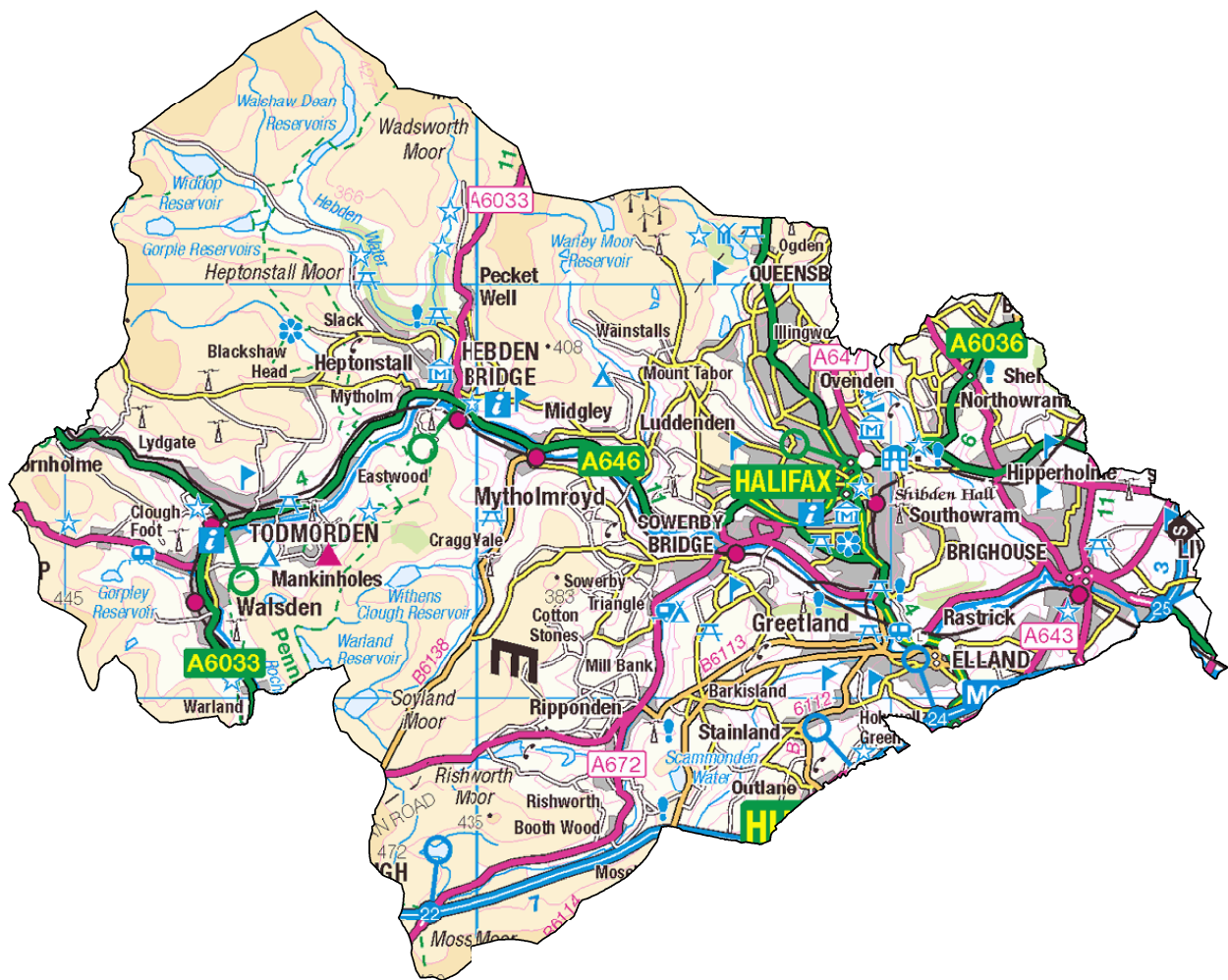


Site Allocations Assessment Methodology



April 2015

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1 Introduction

1.1 Introduction

- 1.1** The local planning authority of Calderdale has to prepare a development plan for the district in order to set the planning policies for the area which planning applications will be determined upon. The Local Plan is the new development plan for Calderdale Metropolitan Borough Council (the Council) which will supersede the Replacement Calderdale Unitary Development Plan 2006 (RCUDP) as amended by direction of the Secretary of State 2009, which looks forward to 2016. The Local Plan is a key document in delivering sustainable development that reflects the vision and aspirations of local communities.
- 1.2** The Council was in the process of producing a development plan which consisted of a Core Strategy and Land Allocations and Designations Plan document. However, due to a slight delay in the delivery of evidence required to ensure that the Core Strategy was “sound”, and evidence of other plan failures across the country, the Council after taking advice from the Planning Advisory Service (PAS) and the National Planning Policy Framework (NPPF) resolved to produce a single Local Plan containing both strategic policies and site allocations.
- 1.3** Allocating sites is integral to the local plan as it is these which will facilitate the delivery of the local plan's strategic policies and objectives. The Council is seeking to identify an appropriate portfolio of sites to allocate for housing, employment, retail, health care, sports, waste and other uses. These sites are required to accommodate an ever expanding population, to create new places and spaces reflecting the needs and priorities of their communities and to ensure that the mutually dependent economic, social and environmental pillars of sustainability are met:
- Economic: contributing to building a strong, responsive and competitive economy, by ensuring sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
 - Social: supports strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality environment, with accessible local services which reflect the community's needs and support its health, social and cultural well-being.
 - Environmental: contributing to protecting and enhancing our natural, built and historic environment and as part of this helping to improve biodiversity, use natural resources prudently, minimise waste and pollution and mitigate and adapt to climate change including moving to a low carbon economy.
- 1.4** The Local Plan site allocations will be informed by a robust evidence base including, but not limited to, the Strategic Housing Market Assessment (SHMA) which assesses housing need and demand; the Strategic Housing Land Availability Assessment (SHLAA) which assesses the land available over a 15 year period, and an Employment Land Review (ELR) covering employment and retail needs. The Open Space Strategy and Minerals and Waste assessment will also inform the site allocations. The site allocations assessment is being undertaken at the same time as the Green Belt Review (GBR). The Green Belt Review and

site allocations assessment are being undertaken independently; however, the results of the GBR will be taken into account as part of the site allocations assessment.

- 1.5** In preparing a new Local Plan, the Council is also preparing a Sustainability Appraisal which will monitor the impact of the Local Plan's allocation options, policies and objectives in order to ensure it contributes to sustainable development.
- 1.6** The purpose of this report sets out the final method which the local authority will use to assess sites for allocation for inclusion in the Local Plan. It incorporates the comments made as part of the public consultation on the draft Site Allocations Assessment Methodology.

2 Policy Context

- 2.1** The NPPF published in March 2012 is a key part of the Government's reforms to make a simple, accessible planning system in order to protect the environment and promote sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. This means, for plan making, that planning policies should positively seek opportunities to meet the development needs of their area.
- 2.2** The NPPF sets out the requirements for producing a Local Plan and states a fundamental part of the Local Plan is to allocate sites to promote development and flexible use of land, bring forward new land where necessary and provide detail on form, scale, access and quantum of development where appropriate. In order to do this the Planning Practice Guidance provides clarity in the production and deliverability of local plans. It requires planning authorities to provide sufficient detail about nature, location and scale of development when proposing allocations.
- 2.3** The NPPF states that local plans should set out the opportunities for the development and clear policies of what will or will not be permitted and where, whilst taking into account economic, social and environmental factors. Local plans should also identify areas to limit change, where development is inappropriate and enhance natural, built and historic environments.
- 2.4** The NPPF also emphasises the importance of early and meaningful engagement, seeking collaboration with neighbouring authorities, local organisations, businesses and communities.
- 2.5** A considerable amount of attention needs to be placed on site viability. The NPPF requires local plans to be deliverable, therefore sites should not be over burdened by obligations which threaten viability. Requirements for infrastructure, affordable housing and to meet Community Infrastructure Levy should be clearly set out. The NPPF states that any affordable housing or local standard requirements that may be applied to development should be assessed at the plan making stage where possible and kept under review.

Local Development Orders

- 2.6** The NPPF states that "Local Development Orders" are made by local planning authorities and give a grant of planning permission to specific types of development within a defined area. They streamline the planning process by removing the need for developers to make a planning application to a local planning authority. They create certainty and save time and money for those involved in the planning process."
- 2.7** The government has recently finished a consultation and are currently analysing feedback on the proposal for LDOs to be used to obtain permissions for housing on over 90% of suitable brownfield land by 2020. One of the criteria is that the land be capable of supporting 5 or more dwellings, however "authorities should also aim to get permissions in place on smaller sites whenever possible because of their valuable contribution to meeting overall housing supply." We therefore need to bare this in mind as we are progressing the site allocations assessment.

3 Methodology

3.1 The site assessment will be completed in four stages. These are:

Stages

1. Site Identification
2. Site Sieve
3. Site Performance
4. Qualitative Assessment

3.2 Stage 1 will gather the sites required for Stage 2 and 3 which will identify broadly preferable locations for development. Stage 4 is a detailed qualitative assessment to determine whether the allocation is appropriate.

3.1 Stage 1: Site Identification

3.3 In order for the Council to meet the requirements of the NPPF to provide enough sites for housing and economic growth and other uses the purpose of this stage is to gather and identify as many sites as possible to be assessed from a wide range of sources. Stage 1 will gather sites from:

- 'Call for sites'
- Spatial Planning Evidence Base
- Review of RCUDP Allocations
- Early Consultation
- Working Party Recommendations
- Sites in Calderdale Ownership
- Online search

Call for Sites

3.4 The majority of sites to be assessed will come from the 'Call for Sites' process which has been running since 2008. This invites landowners/agents and members of the public to submit details of sites for employment, housing and other uses. There will be a renewed 'push' for 'Call for Sites' as part of this process to ensure all possible sites are considered.

3.5 This renewed 'push' will consist of a press release, contacting those on our consultation list and contacting large land owners. The press release will go to local papers within the district to inform the public we are requesting land and sites to be submitted for assessment for allocation. We will emphasise the requirement for more brownfield land and explain that the public can submit a site for assessment even if the site is not in their ownership as the council will identify and contact the owners to discuss the potential for their land. Those on our consultation database and large land owners such as estates, utility and service providers will be contacted to discuss submitting sites for allocation.

3 . Methodology

Spatial Planning Evidence base

- 3.6** Sites identified from evidence base such as Strategic Housing Land Availability Assessment, Employment Land Review, Open Space Survey and other evidence base will also be submitted for analysis. The 'Call for Sites' has been used for the basis of the Strategic Housing Land Availability Assessment (SHLAA) which assesses the sites for suitability, availability, achievability, and deliverability.

Review of allocations in the RCUDP

- 3.7** A number of allocations in the RCUDP have still not been fully developed and may still have development potential, therefore a review of existing site allocations will be undertaken. Sites which are allocated and have not yet been developed will be assessed in the following stages. Allocations which will be assessed are:

- New Housing Sites
- New Employment Sites
- Mixed Use Sites
- Protected Land

- 3.8** The council will establish:

- What land is still remaining undeveloped?
- Whether the allocated sites are still available?
- Whether there is any evidence of why a site has not been developed.

Early consultation

- 3.9** Whilst the Council were preparing a Core Strategy and separate Land Allocations and Designations document, early engagement workshops in 2014 were arranged with members of local communities to consult on what site allocations and designations people think should be included in the Plan. It gave people the opportunity to suggest possible new sites and comment on potential sites which had already been put forward. These sites will be fed into the work now being undertaken.

Working Party recommendations

- 3.10** Council departments have a specific strategic and local view of communities' requirements, therefore an internal working group made up of Business and Economy, Regeneration, Housing, Highways, Asset Management, Development Management and a number of other departments will be asked to suggest sites to be submitted for analysis. They will have good local area knowledge and will be able to identify potential brownfield land to be allocated.

Sites in Calderdale ownership

- 3.11** The Calderdale ownership database will be explored for potential sites and discussions will be had with the asset management team as to the potential of these sites. The Council has a huge resource of employees who will be contacted through our internal mailing system

requesting that whilst on site they identify and submit to the Planning department any potential brownfield sites available for allocation.

Online search

3.12 Planning officers will conduct an online search of sites on the market through such sites as rightmove.co.uk. Sites for sale may indicate sites which are available as they are no longer required by the current owner. These will be submitted by Planning Officers through the Call for Sites form in order for the public to view online which sites the council has submitted.

Site rationalisation

3.13 Once we have gathered the sites from the above sources then there may be some site rationalisation to be undertaken and boundaries checked as sites may have been submitted more than once and sites may overlap with others. Sites will potentially be joined to make one large site or divided as they may have more potential as different sized sites. This initial stage will provide a long list of sites and will be the basis of the Calderdale Local Plan Site Allocations. Whilst the council is assessing these sites it does not preclude further sites coming forward which can be assessed up until we publish the new Local Plan.

3.2 Stage 2: Site Seive

3.14 The aim of Stage 2 is to filter out those sites which are deemed unsuitable for allocation based on the following constraints:

- Located outside a 500 metre built-up area buffer
- Located within Flood Zone 3(b)
- Located within areas of importance
- Sites under 0.25 hectares
- Sites with Planning Permission

3.15 Sites that are sieved out at this stage will remain in the database in order to show transparency and why these sites have been sieved however they will not be assessed in stage 3 and 4 of the methodology.

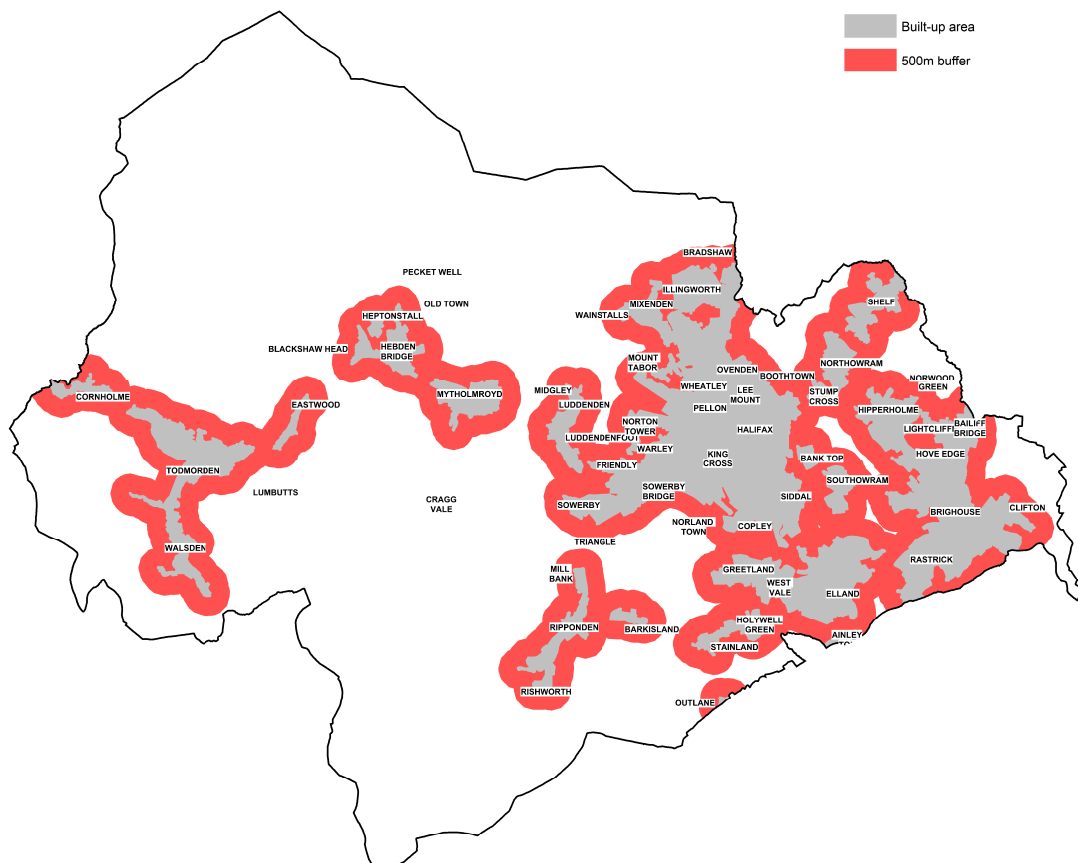
Located outside a 500 metre built-up area buffer

3.16 Sites which fall outside 500m of a built-up area buffer are deemed to be in unsustainable locations as they are disconnected from settlements and in open countryside. It is considered appropriate to assess those sites which fall within the buffer which are in the Green Belt as there is currently a review of the Green Belt boundaries underway. It is fair to assess those sites which could potentially be released from Green Belt if the land does not meet the requirements of Green Belt in the NPPF. It is important to emphasise that the council does not wish to release Green Belt for the sole purpose of redevelopment, however Green Belt which fails to meet the NPPF requirements has the potential to be released. Sites which fall outside the buffer and are brownfield may have the potential to go forward for assessment for Local Development Orders. Furthermore, some 'village envelopes' as

3 . Methodology

allocated in the current RCUDP which fall outside the 500m buffer may have sites which can be assessed depending on the outcome of the Green Belt Review.

