

SITE ASSESSMENT PROCESS METHODOLOGY

1. INTRODUCTION

- 1.1 This document outlines the methodology undertaken to assess the sites submitted for consideration in the Greater Norwich Local Plan (GNLP). It forms part of the background evidence to the Regulation 19 plan and should be read alongside the site assessment booklets produced for each settlement or village cluster.
- 1.2 The basic principles for site assessment were set out in a document called 'Towards a Strategy' which was agreed by the Greater Norwich Development Partnership in January 2019. 'Towards a Strategy' presents a high-level planning strategy for the distribution of growth to guide preparation of the GNLP and sets out broad amounts of growth for each level of the settlement hierarchy (Norwich urban area, Main towns, Key service centres and Village clusters). These figures have been the starting point for site assessment.
- 1.3 In particular the 'Towards a Strategy' document gives a clear approach to the assessment of sites within villages. In accordance with the strategy, sites have been considered within 'village clusters' based on primary school catchments. A key requirement was that new housing allocations within village clusters should be on sites with good access to a primary school and a 'safe route to school' to reduce additional car journeys and encourage healthy and active lifestyles.
- 1.4 An initial desktop study of sites submitted within 2km of school with a 'safe route' identified enough potential sites to meet the 2,000 dwellings identified for village clusters in the 'Towards a Strategy' document (no detailed assessment of sites undertaken at this stage). The 2km distance was later increased to 3km to ensure that the widest possible range of sites had been considered.
- 1.5 The scale of growth proposed within each 'village cluster' reflects school capacity or ability to grow, plus the availability of other accessible services. Taking account of the timescales for delivery and other uncertainties, such as pupil preference, it has been assumed that a minimum scale of allocation (12-20 dwellings) can be accommodated in all clusters if appropriate sites are available. To guide development all village clusters have been rated 'red' (12-20 dwellings), 'amber' (20-50 dwellings) or 'green' (50-60 dwellings) based on information provided by Children's Services, although this is a starting point and there is flexibility within these ratings, depending upon the quality of sites and the circumstances of individual schools.
- 1.6 Following the principles set out in 'Towards a Strategy', a site assessment process was put in place to deal with the 800+ sites submitted through the initial 2016 'Call for Sites' and the two subsequent Regulation 18 public consultations in January-March 2018 and October-December 2018 (further sites were also submitted through the Regulation 18C draft plan consultation which took place between January-March 2020). It was agreed that the site assessment methodology should centre around the Housing and Economic

Availability Assessment (HELAA) work that had already been undertaken for each site, alongside additional work to look in more detail at the constraints identified by the HELAA as well as bringing in new criteria such as safe routes to school. This additional work was undertaken by the Greater Norwich Local Plan team and was based on a desktop study using GIS and Google maps. Account was also taken of consultation comments.

- 1.7 The main purpose of the site assessment process was to sift out the more unsuitable sites at an early stage to leave a shortlist of sites with potential for allocation that would then be subject to further assessment. This shortlist of sites was termed 'reasonable alternatives' and sent to consultants for Sustainability Appraisal. The sites screened out at this early stage were those with significant constraints such as no suitable access, significant flood risk, environmental constraints, those where there was no possibility to create a safe route to school or where the sites were simply too remote from the catchment primary school and other facilities. If there was any doubt about the suitability of a site for allocation at this stage then it was not sifted out. The screening process did not entirely rule out development on any sites, there was always the opportunity for a site to be brought back into the assessment process on its merits.
- 1.8 The shortlist of 'reasonable alternative' sites was then discussed in detail with Highways, Development Management, Lead Local Flood Authority and Children's Services colleagues to come up with a list of preferred sites for allocation. Written comments were also provided by Minerals and Waste. Each group of colleagues undertook their own assessments of the sites and then round table discussion took place in the form of workshop sessions, where the merits of each site were debated and agreement sought on the preferred sites for allocation. In some cases, further discussion and negotiation was needed to ensure that all parties were happy with the sites that had been chosen.
- 1.9 Booklets have been created for each settlement or village cluster in the Greater Norwich Local Plan area to document the site assessment process (other than South Norfolk village clusters which are being progressed as part of a separate Local Plan document being prepared by South Norfolk Council) . The main site assessment booklets focus on residential/mixed use sites larger than 0.5ha with separate booklets being produced for non-residential uses. Sites of less than 0.5 ha or those submitted as settlement boundary extensions are listed in the booklets but were not assessed at Regulation 18C as they were not considered to be suitable for allocation. A note in the booklets at this point in time states that these sites will be considered as part of a reappraisal of settlement boundaries to be published with the Regulation 19 Submission Version of the plan. Since that point in time the decision has been taken that as this is a strategic plan sites of less than 0.5 hectares and those proposed as settlement boundary extensions will not be included.

