



Development and Site Allocations Local Plan



Site Assessment Methodologies

Background Paper

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1 Introduction, Background, Purpose and Scope

- 1.1. The Council's Local Plan Core Strategy, adopted in September 2014 following Examination by an independent Planning Inspector, has set the strategy for the overall quantity and distribution of development in Rother District up to 2028.
- 1.2. The Core Strategy does not identify individual sites within settlements for development (although identify broad locations for further development at Bexhill). That is a function of the Development and Site Allocations Local Plan (DaSA) – which is effectively part two of the 'Local Plan' for Rother district.
- 1.3. The role of the DaSA is to allocate specific sites for different types of developments, notably housing (including gypsy and traveller pitches) as well as for business, retailing, community facilities, open space and recreational areas. Where appropriate, allocations may include a mix of different land uses.
- 1.4. This paper sets out the methodologies for assessing sites that are considered for development as part of the Council's Development and Site Allocations Local Plan (DaSA) in order to provide a consistent and transparent basis for site selection for new land uses.
- 1.5. For clarity, while there will be considerable overlap with approaches in Neighbourhood Plans to site allocations, this paper is not intended to provide a framework for Neighbourhood Plans in course of preparation.

2. Overview

General approach

- 2.1 The Council's approach to assessing the appropriateness, or otherwise, of putting a site forward as a development allocation in the DaSA is to:
- ensure that it accords with the development strategy contained within the adopted Core Strategy
 - be consistent with the 'core', strategic policies of the Core Strategy
 - support 'sustainable development' as defined by the National Planning Policy Framework (NPPF) and otherwise is consistent with its policies
 - duly consider the deliverability of development
 - have regard to the findings of the separate Sustainability Appraisal process

Strategic Policy Considerations

- 2.2 As stated above, the DaSA should identify the most sustainable options to meet the Local Plan Core Strategy's development requirements over the plan period.
- 2.3 Of particular note, the Core Strategy sets out in Policy OSS1 policies that form the basis of the development strategy, namely to:
- *focus new development at Bexhill*
 - *provide for some development in Battle and Rye*
 - *facilitate the limited growth of villages with a range of services*
 - *allow for small-scale infill and redevelopment in other villages*
 - *generally restrict new development in the countryside*
- 2.4 This strategy is elaborated upon through policies setting out the scale of housing expected in individual towns and villages in order to achieve the number of new homes that are required.
- 2.5 Business and retail floorspace targets are also identified for the towns, the former being minima and also identified for the Rural Areas as a whole.
- 2.6 Core Strategy policies BX3, HF1, RY1, BT1, RA1 and RA2 set out the development requirements for Bexhill, Hastings Fringes, Battle, Rye and the Rural Areas respectively.

- 2.7 Policy OSS3 refers to certain factors relating to the 'location of development' to be considered in conjunction with the spatial strategies for the respective settlements and with relevant thematic, 'core' policies. It highlights the context for site identification provided by the spatial strategy for the particular settlement, infrastructure capacity, the local need for affordable housing and other community needs, the potential for renewable and low carbon energy, landscape considerations, the effective use of urban, especially brownfield, land, several development constraints not covered by other policies, regard to employment opportunities and deliverability.
- 2.8 In terms of assessing the suitability of development sites, other key policies include:
- Policy SRM2 -that protects areas of important groundwater resources
 - Communities chapter policies that both protect and promote important to community and recreation provision (CO1, CO3), as well as looking at the locational factors for both young and older people
 - Policy LHN6 – that sets out the locational criteria for sites for Gypsies and Travellers
 - Policies to retain sites in business use that contribute effectively to business land supply (EC3, EC6)
 - Environment chapter policies - that highlight the need to protect landscape character, notably of the High Weald AONB, the historic built environment, areas of bio-diversity importance and the effective management of flood risk
 - Strategic Gap policies (HF1, RY1)
 - Transport chapter policies – that promote sites with good accessibility to local services
 - Policy IM2 - that highlights the availability of infrastructure to support development
- 2.9 Attention is also drawn to policy OSS2, which sets out the approach to the review of settlement development boundaries, which should be undertaken alongside the allocation of sites.
- 2.10 The Core Strategy has been accepted, through the independent examination process, as being consistent with the Government's planning policies that are contained in the National Planning Policy Framework (NPPF).
- 2.11 Hence, for the most part, the Core Strategy can be viewed as carrying forward NPPF policy statements in the local context. However, the NPPF remains a 'material consideration' in its own right and provides the main reference point (supported by Planning Practice Guidance) for assessing the consistency of local plans with national policy. At the heart of the NPPF is the principle of 'sustainable development'. It defines sustainable development in terms of economic, social and environmental dimensions to be pursued together.

