

South Staffordshire Council

Local Plan Review

Spatial Housing Strategy & Infrastructure Delivery October 2019

Appendix 6

Site Selection Methodology for Preferred Options

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1. Site Selection Methodology for the Preferred Options Plan

- 1.1 The purpose of this section is to set out the methodology that the Council will use for selecting sites in the 2020 Preferred Options consultation. It firstly summarises how the Council has identified the shortlist of sites to be considered to date, before setting out the criteria which will be used in identifying sites which could potentially deliver an appropriate spatial strategy for growth in the District. It then goes on to outline the key planning considerations which will guide the Council’s assessment of different site options and the evidence the Council will draw on in assessing each site’s performance against these factors.
- 1.2 It is our view that this methodology offers a comprehensive approach to the most important factors that should guide the Council’s decision as to which sites to allocate. It also ensures that the proposed site selection process is proportionate to the number of sites to be assessed and the need for the Local Plan Review to be submitted for Examination in 2021. We believe that this means that sites are allocated in a manner which allows growth to be accommodated in less harmful locations, whilst also maximising the opportunities presented by potential growth options.

Which sites will be assessed for allocation?

- 1.3 The Council has undertaken many ‘Call for Sites’ consultations over a number of years. This invites landowners and agents to submit details of 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 & Economic Land Availability Assessment (SHELAA), which lists all of the sites formally suggested to the Council for housing.
- 1.4 To help to identify a shortlist of sites for allocation in the Local Plan Review, the SHELAA categorises sites using the categories set out below, which were agreed with local agents, developers and duty to cooperate partners through the preparation of the 2018 SHELAA:

S1	Sites currently suitable for housing and deliverable within 5 years
S2	Sites currently suitable for housing and developable between 5 and 10 years
S3	Sites currently suitable for housing and developable 10+ years
NCD1	Sites potentially suitable for housing but not currently developable because of a policy designation (eg Green Belt/Open Countryside/Employment Land/outside current Spatial Strategy/Safeguarded Land Policy)
NCD2	Sites potentially suitable for housing but not currently developable because of other constraints
NS	Sites which are unsuitable because of constraints which cannot be overcome.

- 1.5 To focus the assessment of potential housing site allocations on sites which could be suitable for allocation, the Council will only consider the allocation of sites which are either suitable (i.e. S1, S2 and S3), or could be made suitable through the removal of a policy or physical constraint (i.e. NCD1 and NCD2). This will avoid the allocation of sites which are fundamentally less suitable for housing, such as isolated sites which are poorly related to existing settlements, sites which are required to meet current needs for open space and community facilities, and sites which are adversely affected by key environmental designations.
- 1.6 To further narrow down which sites will be selected for allocation, sites will only be assessed for allocation where they are in a potential location for growth under the infrastructure-led strategy (Spatial Option G) proposed by the Council in section 5 of the Spatial Housing Strategy

and Infrastructure Delivery document. This means that the Council will not assess any potential site options in or adjacent to Tier 5 settlements or in isolated locations in the district's rural area. Equally, no new Green Belt or Open Countryside allocations will be made at any Tier 1-4 settlements that are not identified for growth in the Council's preferred approach to spatial distribution, although the Council may consider opportunities to allocate part of the plan's housing requirement on infill sites within the existing development boundaries of such settlements. The Council is adopting this approach to ensure that the evidence gathering process for each site is proportionate and focuses more detailed assessment on sites which are more realistic candidates for development, in accordance with national Planning Practice Guidance.

