

Local Plan: Approach to Site Assessment

Summary: The purpose of this report is to outline the methodology and decision making framework for the finalisation of site selection in the Local Plan.

Recommendations: The report is for information and advice only.

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer;	
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1. Introduction

1.1 The emerging North Norfolk Local Plan has been subject to public consultation at regulation 18 stage during May and June 2019. This report is one of a number of reports that seeks to finalise the draft Local Plan policy approach in relation to consideration of the consultation responses and the finalisation of the supporting evidence. At the end of the process a revised Draft Local Plan incorporating justified modifications will be produced for the authority in order to consult at Regulation 19 Draft Plan publication stage ahead of subsequent submission for examination. At such a stage the Plan will be subject to consideration by an independent inspector against a number of legal tests and soundness tests to determine if it is legally compliant, justified, effective, and has been positively prepared. A binding report will be produced which will determine if the Draft Plan is sound, with or without further modifications, following which the Plan can be formally adopted by the Council.

1.2 This report focusses on the site selection methodology used, outlining the approach taken to date and explains how selection has utilised public feedback and further statutory comments in order to identify a final suit of sites for the emerging Draft Plan over the coming months. Although the site selection methodology has been reported to previous working parties and subsequently consulted on, membership of the working party has fluctuated not least following the local elections held last year. Ahead of future work it is considered prudent to update members of the process undertaken to date and the further work that

has been undertaken since the consultation that is incorporated into such assessments.

- 1.3 **The purpose** of this report is to bring to the attention of Members the process and framework that is being used in the identification of suitable sites and forms the basis for decision making. The report is written in unusual times during the suspension of normal council committees due to Covid19. Alternative arrangements have been put in place that continue to allow Cabinet to endorse recommendations made through the portfolio holder for planning following discussion with officers. This report forms the basis of those discussions and is intended to aid decision making and help with maintaining transparency and an audit trail.
- 1.4 The approach is one that is thorough, proportionate and one that is based on evidence, utilises consultation feedback and objective inputs from the statutory bodies. Site selection can be emotive but it remains that selection and examination needs to be based wholly on evidence. Policies and proposals that are justified and evidenced in a positive and realistic way, provide more certainty at examination and stand the test of time. Building a strong evidence base to support and inform not just site selection but policies throughout the Local Plan is vital to its immediate and long-term success.
- 1.5 Evidence can be both quantitative (facts and figures such as census data) as well as qualitative, (e.g. opinions given in consultation responses, as long as they are backed up by facts). Evidence, **not opinion**, should be used to inform decisions on policies and proposals. Such evidence should also be made publically available in a full and transparent way throughout the production of a Plan where it will be scrutinised at future consultations, submission and examination. It is worth remembering that **planning policies and site proposals need to be based on a clear planning rational and a proper understanding of the legislative requirements.**

2. Site Selection Methodology

- 2.1 The site assessment methodology follows the process advocated in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance. The detailed methodology was explained in Background paper no 6, [Development Site Selection Methodology](#) which accompanied the previous Regulation 18 consultation and can be found in the published document library under consultation documents. The paper should be read in conjunction with this report.
- 2.2 The process can be summarised as follows:
- **Stage 1: Screening out sites that do not meet given selection criteria** - This excludes sites from further consideration which are outside the selected settlements, subject to absolute constraints such

as those being within a non-selected settlement, coastal erosions zone or within flood risk zone 3. This stage also removes sites that are not capable of delivering 5 or more dwellings, or are less than 0.25 hectares (or 500m² of commercial floor space) as the Council are unlikely to allocate such small sites for development.

- **Stage 2a: Applying Sustainability Appraisal (SA) process:** This measures each site against measurable site assessment criteria based on the SA Objectives and SA Framework
- **Stage 2b: Considering further site suitability criteria:** Sites are assessed against further suitability criteria considering the wider issues, policy context and evidence. The assessments are informed by engagement with relevant consultees such as the Highway Authority and Anglian Water.
- **Stage 2c: Considering Availability and Deliverability:** Sites are assessed against further availability and deliverability criteria considering whether suitable sites can actually be delivered during the plan period.

