

Chapman Planning

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1. Introduction

- 1.1. I have been asked by Wisborough Green Parish Council to evaluate their methodology for assessing sites for the Neighbourhood Plan carried out by the Neighbourhood Plan Steering Group in 2011. The Wisborough Green Neighbourhood Plan was made in July 2016 and allocated 4 sites for a total of 68 dwellings.
- 1.1. Chichester District Council has commenced work on a new Local Plan and has asked the Parish to find sites for additional houses.
- 1.2. I am a fully qualified chartered Town Planner with extensive experience in neighbourhood planning and strategic planning. I was responsible for neighbourhood planning from 2011-2018 in my role as Development Plan Process Manager at Central Bedfordshire Council. I was a member of the Neighbourhood Plan Steering Group for my own Parish, Wing in Buckinghamshire and wrote the Wing Neighbourhood Plan which was made in 2015, allocating two sites for over 100 homes. I have helped around 30 communities (both with Central Bedfordshire Council and on a private basis) with their Neighbourhood Plans and currently I run my own consultancy, Chapman Planning, which specialises in advising Parish Councils on their Neighbourhood Plans.

2. Consideration of methodologies

- 2.1. There is no set or recommended methodology to assess sites for Neighbourhood Plan (NP) allocations. Locality Guidance <https://neighbourhoodplanning.org/toolkits-and-guidance/assess-allocate-sites-development/> provides a basic framework to consider whether sites are suitable, achievable and available, but does not recommend specific criteria or scoring methods.
'Sites can be assessed as 'more positive' or 'less positive' or high/medium/low in terms of how they perform against the criteria, site can be given a 'red-amber-green' traffic light scoring, indicating where a site performs poorly against the criteria, or there is an insurmountable constraint (red); performance is average against the criteria/some constraints but they can be mitigated (amber); performs well against the criteria (green). Sites can be ranked according to how well they score against the criteria'
- 2.2. Some local authorities have produced guidance on site allocations for their communities. Herefordshire have over 30 guidance notes for neighbourhood planning. However, their guide to site allocations does not refer to scoring/ranking sites
https://www.herefordshire.gov.uk/download/downloads/id/3712/guidance_note_21_guide_to_site_assessment_and_choosing_allocation_sites.pdf
- 2.3. One of the most comprehensive guidance notes on this matter has been produced by St Albans City & District Council. This guidance was produced using government funding and is recommended reading for the Steering Group.
https://www.stalbans.gov.uk/Images/SP_NP_NeighbourhoodPlanningGuidanceandToolkitFinal2017v2_tcm15-61618.pdf

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- 2.4. In short, there is no 'preferred' way of assessing sites. Provided that all possible sites have been assessed, the site selection process, criteria and scoring methods used have been open, transparent and fair and that consultation had taken place, an Examiner would be satisfied that a robust selection process had been undertaken.

3. Methodologies used locally

- 3.1. Parishes in Chichester District Council have been fairly active in neighbourhood planning with 10 'made' NP's. Out of these, very few have allocated sites for housing.
- 3.2. Loxwood Neighbourhood Plan had been made, but was subject to a legal challenge by developers of a site which had not been allocated in the NP. The grounds of the challenge included the methodology for assessing sites. Loxwood Parish had engaged a consultancy, URS to carry out their site assessment process. The methodology included a numerical scoring system in which an error had been made. Whilst the judicial review was dismissed and all the grounds failed, one of the main points was acknowledgement that the site assessment process is not an exact science and that the NP is not subject to the more rigorous examination process of a Local Plan. The assessment process and the sites had been consulted upon in a robust and transparent manner. The outcome of that consultation had been a clear indication that the two allocated sites were the preferred sites, not the site promoted by the claimant.
- 3.3. There is not a 'locally preferred' methodology for site assessment for NP's in Chichester District.

