

Annex 1 – Site Selection Contextual Review

Local Planning Policy Context

District Local Plan Review 1994 ‘saved policies’

1. The St Albans District Local Plan Review was adopted in 1994 and replaced the District Plan adopted in 1985. The Hertfordshire Structure Plan Alterations 1991 informed the District Plan.
2. Specific policies from the District Plan were saved in 2007 and form part of the current statutory development plan. The saved policies primarily relate to Green Belt protection and development, the spatial development strategy, the employment strategy, the retail strategy and retail development, development management policies, city centre policy areas and development allocations.

St Albans Strategic Local Plan 2011-2031 (withdrawn)

3. The Strategic Local Plan (SLP) was submitted for independent examination in 2016.
4. The Strategic Local Plan Technical Report Development Site and Strategy Options Evaluation (2014) set out a nine-step evaluation process for the site selection process:
 - i. Detailed definition of Options for evaluation
 - ii. Application of the SA Framework objectives to provide detailed evaluation criteria
 - iii. Definition of a weighted scoring system taking account of the SA Framework objectives
 - iv. Creation of an evaluation criteria matrix and an assessment form, with a series of standard questions
 - v. Assessment research recorded in the assessment form
 - vi. Outline scoring of options against evaluation criteria
 - vii. Brief written explanation of reasons for scoring decisions
 - viii. Rechecking of scoring following 6/7; including moderation to judge consistency of application of factors and identification of any issues not fully covered in the SA Framework
 - ix. Final written and scored assessment for each option and moderation for any additional considerations not fully reflected in the scoring system.
5. The evaluation built on sites assessed in the Green Belt Review (Strategic Sub Areas).
6. An Initial Hearing Session was held on 26 October 2016, following which the Inspector (David Hogger) submitted his conclusions in relation to the Duty to Cooperate.
7. In an earlier letter dated 22 August 2016 the Inspector set out his preliminary concerns. Whilst focussing on the Duty to Cooperate, he also made a number of observations which relate to the wider approach of the plan. He raised concern in relation to the justification for the overall approach to housing provision in the Plan. This sat in a context where the four other South West Herts Councils raised Duty to Cooperate objections to the Plan.
8. St Albans City and District Council launched a legal challenge against the Inspector’s conclusions that it had not met the Duty to Cooperate in January 2017. In *R on the Application of St Albans City and District Council v Secretary of State for Communities and Local Government [2017]*, the judge Sir Ross Cranston concluded he did not disagree with the Inspector’s decision. The SLP was subsequently withdrawn.

St Albans City and District Council Local Plan 2020-2036 (withdrawn)

9. The St Albans City and District Council Local Plan 2020-2036 was submitted for independent Examination in March 2019.

10. The Council ran a Call for Sites from January to February 2018 alongside Regulation 18 Consultation. Strategic sites submitted at the Call for Sites and previous SHLAA submissions were evaluated using a Red Amber Green (RAG) rating system against the following criteria set out in the Draft Strategic Site Selection Evaluation Outcomes Report (2018):
- **Stage 1:** 1. Green Belt Review (GBR) evaluation
 - **Stage 2:** 2. Suitability 3. Availability
 - **Stage 3:** 4. Unique contribution to improve public services and facilities 5. Unique contribution to enhancing local high quality job opportunities 6. Unique contribution to other infrastructure provision or community 7. Deliverable / Achievable 8. Overall Evaluation.
11. In March 2018, the Planning Policy Committee agreed strategic sites are those considered capable of accommodating a minimum of 500 dwellings or with 14 hectares of developable land. Conclusions from the Independent Green Belt Review which assessed strategic land parcels informed the site selection evaluations.
12. Sites given a red rating at either Stage 1 or 2 were eliminated from the site selection process. Eight sites were given a Green rating: East Hemel Hempstead (North), East Hemel Hempstead (South), Land at Chiswell Green, North East Harpenden, North West Harpenden, North St Albans and East St Albans. These same sites were evaluated as making the least contribution to the Green Belt in the Green Belt Review. Four sites were given an Amber rating: South East Hemel Hempstead, North Hemel Hempstead, the Former Radlett Aerodrome and North East Redbourn.
13. In their letter dated 14 April 2020 the Inspectors' identified concerns about the narrow focus that had been placed on only strategic sites. This ruled out a number of smaller sites which may have had limited significant impacts on the Green Belt. The Inspectors' disagreed with the Councils argument that small scale sites in the Green Belt should be discounted because they are not needed or would unacceptably spread the adverse impacts of development on Green Belt purposes. They stated *'Whilst this would extend the impact of development over a wider geographic area, the extent of the resultant impacts would be likely to be smaller given the more limited scale of the sites (in comparison to the cumulative impact on the Green Belt purposes of developing large adjoining strategic sites, such as to the east of Hemel Hempstead as proposed)'*.
14. The Inspectors also raised a number of further concerns in relation to the site selection methodology utilised by the Council. It is important to note that these were only initial impressions formed by the Inspectors' and the Council did not have the opportunity to justify the approach taken through further representations, which would likely have resolved much of the concern raised. These can be summarised as follows:
- Perceived inconsistencies were identified in how sites had been discounted;
 - Some sub-areas in the Green Belt rated as 'red' were not subject to a detailed assessment in the same way as those considered 'green' or 'amber', making comparison difficult;
 - The impacts of smaller sites as opposed to larger parcels were perceived not to have been consistently reviewed to allow informed decisions on Green Belt release to be made; and
 - Concerns that previously-developed sites or sites in a sustainable location well served by public transport in the Green Belt below the size threshold had been discounted.
15. In their letter to the Council dated 27 January 2020, the Local Plan Inspectors' raised concerns in relation to the legal compliance and soundness of the Local Plan following initial hearing sessions which took place in January 2020. At this stage the Inspectors' cancelled the further hearing sessions that had been scheduled.
16. In their letter to the Council dated 14 April 2020, the Local Plan Inspectors' set out their concerns. These were primarily focussed on:
- concerns relating to the application of the Duty to Cooperate and the strategic matters of (a) the Radlett Strategic Rail Freight Interchange proposal and (b) the ability of other local authorities to accommodate housing needs outside of the Green Belt.