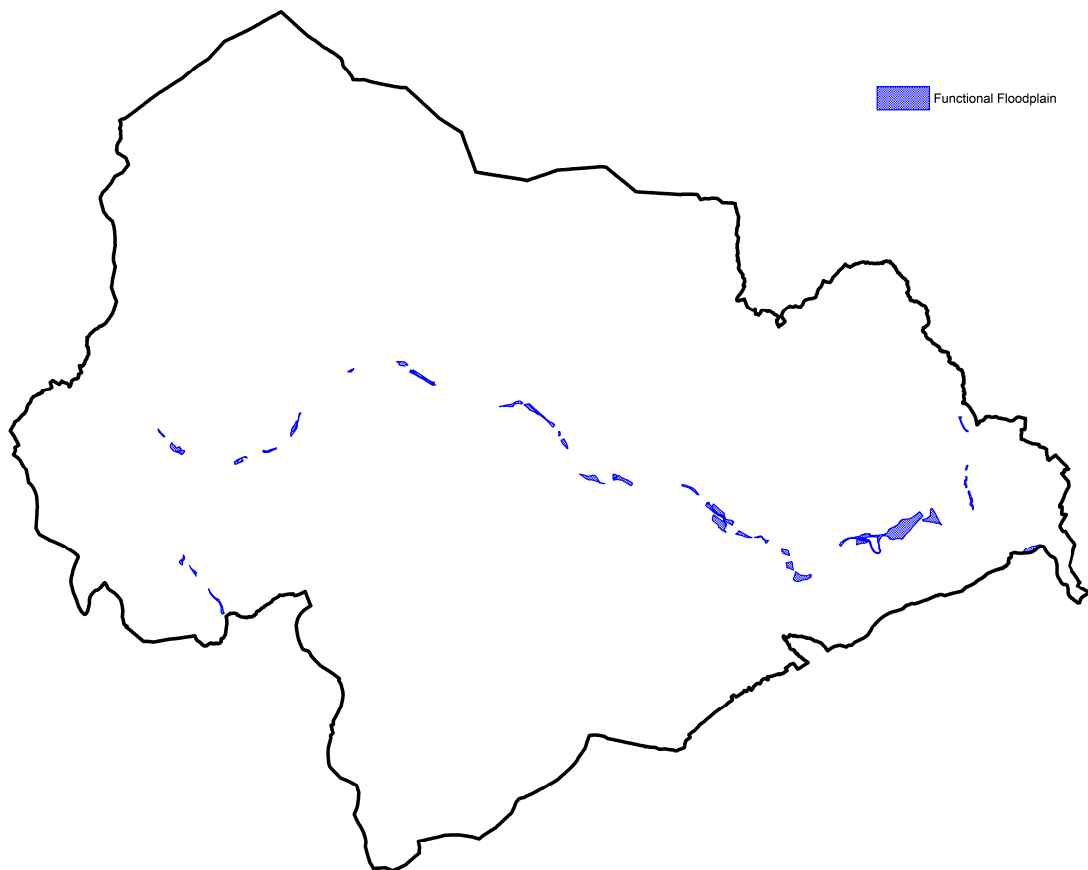
Map 3.1 Urban Buffer



Located within Flood Zone 3(b)

3.17 Sites located within Flood Zone 3(b) will be sieved at this stage due to the classification of functional flood plain. Work is currently being undertaken between CMBC and the Environment Agency to update this data. The most up to date data will be used for analysis. Sites within other flood zone categories will be assessed in Stage 3 and as part of the qualitative assessment in Stage 4 a flood risk assessment will have to be completed to ascertain the appropriate use of the site, if any.

Map 3.2 Functional Flood Plain

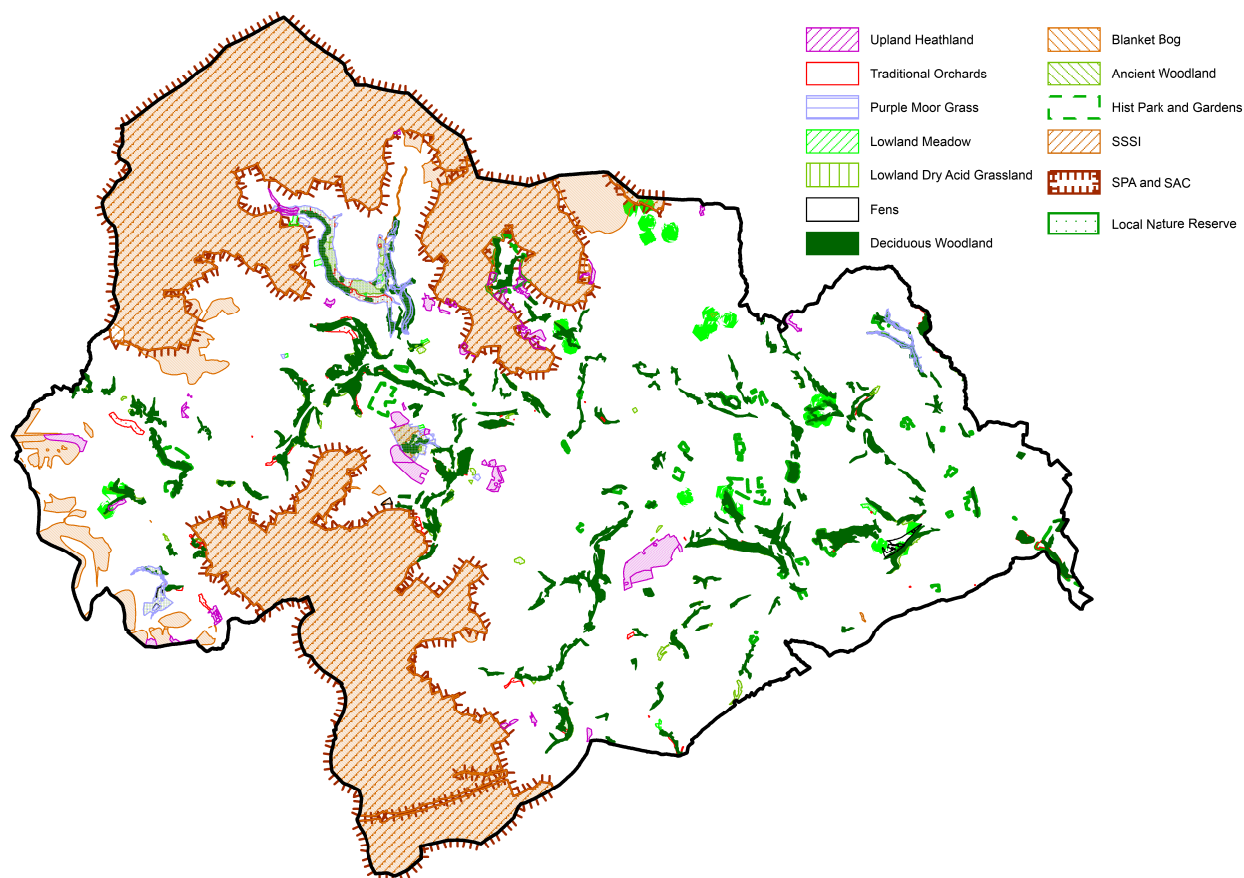


Located within areas of importance

3.18 Areas of local, national and international importance require protection from development. Therefore, sites which fall within these areas will be filtered for protection, unless the allocation of a site will achieve substantial public benefits. The areas which will be protected are:

- Special Protection Areas
- Sites of Special Scientific Interest
- Special Areas of Conservation
- Local Nature Reserves
- Ancient Woodland
- Historic Park and Gardens
- Other Irreplaceable Habitats

Map 3.3 Areas of Importance



Sites under 0.25 hectares

3.19 Sites which are below 0.25 hectares will also be filtered at this stage in terms of allocation. Planning Practice Guidance states that a range of different sized sites will be required to deliver the required scale of development. It suggests that sites should be assessed which could support 5 or more dwellings or economic development sites of 0.25 hectares. Many other local authorities have traditionally used a site size of 0.4 hectares, however due to the important contribution of small sites historically in Calderdale it is believed this threshold is more appropriate. Sites which are below 0.25 hectares and are brownfield sites will be assessed for their potential for Local Development Orders.

Sites with Planning Permission

3.20 Sites which already have planning permission do not need to be allocated in the local plan as there is a presumption that these sites will gain planning permission again if the permissions lapse. Therefore those sites with planning permission will be filtered at this stage.

3.3 Stage 3: Site Performance

- 3.21** Stage 3 will assess the general performance of each site by using a set of factors which have been informed by work on the Local Plan Sustainability Appraisal Scoping Report. The factors are set out in the table below with each of the scoring parameters. The factors are scored on a scale of 1 to 3 where 1 scores poorly and 3 scores best. The scoring parameters are derived from: the Calderdale's Settlement Hierarchy, Department for Transport Manual for Streets, and a review of other local authority methodologies. Each site will be scored against the following factors:

3 . Methodology

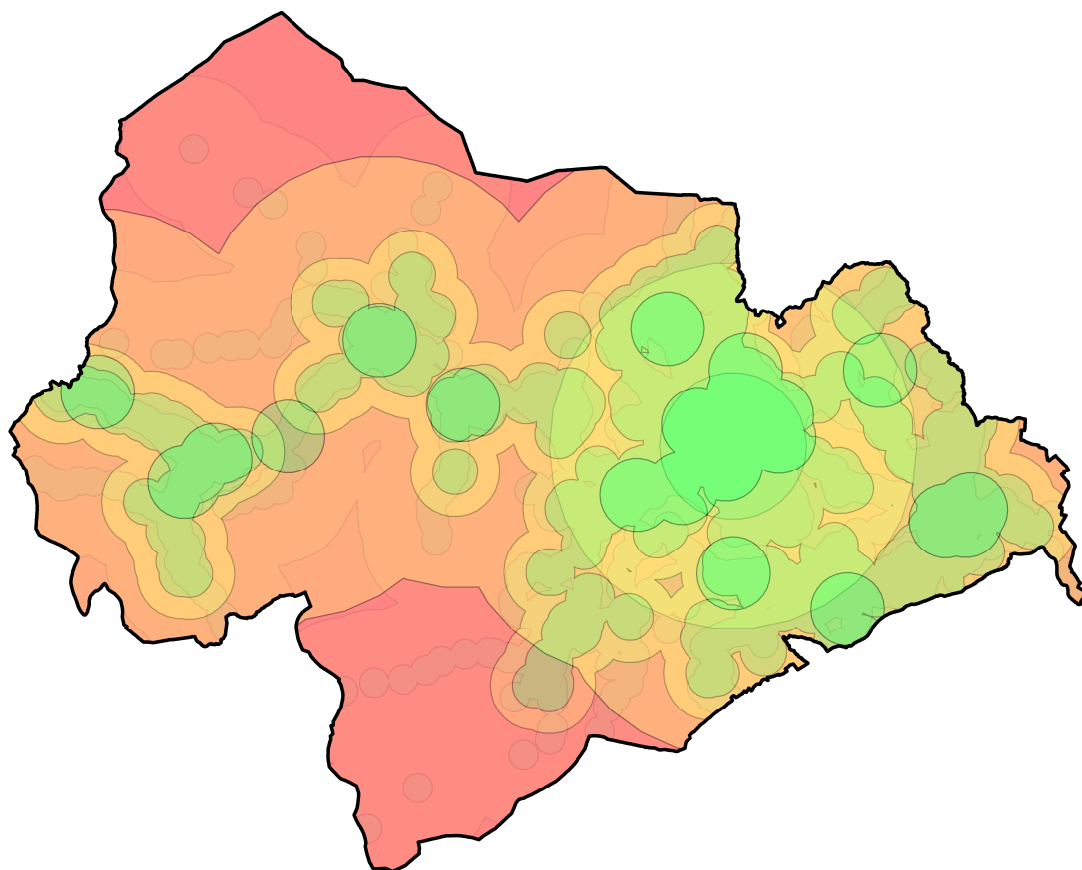
Table 3.1 Factor Scoring

Factors	Score		
	3	2	1
Access to High Speed Broadband	High Speed Broadband	Standard Broadband	None
Distance to Bus Stop	Site <400m	Site between 400m-2km	Site >2km
Distance to Conservation Areas and Archaeological Sites	Site >400m	Site between 100m-400m	Site <100m
Distance to Cultural Facility	Site <2km	Site between 2km-5km	Site >5km
Distance to Cycle Path	Site <2km	Site between 2km-3km	Site >3km
Distance to Further / Higher Education	Site <2km	Site between 2km-5km	Site >5km
Distance to GP	Site <750m	Site between 750m-3km	Site >3km
Distance to Historic Parks and Gardens	Site >400m	Site between 100m-400m	Site <100m
Distance to Listed Building	Site >400m	Site between 100m-400m	Site <100m
Distance to Primary Employment Area	Site <2km	Site between 2km-5km	Site >5km
Distance to Primary School	Site <750m	Site between 750m-3km	Site >3km
Distance to Publicly Accessible Amenity Green Space of at Least 0.1ha	Site <600m	Site between 600m-1200m	Site >1200m
Distance to Publicly Accessible Sports Facility / Pitch	Site <750m	Site between 750m-4km	Site >4km
Distance to Rail Station	Site <750m	Site between 750m-5km	Site >5km
Distance to Recycling Facilities	Site <1km	Site between 1km-5km	Site >5km
Distance to Road Network	Site <100m	Site between 100m-500m	Site >500m
Distance to Schedule Ancient Monument	Site >400m	Site between 100m-400m	Site <100m
Distance to Secondary School	Site <750m	Site between 750m-5km	Site >5km
Distance to Shops Selling Day to Day Goods	Site <750m	Site between 800m-2km	Site >2km
Distance to Town Centre	Site <750m	Site between 800m-2km	Site >2km
Efficient Use of Land	Brownfield site	Partial Brownfield site	Greenfield site

Impact on Locally Protected Sites (Local Nature Reserve, Local Wildlife Site, or area of Biodiversity Action Plan Priority Habitat, Local Geodiversity Site)	Site >800m	Site between 400m-800m	Site <400m
Impact on Nationally and Internationally Protected Sites (SSSI, SAC, SPA)	Site >800m	Site between 400m-800m	Site <400m
Is the Site Outside of Agricultural Land Classification (ALC) areas, 1, 2 or 3	Lies within Grade 4 and 5	Lies within Grade 3	Lies within Grades 1 and 2
Loss of Common Land	No	Partial	Yes
Loss of Public Open Space	No	Partial	Yes
Within a Flood Risk Zone	Site is within Flood Risk Zone 1 and lower	Site is within Flood Risk Zone 2 and 3a	Site is within Flood Risk Zone 3b
Within a Working Mineral Site	No	Partial	Yes
Within Mineral Area of Search	No	Partial	Yes

3.22 A map showing each of the above factors and the parameter scores can be found in the appendix. The Council have decided to use 'as the crow flies' for the parameter distances as the idea of Stage 3 is to give an indication of the general performance of each site. Using exact measurements along paths and roads would not affect the general ranking of the sites. Other local authorities have also used 'as the crow flies' to assess sites, and a number of the sources where we have found the parameters used, use the same method. The map below demonstrates how this method works using a few of the factors, where the bright green are the most preferred locations:

Map 3.4 Factor Example



3.23 As well as scoring the sites against each of the above factors, the council needs to be able to decide which of these factors are most and least important. A tried and tested method of this is 'Pairwise Comparison' which generally refers to any process of comparing entities in pairs to judge which of each is more important. The method of pairwise comparison is used in the study of preferences. The weighting will be consulted on with the working group as they have the knowledge and the experience to be able to judge impartially which pair is more important and then a wider consultation including the public will be undertaken at the draft Plan stage. By comparing each of the factors the weighting (importance) of each factor can be derived. The weight is then multiplied by the parameter scores in order to rank the sites.

3.24 The aim of this stage is to identify those sites which perform the best and those which perform poorly.

3.4 Stage 4: Qualitative Assessment

3.25 Stage 4 is the qualitative assessment of the sites which will assess whether the sites are suitable, available and deliverable and conforms to the local plan strategic policies and evidence base. The assessment consists of 4 steps:

- An assessment of the results from Stage 3
- A desktop appraisal and site visit
- Consultation on sites with working group
- Conformity to strategic policy and evidence base

An assessment of the results from Stage 3

3.26 First, the performance of all sites from Stage 3 will be reviewed. We will rank the sites from the best performing to the worst performing (e.g. 1 of 300 is the best, 300 of 300 is the worst). Depending on the outcomes of the performance will deem whether the worst performing sites should be filtered. The performance of the sites will also determine which sites should be considered first for allocation as these will be in the most suitable locations. The performance factors play a useful role later on in the process where if a site is deemed as deliverable and available but scores poorly on a number of other factors, it will highlight the potential remedial requirements for the future development of the site.

Desktop appraisal

3.27 Planning Officers will then undertake a desktop assessment to assess a number of elements including:

- Availability - allocations have to be likely to come forward over the plan period. Therefore, site owners need to be identified and contacted to find out whether the site is available now and what their plans are for the site. Some of this information will be gathered through the 'Call for Sites' submission form but the Council will also have to make contact with the owners.
- Planning histories - these will provide evidence of previous planning approvals and refusals and the reasons for these decisions. Refusals will highlight the unsuitability of certain uses.

Site visit

3.28 Planning Officers will follow the desktop appraisal by a site visit which will include:

- Existing land use - the existing land use needs to be verified to check the site use is what it has been submitted as, and as to whether it is greenfield or brownfield.
- Adjacent land use - areas adjacent to the proposed site will be identified to make sure the uses are compatible and to ensure there are no significant impacts from 'bad neighbours' on the submitted or adjacent sites.

- Site characteristics and constraints - these need to be identified to establish whether constraints of the sites will render the site undevelopable. For example, unsuitable topography, contamination, public right of ways etc.
- Site boundary - the appropriateness of the site boundary needs to be considered as to whether it is logical. If it is not then there may need to be further site rationalisation.