4. Traffic Light or RAG rating versus numerical scoring

- 4.1. The NP site assessment process tends to be consistent in that a set of criteria is drawn up, although often from various sources and then these criteria are applied to every site that is under consideration. Sometimes sites are surveyed first and the criteria applied secondly to all the sites. Sometimes sites may be ruled out before they actually go through the assessment matrix, for example there is a 'show stopper' such as the site being within the flood plain or on the site of a Scheduled Monument.
- 4.2. In Central Bedfordshire, a simplified template was made available for NP Groups to use, based on the Site Selection process that the Local Planning Authority had been through for Local Plan allocations.
- 4.3. Some NP Steering Groups prefer a written approach to explain how sites meet the criteria (or otherwise). Others prefer a numerical approach and score the site for each of the criteria. If numerical scoring is carried out, the score for each criterion has to be explained. For example, a site which (when developed) would adversely affect a listed building scores 3, a site where the impact of development upon the listed building could be mitigated (by planting for example) scores 2 and a site remote from a listed building scores 0.
- 4.4. Whatever approach is taken, it is vital that individual sites are assessed in a consistent, open and transparent way and that the assessment is presented so that the reader is able to clearly understand why sites have or have not been included, and why sites have been rejected or taken forward into the NP.

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- 4.5. When presenting the results of the assessment it is important to acknowledge that it has been undertaken based on local judgement and knowledge.
- 4.6. Two examples that I have had personal involvement in:
- Example 1: Wing (RAG)
http://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/Site-assessment-Report-April14.pdf. The assessment criteria were developed from basic sustainability appraisal criteria. This was derived from criteria discussed in a training session given to the Parishes in the early days of neighbourhood planning. Each site was surveyed for factual information and then assessed descriptively and the overall site given a RAG rating. Out of the 3 sites with a green rating, only 2 were 'available' for development.
 - Example 2: Worminghall (numerical)
https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/Worminghall%20Site%20Assessment%20Report.pdf. The criteria were derived from the Local Authority's SA/SEA criteria for the Local Plan and made 'local' by adding in the identified land use planning matters in the Village Plan. Scoring was worked out using a point system which varied for each criterion. The detail of how the scoring matrix was applied is set out in Appendix B to the Site Assessment Report.
- 4.7. I would recommend that the Steering Group read the Worminghall example because it fully explains the methodology and the process of creating the criteria, as well as the results. I do not specifically recommend a numerical rating and ranking system, because it does open up the assessment to very detailed criticism at Regulation 14 and Examination Stage. However, if the Steering Group feels more comfortable with a numerical approach, it can choose to construct a scoring matrix, but it must be based on local circumstances, not using an approach from elsewhere.

5. Wisborough Green Assessment Methodology

- 5.1. 25 sites were considered at Wisborough Green, with a further 6 at Newpound. All sites were surveyed and individual site reviews produced for each site. An overall guide was prepared to explain the criteria and is attached at Appendix A.
- 5.2. Descriptions were categorised under the following 10 headings or 'sustainability criteria':
- Access & provision of services
 - Transport & travel
 - Village Character
 - Best use of land
 - Landscape and Heritage
 - Biodiversity
 - Flooding, drainage & water sources
 - Employment and economy
 - Energy and climate change
 - Mitigation
- 5.3. A traffic light notation was made for some of these criteria.

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5.4. Comments on site assessment methodology:

- The criteria headings are vague and could have been more detailed or focussed. e.g. 'Landscape and Heritage' covers a wide range of constraints such as Listed Buildings, Conservation Area, Impact on the AONB etc.
- Some of the descriptions are repeated under other criteria or are very vague.
- The Guide (Appendix A) does ask specific questions for each criteria, but not all the questions were answered for each site and each criteria.
- Use should have been made of existing documents showing constraints such as maps of Listed Buildings and the Conservation Area and Landscape studies. Were there documents that are map based and could have been referred to?
- The criteria were listed in the NP (Page 57) as:
 - *Access by non-car modes to the main village services and facilities.*
 - *Transport impact and means of access.*
 - *Village character, and relationship to the settlement boundary and built development.*
 - *Use of brownfield sites in preference to greenfield where they were sustainably located.*
 - *Opportunities for new open spaces and recreational facilities.*
 - *Impact on biodiversity and opportunities for enhancement.*
 - *Impact on landscape and heritage.*
 - *Impact on flooding, drainage and water sources.*
 - *Ability to retain employment for a mixed economy in the village.*
 - *Climate change impact.*
 - *Opportunities for mitigation of issues.*

Clearly, this list does not match the actual criteria used for site assessment and there are 11 in number. This inconsistency is fairly minor and was not picked up by the Examiner, but should be avoided in the future.