They also included:

- Inadequate evidence to support the Council's contention that potential exceptional circumstances exist to alter the boundaries of the Green Belt;
- Failure of the Sustainability Appraisal to consider some seemingly credible and obvious reasonable alternatives to the policies and proposals of the plan;
- Failure of the Plan to meet objectively-assessed needs; and
- Absence of key pieces of supporting evidence for the plan.

17. Again it is important to note that (other than in response to the main matter under the first bullet above) these were only initial impressions formed by the Inspectors' and the Council did not have the opportunity to justify the approach taken through further representations, which would likely have resolved much of the concern raised.
18. The Plan was ultimately withdrawn from Examination in November 2020.
19. A judicial review was considered but not ultimately brought forward by the Council.

Neighbourhood Plans

20. Two Neighbourhood Plans have been 'made' to date in the District, for Harpenden and Sandridge. Neighbourhood Plans have been published for consultation under the Regulation 16 stage for St Stephen and Wheathampstead parishes.

Emerging Local Plan

21. The Planning Policy Committee report *Local Plan – Vision, Strategic Priorities and Objectives*, dated 2 February 2021, sets out the draft Local Plan Vision, Strategic Priorities and Objectives. The draft vision seeks '*A thriving, inclusive and sustainable community which is a great place to live and work and has a vibrant economy*'. A follow-up Planning Policy Committee report in April 2021, after engagement with and support from a wide range of stakeholders, endorsed the approach taken.
22. The Strategic Priorities and objectives are informed by objectives in the NPPF, the Sustainability Appraisal Scoping Report, the draft Corporate Strategy (2020), and the declaration of a Climate Emergency on July 2019 at Full Council. The six Strategic Priorities are as follows:
- A. Climate Change and Spatial Strategy (low carbon)
 - B. Housing
 - C. Economy and Employment
 - D. Infrastructure (including community facilities)
 - E. Natural and Historic Environment
 - F. Healthy Places and High Quality Design
23. The twelve Objectives expand on the strategic priorities. In terms of climate change and the spatial strategy, the objectives seek to work towards net zero carbon by 2030 and make effective use of land by prioritising development on previously developed land. The housing objective seeks the provision of a sufficient amount of good quality housing to meet the needs of all sections of society in sustainable locations.
24. Under the economy and employment priority, the objectives seek to encourage strong and resilient economic growth, including support for the green and creative sectors. The objectives also seek to support the role of town, village and neighbourhood centres by taking a positive approach to their growth, management and adaptation.
25. The infrastructure objectives seek to make sufficient provision for and access to community infrastructure and utilities, encourage the use of active and sustainable modes of transport, and ensure the delivery of essential utilities infrastructure.
26. The natural and historic environment objectives seek to protect and enhance the natural environment, including biodiversity and green and blue infrastructure, and the historic environment.

27. Finally, the health and design objectives seek to achieve high quality, well-designed developments, and promote active and healthy communities and homes with a high quality of life.

Sustainability Appraisal

28. The Sustainability Appraisal Scoping Report (2021) Consultation Draft, published for consultation between 25 January 2021 to 8 March 2021, set out sixteen objectives arranged according to the topics required in the Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004. The objectives are as follows:
1. Biodiversity: (SO1) Protect, maintain and enhance biodiversity in the district;
 2. Population: (SO2) Encourage a strong and resilient economy across the district including in key sectors in St Albans city centre and other centres with an appropriate long term response to Covid 19, (SO3) Provide a sufficient amount of good quality housing which meets the needs of all sections of society in sustainable locations, (SO4) Promote access to community infrastructure for all sections of society in sustainable locations, (SO5) Encourage the use of active and sustainable means of transport and reduce the need for people to travel;
 3. Human health: (SO6) Support active and healthy communities;
 4. Soil: (SO7) Minimise development on best and most versatile agricultural land and minimise the degradation/loss of soils due to new developments;
 5. Water: (SO8) Conserve and enhance water quality and flow in St Albans and reduce the risk of water pollution, (SO9) Minimise the risk of flooding;
 6. Air: (SO10) Achieve good air quality across the district;
 7. Climatic factors: (SO11) Reduce greenhouse gas emissions, (SO12) Promote adaptation and mitigation to climate change;
 8. Material assets: (SO13) Promote efficient use of natural resources and protect existing material assets and geodiversity, (SO14) Prioritise locating new development on previously developed land first;
 9. Cultural heritage: (SO15) Preserve and enhance heritage assets; and
 10. Landscape: (SO16) Maintain and enhance the quality of the countryside and landscape.

Green Belt Review

29. The Green Belt Review (GBR) Part 1 was undertaken by consultants SKM on behalf of the St Albans, Dacorum and Welwyn Hatfield Councils in 2013. It considered whether the whole of the Green Belt in these authorities still meets the purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). The Part 1 GBR split the Green Belt into a number of land parcels and considered how each of these performed against a number of criteria which were developed by the consultants and through Duty to Cooperate discussions. This included refining land parcels to account for absolute and non-absolute environmental constraints.
30. The Part 2 GBR identified a number of sites within the land parcels which when refined either only weakly met Green Belt purposes or which did not meet purposes at all.
31. In the Independent Examination for the withdrawn Local Plan 2018-2036, the Inspectors made a number of comments about the size of the sites and whether they were too large. It was suggested that smaller areas should be considered, and a finer grained review should be undertaken.
32. As such, St Albans City and District Council commissioned Arup to undertake a review of the Green Belt in 2020. The Study includes a review of the SKM Part 1 work from 2013 and undertakes a finer grained review. One of the aims is to ensure that smaller sub-areas of land are considered. The emerging Part 2 GBR considers larger and smaller sub areas where they fall into defined buffers around existing urban settlements in the District, or those in neighbouring authorities where they are near the boundary.
33. There is no formal guidance or methodology to defining settlement buffers for use in a Green Belt Review. As a result, an element of professional judgement is being used to develop an approach to the definition of settlement buffers which is appropriate to the context. Given the differing characters and scales of the settlements, two buffer scales are to be used to reflect the variations

in the settlement hierarchy and to ensure that any future development would remain proportionate to the size of the existing built-up area.

