</tr>
<tr>
<td>Impact on trees and woodland</td>
<td>Medium impact</td>
<td>Developers are encouraged to incorporate trees and woodland into the design when setting out proposed schemes as this can contribute to the green network thus improving the public realm. Development that would see the loss of trees and woodland, particularly if the trees have a tree protection order attached, would be judged to have a greater impact when judged against this criterion. The aim of this criterion is to help ensure that historic and locally important trees and woodland are preserved where possible. The impact will be assessed following consultation with the Council’s arboricultural officer.</td>
</tr>
<tr>
<td>Use of Natural boundaries (including impact on neighbouring residential amenity)</td>
<td>Medium impact</td>
<td>Proposal should look to retain natural screening wherever possible and look to protect the residential amenity of neighbouring properties in line with Core Strategy Policy EQ9. This will help reduce the visual intrusion from development. Proposed schemes use that natural boundaries and protect residential amenity will be judged to have a lower impact when considered against this criterion.</td>
</tr>
<tr>
<td>Enhancing Community Safety</td>
<td>Medium impact</td>
<td>Where possible development should use natural surveillance and secured by design opportunities as well as safe pedestrian routes to help avoid problems around community safety. Proposals that incorporate such community safety principles will be considered more favourably against this criterion.</td>
</tr>
</tbody>
</table>
Methodology Paper – Site Selection Criteria

1) Do you agree with this approach?

2) If not, why not, and can you suggest an alternative approach?

3) Are there any criteria missing above?

4) Are there any criteria you think should be deleted and why?

5) Do you agree with the weighting attributed to the criteria and why?