- 1.10 The aim of the site assessment booklets is to provide background evidence to the selection of sites for allocation in Part 2 of the Plan in a clear, consistent manner. The booklets tell the story to allocation and aim to present the site assessment process in a logical and transparent way. The information in the site assessment booklets has been used to produce the settlement chapters and policies in the Regulation 19 version of the plan. Through the site assessment process that has been put in place we have ended up with a set of preferred sites for allocation which have broad agreement from Development Management and Highways and other parties which should make for a smoother plan examination and planning application process.
- 1.11 The site assessment booklets were first published as background evidence to the Regulation 18C draft plan consultation. Following this consultation further information has been added to the booklets to continue to tell the story of site selection up to Regulation 19 publication. ***Please note that Part 1 of the booklets is an exact copy of the information published at Regulation 18C so may include some outdated references in the text, and then additional information has been added from Part 2 onwards.***

2. STRUCTURE OF SITE ASSESSMENT BOOKLETS UP TO THE REGULATION 18C CONSULTATION

PART 1 – ASSESSMENTS OF SITES INCLUDED IN THE DRAFT LOCAL PLAN REGULATION 18C CONSULTATION (JANUARY -MARCH 2020)

Introduction:

- 2.1 Each site assessment booklet has an introduction setting out some background information about the settlement or cluster. It lists out its place in the settlement hierarchy, the level of growth identified in 'Towards a Strategy', the key services and facilities and whether a neighbourhood plan is in place along with any carried forward allocations and dwellings with planning permission at the base date of the plan. In the case of village clusters information is given about the capacity of the school and the approximate number of dwellings sought. This section forms the basis for the introductory information in the settlement chapters of the draft plan.

Stage 1 – List of sites promoted in the settlement:

- 2.2 Stage 1 is a complete list of all the sites promoted in each settlement/cluster in the hierarchy. It includes lists of residential proposals (split by those greater or smaller than 0.5ha) with and sites promoted for other uses. The lists of sites include details of address, site reference, area in hectares and proposal. The assessment booklets only deal with the larger residential sites that would be suitable for allocation. Notes in each booklet state that the smaller sites will be dealt with through a review of settlement boundaries at Regulation 19 (see paragraph 1.9 above for latest position). Non-residential uses have been

compiled together and are considered in separate non-residential site assessment booklets.

Stage 2 – HELAA tables:

2.3 The starting point for the site assessments has been the Housing and Economic Land Availability Assessment (HELAA) which has been completed for each site greater than 0.5ha (the HELAA takes the form of a number of separate documents which can be found [here](#)). The relevant HELAA assessments for the individual sites within each settlement/cluster have been copied into the assessment booklets, with a 'red', 'amber' or 'green' indicator against each criterion. The HELAA gives an indication of any major constraints with sites and has been used as part of the assessment of sites at Stage 4.

Categories covered:

- Site access
- Access to Services
- Utilities capacity
- Utilities infrastructure
- Contamination/ground stability
- Flood risk
- Market attractiveness
- Significant landscapes
- Sensitive townscapes
- Biodiversity & Geodiversity
- Historic environment
- Open space and Green Infrastructure
- Transport and Roads
- Compatibility with neighbouring uses

2.4 The HELAA methodology which gives the assessment criteria can be found in section 2, pages 6-17 [here](#)

Stage 3 – Summary of consultation comments

2.5 A summary of comments received to the last two public consultations held in January – March 2018 and October – December 2018 is included for completeness and transparency. These comments have been considered in the site assessment process at Stage 4.

