

Appendix A

Residential and Employment Site Selection Methodology

Site Selection Methodology - Reaching a view on preferred sites for allocation

1 Introduction

- 1.1 This note explains the proposed methodology for identifying suitable sites for residential and employment development to meet identified needs, the most suitable of which will be selected and included as proposed site allocations in the Epping Forest District Local Plan ("the Local Plan") – Draft Local Plan Consultation. A separate note addresses the methodology to be followed for identifying and selecting preferred sites allocations for traveller site development in the Local Plan.
- 1.2 The site selection methodology (SSM) takes account of relevant government policy and practice guidance contained within the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), respectively; together with the work undertaken by a number of other planning authorities at varying stages of plan making, including from adopted plans.
- 1.3 The evidence base informing the preparation of the Local Plan must include *"adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. ..."* (NPPF, paragraph 158).
- 1.4 To be adequate, the evidence base must be robust, assessments should be founded upon a cogent methodology, undertaken in a transparent manner and fully documented at key stages. Professional judgements require justification and site-selection decisions must be clearly explained.

2 Planning Policy and Guidance

National Planning Policy Framework

- 2.1 The Local Plan must allocate sufficient land in appropriate locations to ensure supply for the 15-year plan period. The core planning principles identified in paragraph 17 of the NPPF note that local plans *"... should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of residential and business communities..."*. The core planning principles also state that *"Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework..."* and *"encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value..."*. In respect of plan-making, paragraph 157 states that *"Crucially, Local Plans should ... allocate sites to promote development and flexible use of land, bringing forward new land*

where necessary, and provide detail on form, scale, access and quantum of development where appropriate" and "identify land where development would be inappropriate, for instance because of its environmental or historic significance".

2.2 The portfolio of site allocations and/or broad locations to be included in the Local Plan for housing must meet the policy requirement within paragraph 47 of the NPPF, by which the Council should: *"identify... a supply of specific deliverable ... sites sufficient to provide five years [sic] worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land..."* and *"identify a supply of specific, developable ... sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15".*

2.3 The terms *"deliverable"* and *"developable"* are defined in the NPPF (at footnotes 11 and 12, respectively), in the following terms:

"11 To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

12 To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged."

2.4 National planning policy specifically addresses the topic *"using a proportionate evidence base"* advising local planning authorities (NPPF, paragraph 158) to ensure *"... that their assessment of and strategies for housing, employment and other land uses are integrated, and they take full account of market and other economic signals"*. Recent experience of the independent examination of other local plans has demonstrated the crucial importance of this aspect of government policy and the risks of failing to provide robust evidence to demonstrate adequately that the housing strategy and economic strategy are sufficiently 'aligned' and/or satisfactorily integrated.

2.5 The Local Plan must be justified as *"... the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence"* (see paragraph 182). This is a key test of soundness and is fundamental to the site selection process.

2.6 Finally, paragraph 152 includes the following overarching policy advice: *"Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate"*. Accordingly, the process of site selection must adhere to these

principles and avoid significant social, environmental, or economic harm, within the context of other policies within the NPPF.

- 2.7 These key factors and a range of other important considerations identified in the NPPF must be taken into account when formulating a robust and transparent site selection methodology, the application of which will produce the evidence necessary to justify the land allocations within the Local Plan.

Planning Practice Guidance

- 2.8 PPG on '*Housing and Economic Land Availability Assessment*' (HELAA) [Reference ID: 3] is silent on the issue of site selection methodologies for development plans. PPG recommends a staged approach to the HELAA, which is identified as an important evidence source to inform plan making that does not, of itself, determine whether a site should be allocated for development. PPG notes that the HELAA provides information on the range of sites available to meet identified need, but the development plan itself determines which sites are most suitable to meet those needs [Reference ID: 3-003-20140306].
- 2.9 The guidance specifies the characteristics which should be recorded during the site survey as: "*site size, boundaries, and location; current land use and character; land uses and character of surrounding area; physical constraints (e.g. access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure/ utilities); potential environmental constraints; where relevant, development progress (e.g. ground works completed, number of units started, number of units completed); initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development*" [Reference ID 3-016-20140306]. It goes on to note factors for the consideration of suitability, availability and achievability, all of which are accounted for in the Council's Strategic Land Availability Assessment (SLAA) (update 2016).