Consultation on sites with the working group

3.29 A working group will be used to give advice on sites with respect to specialist areas including:

- Highways and Engineering
- Ecology
- Heritage
- Business and Economy
- Housing

3.30 They will be able to advise on potential implications to conservation areas, listed buildings and heritage assets; the impact on the road network and whether sites have good accessibility; whether there is flood risk and a Flood Risk Assessment needs to be undertaken; they can advise on sites which should be retained for employment and housing or released and they can make aware of potential effects to the natural environment.

Conformity to strategic policy and evidence base

3.31 The site allocations proposals will be shaped by strategic policy and evidence base, including the Strategic Housing Market Assessment (SHMA), Employment Land Review (ELR) and the Green Belt Review (GBR). The SHMA and ELR sets out housing and economic need and demand, where the settlement hierarchy will inform the spatial distribution required across the borough. The GBR will determine whether there is land which does not meet the requirements of Green Belt policy as set out in the NPPF and therefore has the potential for release.

3.32 The sites will then be assessed against the Sustainability Appraisal which considers all the likely significant effects on the environment, economic and social factors of sustainable development and whether the site allocations meet the strategic policies of the plan.

Proposed Use

3.33 A proposed recommendation for the sites allocation will be made by Planning Officers and submitted for consultation in the Autumn 2015 as part of the draft Calderdale Local Plan.

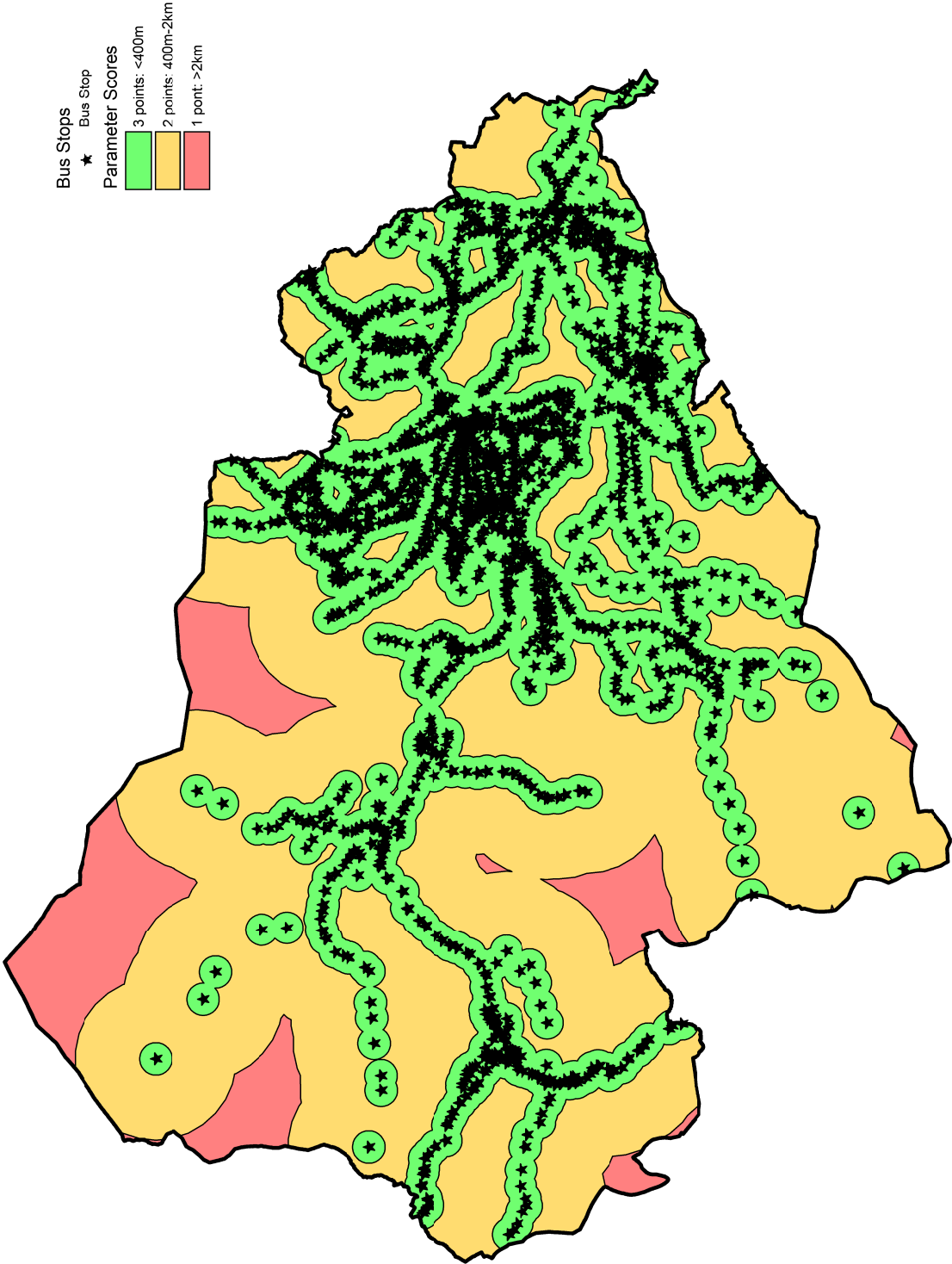
4 Next Steps

- 4.1** Once the sites have been consulted on in Autumn 2015 the results and comments will be taken into account when deciding which sites should be allocated. There may be a requirement to reassess some of the sites and assess new sites which have been submitted as part of the Autumn consultation.
- 4.2** The Council will then undertake a viability assessment of sites in order to highlight those sites where constraints render them unviable. Only sites which are viable and therefore achievable will be allocated within the Local Plan.
- 4.3** The Local Plan including the site allocations will then go before Council for Approval of Publication. If the Council approve the plan then there will be a Publication Plan consultation which will give communities, stake-holders and other interested persons a final opportunity to make comments on the plan.
- 4.4** For more information on the Site Allocations Assessment Methodology please contact the Spatial Planning Team:
- Email: spatial.planning@calderdale.gov.uk
 - Telephone: 01422 392206

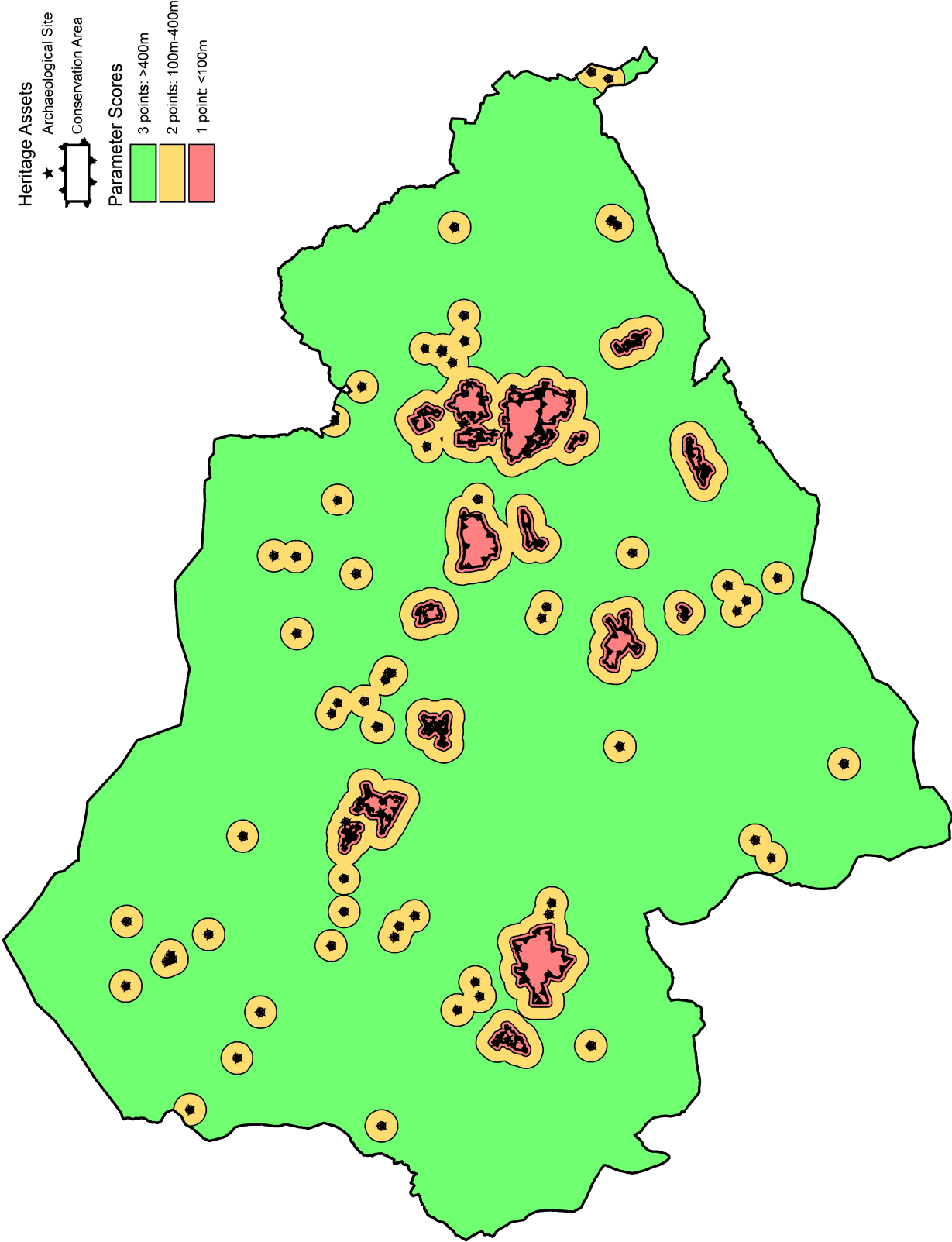
5 Appendix

Access to High Speed Broadband - Awaiting finalised data

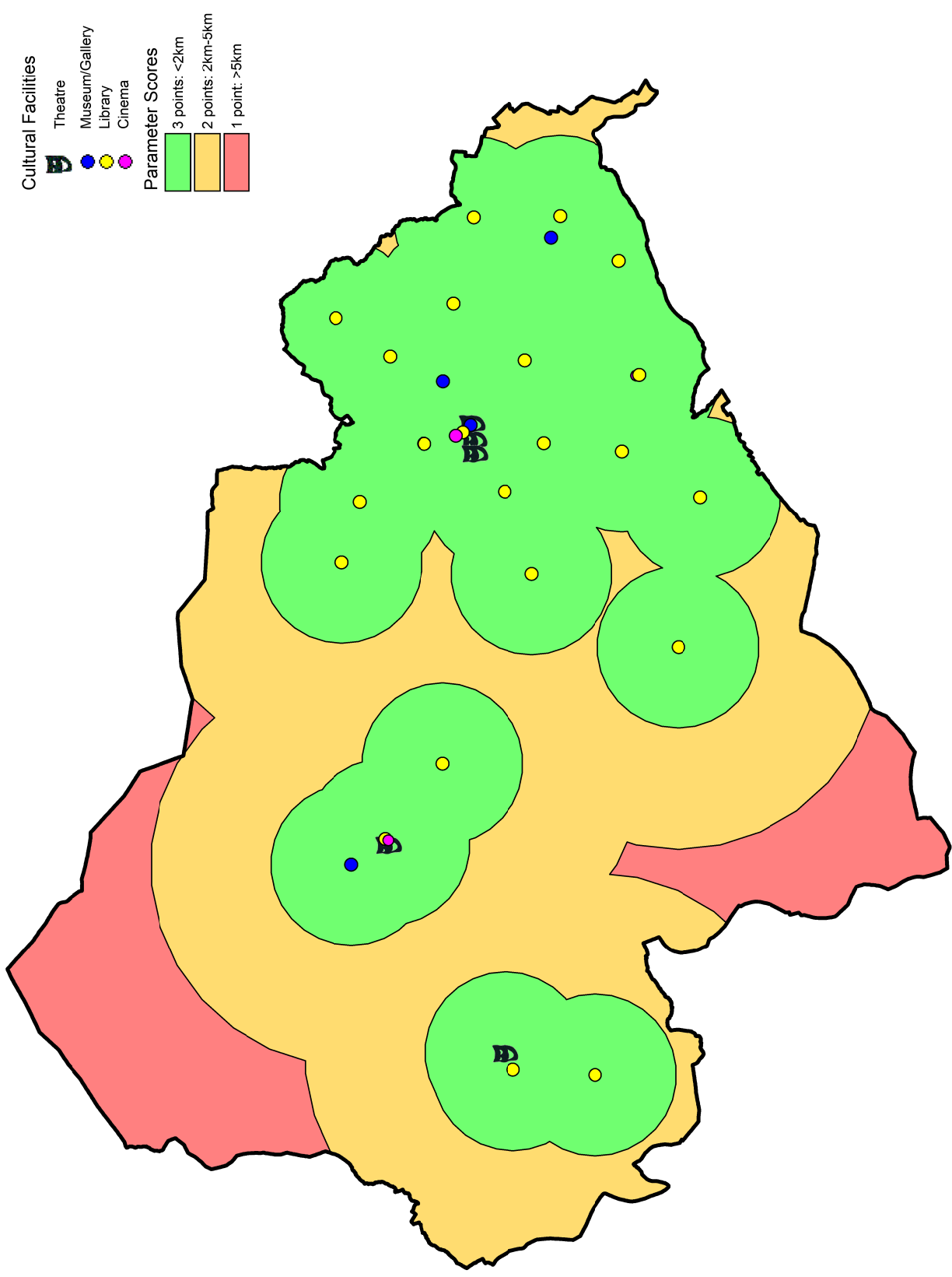
Map 5.1 Distance to Bus Stops



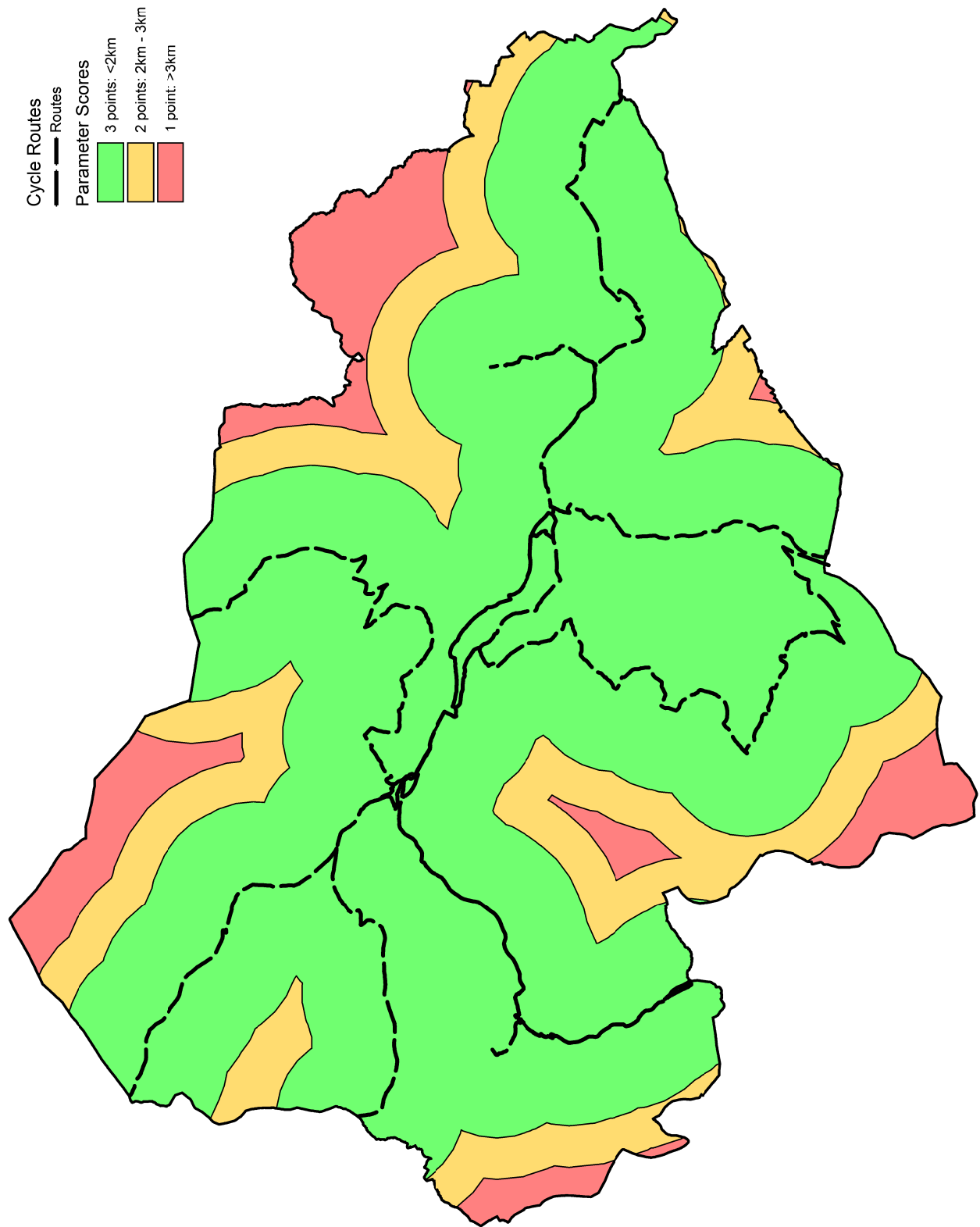
Map 5.2 Distance to Conservation Areas and Archaeological Sites