- 'Mitigation' is not a criterion in its own right, it needs to be applied to each criterion in the table. If there are unacceptable issues that cannot be mitigated for, then a red rating/traffic light would need to be applied.
- Not all the categories in the matrix were traffic-light rated, it varied depending on the site. It is important that the assessments are consistent and there is no explanation available for the lack of consistency. e.g: WG10 had a traffic light rating for Access & provision of services, Village character, Best use of land, Landscape and heritage; WG 11/WG12/WG13 had a RAG rating for Village Character, Best use of land, Landscape and Heritage, and Mitigation
- Explanation is needed in the site assessment methodology for the traffic light rating for each site. The questions that need to be clarified are, for example, 'if a site received a red, does a green cancel it out?' 'If a site received a red, does that automatically rule it out?' etc.
- Some further explanation/conclusion is required. For instance, if development on a site would have an unacceptable impact on the setting of a listed building and the site wasn't large enough for mitigation to be carried out, (such as planting or separation of new built development from the listed building) it would receive a red rating, because this would actually be a 'show stopper' i.e. ruling the site out because planning permission would not be granted. If that site was large enough for mitigation, then it could potentially remain as a possibility and should be rated as amber.

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- Comparison between sites needs to be clearly explained. For example, if Site A has 4 ambers and a green, but Site B has 4 greens and a red, which one is preferred? This can be explained if Site B has a red for unacceptable impact on a Listed Building (as above). Even though Site B is a good site in all other aspects, it has to be ruled out.
- There is no explanation as to why WG11/12/13 was eventually allocated. It received 3 x amber and 1 x green rating. There is some explanation in the NP itself, but is not specific enough. It is imperative that the overall assessment results and conclusions are brought together in one document. I understand that there were some meetings held with CDC to assist in site selection, but there is no publicly available documentation on why the outcomes were reached.
- I have slight concerns that the 5 minute isochrone is centred on the centre of the Village Green. The school and village shop, both of which are likely to attract the most frequent short trips that could be undertaken on foot, are off-centre.

6. Consultation on sites

6.1. **April 2012** Early consultation, comments received on sites

<http://www.wisboroughgreen.org/wp-content/uploads/2017/11/WGPCCLPApril2012Housin-Commentsv0.1.pdf>

<http://www.wisboroughgreen.org/wp-content/uploads/2017/11/WisboroughGreenSiteIdentificationMay2012.pdf>

<http://www.wisboroughgreen.org/wp-content/uploads/2017/11/WGPCCLPApril2012HousingCommentsrawdata.pdf>

<http://www.wisboroughgreen.org/wp-content/uploads/2017/11/consultationeventcasestudydoc2012.pdf>

6.2. **May 2013** Early Site Selection. This was an extensive exercise involving approximately 200 residents, seeking feedback on issues and benefits on 6 possible sites (some of which were subdivided into smaller sites). This type of interactive exercise is commendable and has real value in making residents feel involved in the process. The full report is not on the WGPC website. Unfortunately, this exercise did not capture all the potential sites and possibly didn't address planning issues.

6.3. **Regulation 14 Jan 2015** No further site specific consultation was undertaken prior to the formal consultation because of the time frames of planning applications explained in Newsletter July 2014

6.4. Meetings were held with Jackson Planning (consultant appointed by WGPC) and developers as well as with CDC.

7. Conclusions on 2014 Site Allocations methodology

7.1. At the time the assessments were made, the neighbourhood planning process was not well established and there was no guidance available. The methodology at that time was sufficiently robust to allocate the two sites (SS3 & SS4) in the NP. The Examiner was supportive of allocating

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these sites, despite the representations before him objecting to site SS4 (Examiners Report paragraph 12.1 and 12.2). He also considered that the public consultation was acceptable (paragraph 8.11).