3 Evidence available for site selection purposes

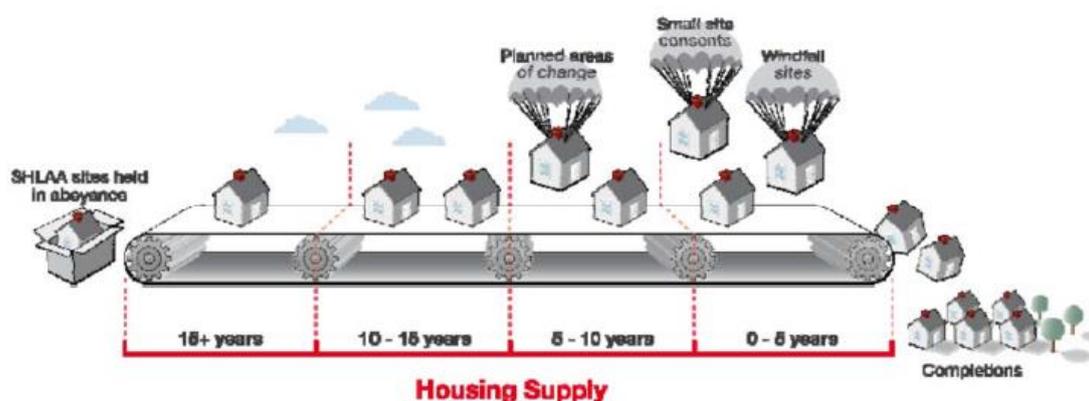
- 3.1 A range of evidential sources will inform the site selection process (as detailed below). The process must also be informed by the Sustainability Appraisal (SA) and the Habitats Regulation Assessment (HRA). The SSM identifies the stages at which SA and HRA will be required.

The relationship between the SLAA, SA, HRA, Strategic Sites for the Housing Market Area and the SSM

- 3.2 Any SLAA acts as a conveyor belt for sites (see Figure 1). The SSM is used to develop a snapshot for the Local Plan of sites suitable for allocation and/or broad locations. In general terms, the SLAA does not involve the assessment of sites against local policy priorities; whereas, the process of site selection is undertaken in the planning strategy context and involves making professional and planning judgements to produce a portfolio of sites and

broad locations suitable for allocation and designation in the Local Plan. Critically, the SLAA represents a very broad brush assessment of land; it relies heavily on data provided by owners/developers which may not be complete, or sufficiently rigorous and consistent. The SLAA provides the starting point for the site selection process and represents one of the inputs into the process.

- 3.3 The Council has identified three key stages during the plan making process where reasonable alternatives should be subject to SA. These key stages are: (1) District-wide spatial distribution alternatives (which is outside of the scope of the site selection process); (2) settlement-specific spatial distribution options; and (3) site options, which will be integrated into the SSM. (Further detail is provided in Section 4 (below)).
- 3.4 In relation to HRA, the SSM will need to consider the impact on European protected sites. The HRA will broadly mirror the key stages for the SA. In addition, an initial assessment of sites will be undertaken to understand the likelihood of any significant environmental effects arising from the potential allocation of individual sites so that the impact on European protected sites can be taken into account as part of the assessing the relative suitability of sites. The SSM identifies the stages at which HRA will be required.
- 3.5 An assessment of strategic spatial options across the Housing Market Area is being undertaken concurrently to determine the most sustainable pattern of development across the Districts of Harlow, East Hertfordshire, Uttlesford and Epping Forest. The Co-operation for Sustainable Development Board agreed to evaluate five spatial options through strategic transport modelling, sustainability appraisal, deliverability appraisal (including the infrastructure necessary to deliver the different options) and Habitat Regulations Assessment. In addition, the Strategic Housing Market Area authorities have commissioned an assessment of the strategic sites in and around Harlow, including those sites in East Hertfordshire and Epping Forest Districts. The Council has worked with AECOM, the consultants appointed to undertake the strategic sites assessment, to align, where possible, the methodology, criteria and data sources for these two pieces of work. Section 4 (below) identifies the stages at which the Council will either cross-check its assessment with, or rely upon the assessment undertaken by AECOM.



Source: Understanding Yorkshire and Humber's Strategic Housing Land Availability, Arup, 2008