- 1.7 Finally, sites will only be assessed for housing allocations where they will provide affordable housing on site, in order to ensure the district's and GBHMAs needs for both market and affordable homes are met within the plan period. Initially, a minimum indicative site size of 0.28ha will be applied, recognising that this is the minimum site size likely to deliver a scheme of 10 or more dwellings at 35 dwellings per hectare. Whilst the Council will initially apply this as a blanket threshold, it may consider sites slightly below this size, provided that it is satisfied that a satisfactory scheme of 10 or more dwellings could be accommodated on the site, without compromising the character and appearance of the surrounding area.
- 1.8 The purpose of this 0.28ha threshold is to ensure all allocation sites meet the minimum site capacity required to trigger the need for affordable homes to be provided on site, whilst still ensuring that a sufficient number of small site options can be identified to provide 10% of the proposed plan target on sites of 1ha or less. Therefore, this threshold will ensure the Council's duties to meet both its need for affordable housing and its need for small site delivery can be met within the plan period.

How sites will be assessed for potential allocation

- 1.9 Once the steps set out above have been completed, the Council will be left with a shortlist of sites which could be potential options for meeting the district's development needs. However, for housing site options in particular, it is still estimated that there will still be nearly 400 sites which will need to be assessed even once these filtering steps are undertaken.
- 1.10 Given the large number of site suggestions present, there is a need to consider the suitability of each of these site options further, through a more comprehensive assessment of the policy and physical constraints that affect each site option. This will be done through the preparation of a pro-forma for each site option, setting out a narrative for each potential site's performance against a number of key planning considerations. This will then allow the Council to take a view on the relative merits of each site in a certain broad location (i.e. a specific village or area of search for urban extension). This will allow a balanced judgement to be made as to which site is best placed to meet each broad location's apportioned level of growth, weighing each of these factors in the round.
- 1.11 The key planning considerations which will inform the Council's judgement are set out below. The ordering of these factors to not imply the level of weight that will be given to them in the housing site selection process and all factors will be considered in the round when comparing the relative merits of sites for housing development.

2. Conformity with levels of growth and strategic aims of the preferred infrastructure-led strategy

- 2.1 The Council's preferred infrastructure-led strategy sets out a distribution of development across South Staffordshire, with indicative levels of housing growth set out for each broad location in the district. Behind each area's level of housing growth is a proposed strategy for that broad location. For example some areas are receiving housing growth to deliver a specific infrastructure need such as a new first school, funding towards a key community facility or a key element of highways infrastructure. Others are apportioned a level of growth to deliver a specific type of site, ranging from areas for small site of less than 1 hectare through to areas of search for large sustainable urban extensions with on-site community facilities to partially self-contain residents' trips. It is therefore important to ensure the sites selected deliver these levels of housing growth and meet the aims of the Council's preferred infrastructure-led strategy.
- 2.2 To achieve this, the Council will give consideration to the likely ability of a specific site to meet the aims of the preferred infrastructure-led strategy. This will mean different things for different areas of the district, but may include the following:
- The preferred level of growth for that broad location
 - Potential to deliver any specified infrastructure needs or opportunities for that broad location
 - Consideration of what site typology is planned for that area (e.g. small sites of less than 1ha, large sustainable urban extensions, areas of safeguarded land planned for allocation etc.)

3. Potential for non-Green Belt Opportunities

- 3.1 It is important, before any further Green Belt is released in the district, that all non-Green Belt opportunities for development are fully explored. In particular, paragraph 137 of the National Planning Policy Framework (NPPF) requires any strategy to:
- make as much use as possible of suitable brownfield sites and underutilised land
 - optimise densities of development in line with NPPF policies
 - be informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development
- 3.2 Discussions with neighbouring authorities and other councils in the housing market area are ongoing and the Council's overall housing target will continue to reflect these discussions, ensuring that the Council will not release more Green Belt than is necessary to meet development needs. Equally, the Council's preferred spatial housing strategy has sought to fully account for existing sources of supply and delivers development beyond the Green Belt (where it is sustainable to do so) and seeks to release safeguarded land before further Green Belt release is considered. Therefore, the Council has currently sought to minimise Green Belt release for further housing growth at both a cross-boundary and district-wide level and it is important that this approach continues into the selection of sites in each broad location.
- 3.3 To minimise Green Belt release, this criteria will consider whether a housing site option to meet a specified development need of a broad location is within:

- the development boundary of an existing settlement (e.g. surplus open space or brownfield land supply)
- safeguarded land previously removed from the Green Belt
- the Open Countryside beyond the Green Belt
- the Green Belt

3.4 This will then enable the Council to give weight to any non-Green Belt options which could meet a broad location's development needs, ensuring that this is a high level factor in the site selection process. However, overall other factors such as landscape harm, the need to retain a site for a certain use or other site specific constraints may, on balance, override this issue. It is therefore important to note that a site being outside of the Green Belt does not automatically mean that it will be considered more favourably than Green Belt site options.

4. Green Belt Harm

4.1 For any potential site option which would require release of Green Belt land, it is important that exceptional circumstances are demonstrated to justify its release from the Green Belt. The tests for this are set out in Section 13 of the NPPF. Amongst other matters, national policy and case-law¹ requires that, before concluding exceptional circumstances exist, we must give consideration to the nature and extent of harm to the Green Belt and its purposes.

4.2 To ensure the Council has sufficient information to make this judgement for each individual development site, a comprehensive Green Belt Study 2019 has been jointly commissioned with the Black Country local authorities. This establishes the harm to the Green Belt that would result from the release of areas of land within the district and identifies where the release of land would simplify the Green Belt boundary. Therefore, for assessing the Green Belt harm arising from the allocation of individual site options, the findings of the Green Belt Study 2019 for the area of land in question will be compared with the site suggestion under consideration to determine the harm from releasing that individual site proposal.

5. Landscape Sensitivity

5.1 South Staffordshire is a rural area surrounding the north-western edge of the West Midlands urban conurbation. The district itself contains numerous small to large rural villages which are set within and surrounded by large areas of open countryside. This means that the vast majority of site suggestions considered by the Council to accommodate new growth are inevitably on greenfield countryside sites surrounding the villages and urban edges of neighbouring towns and cities. This is important as the NPPF requires us to protect and enhance valued landscapes and to recognise the character and beauty of the countryside.

5.2 To address these issues, the Council has prepared a jointly commissioned Landscape Sensitivity Assessment 2019. This study examines the landscape and visual sensitivities within individual assessment areas, establishing the sensitivity of an area of landscape to employment and housing development. Therefore, for assessing the degree of landscape sensitivity of individual assessment parcels to housing or employment development, the Council will use the findings of the Landscape Sensitivity Assessment 2019 for the area of land in question, comparing these with the site suggestion under consideration to determine the harm from releasing that individual site proposal. This will allow site options that would affect

¹ Calverton Parish Council v Greater Nottingham Councils & others (2015)

more sensitive landscapes to be identified, so that harm to the landscape can be weighed against other factors when considering the merits of a scheme.

6. Sustainability Appraisal

- 6.1 It will be important for any site selections to be informed by a Sustainability Appraisal of any chosen sites and reasonable alternatives, in order for the Council to address its legal requirements of Section 19 of the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004. In summary, this will offer the Council an indication of the relative sustainability merits of individual development sites, based upon a consistent framework of assessment criteria. To ensure that the Sustainability Appraisal of sites is fully integrated into the site assessment process, the key findings of the assessment will be recorded under this criterion, to ensure it can be weighed against other planning factors when making a decision as to which site to allocate.