34. Experience from Local Plan Examinations elsewhere, the character of the urban settlements and the approach for a finer grain assessment lends itself to a 400m buffer for the main settlements while a 250m buffer is considered appropriate for lower order settlements. These buffers indicate the likely maximum extent of sustainable development and vary accordingly to the position of the built-up area in the settlement hierarchy. This was discussed at LPAG in January 2022.
35. Buffers are also to be applied to immediately adjacent settlements in neighbouring authorities, where the buffer would lead to some partial interception with Green Belt in the District. The buffer is to be applied to inset settlements only; the exception being Blackmore End in North Herts, which currently lies outside the Green Belt although immediately adjacent to both the North Herts and St Albans Green Belts. The 400m buffer is to be applied to the highest order settlements and 250m buffer to lower order settlements in accordance with the latest settlement hierarchies in adopted plans for the respective local authorities.
36. Sites that are not adjacent to existing urban areas (or the buffers) will therefore be excluded for the assessment on the basis that their release would (a) not contribute to a sustainable pattern of development; and (b) undermine the integrity of the Green Belt by creating hole(s) within its fabric.
37. Within the applied buffers, weakly performing land (as defined by the Stage 1 Green Belt Review, SKM 2013) and promoted sites identified through the Council's site selection work, will be considered further for refinement; sites falling outside the buffer, but adjoining areas or sites located within the buffer, will also be considered further. Where a prominent outer boundary feature forms a natural stop to the settlement, sites beyond this feature will not be considered.
38. The Part 2 GBR will incorporate a Washed Over Villages Study. This will consider the contribution of 'washed over' settlements in the District against relevant national planning policy (NPPF, paragraph 144) in order to ascertain whether or not villages should continue to be included in the Green Belt. The assessment will explore whether the washed over villages are open in character and whether they contribute to the openness of the Green Belt, before making a recommendation. These buffers will be applied to the Site Selection process at Stage 3 (Screening of Constraints).
39. The approach reflects best practice identified from other authorities, including those Local Plans in Green Belt areas that have been through the Examination process and been found sound. The approach is also aligned with approaches taken in neighbouring authorities to ensure consistency with this cross-boundary strategic issue. As part of the development of the Green Belt Review methodology, the Council consulted with its duty to cooperate partners. Minor amendments were made to the methodology to ensure greater alignment with the methodologies employed by the surrounding authorities.

Housing and Economic Land Availability Assessment

40. The latest Housing and Economic Land Availability Assessment was published by the Council in early 2022. The sites considered in the HELAA have been assessed as to whether they are deliverable and whether they are potentially suitable. The assessment of suitability considers a number of absolute constraints which cannot be overcome, even if mitigation is proposed. This includes constraints such as functional floodplain and sites of international importance for nature conservation. The HELAA also considers the suitability of sites against a number of non-absolute constraints which could be overcome if mitigation or certain measures are taken. The HELAA methodology sets out details of the absolute and non-absolute constraints considered through the HELAA process.
41. The role of the HELAA is to consider the potential land supply to help meet development needs in St Albans, but it is not the evidence which considers which of the submitted sites perform more strongly or sustainably than others and which should be taken forward to allocation. That is the role of the Local Plan supported by the site selection methodology and assessment, other evidence, and the Sustainability Appraisal.

42. The HELAA does not consider the Green Belt as an absolute constraint but as a policy constraint. HELAA sites which were identified in the Green Belt have been appraised through this assessment having regard to the Stage 1 and Stage 2 Green Belt Reviews and the sifting process set out in this methodology.
43. The sites in the HELAA are primarily derived from a Call for Sites consultation which ran from 25 January to 8 March 2021 and urban capacity work. The Urban Capacity Study forms part of the HELAA. This work is being updated on an iterative basis.

Infrastructure Delivery Plan

44. The 2019 version of the Infrastructure Delivery Plan sets out future infrastructure needs to support anticipated growth up to 2036. The IDP was informed by consultation with infrastructure providers in the District and assesses the need for social and community infrastructure, green infrastructure, physical infrastructure and utilities. Infrastructure costs are presented in the Infrastructure Delivery Schedule Update. An update to the Infrastructure Delivery Plan will be produced to support the emerging Local Plan.
45. An updated Infrastructure Delivery Plan (IDP) is being commissioned to update understanding of the quality and capacity of the districts infrastructure assets and assist in identifying future requirements. Where relevant the results of this work will be fed into site selection process.

South West Herts Local Housing Need Assessment

46. The joint South West Hertfordshire Local Housing Need Assessment (LHNA) was commissioned jointly by St Albans, Dacorum, Hertsmere, Three Rivers and Watford councils. It sets out the housing need across the five authorities which form the Housing Market Area (HMA). Following the Government's required approach, the LHNA (2020) identified the need for 893 new homes per a year in St Albans, subject to any changes in the Standard Methodology.