Figure 1: Purpose of the SLAA

Recommendations from studies relevant to site selection

- 3.6 A number of the evidence base studies that have been produced for the Council, which contain reference to and recommendations about how data should inform later stages of the plan making process, including site selection. The relevant evidence base studies are outlined below.
- 3.7 *Level 1 Strategic Flood Risk Assessment Update – (2015) ("SFRAU")* – the output from the SFRAU should be used to direct development to Flood Zone 1. Where development cannot be located in Flood Zone 1, the Council should use the Environment Agency's Flood Maps to apply the Sequential Test to their remaining land allocations. Where the need to apply the Exception Test is identified due to there being insufficient number of suitable sites for development within zones of lower flood risk, the scope of the SFRA may need to be widened to a Level 2 assessment. The need for a Level 2 assessment cannot be fully determined until the Council has applied the Sequential Test. It is recommended that as soon as the need for the Exception Test is established, a Level 2 SFRA should be undertaken by a suitably qualified expert to provide timely input to the overall plan making process. The SFRAU does not currently include the new Climate Change Allowances introduced by the Environment Agency on 19 February 2016 and, at present therefore their likely impact is not clear. At present, it is understood that the flood risk mapping contained in the SFRAU will not change. For the purposes of identifying preferred sites to support the Draft Local Plan Consultation, it is proposed that the data contained in the SFRAU be used. Following consultation with the retained consultants and the Environment Agency on the SFRA, issues around Climate Change Allowances will be accounted for as part of a Level 2 SFRA.
- 3.8 *Landscape Character Assessment (2010)* – does not specifically reference site allocation but does highlight components of policy that are of relevance, namely:
- Landscape character and local distinctiveness to be protected, conserved and, where possible, enhanced;
 - Proposals for development to take into account the key characteristics, local distinctiveness and sensitivities to change;
 - Development to be permitted where it can protect, conserve and enhance:
 - Landscape character and local distinctiveness of the area;
 - The distinctive setting of, and relationship between, settlement buildings and the landscape, including important views;
 - The function of watercourses, woodland, trees, field boundaries, vegetation and other landscape features such as ecological corridors;
 - The special qualities of rivers, waterways, wetlands and their surroundings;
 - The topography of the area including sensitive skylines, hillsides and geological features.

- 3.9 *Settlement Edge Landscape Sensitivity Study (2010)* – the report will inform options for settlement growth in landscape terms and inform site allocations.
- 3.10 *Employment Land Review (2010)* contains assessments of sites in use for employment purposes. During the spring/summer 2016 this report is being selectively updated to ensure that the information is up-to-date.
- 3.11 *Settlement Capacity Study (2016)* – identified a series of sites within the existing settlements that have been included in the SLAA 2016 Update. In addition, there are ‘brown belt’ sites identified by the Settlement Capacity Study that duplicate parts of sites already identified through the SLAA.

4 Stages of the Methodology

Approach to site selection

- 4.1 The NPPF indicates a range of criteria pertinent to site selection in the breadth of factors it addresses. A critical factor for the Council is to establish the principal criteria that will inform appropriate site selection in the context that there will be a need for some of the land supply - assuming the objectively assessed housing need and objectively assessed employment need is identified for Epping Forest District in the Strategic Housing Market Area is met in full within the District – to arise from a review of Green Belt boundaries. Consideration will also need to be given to safeguarding land for the future in order to ensure the long term security of any new Green Belt boundary. Account will be taken of any future changes to the NPPF; in particular, the use of previously developed land in the Green Belt – in the event of that foreshadowed change being made during 2016.
- 4.2 The consideration of sites needs to demonstrate that all reasonable alternatives have been assessed consistently and thoroughly. It is common for this issue to be the subject of detailed scrutiny during the examination of local plans. The SSM will take the form of a staged process, reflecting good practice amongst other local authorities at more advanced stages of plan making. The staged approach comprises the application of a series of more detailed assessments to identify the most suitable sites for allocation, by which sites are sifted out at each stage of the process. Further detail on each of the proposed stages is set out in the following sub-sections.
- 4.3 It is clear from an examination of other site selection methodologies that the criteria used in site selection are all very similar.¹ However, in some instances, individual methodologies include local assessment criteria, that may impact significantly on local results. The inclusion of such criteria appears to be justified by reference to local circumstance and policy priorities.

¹ Selby DC's 'PLAN Selby Site Allocations: A Framework for Site Selection' (Stakeholder Engagement Draft, 24 June 2015), which includes (at Section 5 and Appendix B) the results of a peer review of SSMs undertaken by other LPAs.

- 4.4 For the sake of comprehensiveness, sites identified in the SLAA Update (2016) and potentially suitable traveller sites will be included in the site selection process. A separate note explains the methodology proposed for identifying traveller sites. Where these two selection processes overlap this is indicated in the following sub-sections.

Stage 1: Major policy constraints

- 4.5 The purpose of Stage 1 will be to identify any sites that are subject to major policy constraints identified in the NPPF, or by reference to local considerations, such that development of the candidate site would likely cause significant social, environmental or economic harm in accordance with paragraph 152 of the NPPF.