- 7.2. The methodology itself is acceptable, but there is insufficient detail and thoroughness in the public documents and the explanations of the outcomes is missing.

8. Current situation

- 8.1. **CDC Local Plan Review 2035 is underway.** Wisborough Green Parish has been asked to accommodate a further 25 dwellings and this requirement has been communicated to the residents in the call for sites. The communications also state that a set of agreed criteria will be used.
- 8.2. The Local Plan is at a very early stage and there is no requirement as yet for WGPC to accommodate further development.
- 8.3. **HELAA 2018.** Methodology and conclusions here <http://www.chichester.gov.uk/article/29759/Housing-and-Economic-Land-Availability-Assessment>. The methodology is relatively simple, using a desk based study to rule out sites first and then a more detailed set of criteria.
- 8.4. It should be noted that during the first stage of sifting sites, one of the criteria states that 'only sites within or adjoining settlements' were included. It is unclear whether this means the Settlement Boundary or just the general extent of the settlement. This could mean that suitable sites within the vicinity of the villages may have been missed. This does not have to be the case with a NP site assessment, where all potential sites should be assessed.
- 8.5. In addition, all sites for less than 6 homes or under 0.25 ha in size have also been excluded. Similarly, the NP should be assessing smaller sites too.
- 8.6. In the HELAA, only one site is seen as achievable. HWG0011 Land east of Saint Peters Church (5 Ha 20 dwellings). Clearly the site is large enough to accommodate larger number of dwellings but the indicative capacity of 20 is not explained. The HELAA assessment recognises the constraints regarding Rights of Way and the potential impact of development on designated heritage assets.

9. Options for moving forward

- 9.1. **Option 1:** Review the NP to update policy wording and remove allocations that are build out and amend the Settlement Boundary accordingly. Do not allocate a site/sites for further development. The Local Plan Review will then allocate development if it finds a suitable site/sites.
 - Advantages: NP is up to date. Parish Council is not held responsible if residents are unhappy with proposed development. Little volunteer time is needed, potentially no referendum would be required.
 - Disadvantages: Less control over location/type of new housing, NP would not contain allocations and therefore not protected under the provisions of the NPPF (paragraph 11) which protects NP areas where the Local Planning Authority has less than 5 years Housing Supply (reduction to 3 years where a NP with allocations is in place).

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- 9.2. **Option 2:** Review the NP to update policy wording and remove allocations that are build out and amend the Settlement Boundary accordingly. Carry out a robust site assessment process using a new set of criteria, developed from the original list of criteria plus the NP criteria.
- Advantages: NP up to date. Control over location of development and potential for gaining infrastructure etc from new development.
 - Disadvantages: The emerging Local Plan has not reached a stage where the additional 25 homes has been 'set in stone' for Wisborough Green. This number could increase or decrease. There is a risk associated with carrying out a new site assessment which may reveal more sites that could be suitable and result in developers submitting premature planning applications.

10. Modifying the Site Assessment Process

- 10.1. In order to assess sites for their potential to contribute towards the requirement that CDC are imposing on the Parish, a modified site assessment process will be required.
- 10.2. The existence of the current NP imposes new restrictions on potential locations for suitable development. These cannot be ignored, so the only way forward is to modify the site assessment process. The restrictive criteria that are derived from the existing NP are:
- 5 minute isochrome identified as 'the key criteria' (Page 57, paragraph 6)
 - Safe pedestrian access(Page 57)
 - Adjacent to the existing settlement boundary or existing built development in the village (Page 57)
 - Balancing the current village split east and west of the church (Page 57)
 - Within CDC's published list of available sites (SHLAA) (Page 58)
 - Distributed, incremental development(Page 58)
 - Reuse of previously developed land (Page 58)
 - Local Gaps
 - Local Green Space
 - Local Open Spaces
 - Views
- 10.3. In order to create a new Site Assessment methodology, these constraints will need to be recognised and either adhered to or rejected. In either case, there must be an explanation of the reasoning behind this.
- 10.4. In order to maintain some continuity, similar headings to those in the previous method could be used for the matrix.
- 10.5. A review of CDC's background evidence for their emerging Local Plan should provide documents that add to the site selection process e.g. the Landscape Capacity Study 2018 for CDC which rates the capacity of the Parish as low. <http://www.chichester.gov.uk/CHttpHandler.ashx?id=31051>. Some of the sensitivities listed in this document might be used/applied at a much smaller scale to individual sites.
- 10.6. Each of the categories or criteria must be applied consistently to all sites.
- 10.7. A traffic light or RAG rating is a reasonable rating system provided that for every criteria there is a rating and that explanation and justification of the rating is written down.