South West Herts Economic Study

47. The South West Hertfordshire Economic Study Update (2019) considers the need for additional employment floorspace across St Albans, Dacorum, Hertsmere, Three Rivers and Watford up to 2036.
48. The study identified a need for 10 hectares of land for future office space to be identified to meet future needs across south-west Herts between 2018 and 2036. It identified land at East of Hemel Hempstead (within St Albans District) potentially providing 136,000 square metres of space towards this, and recommended that further work is undertaken to identify potential reserve sites suitable for strategic office development should delivery issues arise at East Hemel Hempstead.
49. The study also identified a need for 53 hectares of land for future industrial development to be identified to meet future needs across south-west Herts between 2018 and 2036. Again, the land at East Hemel Hempstead (within St Albans District) is anticipated to provide towards meeting this requirement, but the Study suggests that further work should be undertaken to identify other potential sites to accommodate future industrial development.

Gypsy and Traveller Accommodation Assessment

50. The Gypsy and Traveller Accommodation Assessment update (2019) sets out the requirements for Gypsy and Traveller pitch provision between 2018-2036.
51. The Study identified a need for 72 additional pitches for households that met the planning definition. The need arising from households that met the planning definition should be addressed through site allocation/intensification/expansion Local Plan Policies.
52. The Study identified a need for up to five additional pitches to meet the needs of 'undetermined' households, and a need for 41 additional pitches for households that did not meet the planning definition. The Study recommended no additional needs for Travelling Showpeople or transit site provision.

Settlement Hierarchy Study

53. The Council is in the process of preparing a 'baseline' Settlement Hierarchy Study.
54. This will include a robust assessment of the sustainability of settlements, and the relationships between them, in order to inform the forthcoming development of the spatial strategy and strategic policies of the emerging Local Plan.
55. To achieve this, the Settlement Hierarchy Study is being prepared in two parts:
 - Part 1: Baseline Settlement Hierarchy – to review each settlement within the district based on defined factors relating to accessibility, provision of services and facilities and employment. Part 1 will provide an up-to-date categorisation of settlements in the district, and result in a baseline settlement hierarchy reflecting the current position. This baseline position will inform the initial development of the spatial strategy and Strategic Policies for the emerging Local Plan.
 - Part 2: Settlement Hierarchy validation and update – upon the identification of a preferred spatial strategy through the Local Plan production process, the settlement hierarchy study will be reviewed to identify whether planned growth/investment in services and infrastructure will change the baseline results and thereby alter the position of settlements within the hierarchy. This will result in a final Settlement Hierarchy for the purposes of the Local Plan.
56. It is not the role of the Settlement Hierarchy Study to identify the capacity of each settlement to grow or to advise on the likely quantum of growth which each settlement could accommodate.

Sustainability Appraisal and Habitats Regulations Assessment

57. The production of the Local Plan will be informed by Sustainability Appraisal and Habitats Regulations Assessment. The Sustainability Appraisal (SA) will assess spatial strategy options, sites, and policies and consider those which are reasonable alternatives to the final preferred Local Plan strategy. It is a legal requirement. The SA assessment of sites will be fed into the site selection process.
58. A Habitats Regulations Assessment (HRA) is also legally required. There are no European Sites in the District, the nearest being the Chilterns Beechwoods Special Area of Conservation (SAC) seven kilometres away in Dacorum Borough Council.

Procedural Requirements and National Policy Context

59. A number of requirements exist which relate to the process for producing the Draft Local Plan.
60. Paragraph 31 of the National Planning Policy Framework (NPPF, 2021) requires the preparation and review of all policies to be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate.
61. Paragraph 35 of the NPPF establishes that Local Plans are to be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are sound if they are:
 - a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
62. Paragraph 11 a) sets the framework for site selection by requiring that *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including making effective use of land in urban areas) and adapt to its effects.*
63. When read as a whole, the requirements in the NPPF provide key considerations for site selection, in order to meet the objectives of sustainable development, including the following:
- Access to community facilities;
 - Access to open space and recreation;
 - Transport and access to walking and cycling networks;
 - Opportunity for net environmental gains;
 - Understanding the availability, suitability, and potential of brownfield sites of under-utilised land and buildings;
 - Green Belt boundaries and boundary review;
 - Mitigating and adapting to climate change;
 - Contributing to and enhancing the natural environment and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure;
 - Ground conditions and pollution;
 - Air quality;
 - Conserving and enhancing the historic environment; and
 - Minerals safeguarding.
64. In terms of housing mix and site size, paragraphs 68 to 73 emphasise the identification of a mix of sites, taking into account availability, suitability and likely economic viability. In particular, paragraph 69 requires that local planning authorities should identify land to accommodate at least 10% of housing requirement on sites no larger than one hectare and. Paragraph 72 requires that local planning authorities should support the development of entry-level exception sites.
65. Finally, paragraph 73 provides details regarding planning for larger scale development, such as new settlements or significant extensions to existing villages and towns; *Working with the support of their communities, and with other authorities if appropriate, strategic policy making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*
- *Consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and scope for net environmental gains;*
 - *Ensure that their size and location will support a sustainable community, with sufficient access to services...*
 - *Set clear expectations for the quality of the places to be created...*
 - *Make a realistic assessment of likely rates of delivery...*
 - *Consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.*
66. The Planning Practice Guidance provides further detail regarding each of the factors listed above.
67. The Government's Planning Policy for Traveller Sites (Policy B) requires criteria to be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward.

Best Practice

68. The Planning Advisory Service Local Plan Route Mapper¹ provides practical advice to authorities on producing a local plan and is supplemented by a comprehensive toolkit. In relation to the development of a local plan, the Route Mapper states:

The evidence does and should interact, for example, be clear about the relationship between all the evidence that you collect. The site selection evidence and sustainability appraisal is a particularly good example of this overlap. There is a real challenge for councils in not duplicating resources and it is important to consider whether criteria can be aligned. Make sure that you understand the relationship between reasonable alternatives identified through Sustainability Appraisal and options in site selection – along with other evidence on constraints, for example including Green Belt and Areas of Natural Beauty, and opportunities (including infrastructure capacity and viability).