- 4.6 The starting point for identifying sites that will be subject to the SSM is the SLAA. Before sites were assessed through the SLAA, a filtering process was undertaken to sift out sites that had been identified through various sources but were considered unsuitable. The SLAA methodology was developed in 2012, before PPG for HELAA's was first published on 6 March 2014 and updated on 1 April 2016. The approach adopted in the SLAA in respect of filtering sites has therefore been reviewed for the SSM to ensure that all potentially suitable sites are considered. The review of SLAA sites, to determine which sites should be subject to the SSM, will include consideration of the following:

- Sites filtered out in the SLAA because they are: a duplicate site; subject to extant planning permission; being promoted for non-housing or employment uses; subject to an existing continuing use; and/or located outside the boundary of Epping Forest District will not be assessed through the SSM;
- Sites discounted at Stage A (strategic constraints)² of the SLAA process will be re-assessed through the SSM;
- Sites greater than 0.2 hectares in area, or capable of delivering six or more dwellings will be assessed through the SSM. (Sites proposed for residential use will only need to meet one of these criteria in order to be assessed through the SSM.)

- 4.7 With regard to the site size/capacity threshold, the PPG advises for HELAA's that: "*The assessment should consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m² of floor space) and above. Where appropriate, plan makers may wish to consider alternative site size thresholds.*" [Reference ID: 3-011-20140306]. The proposed thresholds for the SSM differ slightly from those set out in the PPG as follows:

- For employment sites, the threshold is smaller than that stated in the PPG. For continuity with the SLAA and completeness the smaller site size threshold will be used. Such an approach is considered to be broadly consistent with the PPG.

² Further details of the strategic constraints are provided in the SLAA Update (2016).

- For residential sites the proposed approach for site selection is considered to align closely with the PPG since it enables all sites capable of accommodating six or more dwellings to be assessed. With regard to the number dwellings, the approach in the SLAA (which established the six-unit threshold) is considered appropriate given the large number of sites identified in the District and that sites capable of accommodating five dwellings or fewer will be accounted for in the Council’s calculations regarding future likely housing windfall.

- 4.8 Sites identified for assessment through the SSM will be considered either for housing or employment (Use Class B). It is to be noted that planned growth of other employment uses, including glasshouses and visitor accommodation, will require land within the District over the Plan period. However, the Council considers that adopting a criteria-based policy approach to identifying sites for such uses provides the most appropriate way to positively plan for economic growth in the District and provides maximum flexibility for these sectors to respond to market conditions and signals. Such an approach is consistent with NPPF, paragraph 21 (second bullet point), which requires local planning authorities in their Local Plans to "*set criteria or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period*". Sites identified in the SLAA for non-Class B uses have been removed from the pool of candidate sites that will be subject to the site selection process unless the secondary use identified in the SLAA was either for residential or Class B employment uses.
- 4.9 It is understood that a number of very large sites have been identified through the SLAA for which there are no detailed proposals and which cannot meaningfully be assessed as currently defined. Such sites will be identified by officers who will use existing natural features and boundaries to sub-divide sites. Should officers identify any large sites potentially for sub-division which have been promoted by a third party, sites will only be sub-divided where there is agreement with the site promoter.
- 4.10 Each site will be screened against the criteria set out in Table 1 (below) using a Geographic Information Systems (GIS) database. The site boundary for each site will be taken from the SLAA.
- 4.11 The SLAA identifies the primary and secondary use for the sites. The assessment will first assess the suitability of the site for the primary use identified; it is this use which will be considered at Stages 2 and 3. Where a site is not selected as a preferred site for the primary use and insufficient sites have been identified for the secondary use, the site will be re-assessed to consider its suitability for the secondary use. Sites will not be re-assessed in other circumstances.
- 4.12 The scoring will comprise a ‘yes’ or ‘no’ score against the criteria indicating whether a site should be removed from the sift. If a site scores ‘yes’ on one or more criteria it will be removed from the sift and will not be taken forward to Stage 2.