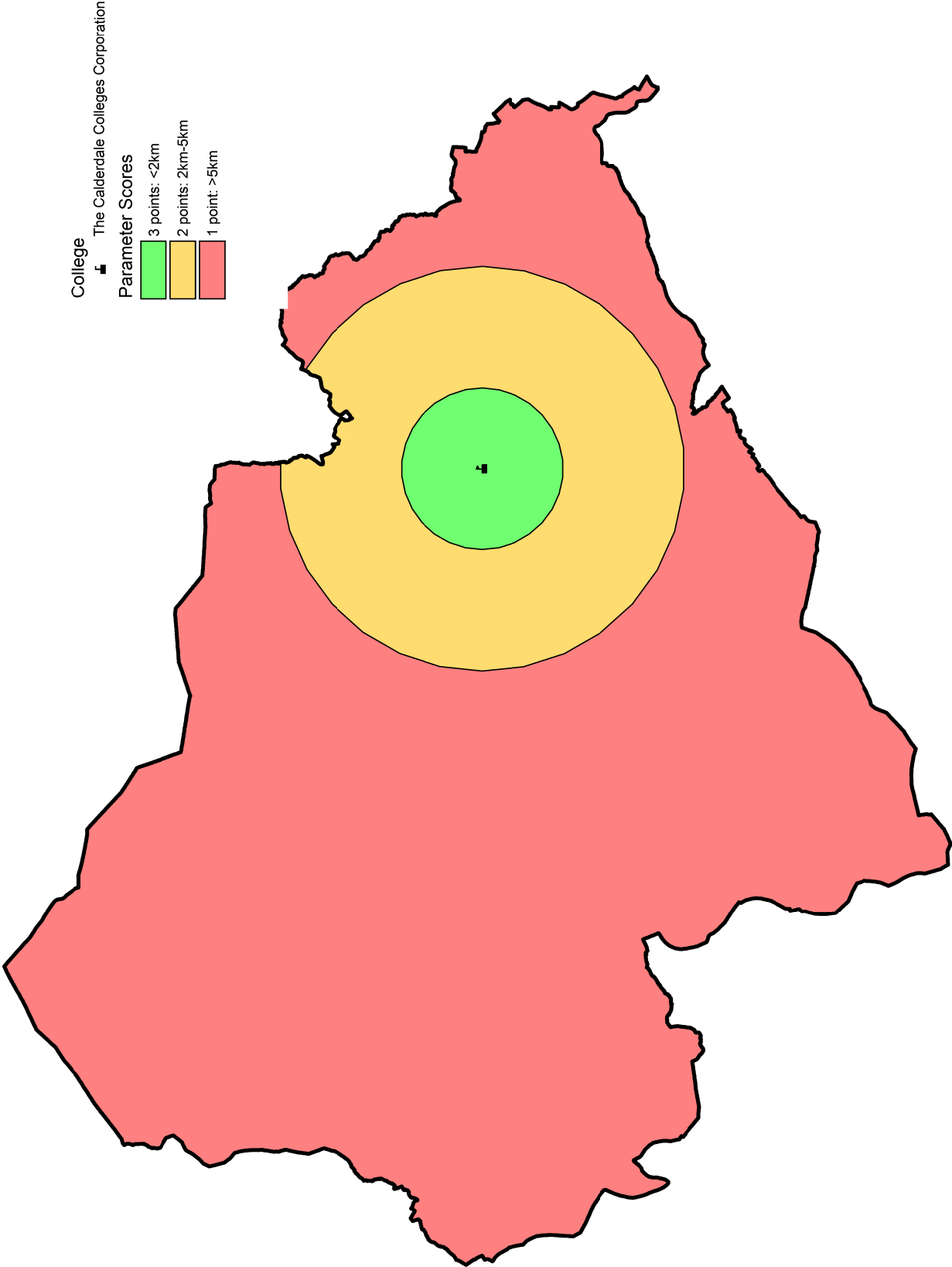
Map 5.3 Distance to Cultural Facility



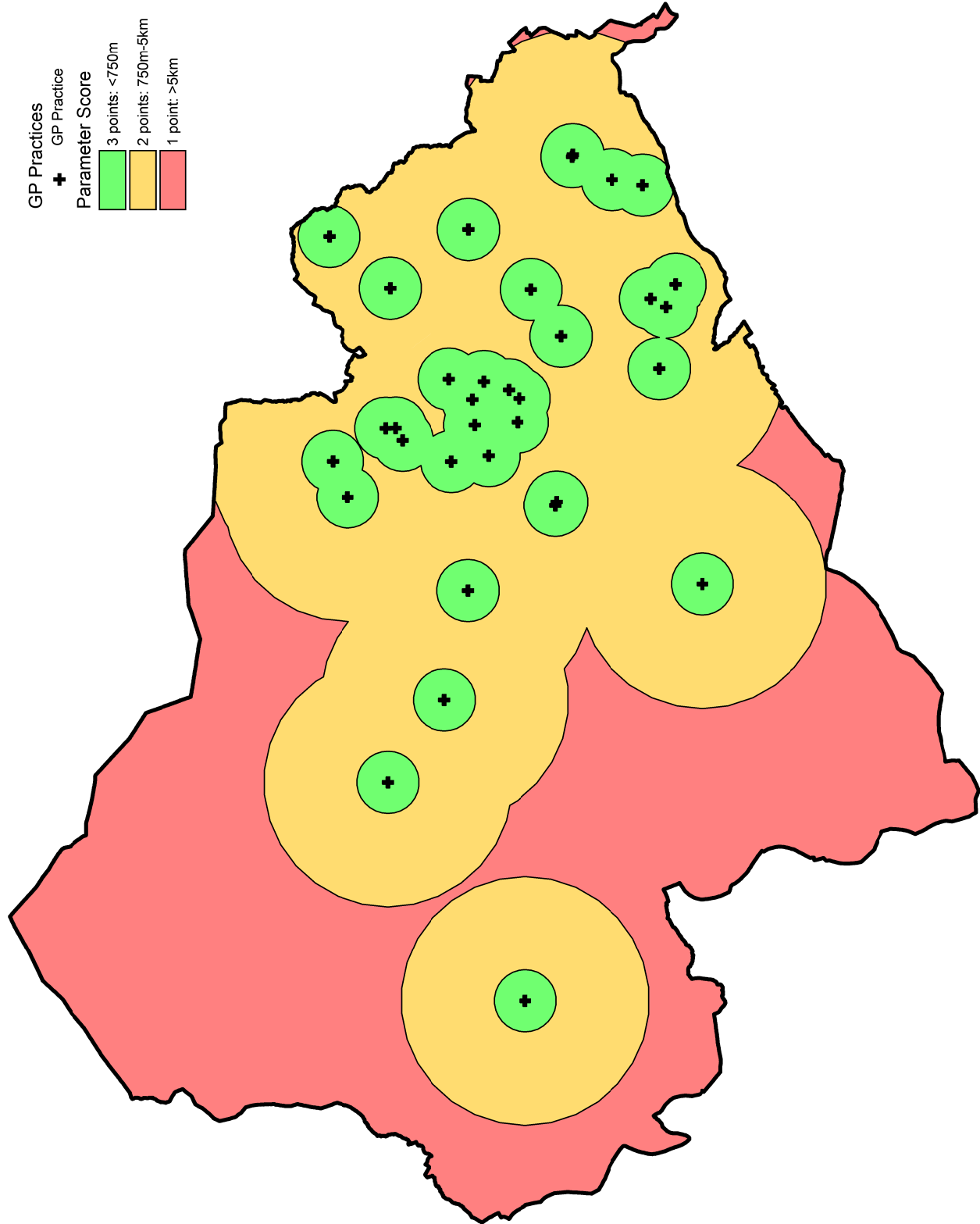
Map 5.4 Distance to Cycle Paths



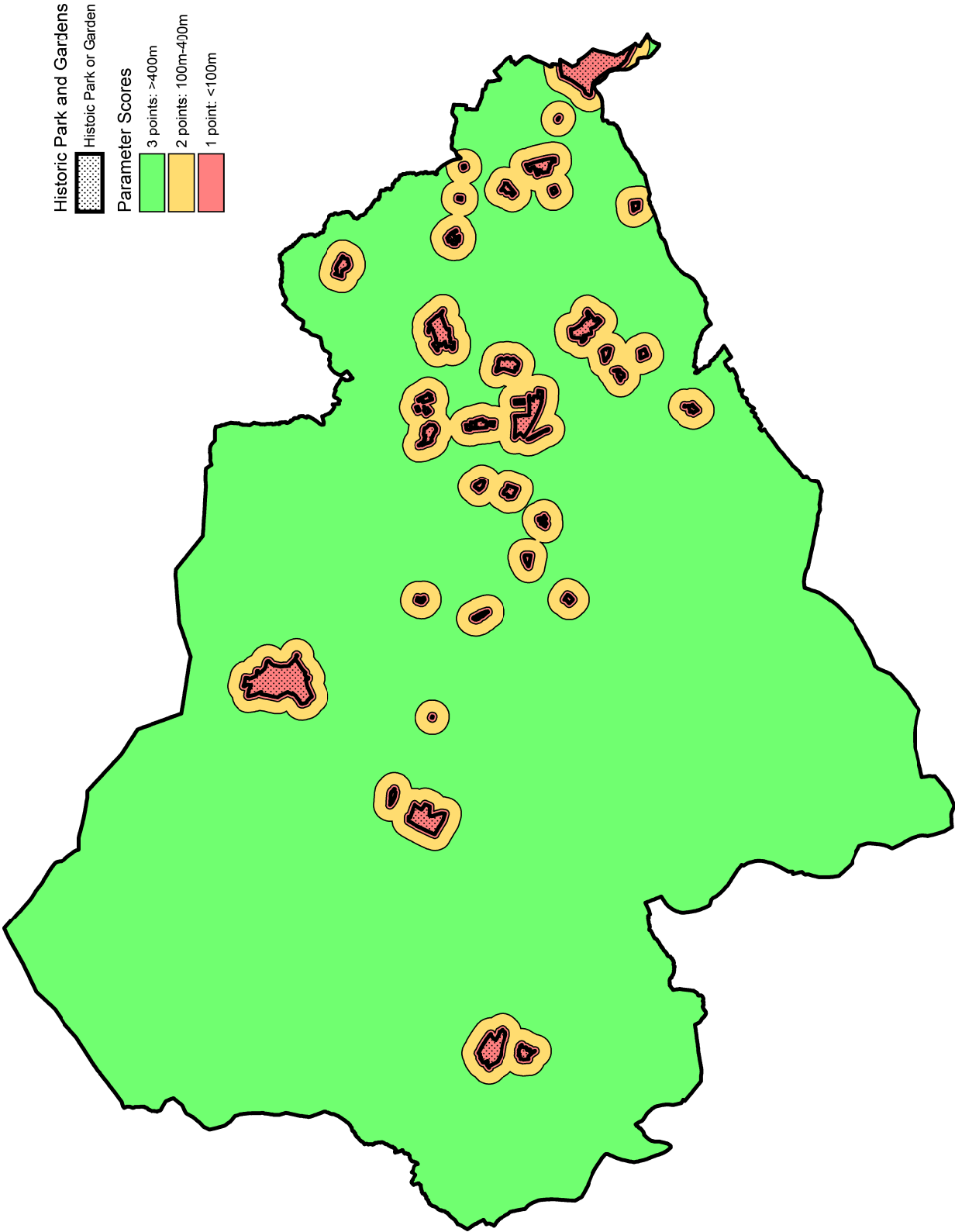
Map 5.5 Distance to Further / Higher Education



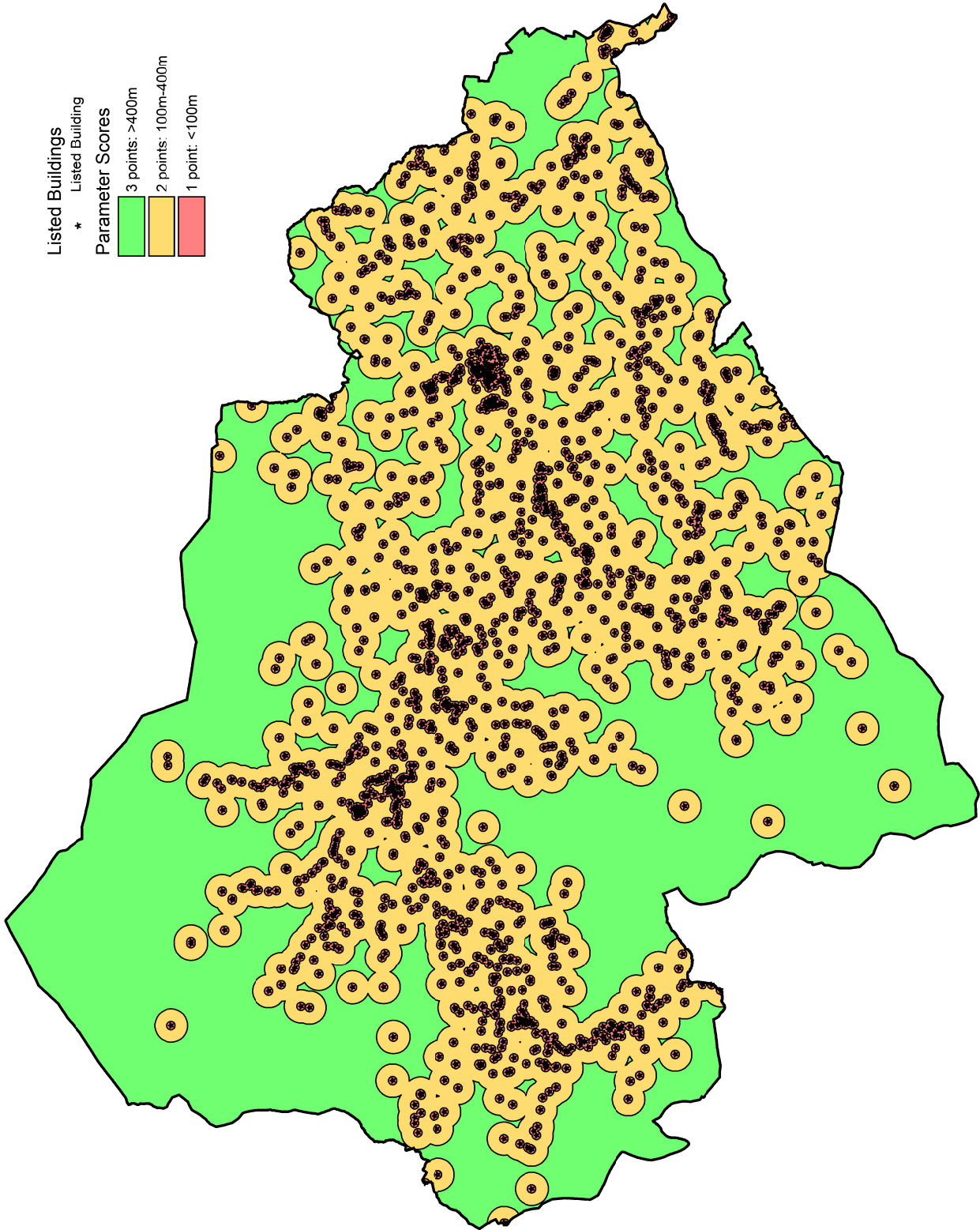
Map 5.6 Distance to GP



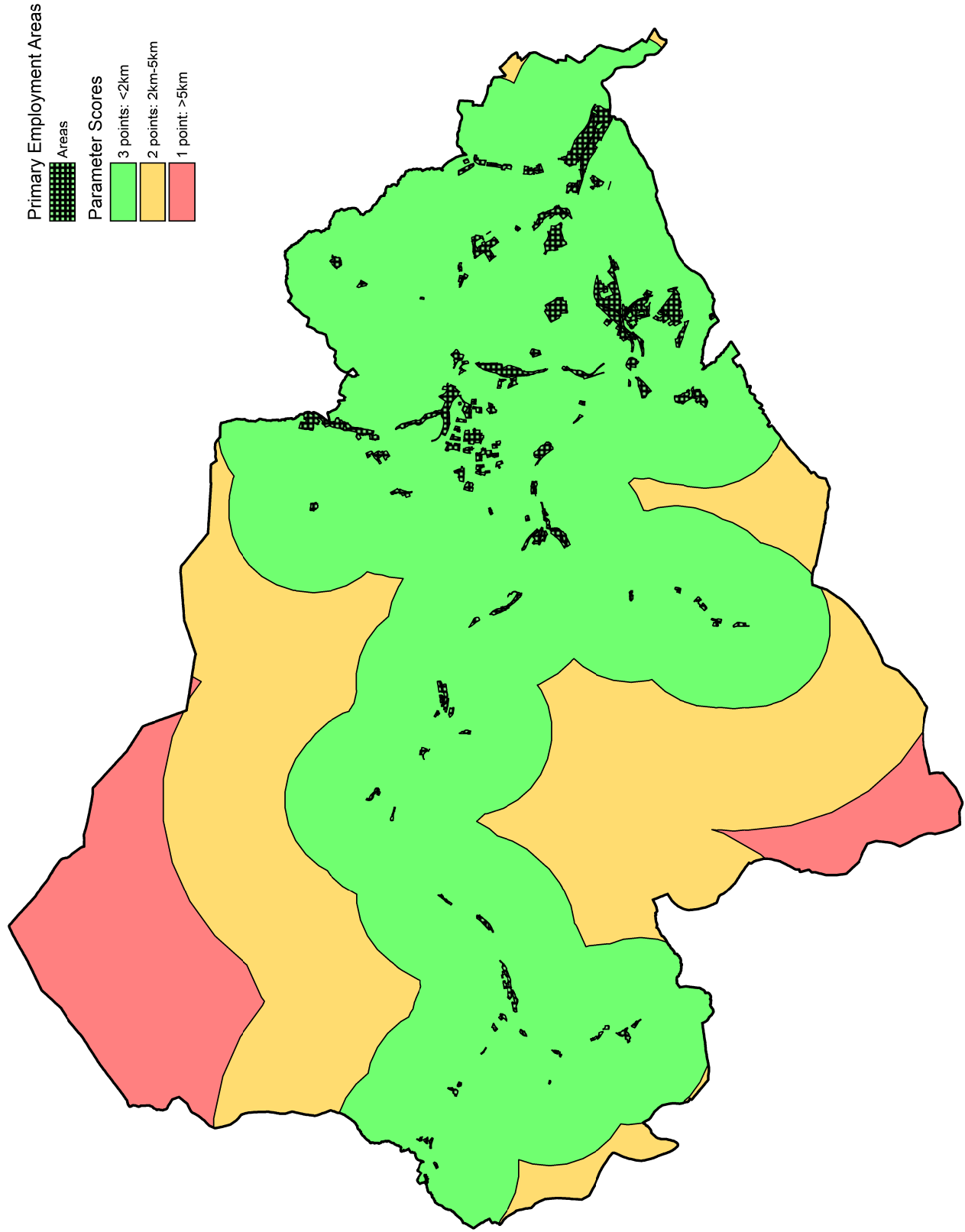
Map 5.7 Distance to Historic Park and Gardens