69. The Route Mapper also recommends early engagement both internally within the Council and externally with key stakeholders in relation to the emerging vision and strategy of the Local Plan. In terms of options development and testing it states:

You will need to identify options and where possible ‘reasonable’ alternatives to the approach you are taking. This won’t always mean starting from scratch – local plan visions, objectives and strategies might still be fit for purpose or provide a reasonable option. This testing of options and alternatives is a critical element of your Sustainability Appraisal and one which is likely to be heavily scrutinised during consultation and as part of the independent examination on the plan. It is therefore essential to ensure that options development is fully integrated with your Sustainability Appraisal process. Use your Sustainability Appraisal to help identify and test the options for Plan production as part of a process to inform the selection of ‘preferred’ options, rather than retrofitting the Sustainability Appraisal once a preferred route has been decided.

The Sustainability Appraisal should help you identify/generate and assess alternative strategic options rather than being an afterthought or late in the process to assess policies. Options need to be realistic, viable and so on, but you are also looking at strategies for a time horizon of 15 years or more and technological as well as socio-economic and environmental change in that period could impact on any strategic approach that you adopt. If in doubt about whether an option is a ‘reasonable alternative’, the process of testing it can be valuable in determining whether it is reasonable – and factoring it in or out.

¹<https://www.local.gov.uk/sites/default/files/documents/PAS%20Local%20Plan%20Route%20Mapper%20v1%200.pdf>

Annex 2

Review of Comparative Studies

Introduction

- 1.1 A review of comparative approaches to site selection across a range of other local authorities across England has been undertaken. These have informed the draft Site Selection Methodology for the Local Plan in order to ensure that the approach will be as robust as possible, taking into account best practice.
- 1.2 The review of comparative studies is primarily focussed on local authority areas which include a significant amount of land designated as Green Belt. Local Plans adopted prior to the publication of the latest version of the National Planning Policy Framework (NPPF) in 2021 have been considered because so few post NPPF 2021 Plans in broadly comparable places have successfully completed examination at this point in time. However, it is not considered that changes introduced to the NPPF in 2021 have any significant implications for the site selection process. The Council will continue to be cognisant of emerging best practice in relation to site selection and will take this into account in finalising the Site Selection Methodology for the emerging Local Plan in due course.

Secondary Peer Review

- 1.3 This comparative review draws on the work set out in 'A Framework for Site Selection' (Arup, 2015), produced for Selby District Council. The paper provides a comprehensive peer review of approaches taken by East Riding of Yorkshire Council, Barnsley Metropolitan Borough Council and South Kesteven District Council for site selection and highlights best practice. The review found three recurring themes to site selection across the three local authorities:
 - A staged process to site allocation;
 - Broadly similar criteria using different rating systems (scoring or a traffic light system); and
 - The inclusion of a deliverability stage as the last stage.
- 1.4 A staged approach enables the process to be built around Local Plan production and engagement, and alongside emerging evidence base studies, including key studies like the Green Belt Review. Findings from evidence base studies and consultation outputs can then be fed back into the site selection methodology.
- 1.5 The peer review noted that the criteria used to sift sites generally includes:
 - Consistency with settlement hierarchy;
 - Relationship to the built form;
 - Flood risk (Flood zone 3b);
 - Site size;
 - Heritage designations; and
 - Environmental designations.

- 1.6 Non-sustainability appraisal criteria were considered, some of which were selected to meet objectives specific to the authorities. Each approach considered viability and deliverability. The deliverability stage was used to confirm the availability of the site for development.
- 1.7 The peer review also found the use of qualitative assessments at different stages in the site selection process. Planning judgement was necessary in determining mitigation measures for identified site constraints, in cases of site reappraisal and for the final site selection. The use of planning judgement should be robustly justified and explained in the methodology.
- 1.8 Based on findings from the peer review, the paper proposed a four staged site selection methodology as follows:
 - Stage 1: Initial sift
 - Stage 2: Quantitative assessment
 - Stage 3: Qualitative assessment
 - Stage 4: Deliverability.

Review of Comparative Approaches

- 1.9 Table A2-2 below provides a summary of recent approaches taken to site selection methodologies and their development by comparable local authorities. The review included a consideration of a range of elements of the site selection process, including:
 - Whether or not Green Belt was a consideration;
 - The current status of the relevant Local Plan, and whether or not it has been adopted;
 - The name of the particular Study or Topic Paper reviewed;
 - A summary of the approach for formulating the methodology, including any engagement undertaken to inform the approach;
 - An overall summary of the approach within the methodology, and particularly the stages incorporated;
 - A summary of any conclusions or observations provided by Local Plan Inspectors where relevant.
- 1.10 The authorities considered in the comparative review are as follows: Runnymede Borough Council, Epping Forest District Council, Dacorum Borough Council, Selby District Council, South Oxfordshire District Council and Spelthorne District Council.

Conclusions

- 1.11 The review of comparative studies highlights recurring stages in a site selection methodology and best practice to engagement in the production of the methodology.
- 1.12 From the approaches considered in the comparative review, it is clear the Local Plan Vision, Strategic Priorities and Objectives, as well as evidence base studies should inform and guide the assessment process. The approaches were developed alongside Local Plan production and evolved in response to engagement.
- 1.13 The methodologies reviewed take a staged, iterative, quantitative and qualitative approach to site selection. They all begin with an initial sifting stage, followed by a one or multi part qualitative assessment of constraints. The constraints are drawn from national planning policy, local plan objectives and evidence base studies, such as the Sustainability Appraisal and Green Belt Review.
- 1.14 Different rating systems were incorporated to assess sites against identified criteria. Epping Forest District Council used a RAG score to assess sites against criteria drawn from the NPPF and local constraints. Selby District Council scored sites on a 1 to 5 scale, with 1 being excellent/high, 3 acceptable/moderate and 5 poor/low. The constraints were determined from national policy and local plan objectives. Runnymede Council discounted a scoring approach and instead weighted sites against criteria drawn from the Sustainability Appraisal. This approach

applied a qualitative assessment to consider whether sites have positive or negative impacts on identified criteria.