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- 10.8. 'Show stoppers' must be identified and applied early on in the process. An example of this would be a site proposed within the Local Gaps.
- 10.9. The NP must promote sustainable development. The criteria to be used have to result in the most sustainable sites being allocated for development. It may be useful to group the headings under 'Economic, Social and Environmental' considerations to reflect the NPPF.

11. Overall Conclusions

- 11.1. NP's are being developed with increasing sophistication and scrutiny. I recommend that the Wisborough Green Neighbourhood Plan Steering Group revisit the site assessment methodology previously used and develop it into a new assessment methodology. The process to be undertaken will be similar, the first step being to survey and photograph the sites, followed by assessment, identification of preferred sites, followed by consultation. Conclusions then have to be made and fully explained and justified.
- 11.2. For transparency, each step of the process must be documented. I recommend that a separate document is produced as a background evidence document to support the new NP.
- 11.3. I understand that consultants will be carrying out the site assessment for Wisborough Green as part of the package of support offered by Locality. The consultants may be able to offer assistance drawn from their previous experience, but it is essential that the NP Steering Group agree the methodology and criteria with them prior to the site assessment being carried out.

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Appendix 1

Site Review Method for WGNP	
<p>All available sites were initially visited in November 2012, and assessed against a consistent range of criteria. During the course of the Neighbourhood Plan process, professional advice was sought to review the criteria for consistency with planning requirements.</p> <p>During 2014 the site reviews were updated and renumbered as changes occurred to the sites available and to reflect additional professional input from consultants and Chichester District Council.</p>	
Description	Describe site and surrounding features
Sustainability Criteria	Comment
Access & Provision of services	<p>Describe access to road. Is the access safe?</p> <p>Is the access appropriate?</p> <p>Does the site fall within the 5 minute walking isochrones?</p> <p>Could residents walk safely to village centre?</p> <p>Distance safe walking to village centre?</p>
Transport & travel	<p>Will the site increase use of car for village journeys?</p> <p>Will development of site provide a benefit to travel?</p> <p>Will the site create increased traffic through the narrow village lanes and village centre crossroads which has limited visibility and a history of accidents?</p>
Village Character	<p>Can the site be developed to be in keeping with the village character?</p> <p>Can the site incorporate green spaces?</p> <p>Will the site impact enhance or detract on the immediate environment?</p> <p>Would development be in keeping with/sympathetic to conservation area?</p> <p>Would development of the site bring a benefit to the village?</p>
Best use of land	<p>Describe current/previous use.</p> <p>Would the developing the site be best use of the land? Is there history or potential for contamination?</p> <p>Site availability and potential capacity if developed?</p>
Landscape & heritage	<p>What is the visual impact if the site is developed?</p> <p>Will site impact on neighbouring properties?</p> <p>Will site preserve existing views?</p> <p>Will site affect strategic gaps between village centre and radial road strip developments?</p> <p>Will we gain some green space? Is there any impact to footpaths?</p>

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Biodiversity	What are the surrounding environmental features? Will development threaten wildlife? Could this be mitigated?
Flooding , drainage & water sources	Does the site slope? Will development of the site increase flood risk? Will site affect capacity of drainage?
Employment and Economy	Would the development influence local employment?
Energy and Climate change	Does the site have unique attributes/issues relating to energy?
Mitigation	What ideas could mitigate identified issues? Could the site be partially developed? Could the site be developed in conjunction with a neighbouring site?