7. Impact on the Historic Environment

- 7.1 To ensure the impact on the historic environment of sites coming forward is consistently and robustly assessed, a Historic Environment Site Assessment will be prepared by an appropriately qualified consultant to inform the site selection process. This will be prepared in consultation with Historic England to ensure the findings of the study are robust and will have full regard to all relevant Historic England guidance in its methodology (in particular, Good Practice Advice 1 & 3 and Historic Environment Advice Note 3). This will allow the Council to identify the areas of land which may be more likely to give rise to substantial impacts on the historic environment, if development occurs.
- 7.2 The Historic Environment Site Assessment is anticipated to come forward in two stages. First, a desk-based assessment of all (circa 400) site options will be undertaken. The findings of this initial desk-based assessment will be recorded under this criterion, to ensure that high-level impacts on the historic environment can be considered in the round alongside all other factors when deciding on which sites to allocate. It is considered that this initial stage of assessment will be an appropriate tool for consistently assessing the comparative merits of sites, given the large number of site options to be consistently assessed and the need for the evidence base to be proportionate.
- 7.3 Following the initial desk-based assessment of sites, the second stage of the Historic Environment Site Assessment will be to undertake a further level of historic environment assessment solely on the preferred sites options selected for allocation. This will include walkover surveys and visits to historic assets whose setting could be impacted by a site and identification of specific mitigation requirements for individual sites. This will allow the historic environment implications of any proposed site allocations to be fully considered before site allocations are confirmed.

8. Other known Site Constraints

- 8.1 In addition to the evidence base listed above, a number of other factors may influence how suitable a site is to accommodate a planned level of growth for that area. To this end, the Council will consider any site constraints that may include:

- Loss of current important land use (e.g. open space, employment sites, community facilities)
- Natural environment constraints (e.g. designated or non-designated wildlife sites, agricultural land classification, AONB, SAC)
- Areas of high flood risk (informed by the Strategic Flood Risk Assessment)
- Any known vehicular and pedestrian access issues
- Coal mining risk areas and mineral safeguarding areas
- Known physical constraints (e.g. topography, adjacent bad neighbour uses, contamination risks etc.)

8.2 Much of this information is already recorded for housing sites in the Council’s SHELAA, which will offer important information on constraints and how these may influence a site’s capacity. Judgements as to how these constraints influence a site’s capacity and suitability will be made in the round, having regard to all factors relevant to site selection.

9. Other Site-Specific Opportunities

9.1 As well as constraints that may influence a site’s capacity to accommodate development, it is important to recognise high-level design opportunities offered by a specific site that may not be recorded by other criteria.

9.2 This approach is supported by key sections of national planning policy, for example:

- NPPF paragraph 124 makes clear that good design is a key aspect of sustainable development
- NPPF paragraph 91 requires policies to consider the potential for mixed-use developments, strong neighbourhood centres and street layouts which allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages
- NPPF paragraph 138 requires LPAs to consider ways in which the impact of removing land from the Green Belt may be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land
- NPPF paragraph 72 indicates that supply of large numbers of new homes can often be best achieved for planning for larger scale development, such as significant extensions to existing villages and towns

9.3 Whilst this criterion will not apply to many sites to any significant degree, some of the above design benefits may be particularly relevant to a specific site. Relevant opportunities may include:

- the ability to link into an adjacent sustainable transport or green infrastructure network
- providing additional ‘compensatory’ green infrastructure in the Green Belt (e.g. through the site facilitating the delivery of a strategic piece of green infrastructure)
- delivering a well-designed site layout that integrates well into the surrounding area
- delivering a site that respects existing natural boundaries
- opportunities to provide mixed-use developments on larger sites (e.g. sustainable urban extensions)

9.4 The Council believes that a comprehensive approach to site assessment and evaluation will provide a sound basis for the site selection process. It is important that professional planning

judgement, knowledge of the district and awareness of any site specific design opportunities that have been presented to the Council are given due regard for this criterion. This will enable the Council to demonstrate that the importance of good design in national policy is reflected at a strategic level in the choice of sites through the Local Plan Review. Therefore, where a site is judged to offer a particularly significant opportunity against the above criteria, this will be recorded.

10. Determining Which Sites will be Allocated

- 10.1 Drawing together all of these factors, the Council will prepare a pro-forma for each site suggestion, recording each sites' performance against the above criteria. For sites proposed for allocation, the site pro-forma will conclude with a balanced judgement as to which, in the Council's view, is the appropriate site (or sites) to meet the level of growth required in the broad location in question. Summary reasons will be given for the Council's choice in each case.