- 1.15 South Oxfordshire District Council appraised the strengths and weaknesses of strategic sites against criteria using a SWOT analysis. The criteria were derived from the Sustainability Appraisal. Spelthorne District Council used a scoring system on a 1 to 3 scale, with 1 being the site does not contribute to the spatial strategy and 3 being the site contributes to the spatial strategy. Planning judgement was used to assess sites against criteria drawn from Sustainability Appraisal objectives.
- 1.16 Each approach identified site size thresholds against which to assess sites (Table A2-1).

Table A2-1 - Site Size Thresholds

| Local Authority | Site size threshold |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Dacorum Borough Council | Exclude sites less than 1ha in size. |
| Runnymede Borough Council | Exclude sites that do not meet the definition of major development. For residential development, major development is defined as a site with capacity for 10 or more dwellings, or 0.5ha or more in size. For employment land use, major development is defined as floorspace of 1,000 sqm or more, or 1ha or more in size. |
| Spelthorne Borough Council | |
| South Oxfordshire District Council | Exclude non-strategic sites. Strategic sites are defined as capable of delivering more than 500 dwellings. |
| Epping Forest District Council | Exclude sites less than 0.2ha in size or with capacity for less than 6 dwellings. Exclude traveller sites less than 0.1ha and more than 1.5ha in size. |
| Selby District Council | Exclude sites less 0.17ha in size for residential development and sites less than 0.25ha in size for employment land use. Existing permissions less than 0.17ha in size but with capacity for 5 or more dwellings are included. |

- 1.17 Following the assessment of sites by constraints, the approaches generally considered outputs from evidence base studies, including the Green Belt Review and Sustainability Appraisal.
- 1.18 The approaches include a deliverability stage near the end of the process which considered site capacity, deliverability, viability and availability. This stage was informed by site submission forms completed by site promoters, correspondence with site promoters, landowners and developers, and, where necessary, a Council led assessment.
- 1.19 Generally, the methodologies reviewed make limited distinction between residential and non-residential land uses. The approaches developed by Dacorum, South Oxfordshire and Selby Councils do not distinguish between residential and employment land uses. The Dacorum site selection process separates urban and rural land, in line with the aims of the spatial strategy.
- 1.20 Runnymede Council makes slight variations to the assessment of employment and residential land against accessibility standards. Similarly, Spelthorne Council's approach differentiates

between employment and residential land when considering the accessibility of sites against accessibility standards. This is both a scoring exercise and qualitative assessment.

- 1.21 Stage 3 *Identify candidate Preferred Sites* of Epping Forest Council's site selection methodology unites parallel processes for the identification of potential preferred residential, employment and traveller sites. Epping Forest Council produced a separate methodology for assessing Gypsy & Traveller sites. The Traveller Site Selection Methodology (TSSM) identified traveller sites for allocation using a broadly similar site selection process tailored to the Local Plan strategy, national planning policy and constraints.
- 1.22 Stage 3 *Deliverability*, the final stage of Selby Council's site selection process, considers a shortlist of potential sites against identified mixed use, residential, employment, retail, leisure, and gypsy and traveller land need.
- 1.23 Stage 2a *Contribution to the Delivery of the Strategy* of Spelthorne Council's site selection approach considers how a site contributes to the Local Plan objectives and spatial strategy, including meeting identified gypsy and traveller needs.

Table A2-2 – Summary of Comparative Approaches to Site Selection

| Authority Area | Green Belt Authority (Y/N) | Local Plan Status (Current Stage) | Study / Topic Paper Name | Approach to Formulation of Methodology and Engagement | Summary of Methodology | Summary of Conclusions / Observations on Approach |
|---------------------------|----------------------------|-----------------------------------------------|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Runnymede Borough Council | Y | Runnymede 2030 Local Plan (adopted July 2020) | Site Selection Methodology and Assessment (2017) | <p>The draft Site Selection Methodology and Assessment paper was published alongside the emerging Runnymede Local Plan for two rounds of Regulation 18 Consultation held in 2016 and in 2017 respectively.</p> <p>Representations to the two rounds of consultation on the draft Site Selection paper were used to inform the final version of the paper.</p> <p>Changes made to the Site Selection paper to address the representations are set out in the appendices of the finalised paper.</p> | <p>Stage 1: Initial sift of sites against absolute constraints, size, availability and whether the site adjoined an urban area.</p> <p>Stage 2: Undertake SA/SEA of sites</p> <p>Stage 3: Assessment of Accessibility and Significant Non-Absolute Constraints. Approach included creating standards and then providing a traffic light score.</p> <p>Stage 4: Assessment of Non-Significant and Non-Absolute Constraints.</p> <p>Stage 5: Assessment of sites with Green Belt Review.</p> <p>Stage 6: Consider the performance of sites in this assessment and the Sustainability Appraisal and recommend sites for allocation.</p> <p>Stage 7: Deliverability –includes Local Plan viability work.</p> <p>Stage 8: Site Capacity – estimates density driven by the context of the local area.</p> <p>In the main a qualitative exercise with commentary.</p> | <p>The Inspectors Report (May 2020) on the Runnymede Local Plan stated the following concerning the site assessment and selection process:</p> <p>In regards to the evidence base used to inform the spatial strategy, the Inspector described it as <i>‘comprehensive, detailed, up-to-date and robust’</i>.</p> <p>The Inspector found the Council’s conclusions from the findings of the Green Belt Review reasonable and justified, as set out in the Site Selection paper.</p> <p>The Inspector concluded the site assessment processes provided a <i>‘robust, comprehensive and transparent evidence base’</i>.</p> |
| Epping Forest District | Y | Main Modifications Consultation | Site Selection Report | The draft Site Selection Report was published alongside the Draft Local | <p>Incorporates a 5 stage approach as follows:</p> <p>Stage 1 Major Constraints: to rule out</p> | Inspector is yet to publish report – expected |