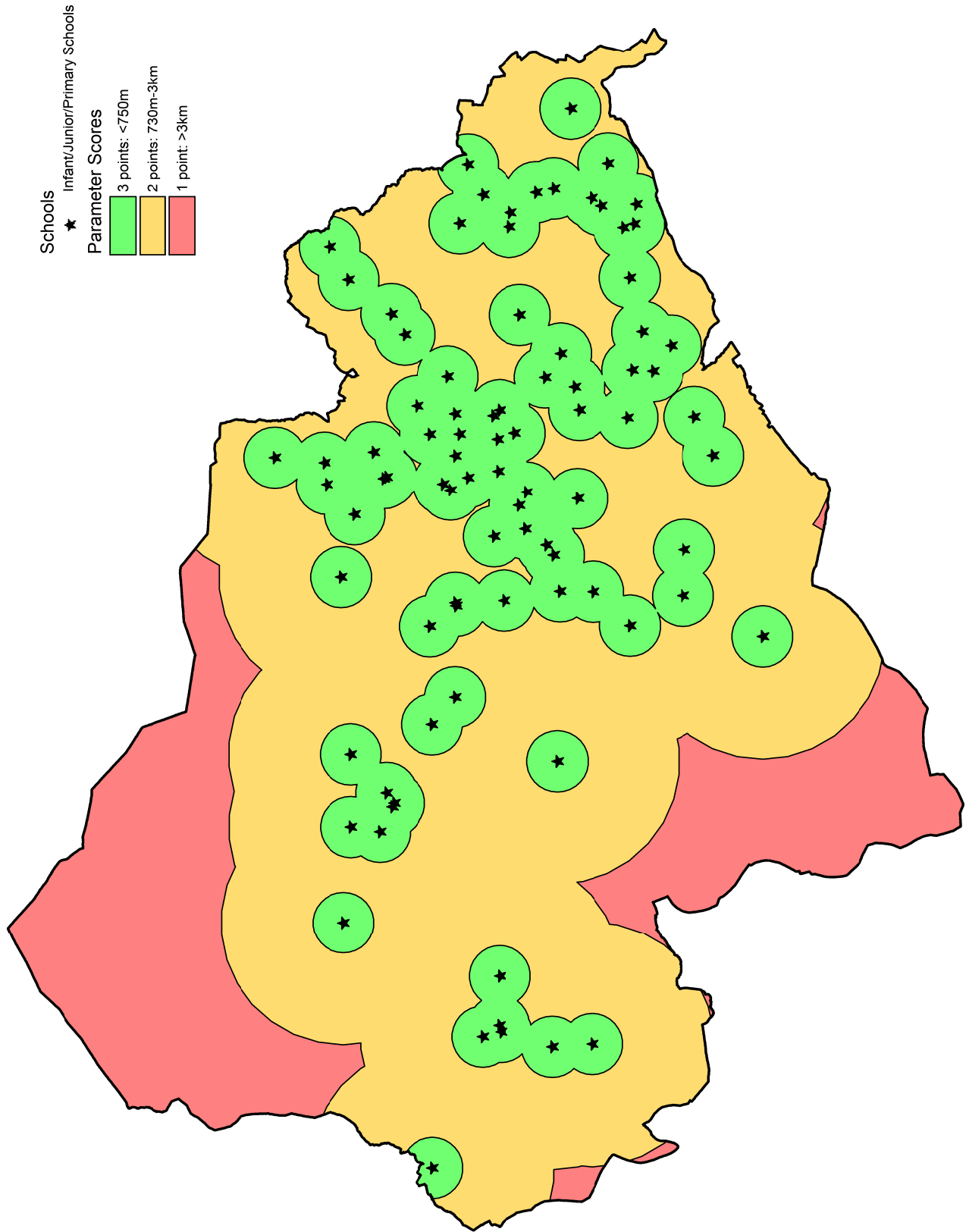
Map 5.8 Distance to Listed Buildings



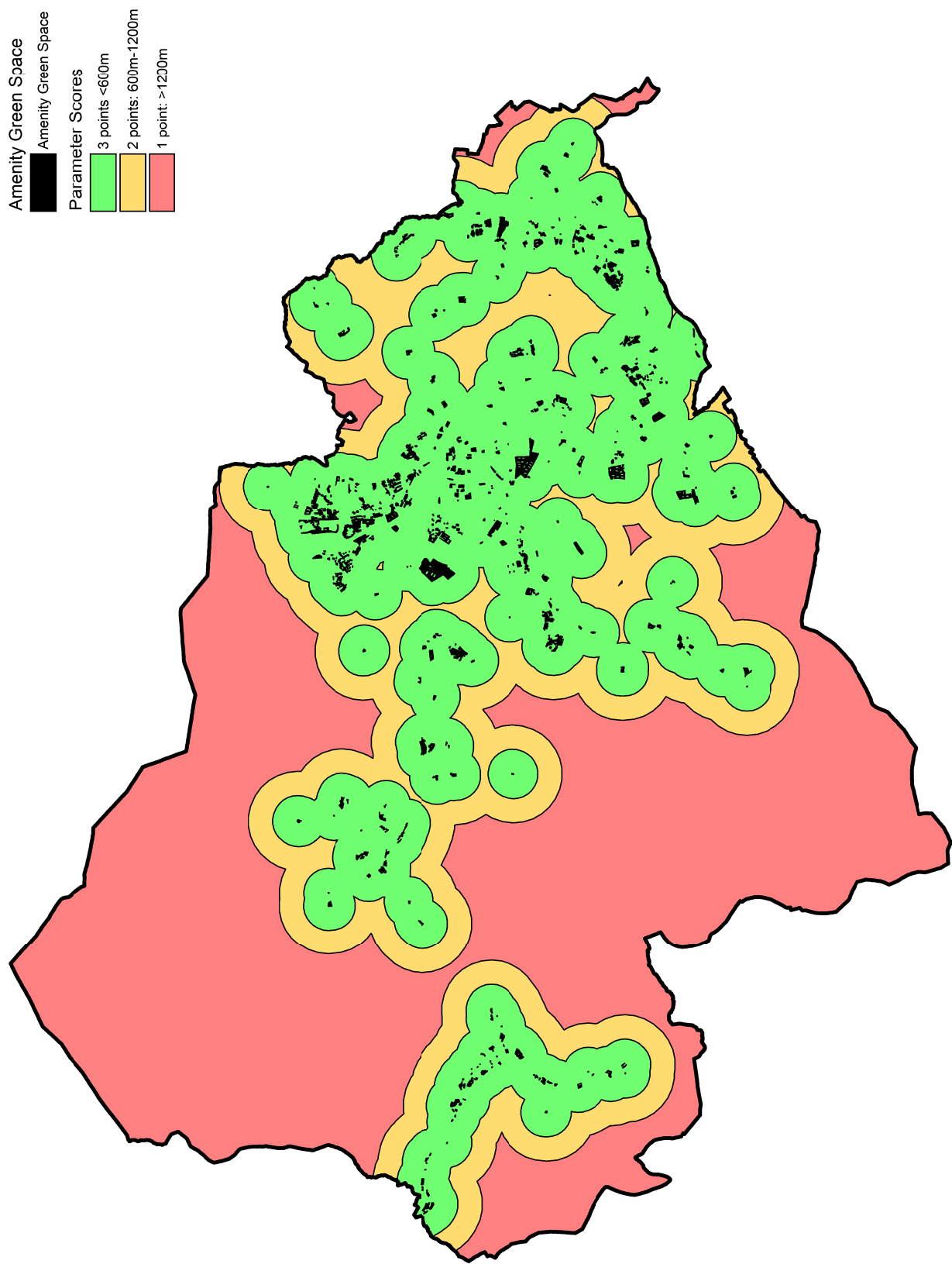
Map 5.9 Access to Primary Employment Areas



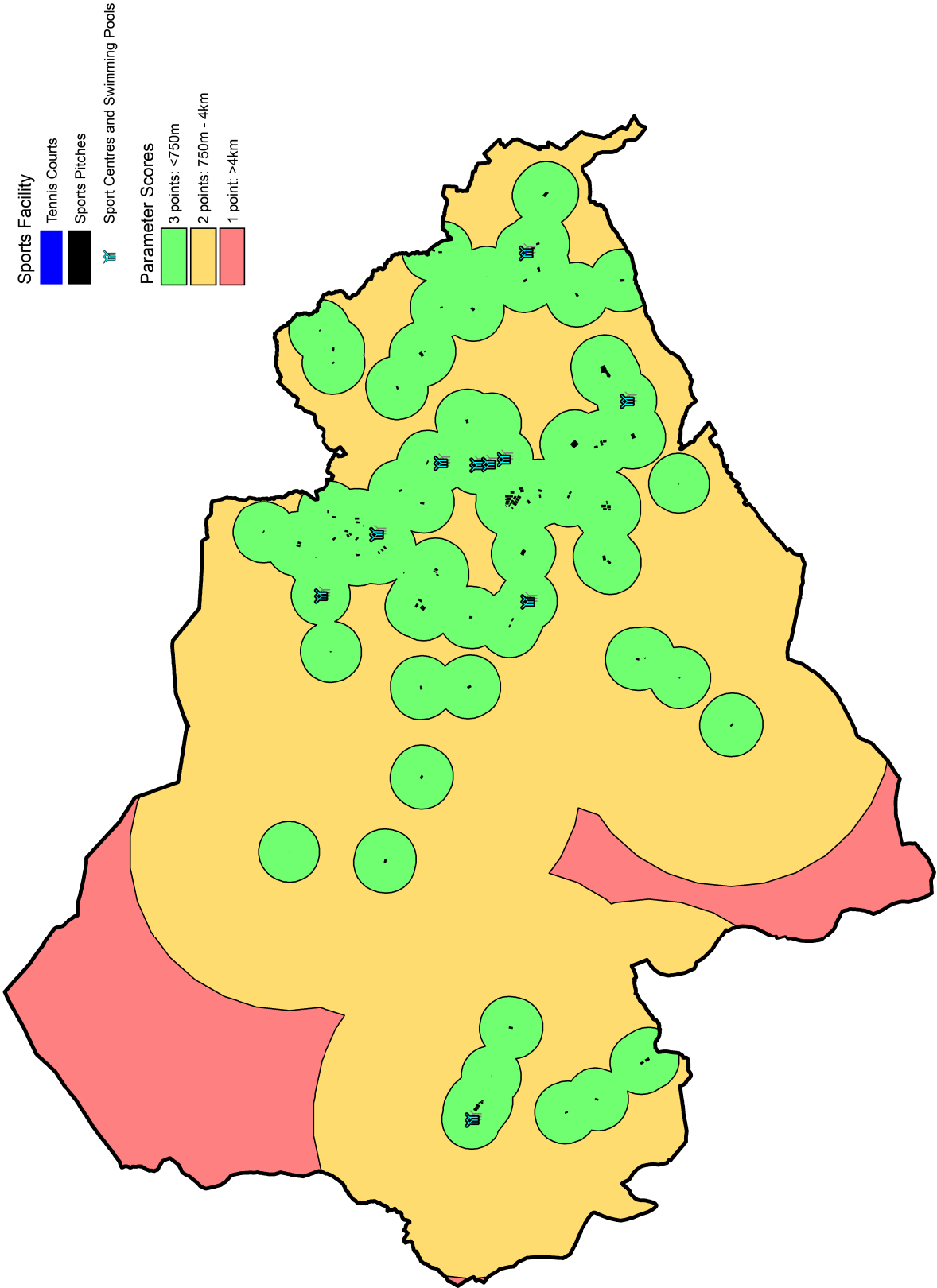
Map 5.10 Distance to Primary School



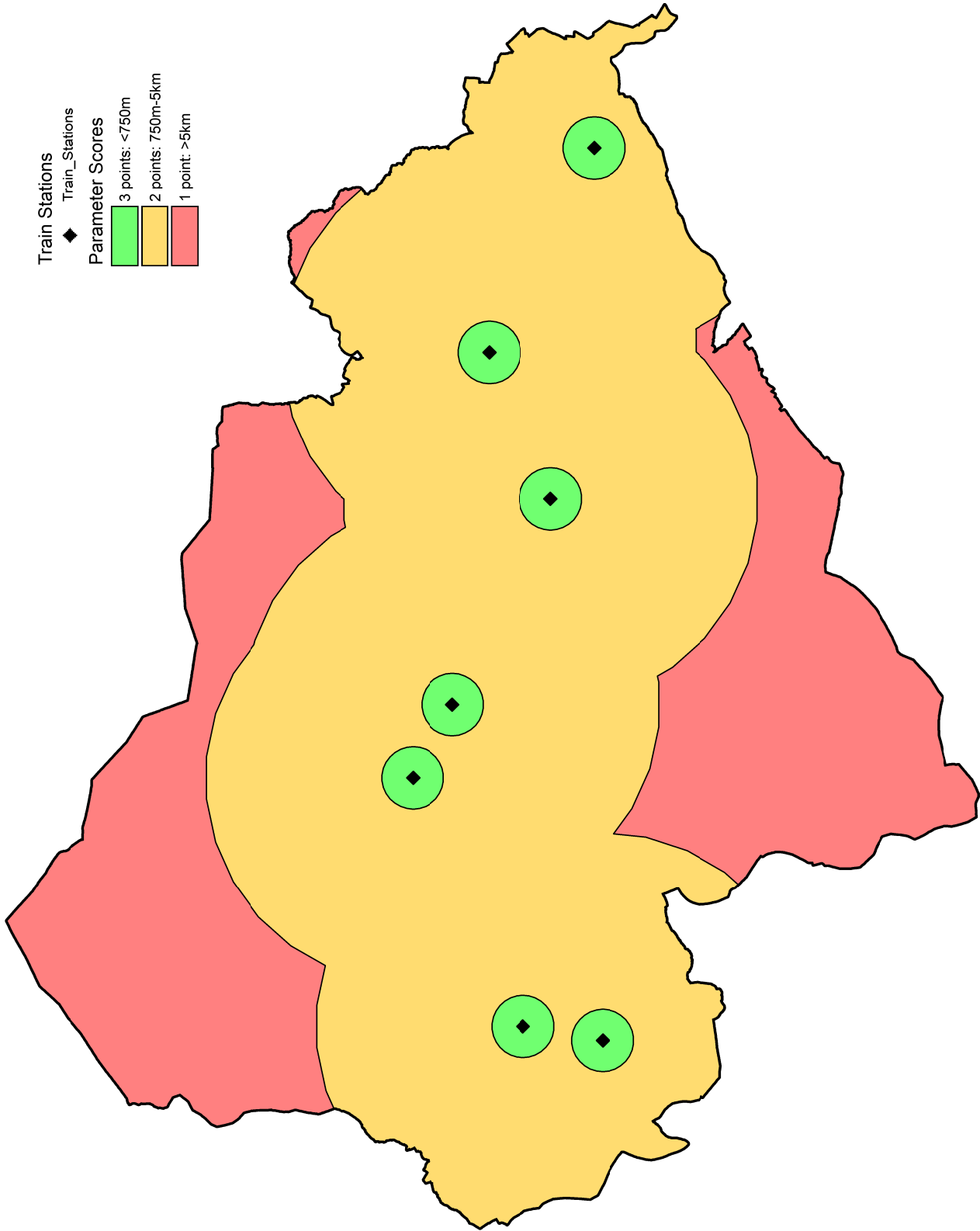
Map 5.11 Distance to Publicly Accessible Amenity Green Space