4.13 Sites which score ‘no’ for all criteria will be taken forward to Stage 2.

No.	Major policy constraint	Justification for major policy constraint
1	Remove sites where no part of the site is located within the settlement buffer zones.	<p>The NPPF contains a presumption in favour of sustainable development (paragraph 14). The core planning principles identify as part of this that planning should “<i>take account of the different roles and character of different areas promoting the vitality of our main urban areas, protecting Green Belts around them, recognising the intrinsic character and beauty of the countryside...</i>” and “<i>actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable</i>”.</p> <p>The NPPF therefore indicates a preference for development to be located in areas which can access services and facilities. Reflecting this, as part of the Green Belt Review Stage 1 (2015) the Council identified buffers for towns, large villages and small villages (as determined through the Settlement Hierarchy Topic Paper (2015)). The buffers identify the areas outside existing towns, large villages and small villages which could access key services and therefore might theoretically be suitable for development³. These buffers will be used to determine whether sites comprise a sustainable location within the District.</p>
2	Remove sites entirely within Flood Risk Zone 3b.	<p>Paragraph 100 of the NPPF states that “<i>inappropriate development in areas of risk of flooding should be avoided by directing development away from areas of highest risk...</i>” and then sets out that the Sequential Test and if necessary the Exceptions Test should be applied. Table 3 (flood risk vulnerability and flood zone ‘compatibility’) in the PPG provides further guidance on flood zones including where development may be appropriate. It confirms that with the exception of essential infrastructure (where the Exception Test would need to be applied) and water compatible uses, other uses should not be permitted in Zone 3b [Reference ID: 7-067-20140306].</p>
3	Remove sites which are fully within internationally designated sites of importance for biodiversity.	<p>Paragraph 109, bullet 3, of the NPPF confirms that the planning system should contribute to “<i>minimising impacts on biodiversity and providing net gains in biodiversity where possible...</i>”. Paragraph 110 goes on to confirm that “<i>Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.</i>”</p> <p>Circular 06/2005 provides further guidance on the Government’s statutory obligations in relation to internationally designated sites. Paragraph 55 states “<i>... If a proposal for a particular type of development on a particular location would be likely to adversely affect the integrity of a such a site, or the effects of the</i></p>

³ Further detail on the methodology used to calculate the buffers is contained in the Green Belt Review - Stage 1 Report.

No.	Major policy constraint	Justification for major policy constraint
		<p><i>proposal on such a site are uncertain, planning authorities should not allocate the site for that type of development unless:</i></p> <p><i>a) they are satisfied that any subsequent or current planning application for that proposal would be likely to pass the tests for derogations in regulation 49; and</i></p> <p><i>b) there is a reasonable prospect that compensatory measures that may be required by regulation 53 can be secured such as to protect the coherence of the Natura 2000 network and meet the requirements of the Ramsar Convention where relevant.”</i></p> <p>It is considered that if a site is wholly located within an internationally designated site that it is unlikely that the proposals would not affect the integrity of the site and therefore on that basis they should not be considered further.</p>
4	Remove site if fully within a County owned or managed wildlife site or Council owned or managed Local Nature Reserve.	Where wildlife sites are owned and/or managed by Essex County Council or where Local Nature Reserves are owned and managed by EFDC – there is absolutely no intent to develop such sites and they are to remain in perpetuity for the purpose of nature conservation.
5	Remove site if fully in City of London Corporation Epping Forest and its Buffer Land.	Epping Forest and the Epping Forest Buffer Land (which is intended to relieve pressure on the Forest from outdoor recreation and provide alternative habitat) are to be retained in perpetuity and are therefore considered unsuitable for the purposes of the type of development for which sites are being selected.
6	Remove site if promoted for residential use and the site is fully located within the Health and Safety Executive Consultation Zones Inner Zone.	<p>Paragraph 172 states that planning policies should be based on up-to-date information on the location of major hazards. The Glossary to the NPPF defines major hazards as: “<i>installations and pipelines, licensed explosive sites and nuclear installations, around which Health and Safety Executive (and Office for Nuclear Regulation) consultation distances to mitigate the consequences to public safety of major accidents may apply.</i>”</p> <p>The HSE’s Land Use Planning Methodology⁴ sets out a matrix for deciding whether development of a site should be advised against, or not. This is based on a sites location within the Consultation Zones (Inner, Middle, Outer), and the Level of Sensitivity (1 to 4) based on the use of the site. Development within the Inner Zone is only permissible for Level 1 uses, which may include employment sites, and therefore employment sites will not be excluded at this stage. All residential sites are classified as Level 2 or above sensitivity (other than the smallest residential sites which fall under the SSM threshold). Therefore, where an entire site is promoted for residential use and wholly located within the Inner Zone it will be removed from the sift.</p>

Table 1: Major policy constraints

⁴ Health and Safety Executive Land Use Planning Methodology, [available online] <http://www.hse.gov.uk/landuseplanning/methodology.pdf>

- 4.14 **OUTPUT for STAGE 1:** Confirmation for each site subject to the SSM as to whether it should proceed to Stage 2 (provided as a list and in map format).