2.3 Sustainability Appraisal

2.4 Sustainability Appraisal (SA) is a tool that is used to inform decision making by identifying at an early stage and iteratively throughout the process the potential social, economic and environmental impacts of proposed allocations, plans and strategies. This allows the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role throughout the plan-making process. It provides a tool for assessing the relative merits of alternative options to help inform decisions. The SA uses a detailed assessment framework that assesses sites as having likely positive or adverse Impacts against the identified SA indices.

2.5 A RAG rating system identifies those sites with most dark green (++) contributing significantly towards the Sustainability Objectives and considered the most suitable, and those sites pink (--) which are considered to contribute least. An element of planning judgement is required to assess the sites in terms of their sustainability. Different weight may be given to each of the indices reflecting the characteristics of the sites being assessed. The SA is a statutory document in its own right. The interim report was consulted on at Regulation 18 stage and the final SA will form part of the considerations in finalising the Draft Plan and will be published at the next stage of Plan making.

Table 1: Sustainability Appraisal framework

Indicator	Effect
++	Likely strong positive effect
+	Likely positive effect
0	Neutral/no effect
~	Mixed effects
-	Likely adverse effect
--	Likely strong adverse effect
?	Uncertain effect

2.6 At regulation 18 stage sites were assessed against a detailed set of criteria including an assessment of the impact on utilities, highways issues, flooding and a range of other considerations as detailed in table 2 below. Using a RAG scoring system, the site appraisal framework identified those sites which are considered most suitable for development, and furthermore, those sites which can be delivered in the plan period. The assessments were reported to earlier PPBHWP's and underwent consultation as detailed in paragraph 1.1

Table 2: Site Assessment framework

Access to Site	Transport and Roads	Sustainable Transport	Impact on utilities infrastructure	Utilities Capacity
Contamination and ground stability	Flood Risk	Landscape Impact	Townscape	Biodiversity and Geodiversity
Historic Environment	Loss of other beneficial use	Compatibility with Neighbouring / Adjoining Uses	Other known constraints	Deliverability

2.7 Selected sites are subject to allocations policies which detail what the Council would expect to be delivered when the site is developed. Where there are specific development considerations arising from the findings of the site assessment or evidence base studies, these are included within the text of the policy. Initial policy wording/requirements for the preferred sites at regulation 18 stage were based on our understanding of key issues that have emerged through technical assessment at that time.

2.8 The site policy also identifies an approximate range for the proposed number of dwellings on the site. The final allocated number of dwellings will be informed by further information, evidence such as emerging open space requirements and requirements of onsite infrastructure along with the considerations of the remaining local plan policies.

2.9 Following the Regulation 18 consultation the SA has been reviewed and each site assessment has been updated in order to consider the feedback received, take account of more detailed technical considerations received and any further updated and or relevant evidence.

2.10 In particular officers are undertaking a more detailed Historic Impact assessment in line with feedback given from Historic England. Further site access comments and technical considerations have been received from County Highways. Further technical studies have been received, some site promoters others from statutory bodies such as the Network Improvement Strategies recently finalised by Norfolk County Council. Infrastructure requirements have been reviewed with statutory providers such as the Education Authority and United Utilities. The sites have been

subjected to an interim Habitat Regulation Assessment, HRA. Feedback contained in the Interim Habitat Regulations Assessment has also informed site selection.

- 2.11 In line with regulations the Draft Plan will also be informed by a final HRA
- 2.12 A number of new and alternative sites were put forward at the time of the regulation consultation. These have also been reviewed in line with the settlement hierarchy, site thresholds and assessed and where appropriate an SA has been undertaken.
- 2.13 The findings of the site assessments have been consolidated into individual settlement site assessment booklets. These will accompany future settlement based reports and be published as part of the Draft plan evidence.

3 Conclusion / Recommendations

- 3.1 This report is for information and advice only

4 Legal Implications and Risks

- 4.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its policy approaches must be justified and underpinned by evidence, the application of a consistent methodology through assessment and decision making is paramount.
- 4.2 The statutory process requires records of consultation feedback and demonstration of how this has informed plan making with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22. Such a commentary will be included in the Consultation Statement.

5 Financial Implications and Risks

- 5.1 Failure to undertake plan preparation in accordance with the regulations and NPPF is likely to render the plan 'unsound' at examination and result in the need to return to earlier stages. Substantial additional costs would be incurred.

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