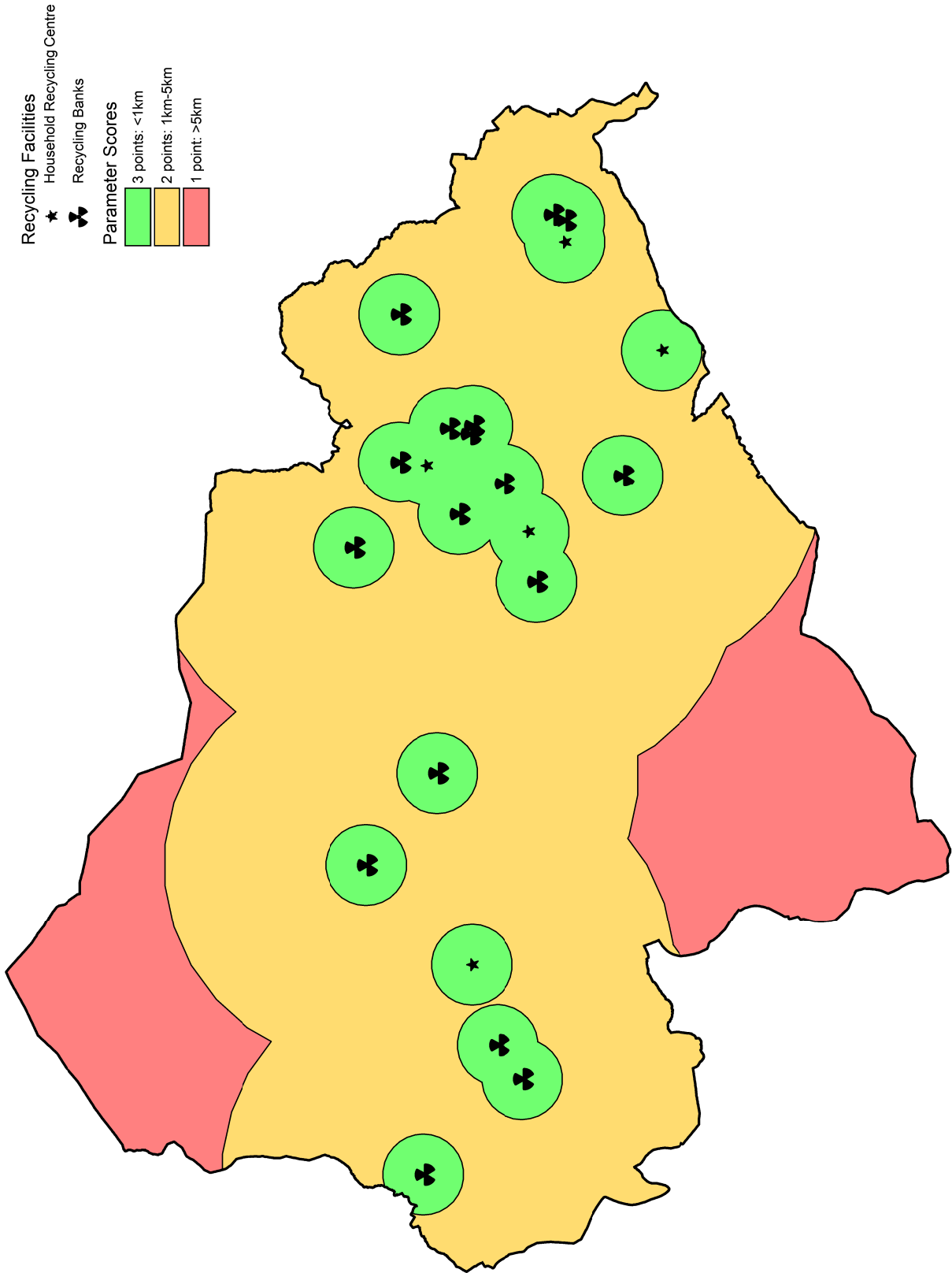
Map 5.12 Distance to Sports Facilities



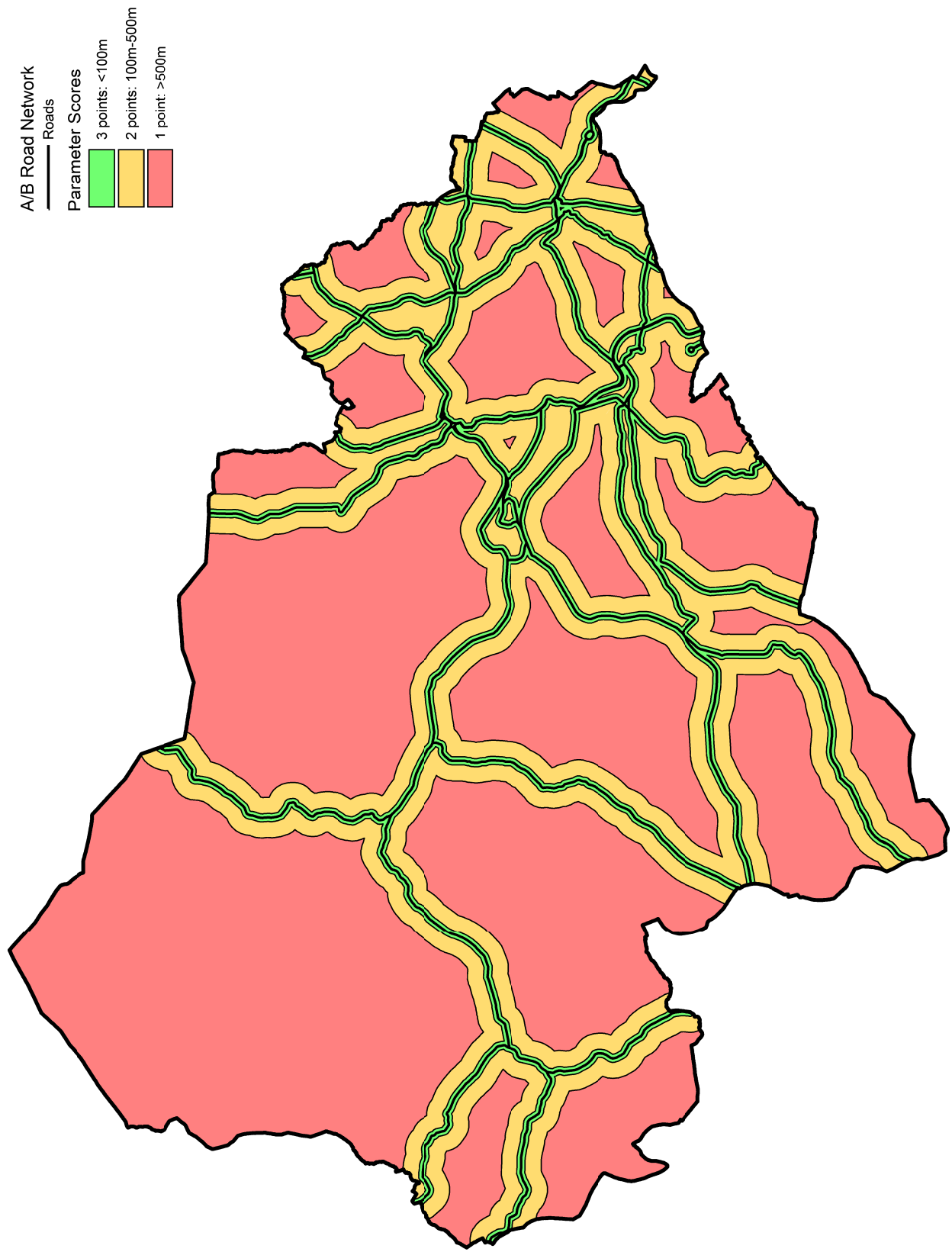
Map 5.13 Distance to Train Stations



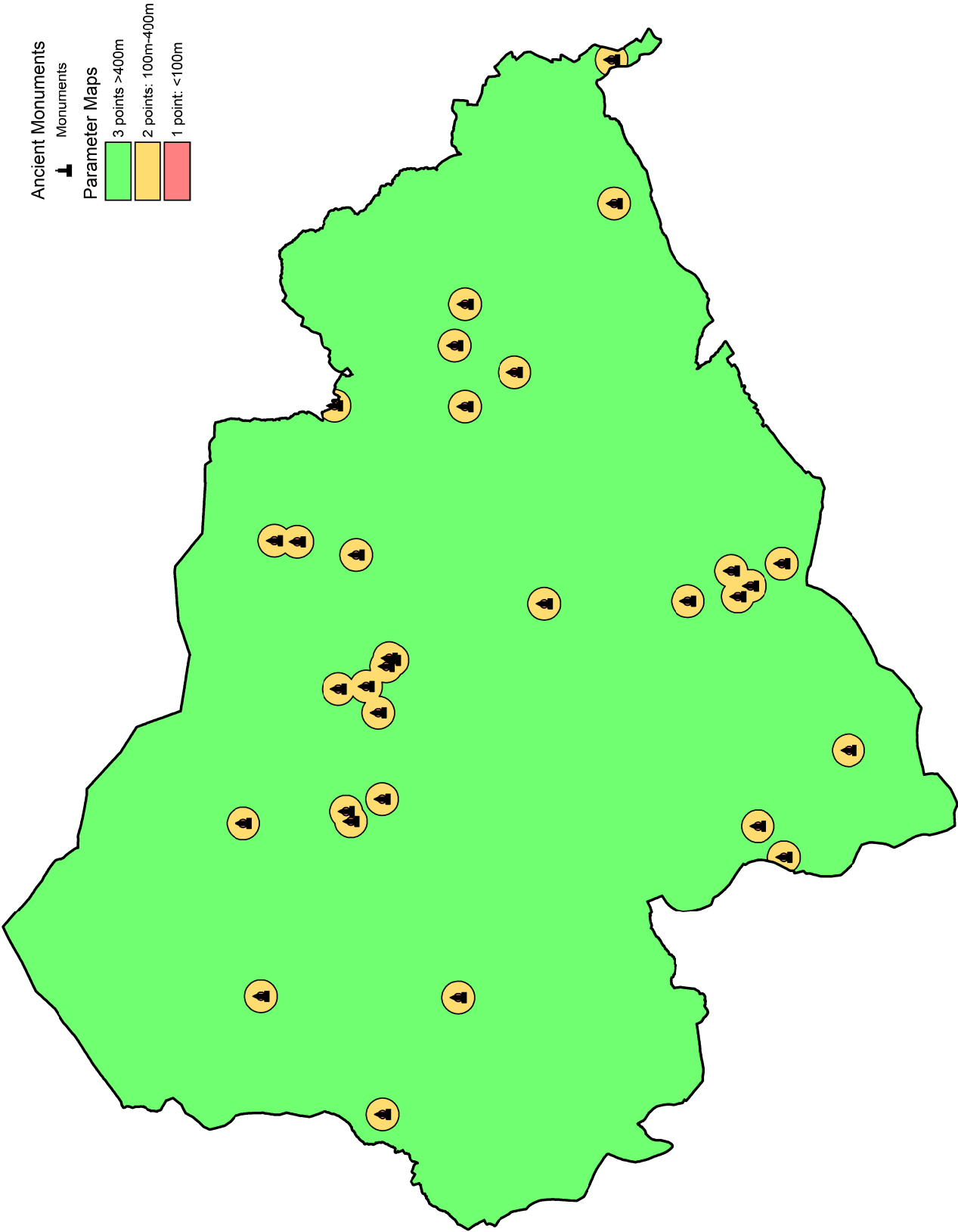
Map 5.14 Distance to Recycling Facilities



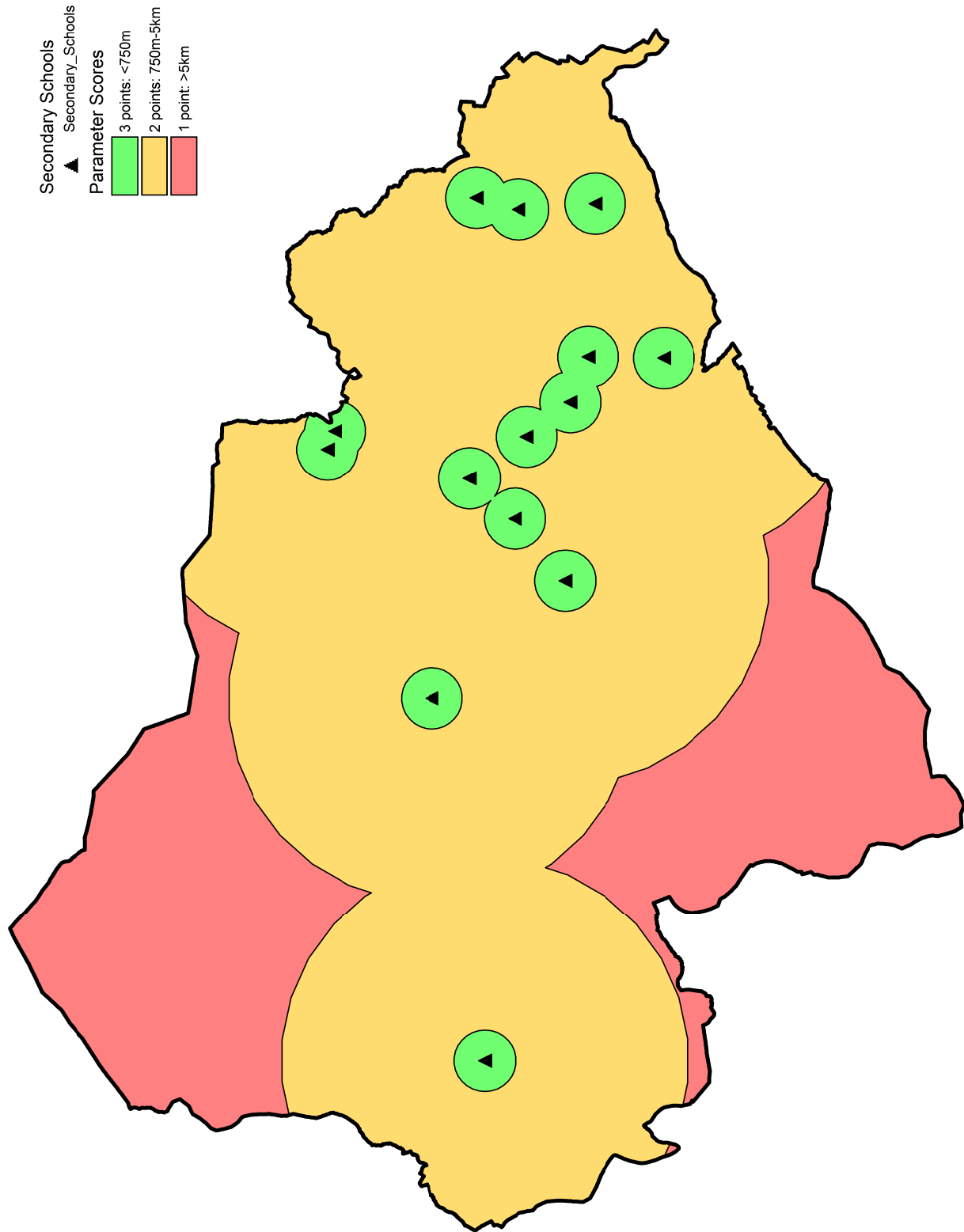
Map 5.15 Distance to Road Network



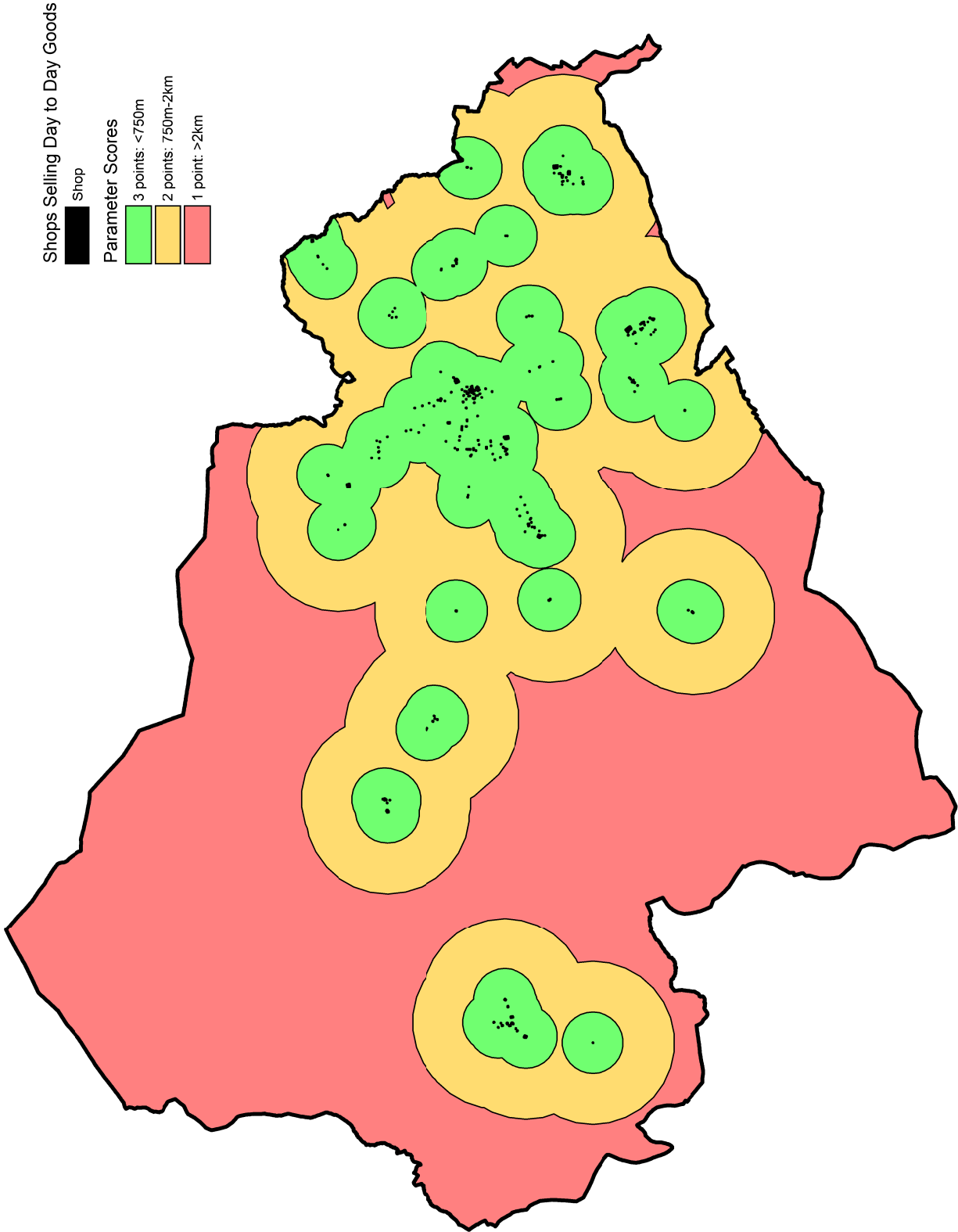
Map 5.16 Distance to Schedule Ancient Monuments