Stage 2: Quantitative and qualitative assessment

- 4.15 The purpose of Stage 2 will be to undertake more detailed quantitative and qualitative assessment of sites to identify the relative suitability of sites for housing or employment development. The assessment criteria are included at Appendix A, which applies a 'Red-Amber-Green' (RAG) rating system utilising a scale of three to five scores.
- 4.16 The criteria are grouped into the following categories:
- Impact on environmental and heritage designations and biodiversity;
 - Value to Green Belt;
 - Accessibility by public transport and to services;
 - Efficient use of land;
 - Landscape and townscape impact;
 - Physical site constraints and site conditions.
- 4.17 The quantitative criteria will primarily be scored against GIS information drawn from the GIS database. Where qualitative criteria are utilised, a narrative on the planning judgements will be provided, including the need for any mitigation measures. To ensure consistency in assessment across the candidate sites, Quality Assurance (QA) processes will be incorporated into the Stage 2 assessment process.
- 4.18 The development of the SSM has involved consideration of criteria for other topics, which were discounted. For example, consideration was given to including a criterion to assess climate change/opportunities for sustainable energy, however, the Council concluded that all sites were likely to offer similar opportunities for sustainable energy, and therefore this criterion is not included in Stage 2 assessment.
- 4.19 For the Housing Market Area strategic sites, the outcomes of the Stage 2 assessment will be cross-checked against AECOM's work.
- 4.20 The scoring for some of the criteria will be different depending on whether the use for the site being assessed is housing or employment; further detail is provided in Appendix A.

Moderation workshop

- 4.21 During the Stage 2 assessment, a workshop will be held with attendees invited from Council officers, Highways England, Environment Agency and Natural England, to moderate the results, check that there is a level of agreement on judgements and regularise any apparently significant inconsistencies. Following the moderation workshop the site assessments will be updated.

4.22 **OUTPUT for STAGE 2:** Assessment Proforma for each site considered at Stage 2.

Stage 3: Identify candidate Preferred Sites

4.23 The purpose of Stage 3 is to identify the candidate Preferred Sites, which best meet the Council's preferred growth strategy. This will be undertaken in parallel for employment, residential and traveller sites and will bring together the assessment under this SSM and the Traveller Site Selection Methodology (TSSM).

4.24 The identification of candidate Preferred Sites will involve consideration of the 'best' fit sites for the particular settlement; and not by reference to any assessment of what may be 'best' for the District overall. Therefore, in order to identify the most appropriate candidate Preferred Sites, at Stage 3 reasonable alternatives to accommodate growth in each settlement will be assessed and a decision made on which alternative or alternatives represent the most appropriate approach. Those sites located within the more suitable settlement alternatives will then be assessed in order to identify the 'best' fit sites in that settlement.

4.25 In general, applying the RAG rating system in Appendix A, those sites with the most dark green (++) and least red scores (--) are likely to be the most suitable for allocation. However, in common with all site selection/allocation processes, the identification of candidate Preferred Site will involve an element of planning judgement, the effect of which on outcomes cannot be prejudged. It should also be noted that in exercising planning judgement different weight may be given to each of the criteria reflecting the characteristics of the sites being assessed under the SSM. Where this is the case, the rationale for applying different weight to the criteria in relation to a particular site will be documented.

4.26 To guide the identification of the most suitable candidate Preferred Sites, each settlement will be considered in turn. The assessment will consider the relative merits of the sites and combinations thereof and then identify the more appropriate sites. A sequential approach to site selection will be applied, in accordance with the following:

- The sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1;
- Sites located on previously developed land within settlements (the Green Belt boundaries will be used as a proxy if more detailed settlement boundaries have not been designated);
- Sites located on open space within settlements where such selection would not adversely affect open space provision within the settlement.
- Previously developed land within the Green Belt (in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015).
- Greenfield/Green Belt land on the edge of settlements:
 - Of least value to the Green Belt if the land meets other suitable criteria for development.

- Of greater value to the Green Belt if the land meets other suitable criteria for development.
- Of most value to the Green Belt if the land meets other suitable criteria for development.
- Agricultural land:
 - Of Grade 4-5 if the land meets other suitable criteria for development.
 - Of Grade 1-3 if the land meets other suitable criteria for development.

4.27 In applying the hierarchy, it is noted that:

- The settlement hierarchy will only be used as a sense check on the results given that the land available does not tally with the places most likely to provide growth in line with the existing hierarchy.
- Since it is likely that any development will impact on traffic and hence air quality in the Epping Forest Special Area of Conservation, in the early parts of the sifting process it will not be possible to narrow the choices for the District based on this critical factor, which will be subject to more robust assessment at Stage 5 as part of assessing the cumulative impacts.

4.28 A workshop will be held with the Local Plan Officer Working Group to identify candidate Preferred Sites. The workshop will consider sites on a settlement by settlement basis. In addition to using the hierarchy outlined above and planning judgement other qualitative factors will be considered including consultation responses received to the Issues and Options Consultation, previous feedback from Councillors and initial officer evaluation of sites.