| Authority Area | Green Belt Authority (Y/N) | Local Plan Status (Current Stage) | Study / Topic Paper Name | Approach to Formulation of Methodology and Engagement | Summary of Methodology | Summary of Conclusions / Observations on Approach |
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| Council | | held 2021 – Inspectors’ report expected early 2022 | (2018) | <p>Plan for Regulation 18 Consultation from October to December 2016.</p> <p>The Report was updated and finalised in 2017 to account for representations received to the Draft Local Plan consultation and Counsel advice, as well as the assessment of new or amended sites submitted in 2016 and 2017.</p> | <p>sites that were completely constrained or outside settlement buffers.</p> <p>Stage 2 Suitability Assessment: this involved assessing each site on a RAG score against over 30 suitability criteria. Sites with more green scores generally better than those with more red and amber scores, but this stage was not determinative and no sites were ruled out at this stage.</p> <p>Stage 3 Selecting Preferred Sites: Taking each settlement in turn, looking at all the sites and the evidence base. Officers identified ‘strategic options for growth’ and concluded using planning judgement whether each option was more or less preferred for growth. E.g. intensification of urban area vs northern expansion of town vs eastern or western expansion. The Strategic Options were also assessed as ‘reasonable alternatives’ in the SA. Individual sites were then classified within a ‘land preference hierarchy’. Sites located outside of a preferred strategic option were considered not suitable and ruled out, as were any sites within preferred options but which scored particularly badly at stage 2 (based on planning judgement). Sites located too far down the ‘land preference hierarchy’ were also ruled out – however ‘how far down’ varied by settlement.</p> <p>Stage 4 Capacity, availability and</p> | <p>imminently.</p> <p>Site selection approach has been considered through examination process.</p> |

| Authority Area | Green Belt Authority (Y/N) | Local Plan Status (Current Stage) | Study / Topic Paper Name | Approach to Formulation of Methodology and Engagement | Summary of Methodology | Summary of Conclusions / Observations on Approach |
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| | | | | | <p>deliverability assessment: review of Call for Sites forms, reps and landowner correspondence to rule out any sites that weren't available or deliverable, or were too small to meet the minimum size threshold.</p> <p>Stage 5 Selecting allocation sites: taking each settlement in turn to select the best sites remaining (suitable, available and deliverable).</p> | |
| Dacorum Borough Council | Y | Regulation 18 stage - Dacorum Local Plan (2020-2038). | Site Selection Topic Paper (2020) | The Site Selection topic paper was published for consultation alongside the emerging Dacorum Local Plan for Regulation 18 Consultation from 29 November 2020 to 28 February 2021. Outcomes from the consultation will inform site selection. The Council will publish an amended topic paper for Regulation 19 Publication. | <p>Sets out a 6 stage approach as follows:</p> <p>Stage 1 Site / broad location identification:</p> <ul style="list-style-type: none"> • Determine assessment area and site size • Desktop review of existing information • Call for sites / broad locations <p>Stage 2 Site / broad location assessment</p> <ul style="list-style-type: none"> • Estimating the development potential • Suitability, availability and achievability • Overcoming constraints <p>Stage 3 Windfall assessment</p> <ul style="list-style-type: none"> • Determine housing potential of | Work on the emerging Dacorum Local Plan was delayed in summer 2021 to gather further evidence and explore alternative spatial options. A revised LDS timetable is being prepared. |

| Authority Area | Green Belt Authority (Y/N) | Local Plan Status (Current Stage) | Study / Topic Paper Name | Approach to Formulation of Methodology and Engagement | Summary of Methodology | Summary of Conclusions / Observations on Approach |
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| | | | | | <p>windfall sites (where justified)</p> <p>Stages 4 and 5 Assessment review & Final evidence base</p> <ul style="list-style-type: none"> Consider outputs from the Urban Capacity Study and Site Assessment Study against future housing requirements Are there enough sites / broad locations to meet future housing needs? <p>Stage 6 Informs Development Plan preparation</p> <ul style="list-style-type: none"> Outputs from the evidence base and assessment review inform the Development Plan spatial strategy options | |
| Selby District Council | Y | Regulation 18 stage - New Local Plan Preferred Options Consultation Jan – March 2021 | Site Assessment Methodology (January 2021 Consultation Draft) | <p>The Selby site selection methodology has gone through several iterations.</p> <p>An initial draft Framework for Site Selection was published for consultation alongside other evidence base studies from 25 June to 10 August 2015 for the focused engagement ‘Let’s Talk PLAN Selby’. This followed the first round of</p> | <p>Stage 1: Initial Sift</p> <p>Sites are considered against fundamental constraints both in physical terms and policy terms, for example flood risk and conformity with the proposed spatial strategy.</p> <p>Stage 2: Sustainability Assessment</p> <p>Sites are then assessed in terms of their relative sustainability, these factors include their proximity to local services and employment, infrastructure constraints, as well as the environmental, social and</p> | The Council began preparing a new Local Plan in 2019 and held a second round of Regulation 18 Consultation in 2021. |