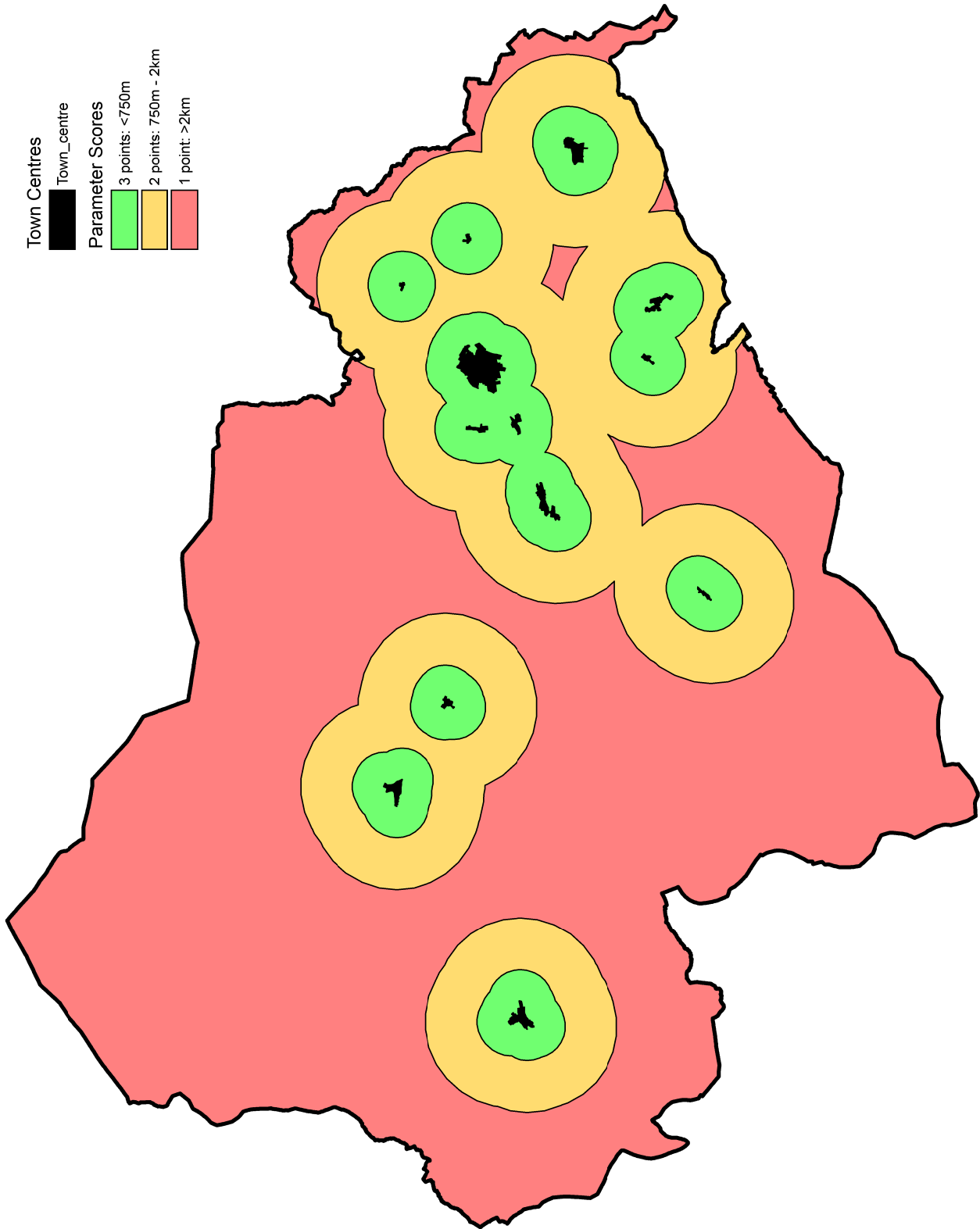
Map 5.17 Distance to Secondary School



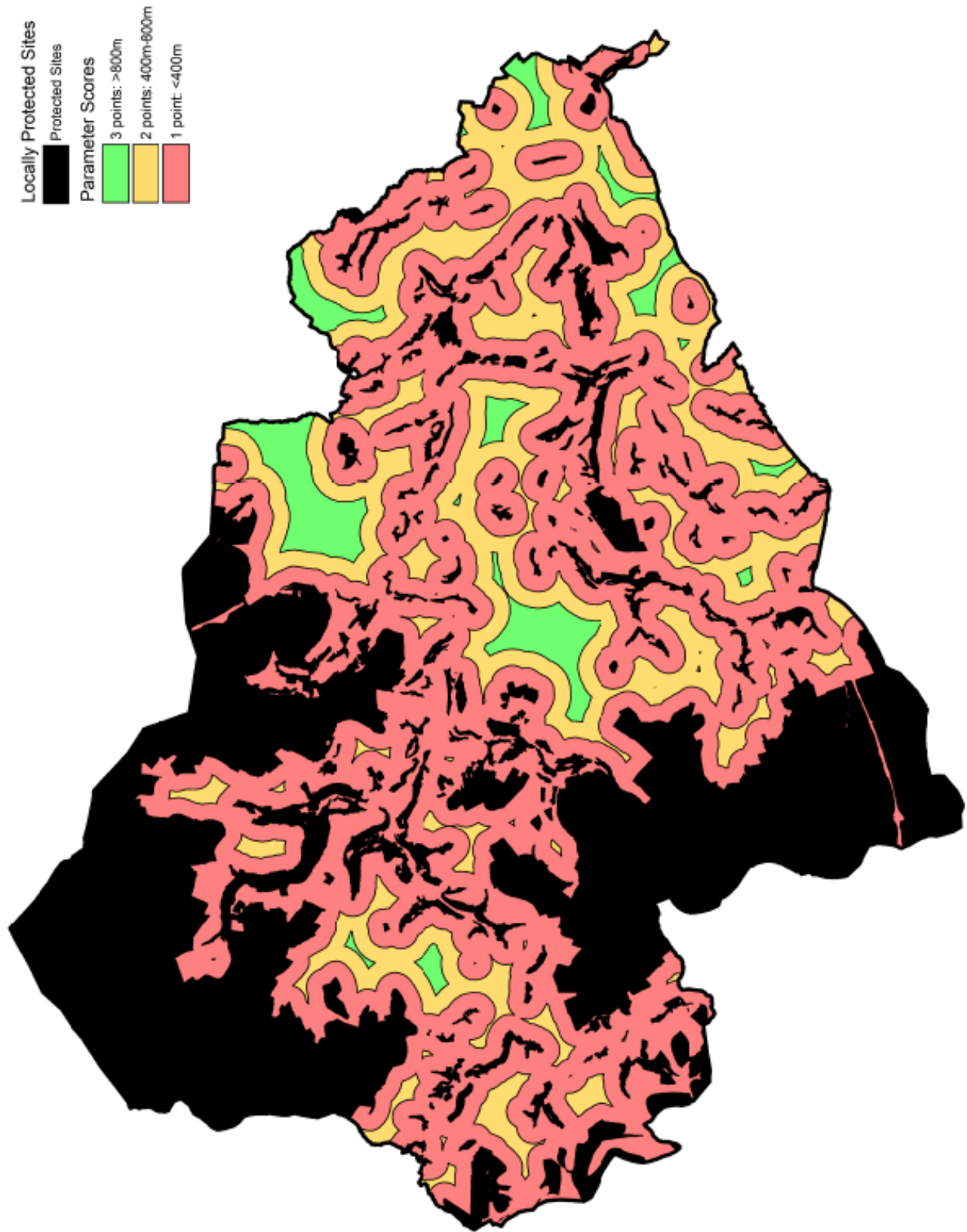
Map 5.18 Distance to Shops Selling Day to Day Goods



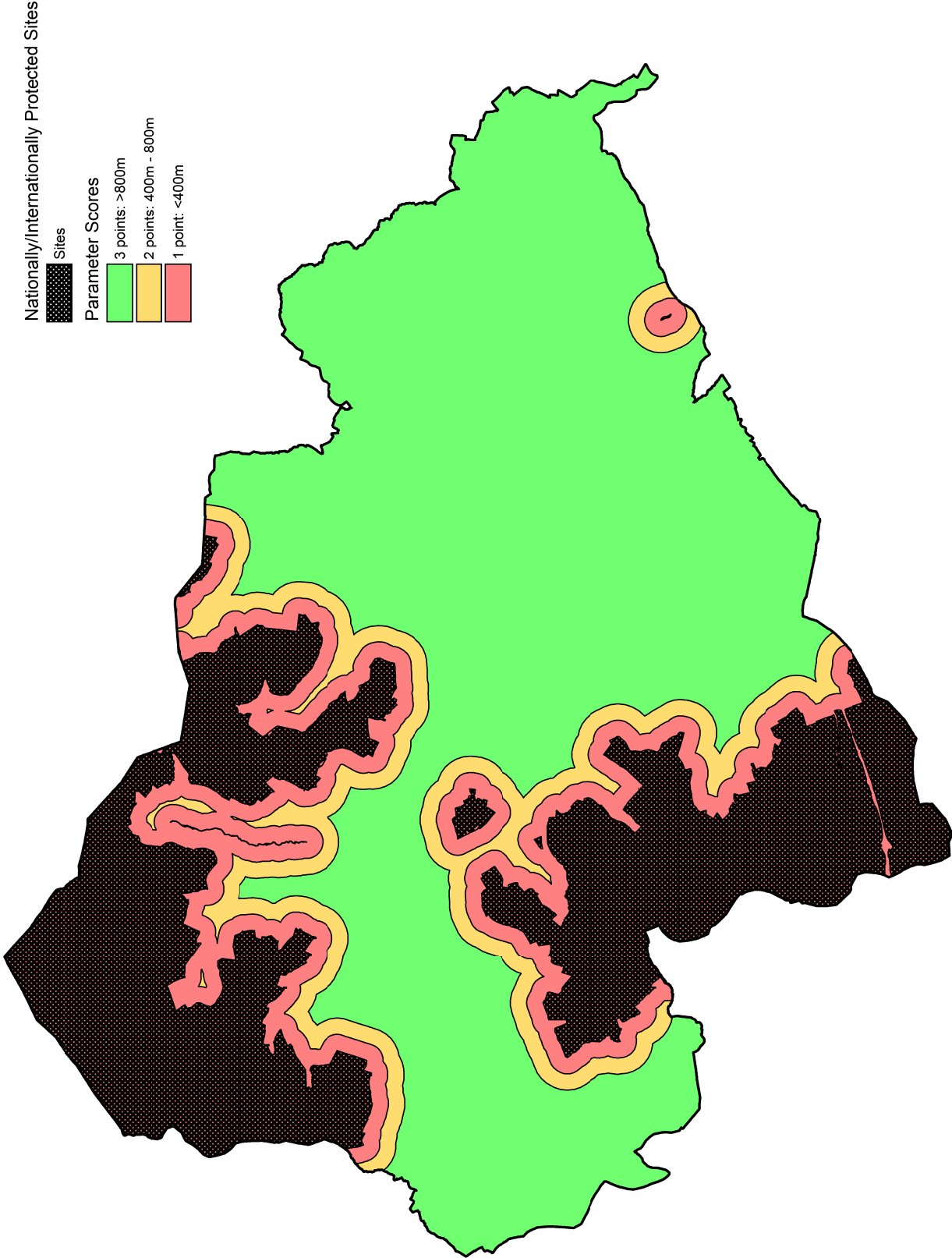
Map 5.19 Distance to Town Centre



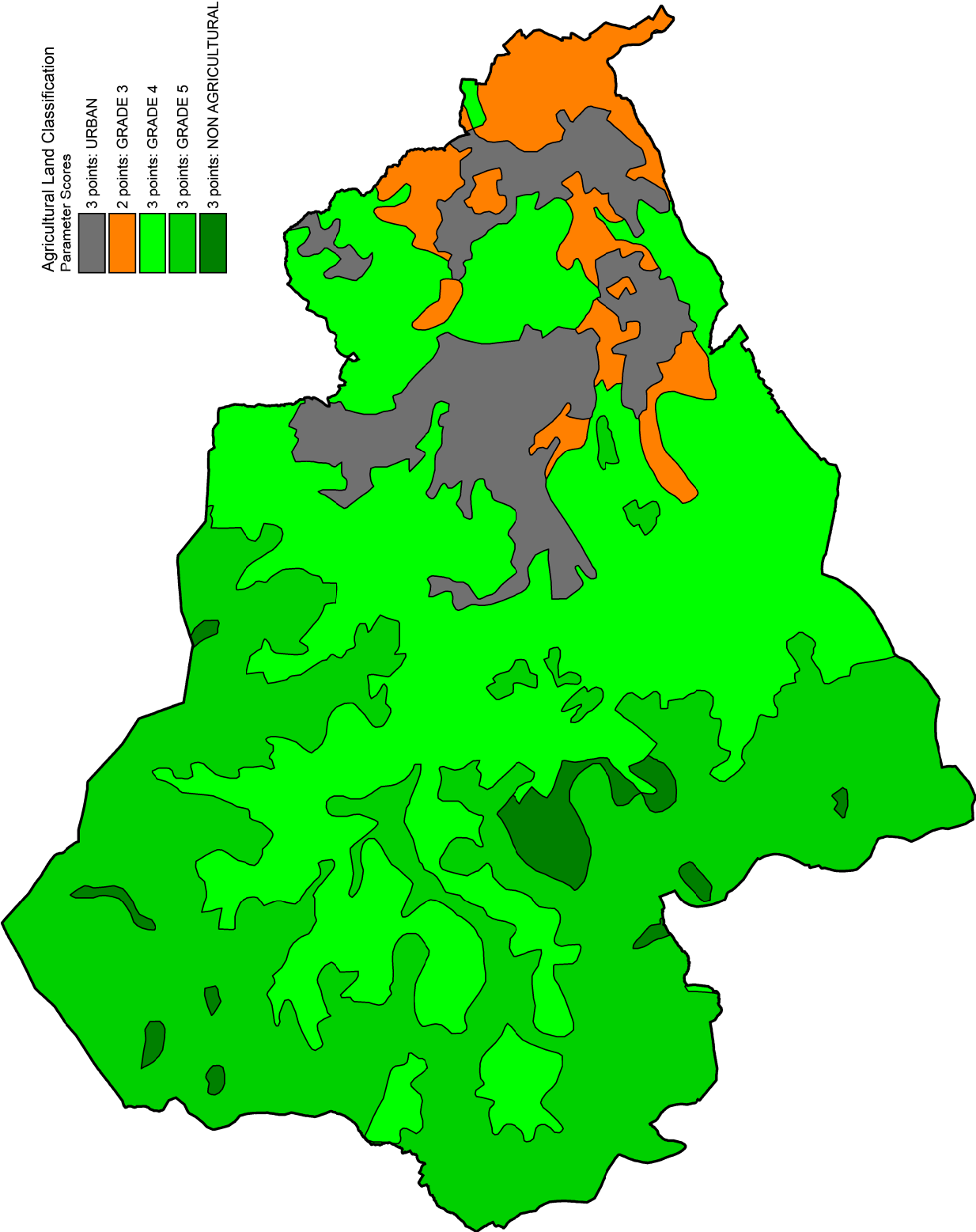
Map 5.20 Impact on Local Protected Sites