2.12 Notable site-specific considerations, listed under these headings, together with 'deliverability', are highlighted below. It is noted that "impacts" can be both positive and negative. 'Deliverability' is added as it is crucial to ensure that sites proposed for development are realistically capable of being built within the plan period.

Notable environmental factors:

- Landscape impact, especially on the character and scenic quality of the High Weald Area of Outstanding Natural Beauty
- Ecological impacts, notably on designated sites, but also on protected species, Biodiversity Action Plan and 'Special to Sussex' habitats and Ancient Woodland, and with regard to Biodiversity Opportunity Areas
- Impacts on trees protected by TPOs and other valuable trees and woodlands, as well as hedgerows, which contribute to local amenity and character
- Flood risk impacts, including from coastal and fluvial, as well as surface water and highway flooding, both on the site, its points of access, and on other land downstream
- Impacts on water quality and watercourses
- Impacts on the integrity and setting of heritage constraints, including Listed Buildings and Conservation Areas

Notable social and community factors:

- Accessibility to key local services, notably food store and primary school, by means other than the car
- Impacts on local character and amenities
- Impact on the delivery of affordable housing
- Ability to contribute to the provision or enhancement of community facilities to meet local needs
- Housing and infrastructure priorities, and community preferences
- Impact on provision of leisure and recreation facilities to meet local needs
- Impact on education facilities and capacity, including for early learning
- Impact on highway safety
- Impact on the public rights of way network
- Proximity to hazardous or other incompatible land uses
- Access to public transport, walking and cycling routes

Notable economic factors:

- Value of existing/proposed land use to local economy, including tourism
- Contribution to meeting needs for market and affordable housing, including for young people, old people and, in Bexhill, for families
- Accessibility to employment and training
- Contribution to supporting key local shops and services, especially those regarded as vulnerable

Notable deliverability factors:

- Brownfield/greenfield nature of site
- Nature of landowner/developer interest
- Highway access
- Existence of any third party land and prospect of agreement
- Past contamination, land stability and other site conditions that may add significantly to costs and/or risks
- Capacity of utilities and cost of any necessary increased capacity
- Market attractiveness, having regard to local market and site conditions
- Infrastructure requirements

2.13 The viability of development is initially assumed where a site/development is put forward by a landowner or developer. For preferred sites, an initial view is taken as to development viability, drawing on local experience and the work on the development of the Council's Community Infrastructure Levy.

2.14 Site-specific commercial advice may be necessary to determine viability prior to the final proposed allocations, which will take account of views expressed about the nature of development during the '*Options and Preferred Options*' consultation, both by local people as well as by landowners and developers.

Relationship with Sustainability Appraisal (SA)

2.15 Site assessments will be complemented by a parallel appraisal against broad sustainability objectives/criteria, via a separate 'Sustainability Appraisal/Strategic Environmental Assessment' (SA/SEA). The SA/SEA process is set out separately in the SA/SEA Scoping Report, which is published online at <http://www.rother.gov.uk/sa> . This process responds to European regulations and is enshrined in UK law.

2.16 The SA/SEA process is explained in Section 7 below, but, in essence, the findings of the site assessment and the SA/SEA both inform the conclusion for each site, which should then be reflected in the recommendations for land allocations in the DaSA.

Housing sites

- 2.17 Residential is the predominant land use being sought by landowners and developers. It is the default assessment when sites are put forward for “development”.
- 2.18 In line with established practice and given that a separate ‘small sites windfall allowance’ is made in the Core Strategy for sites of less than 6 dwellings, this threshold (equivalent to approximately 0.2ha) is applied . Sites that are not capable of accommodating at least six dwellings are not generally considered as potential allocations.
- 2.19 The starting point for assessing suitable sites for housing is the target for each town and village identified in the Core Strategy.
- 2.20 It follows that sites which could contribute to meeting the dwellings target for those settlements with a requirement for ‘new sites’ identified in the Core Strategy (at Appendix 3 and in Figure 12) should be subject to more detailed assessment.
- 2.21 In line with Core Strategy policy, such sites should be well-related to the existing development boundary and normally either within or immediately abutting it.
- 2.22 Conversely, sites that do not meet this criterion are normally not considered as reasonable alternatives consistent with the strategic spatial strategy agreed through the adopted Local Plan Core Strategy and, therefore, are excluded from further consideration.
- 2.23 However, notwithstanding the focus of new development on certain settlements, it is also recognised that brownfield sites in and adjacent to other, less sustainable settlements may be regarded as suitable for housing in line with national and local support for their effective use. Hence, such sites that the planning authority is asked to consider as part of this process will also been subject to more detailed assessment.
- 2.24 Sites that are in the countryside and outside well-defined villages (i.e. with development boundaries) are ruled out from further investigation, as their residential development would represent a clear incompatibility with the approved development strategy.
- 2.25 Similarly, in the few situations where consideration is being given to the removal of a development boundary around a settlement, if that review concludes that a development boundary is no longer appropriate, then sites in such settlements are also excluded at this first stage.