4.29 Through the workshop the rationale for release of Green Belt and demonstrating exceptional circumstances will be discussed. Should this review of sites not result in sufficient suitable sites being identified, sites with secondary uses will be re-assessed against the Stage 2 (and if necessary Stage 1) criteria. The need to re-visit Green Belt Stage 2 sites of greater value to the Green Belt will also be agreed along with whether broad locations should be identified to deliver planned development in the latter stages of the plan period.

Workshop with Members

4.30 Once the candidate preferred sites have been identified, Members will take part in a workshop to discuss the emerging findings. The purpose of the workshop will be to brief Members on the work completed and to check for factual inaccuracies in the technical assessment. It will also provide an opportunity for Members to ‘check and challenge’ the initial conclusions reached by officers. Following the workshop, the feedback received will be reviewed and an assessment made as to whether there are clear planning reasons for amending any site assessments or the selection of candidate preferred sites.

More detailed assessment for housing sites

- 4.31 The SLAA provides an indicative capacity for each site. This comprises a gross density taking account of any major site constraints. For larger sites in particular, there is a concern that using gross density may result in the capacity of the site being overstated once the need for internal roads and other infrastructure is taken into account.
- 4.32 The Council is also progressing work which may result in amended car parking standards to those currently adopted by Essex County Council, which could increase the potential capacity of sites as assessed in the SLAA. The densities would also benefit from a check in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015 regarding support for higher densities at transport and commuter hubs.
- 4.33 The density assumptions will be reviewed for all preferred sites and updated as necessary to reflect the factors outlined above and any new information. Should this exercise substantially reduce the predicted housing capacity, additional appropriate sites will be identified in accordance with the methodology outlined at the beginning of this sub-section.
- 4.34 At this stage, further consideration will also be given as to the potential mix/types of homes on a site to demonstrate how the needs outlined in the Strategic Housing Market Area plus Starter Homes will be met so that any revised mixes can be subject to further viability assessment. The appropriateness or ability of sites to accommodate mixed use development will also be considered at this stage.

More detailed assessment for employment sites

- 4.35 A qualitative judgement reviewing current employment allocations will be needed to meet the Government's requirements regarding flexibility of use. The candidate Preferred Sites will therefore be assessed to confirm that they can comply with this policy requirement.
- 4.36 Additionally, it is noted from the Employment Land Review that, in Epping Forest District, there is a critical need for future policy to cater sufficiently for the needs of SMEs (including incubators), which provide a sustainable option for economic diversification and growth. An assessment will be made to determine whether the candidate preferred sites are suitable to meet this need.
- 4.37 **OUTPUT for STAGE 3:** List and associated mapping of candidate Preferred Sites that will be taken forward for more detailed deliverability assessment. More detailed housing and employment site assessment.

Stage 4: Deliverability

- 4.38 The purpose of Stage 4 is to consider the deliverability of the candidate Preferred Sites to inform the housing trajectory for the Plan. Stage 1, 2 and 3 considered the suitability of the site and, therefore, this stage focuses on whether a site is deliverable, specifically:
- Whether the site is available now, or is it likely to become available during the Local Plan period?
 - Whether there is a reasonable prospect that development will be achievable within the appropriate timescales?
- 4.39 Information collected as part of the SLAA will be supplemented by updated information from promoters/developers/landowners, findings from the strategic sites assessment and further technical studies. As a minimum, a Proforma will be sent to all sites promoters/developers/landowners (as appropriate), which proceed to Stage 2 to validate the information contained in the SLAA and to seek further, more detailed information on proposals. This exercise will commence during Stage 2 to provide sufficient time for promoters/developers/landowners to respond. Where up-to-date landownership information is not currently held by the Council, landownership searches will be undertaken at HM Land Registry. More detailed discussions may be held with promoters/developers/landowners of sites to inform this stage of the site selection process.

Availability

- 4.40 The availability assessment will draw on the information collected as part of the SLAA assessment, promoter/developer/landowner Proforma and findings from strategic sites assessment. The assessment will consider the implications of the following factors for the availability of each candidate preferred site:
- Willingness to release or sell the site within the plan period;
 - Whether the site has a sole owner or multiple owners, and the terms of ownership;
 - Where multiple owners, who owns the remainder of the site;
 - Whether adjacent owners are promoting their own sites for development collaboratively or independently;
 - If multiple owners whether there are any land /ownership constraints including restrictive development covenants, easements and legal agreements, public rights of way which may require variation; and ‘ransom strips’ or other land which the development is dependent on;
 - Existing on-site use(s) which would need to be relocated;
 - When the site will be brought forward for development within the plan period;
 - Phasing of development.