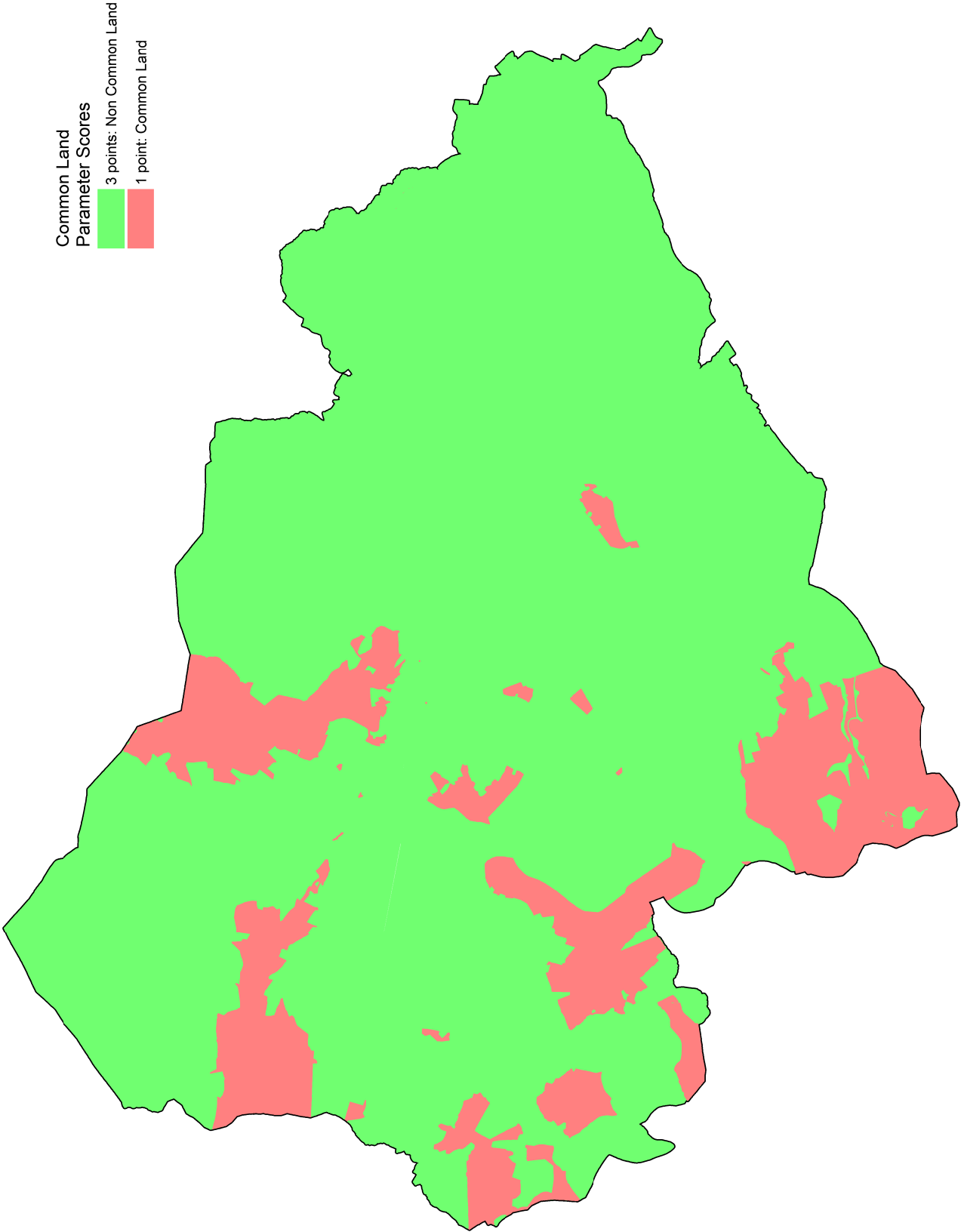
Map 5.21 Impact on nationally and internationally protected sites



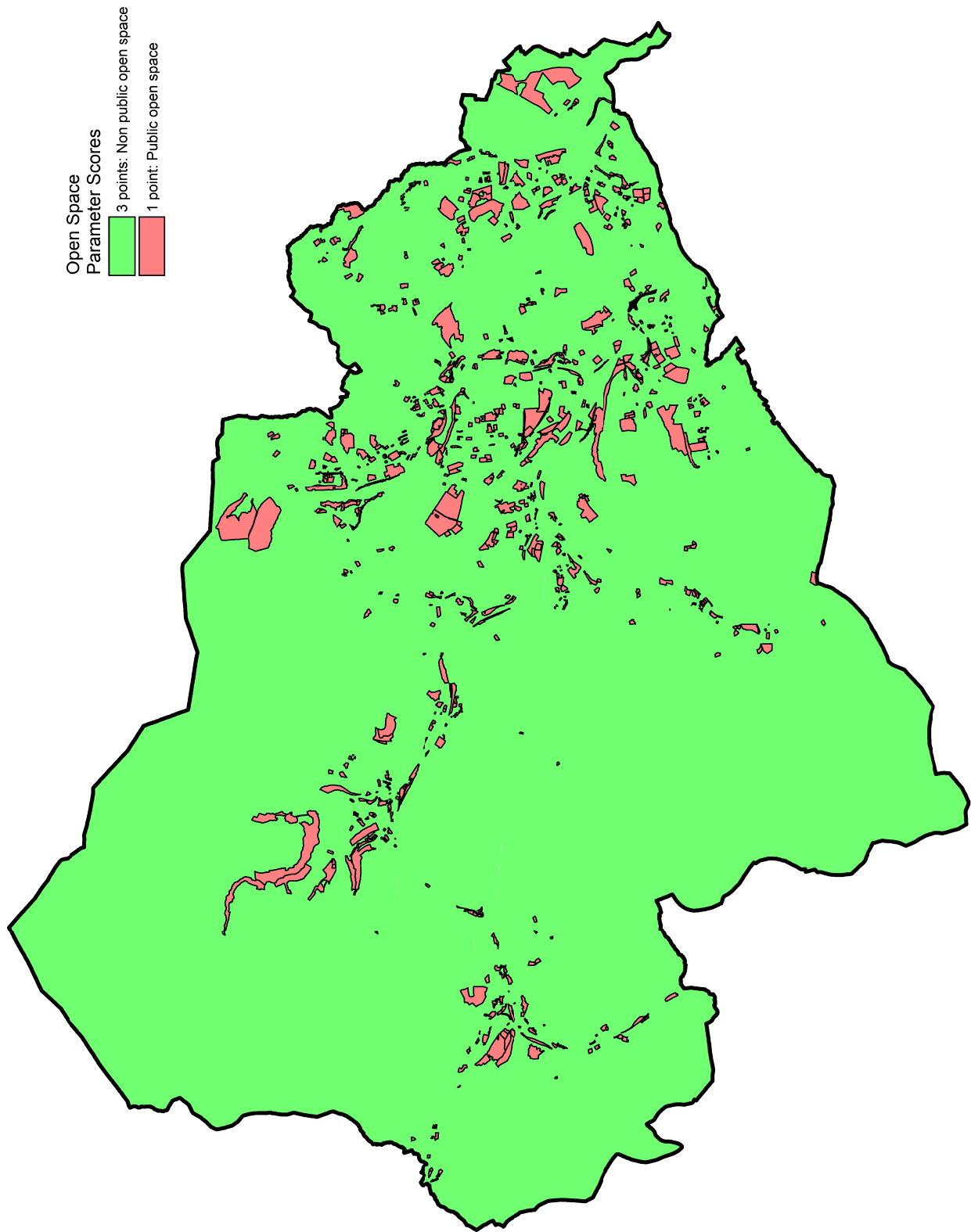
Map 5.22 Agricultural Land Classification



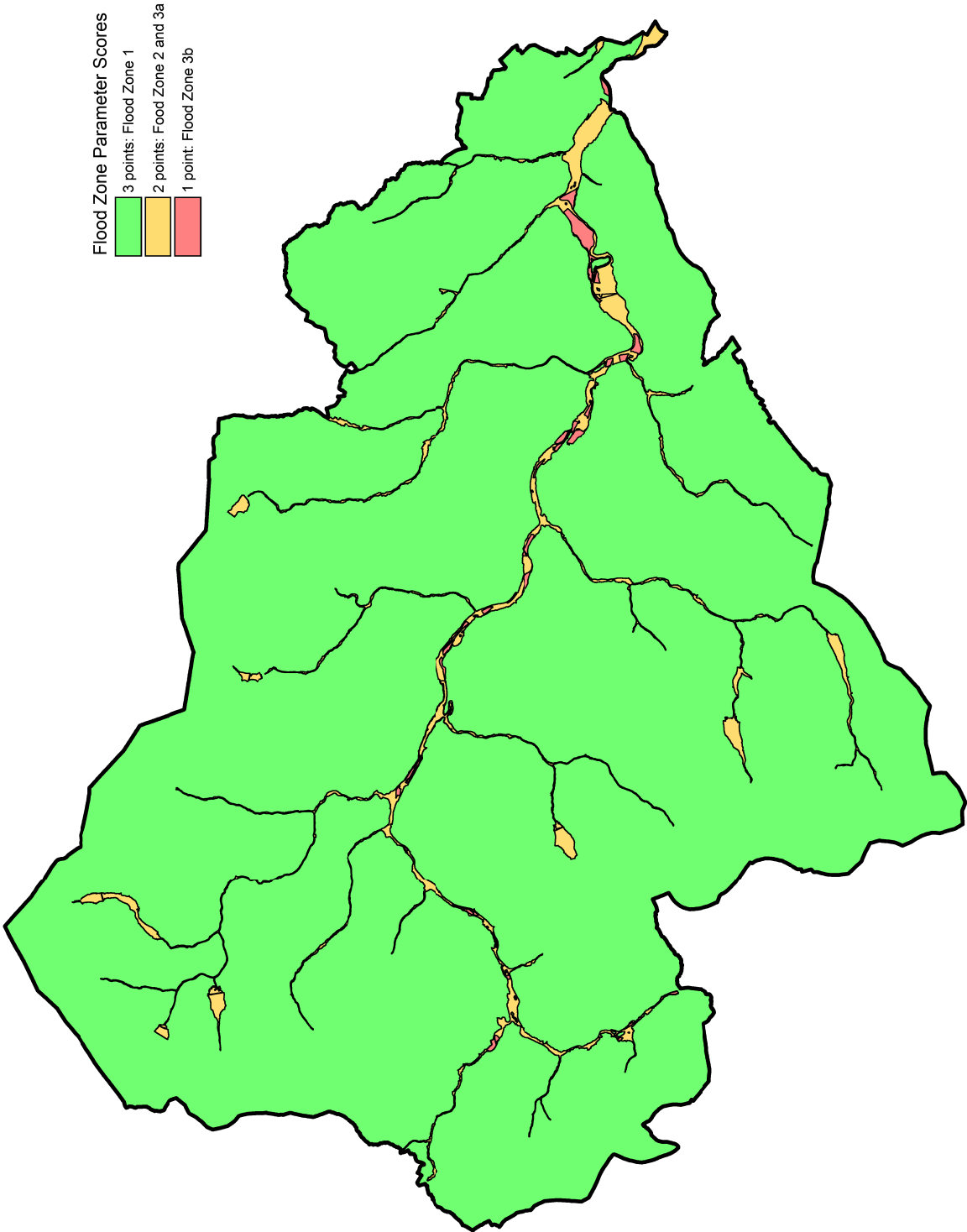
Map 5.23 Loss of Common Land

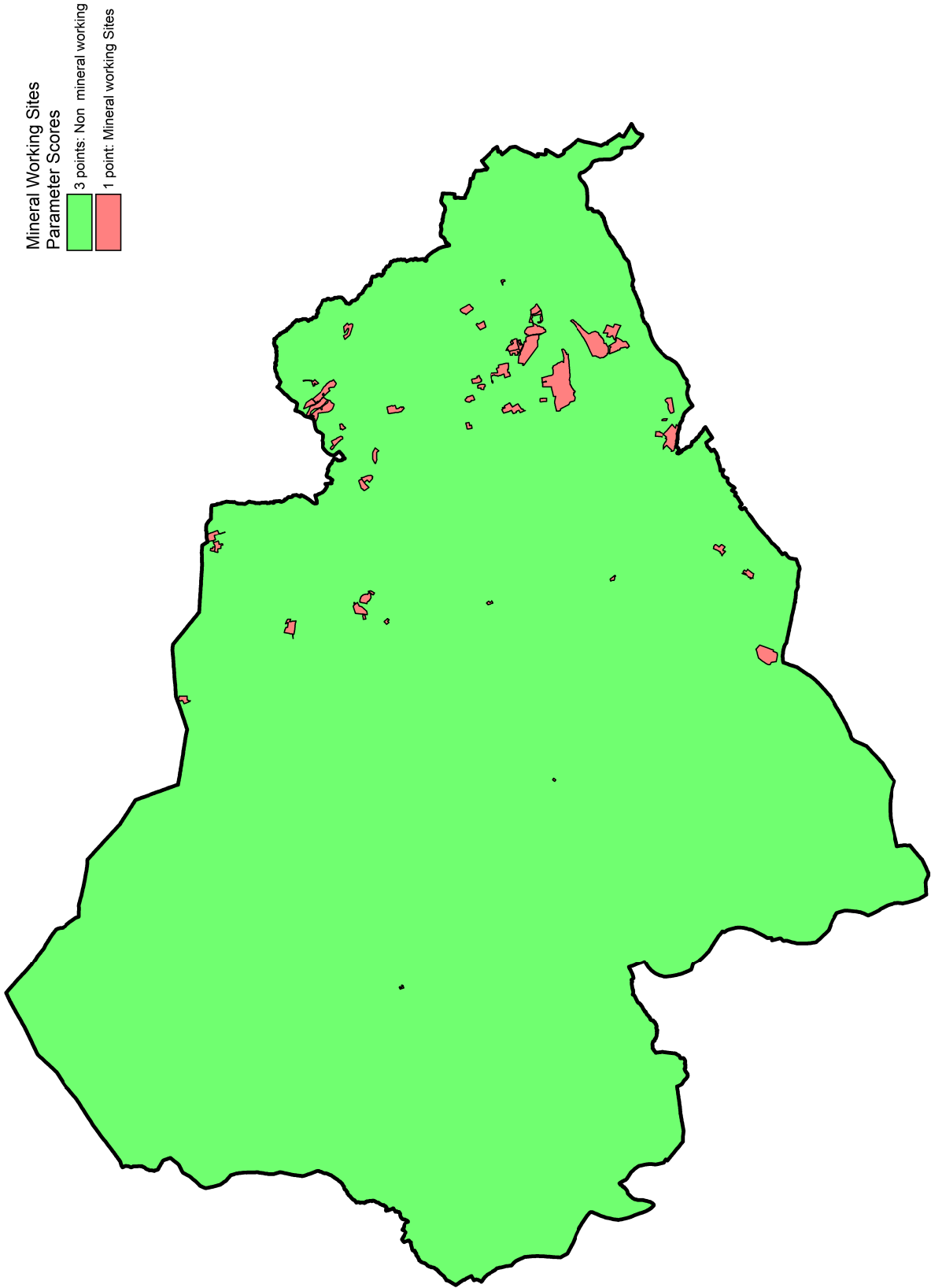


Map 5.24 Will it result in a loss of public open space?



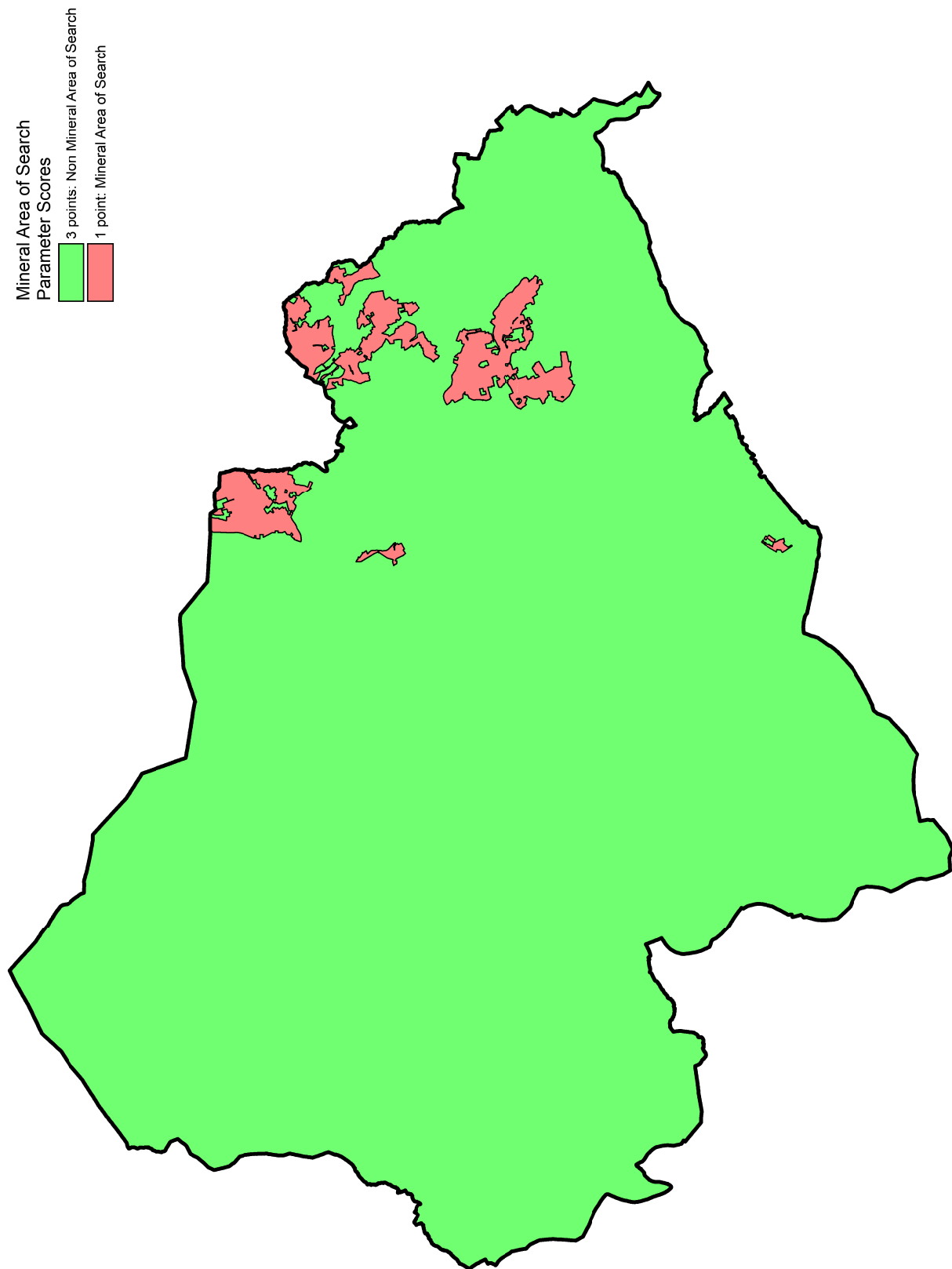
Map 5.25 Within a Flood Risk Zone





Map 5.26 Within a Working Mineral Site

Map 5.27 Within a Mineral Area of Search





Spatial Planning Team

Planning Services
Calderdale Council
Town Hall, Crossley Street
Halifax, HX1 1UJ

Telephone: 01422 392206