- 2.26 Particular forms of residential use, notably specialist/retirement housing, have been considered where the landowner has indicated this as an option and Council Planning Officers are of the view there is a planning merit in the suggestion.
- 2.27 Potential sites to meet the identified need for further for gypsies and travellers are considered separately below.

Employment sites

- 2.28 In relation to employment sites, the approach similarly relates to assessing sites and areas with potential to meet the business floorspace targets contained in the Core Strategy Figure 8.
- 2.29 In relation to sites on the fringes of Hastings Borough, there has been engagement with Borough Council as part of the assessment process, as well as a wider dialogue on strategic needs across our economic area.
- 2.30 Further detail of the approach and the areas (as well as the sites assessed) is set out in the Employment Sites Review Background Paper.
- 2.31 In order to make best use of land, as well as to ensure that business land is not being inappropriately held for that use, the approach embraces the various sources of supply, namely:
- existing business areas/estates
 - committed and vacant sites
 - further potential sites
- 2.32 The potential for intensification – making best use of brownfield land – is an early stage in the process, not least as this may prevent unnecessary loss of greenfield sites. Hence, all sizeable estates/areas will be assessed for both intensification and, secondly, expansion potential. Specific consideration should be given to Harbour Road, Rye, as this is the subject of an extant policy defining its extent and approach to development therein.
- 2.33 The methodology followed relates closely to that of the earlier Guidance Note on Employment Land Reviews, published by the then ODPM. It referred to ‘fitness for purpose’, which is still regarded as a key test for determining whether existing employment land should be retained (and potentially extended) or released for other uses.
- 2.34 Meeting sustainable development criteria and market requirements, either now or over the plan period, are key factors for existing employment areas, as they are for undeveloped sites.

- 2.35 For all existing employment areas and identified/potential sites, basic details are reviewed in terms of:
- Location
 - Site size (ha.)
 - Site extent/boundaries
 - Current land use
 - Surrounding land uses
 - Physical characteristics
- 2.36 A commercial property market perspective is provided by Locate East Sussex.
- 2.37 The identification of potential employment sites stems from outstanding Core Strategy business floorspace requirements. Initial consideration is given to whether previously allocated employment sites continue to represent sensible alternatives for business use to meet the identified requirements, as the NPPF expects existing unimplemented business site allocations - (which are at Bexhill, Hastings Fringes, Rye Harbour and Marley Lane - to be reviewed
- 2.38 The extent of the search for additional sites will depend on the level of unmet need in each locality and an assessment of the most appropriate approach to meeting that need. All sites submitted for employment use should be considered.

Sites for assessment for other uses

Gypsy and traveller sites

- 2.39 Potential sites are assessed against the criteria in Core Strategy policy LHN6 and other relevant policies as well as having regard to the national 'Planning Policy for Traveller Sites'.
- 2.40 This is a separate assessment process and is presented separately in a specific supporting paper.
- 2.41 Sites considered include all those put forward to the Council, land forming and adjoining existing traveller sites (both permanent sites and those with only temporary consent, or are unauthorised) , together with large housing allocations (which may have scope to accommodate a site or sites).

Retail sites

- 2.42 The Core Strategy identifies retail floorspace requires over the Plan period for each of the towns. As both Battle and Rye are the subject of Neighbourhood Plans, then the focus is on identifying suitable provision in Bexhill.

- 2.43 New retail provision has not been identified as a need in rural areas, although the presence of existing retail services has been a key factor in assessing the sustainability of sites for other forms of development.
- 2.44 The approach is to apply the sequential test as set out in the NPPF. Full details of this will be set out in the DaSA, drawing on the existing background paper on retail options for Bexhill.