Stage 4 – Discussion of submitted sites

- 2.6 All sites have been subject to a desk top assessment by the Greater Norwich Local Plan team using GIS, Google Maps and local knowledge.
- 2.7 In addition to the HELAA assessment and consultation responses a range of factors have been considered in order to establish whether a site should, or should not be, considered suitable for allocation and shortlisted as a 'reasonable alternative' at this stage for further consideration. These factors include:
- impact on heritage and landscape;
 - impact on the form and character of the settlement;
 - relationship to services and facilities;
 - environmental concerns including flood risk and
 - a safe walking route to a primary school within 3km.
- 2.8 Sites not considered suitable for allocation were cautiously sifted out at this stage on the understanding that this assessment could be revisited at any time. Any sites considered to have any possibility for allocation were shortlisted as 'reasonable alternatives' at Stage 5.

Stage 5 – Shortlist of reasonable alternative sites for further assessment

- 2.9 Based on the assessment undertaken at Stage 4, a 'shortlist' table of reasonable alternative sites considered worthy of further assessment was compiled. These sites were sent to the Sustainability Appraisal consultants for consideration. The shortlist of sites was then subject to further assessment by officers from the partner councils including Development Management, Conservation, Highways, Flood and Education colleagues and discussed at a series of workshop sessions where detailed professional advice was given. Site visits were carried out at this stage.

Stage 6 – Detailed site assessments of reasonable alternative sites

- 2.10 The detailed professional advice was used to complete site assessment proformas for each shortlisted site which included:
- The current use of the site;
 - Whether it is brownfield/greenfield;
 - Identification of the main HELAA constraints and conclusion;
 - Any further comments received;
 - The planning history for the site and
 - A list of the plans/documents provided with the submission.

Stage 7 – Settlement based appraisal of reasonable alternative sites and identification of preferred sites

- 2.11 The steps outlined above have built up a comprehensive picture of all the shortlisted ‘reasonable alternative’ sites. The purpose of Stage 7 is to pull all this information together and show how the preferred option/options have been arrived at.
- 2.12 As a result of the discussions that have taken place at Stages 5 and 6 in the process not all the ‘reasonable alternative’ sites identified at Stage 5 will go on to be preferred options or reasonable alternatives in the draft plan. For many sites further investigation will have flagged up some concerns which will lead to them being deemed as unreasonable sites in the draft plan.
- 2.13 Final tables of preferred sites, reasonable alternatives and unreasonable sites have been included at Stage 7 to show the final decision for the draft Regulation 18 Plan that has been made on each site.

3. STRUCTURE OF SITE ASSESSMENT BOOKLETS FOLLOWING THE REGULATION 18C CONSULTATION

PART 2 - SUMMARY OF COMMENTS FROM THE REGULATION 18C DRAFT PLAN CONSULTATION

- 3.1 Part 2 of the booklets contains summaries of consultation comments received through the Regulation 18C consultation in relation to the sites considered in Part 1. There may not be tables for all the sites listed in Part 1 as not all sites were commented on through the consultation.
- 3.2 The tables contain summaries of the consultation comments received and identify the main issues raised requiring further investigation. They also contain a draft GNLP response and proposed change to plan (where relevant). These comments have been included in the site assessment booklets as they have been taken into account when making the final decisions on which sites should be allocated in the Regulation 19 plan.

PART 3 - ASSESSMENT OF NEW & REVISED SITES SUBMITTED DURING THE REGULATION 18C CONSULTATION

- 3.3 A number of new and revised sites were submitted through the Regulation 18C consultation and these have been included in this section of the booklets as appropriate and taken through the same process of assessment as detailed under Part 1 with an initial indication of their suitability for allocation being given at Stage 7. A HELAA has been undertaken of these new and revised sites to inform the assessment process.

FINAL CONCLUSIONS FOR THE REGULATION 19 VERSION OF THE PLAN

- 3.4 The purpose of this section is to bring together all the information in the site assessment booklets to come to a final conclusion regarding the sites to be allocated in the Regulation 19 version of the plan. It recaps on the site assessments that took place prior to the Regulation 18C consultation and gives a brief summary of consultation comments from the Regulation 18C draft plan consultation and assessment of any new/revised sites submitted. There is then a brief section on Sustainability Appraisal (SA) which touches upon how the SA has been used alongside the site assessment process to inform the selection of sites.
- 3.5 The site assessment booklet is then concluded with a section outlining the final selection of sites for allocation in the Regulation 19 plan. This section should be considered alongside appendices A and B which give a full list of all the sites promoted through the GNLP with reasons for the allocation or rejection of each one.