| Authority Area | Green Belt Authority (Y/N) | Local Plan Status (Current Stage) | Study / Topic Paper Name | Approach to Formulation of Methodology and Engagement | Summary of Methodology | Summary of Conclusions / Observations on Approach |
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| | | | | <p>Regulation 18 Consultation for the draft PLAN Selby.</p> <p>The consultation included two questions concerning the Site Selection paper:</p> <p><i>Q9 (SS): Do you have any comments on:</i></p> <p><i>a. The overall approach to the site selection process set out in section 6.3 of the study?</i></p> <p><i>b. The details of the site assessment work proposed in Appendix A of the study?</i></p> <p>Results from the engagement were aimed to inform the decision making process for site allocations within the emerging PLAN Selby.</p> <p>The paper was published for a subsequent round of consultation alongside the emerging Local Plan from October to November 2017.</p> <p>Work on the PLAN Selby was withdrawn, and the Council began working a new draft Local Plan in</p> | <p>economic impacts of the potential development of the site. This stage of the SAM is linked to the Sustainability Appraisal.</p> <p>Stage 3: Deliverability</p> <p>Sites are assessed against factors such as ownership, availability, viability and achievability</p> | |

| Authority Area | Green Belt Authority (Y/N) | Local Plan Status (Current Stage) | Study / Topic Paper Name | Approach to Formulation of Methodology and Engagement | Summary of Methodology | Summary of Conclusions / Observations on Approach |
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| | | | | 2019. The site selection methodology was revised and published for Regulation 18 Consultation alongside the draft Local Plan from 29 January 2021 to 12 March 2021. | | |
| South Oxfordshire District Council | Y | South Oxfordshire Local Plan 2035 (adopted December 2020) | Site selection background paper – Part 1 and Part 2 (2018) | The Council developed its site selection approach with advice from the Planning Advisory Service, Intelligent Plans and Examinations and the Planning Inspectorate. The Council produced the Site Selection background paper following Regulation 19 Publication in October 2017. | <p>Sets out a two-part programme as follows:</p> <p>Part 1 includes five stages:</p> <ul style="list-style-type: none"> • Stage 1: includes two processes - identification and initial assessment of absolute constraints • Stage 2: initial site assessment • Stage 3: detailed assessment of constraints and opportunities • Stage 4: detailed evidence testing • Stage 5: identification of preferred sites <p>Part 2 includes seven stages:</p> <ul style="list-style-type: none"> • Stage 1: identification of reasonable strategic site options • Stage 2: information gathering to inform the site assessment process. • Stage 3: general site assessments and high level SWOT. Also considers compliance with the | The Inspectors Report (November 2020) notes that the site selection process was ' <i>thorough and lengthy</i> ' and ' <i>sites were thoroughly assessed by means of a range of studies and through consultation with statutory bodies, and a separate sustainability appraisal assessed each of the potential sites.</i> ' |

| Authority Area | Green Belt Authority (Y/N) | Local Plan Status (Current Stage) | Study / Topic Paper Name | Approach to Formulation of Methodology and Engagement | Summary of Methodology | Summary of Conclusions / Observations on Approach |
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| | | | | | <p>emerging spatial strategy.</p> <ul style="list-style-type: none"> • Stage 4: further information gathering and evidence base updates • Stage 5: detailed site appraisals (including sustainability appraisal): Sites that progress past the general assessment stage considered against a range of more detailed criteria based upon the SA assessment objectives. • Stage 6: scenario testing: Selection of sites to be taken forward as strategic allocations in the emerging Local Plan tested against five different scenarios. <ul style="list-style-type: none"> • in line with October 2017 Local Plan • maximise edge of Oxford sites and regeneration • science Vale and Oxford unmet need met on specific sites adjacent to Oxford • maximise non-green belt sites and Regeneration- full delivery • Preferred delivery scenario | |

| Authority Area | Green Belt Authority (Y/N) | Local Plan Status (Current Stage) | Study / Topic Paper Name | Approach to Formulation of Methodology and Engagement | Summary of Methodology | Summary of Conclusions / Observations on Approach |
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| | | | | | <ul style="list-style-type: none"> • Stage 7: detailed appraisal - selection of sites to be taken forward as strategic allocations in the emerging Local Plan. Provides a summary of outcome and is a qualitative assessment. <p>Additionally, pro-formas include commentary on the Duty to Cooperate.</p> | |
| Spelthorne District Council | Y | Regulation 18 stage - Draft Local Plan 2020-2035 | Site Selection Methodology (2021) | <p>The site selection methodology was updated to support the Regulation 19 Local Plan, following representations to the Regulation 18 Consultation in late 2019 concerning the spatial strategy.</p> <p>The revised methodology takes into account changes to the local plan spatial strategy for increased urban densification, dispersed Green Belt release and the framework for regeneration set out in masterplan Staines Development Framework.</p> | <p>Sets out a 4 staged approach as follows:</p> <p>Stage 1</p> <ul style="list-style-type: none"> • Stage 1a: Consider SLAA sites. Remove those below the threshold and assessed as not developable. • Stage 1b: Assess sites against absolute constraints <p>Sustainability Appraisal (SA)</p> <ul style="list-style-type: none"> • Appraise the remaining sites to identify any significant negative effects that may require mitigation if the site is allocated. <p>Stage 2</p> <ul style="list-style-type: none"> • Stage 2a: Contribution to delivery of strategy • Stage 2b: Non-absolute constraints • Stage 2c: Open space & recreation | <p>Work on the emerging Local Plan has been delayed. Regulation 19 Publication is anticipated for Spring 2022. Regulation 18 Consultation was held between November 2019 and January 2020.</p> |

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| | | | | | <p>value</p> <ul style="list-style-type: none"> • Stage 2d: Sustainable location <p>Stage 3</p> <ul style="list-style-type: none"> • Stage 3a: Green Belt Assessment • Stage 3b: Previously Developed Land • Stage 3c: Visual Amenity <p>Stage 4</p> <ul style="list-style-type: none"> • Stage 4a: Collate findings from stages 2 & 3 and SA • Stage 4b: Assess deliverability (achievability and availability) • Stage 4c: Site capacity | |