Recreation provision

- 2.45 A Playing Pitch Strategy is commissioned, jointly with Hastings Borough Council, and this will provide the basis of identifying the need for any further provision, or potentially, relinquishing any sites.
- 2.46 An Open Space, Sport and Recreation Study was prepared for the Core Strategy and its standards were adopted. Hence, this will inform relevant allocations.

Mixed use sites

- 2.47 Where mixed, or alternative, uses are being considered for a site, each of the relevant options is assessed.

Development boundary reviews

- 2.48 The function of development boundaries is spelt out in the adopted Core Strategy. Paragraph 7.60 states: *'They provide a clear indication of where development would, and would not, be allowed in principle.'* Paragraph 7.61 adds: *'They help to focus development into sustainable locations and to protect against intrusive development beyond the substantially built-up areas of towns and villages.'*
- 2.49 Core Strategy policy OSS2 identifies the factors to which regard should be had in reviewing development boundaries. Development boundaries therefore support sustainable development, having regard to economic, social as well as environmental factors.
- 2.50 Economic factors include meeting development requirements, making effective use of existing infrastructure and supporting the economic function of settlements (and linked settlements). Social factors include recognising and respecting the form of well-defined communities and supporting local facilities and services. Of the environmental factors, the differentiation between the main built-up confines of settlements and the adjacent more rural fringes and countryside clearly helps to maintain their character and setting. Regard should also be had to the effect that further development would have on interests of acknowledged importance, including the High Weald AONB and nature conservation designations. The consistency of development with minimising flood risk is a further important consideration.

- 2.51 When considering the question of whether a settlement should have a development boundary, for towns and villages with a requirement for new sites determined through the Core Strategy, it is taken that they have already been found to represent sustainable settlements; hence, they warrant development boundaries.
- 2.52 For other villages, the retention of a development boundary is based on the factors set out in policy OSS2 and, in terms of the Sustainability Appraisal, on the relevant economic, social and environmental factors, as summarised above. Of note, the degree to which a settlement is of a scale and form such that policies which give more flexibility in terms of new development are appropriate is an important economic factor. The support for local services is a related social factor. Conversely, the need to travel some distance by car to access shops, services and/or employment is a negative factor. These may be mitigated by environmental factors, especially where there are significant constraints to development such that any intensification of development, especially of green field land, would represent a fundamental incompatibility with a statutory designation or with a high level of flood risk.

3. Identification of sites

Housing

- 3.1 The Council undertook a “call for sites” consultation over several years, which informed the preparation of its Strategic Housing Land Availability Assessments (SHLAA), which in turn informed its Local Plan Core Strategy.
- 3.2 An initial SHLAA was published in March 2010, with an updated version published in June 2013. This provided a key part of the evidence base for the Core Strategy in that it highlights opportunities to deliver the scale of development identified for the towns and villages.
- 3.3 Hence, sites found to be suitable for development through the SHLAA process should be included as part of the detailed assessment of options for housing allocation through the DaSA. At the same time, it is recognised that the SHLAA is a technical document, with sites requiring additional inputs, including via public consultation. The status of the SHLAA is set out clearly in its frontispiece:

‘The SHLAA is an ‘evidence base’ document which does not allocate land for housing nor pre-empt or prejudice any future Council decisions about particular sites. It is an aid to plan making and not a statement Council policy. Specifically, it informs the preparation of the Local Plan Core Strategy and the subsequent Development and Site Allocations DPD.

A positive assessment of individual sites does not indicate the sites will definitely be developed and does not outweigh or alter existing policies or land-use designations. However, the SHLAA does provide evidence that will be kept up-to-date and used to inform the preparation of the Local Plan.

It is noted that some of the sites identified in the SHLAA are the subject of a current planning application. However, inclusion within the SHLAA does not imply acceptance of any scheme, the details of which will need to be fully evaluated through the Development Management process, taking full account of all consultation responses and other representations received.’

- 3.4 In addition, the Council has received a number of further site submissions from landowners and developers since publication of the June 2013 SHLAA. These (subject to the site size threshold used for the SHLAA) are also considered for inclusion in the DaSA – which provides the opportunity for comments to be made on the merits of these vis-à-vis the SHLAA sites.
- 3.5 The Options and Preferred Options consultation represents a further opportunity to submit sites for consideration.

Employment sites

- 3.6 While employment sites could have been submitted as part of the earlier call for sites that led to the SHLAA, a later call for sites was specifically focussed on employment sites. Details of this are contained in the Employment Sites Review.

4. Sources of Information/Evidence base

- 4.1 A large amount of GIS-based information, especially in relation to environmental designations and statistical data (mainly sourced from the East Sussex in Figures website), as well as a number of background evidence studies have been reviewed to inform site assessments. The latter include both spatial and topic-based studies.
- 4.2 Key reference documents are available to view on the Council's website at <http://www.rother.gov.uk/Background-Evidence>

5. Site assessments and their presentation

- 5.1 The factors identified in Section 2 are not specifically weighted. Rather, a balanced judgement is made, taking all the relevant factors into account.
- 5.2 Normally, only sites within Rother District are assessed. Where a site straddles the district boundary, or forms parts of a larger tract of land which does so, then the assessment has been carried out in close liaison with the adjoining relevant local planning authority.
- 5.3 Site assessments have been carried out by Council planning officers, advised by partner organisations as appropriate (e.g. the Highways Authority), with advice from the Council's Economic Regeneration Manager in respect of employment sites.
- 5.4 The site assessments are considered alongside the conclusions of the SA site appraisals.
- 5.5 Sites in and around villages are treated as options for meeting the Core Strategy's housing targets for individual settlements from new sites and are presented in the 'Options and Preferred Options' document for public consultation.
- 5.6 Sites are either 'recommended' for inclusion as a preferred option in the initial version of the DaSA for public consultation or, rejected. Further consideration is then given to the 'preferred sites' as set out in the following section.

6. Further consideration of preferred sites

- 6.1 It is noted that, for those sites that are '*preferred*' for development, the findings of the respective assessments also inform the formulation of guidelines for the form and layout of development for those sites.
- 6.2 Where a site is preferred for development following site assessment and sustainability appraisal (see next section), further consideration is given to appropriate form, mix, layout of development in order to establish key development principles to be included within any site allocation.
- 6.3 These development issues can cover:
- Regard to physical characteristics and site features
 - Layout and scale/form of development
 - Environmental and amenity mitigation
 - Possible community benefits
 - Access requirements and movement linkages
- 6.4 While certain sites are considered the 'preferred sites' at this 'Options' stage of public consultation, the inclusion of a site as a 'preferred site' is a provisional position and does not represent Council policy for that site.

7. Sustainability Appraisal and Strategic Environmental Assessment

- 7.1 Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) is part of the site assessment process. A separate Sustainability Appraisal has been published in support of the DaSA 'Options and Preferred Options'
- 7.2 All sites except those that are clearly not reasonable alternatives are subject to an SA/SEA, in accordance with European and national legislation relating to the production of plans and programmes.
- 7.3 The approach to considering reasonable site options that is set in Section 2 has been applied in the SA/SEA as well.
- 7.4 All reasonable site options are assessed against the sixteen SA objectives, as set out in 'SA/SEA Scoping Report'. This also contains 'decision-aiding questions' and indicators that have been tailored to the consideration of sites. An overview of the degree to which a site meets the sustainability objectives is given in symbol form, in line with normal SA protocols. This is supplemented by a site commentary, which covers significant effects and potential mitigation, as well as overall conclusions.
- 7.5 A further SA/SEA assessment is undertaken of the emerging policies for preferred sites to ensure that sustainability objectives are addressed as far as possible. These assessments include commentaries on the contributions to economic, social and environmental objectives.
- 7.6 Further information is contained in the Development and Site Allocations Local Plan SA/SEA which will be presented as a specific document.

8. Consultation

- 8.1 In order to ensure that the most appropriate policies and proposals are put forward, the plan-making process specifically provides opportunities for local people, businesses and other stakeholders, such as community and interest groups, to contribute to the decision-making process.
- 8.2 There are expected to be two stages of consultation on the DaSA, reflecting the process of refinement and amendment. The first formal consultation is at the '*Options and Preferred Options*' stage. This provides the opportunity to comment on individual sites, as well as on site assessment framework.
- 8.3 There is also the opportunity for people to put forward policy topics and sites at this stage that have not yet been considered in preparing the 'Options and Preferred Options' document. Further sites will duly be assessed against the criteria set out in this Methodologies paper (subject to any amendments to it in response to representations received).
- 8.4 Comments received on individual sites may result in revised assessments of their suitability, availability and/or developability as the DaSA progresses.
- 8.5 Consultation will be undertaken in accordance with the Council's adopted 'Statement of Community Involvement'.