Achievability

4.41 The assessment of achievability of candidate Preferred Sites will focus on the following elements:

- Viability and marketability of the sites based on information provided through the promoter/developer/landowner Proforma and findings from strategic sites assessment.
- Confirmation that there are no insurmountable constraints to a site. Primarily, this will be drawn from the Stage 1 and Stage 2 assessments but will also include consideration of infrastructure requirements/constraints including inputs from statutory undertakers and infrastructure providers as identified through the preparation of the Infrastructure Delivery Plan.

Housing trajectory

4.42 Taking into account all information submitted under the previous headings, a judgement will be made on the likely timescales for the development proceeding. Sites that are deemed to be available and suitable, which are not subject to any constraints, will be considered as potential allocations within the first five years. For those sites that are considered suitable but have constraints, an assessment will be made to determine whether or not the site falls within five years, 6 to 10 years or 11 to 15 years depending upon the nature of the constraint. Some constraints are likely to take longer than five years to overcome and in these cases the site will be considered as a potential allocation in the 6 to 10 years and 11 to 15 years categories. Through the Proformas, developers/agents will be asked to indicate the assumed timescale for development of the site, including the rate of unit completion over time, but a final decision on how to allocate the site will be based on professional judgement, taking into account the wider range of factors considered. As part of this stage, the exceptional circumstances for sites located within the Green Belt will be re-confirmed and decision taken regarding the need for identifying Safeguarded Land for potential release from the Green Belt, beyond the end of the Local Plan period, including the appropriate duration of any period of safeguarding.

Workshop with Members

4.43 Following the more detailed assessment of the candidate preferred sites, a second workshop will be held with Members. The purpose of the workshop will be to brief Members on the further work undertaken and provide a further opportunity to ‘check and challenge’ the identified sites. Following the workshop, the feedback received will be reviewed and an assessment made as to whether there are clear planning reasons for amending the selection of candidate Preferred Sites.

4.44 Once a decision has been reached on the proposed site allocations the Council will seek to reach written agreement with those individuals/parties promoting the proposed site allocations. Such documents will form part of the Council’s evidence base and will be used to support the proposed site allocations. It is envisaged that documenting and reaching written

agreement with site promoters will be an on-going process which may commence during Stage 4 but will continue in parallel with Stages 5 and 6.

- 4.45 **OUTPUT for STAGE 4:** Portfolio of proposed site allocations for the Draft Local Plan Consultation. Confirmation of housing and employment land trajectory.

Stage 5: Sustainability Appraisal/Habitats Regulation Assessment of candidate Preferred Sites

- 4.46 The SA assessment, undertaken by AECOM, will establish the impact of the candidate Preferred Sites alone and in combination. AECOM will also undertake an HRA of the candidate Preferred Sites as well as any more detailed assessment required for individual sites (as identified at Stage 2).

Stage 6: Review of candidate Preferred Sites Following Draft Local Plan Consultation

- 4.47 The approach set out above is predicated on the assumption that further information on site suitability will be received in response to the Draft Local Plan consultation. Therefore, the assessment made in advance of the Draft Local Plan consultation will be based on the available information. It is not unusual for site proposals to change through the process of plan making as sites fall away when consulted upon and others are put forward.
- 4.48 Following the Draft Local Plan consultation, the candidate Preferred Sites will be reviewed against any consultation responses and updated technical information, which is likely to include:
- Findings from the Stage 2 Viability Study;
 - Detailed assessment of transport impacts;
 - Updated information on infrastructure requirements/constraints;
 - Level 2 SFRA.
- 4.49 Where there are clear planning reasons for altering the assessment (e.g. a change in planning circumstances, late identification of an error or new information arising from updated technical information), candidate Preferred Sites may be discounted and new sites identified for allocation in the Local Plan.

Appendix A Stage 2 Criteria

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.1	Impact on Internationally Protected Sites	Housing and Employment (B class uses)		Site is necessary for the management of internationally protected sites	Effects of allocating the site for the proposed use do not undermine conservation objectives (alone or in combination with other sites)	Effects of allocating the site for the proposed use are not likely to be significant alone but should be checked for in-combination effects	Effects of allocating the site for the proposed use is likely to have a significant effect
1.2	Impact on Nationally Protected sites	Housing and Employment (B class uses)			Based on the Impact Risk Zones there is no requirement to consult Natural England because the proposed development is unlikely to pose a risk to SSSIs.	Site falls within an Impact Risk Zone and due to the nature and scale of the development proposed it is likely to be possible to mitigate the effects of the proposed development.	Site falls within an Impact Risk Zone and due to the nature and scale of development proposed it is unlikely to be possible to mitigate the effects of the proposed development.
1.3a	Impact on Ancient Woodland	Housing and Employment (B class uses)			Site is not located within or adjacent to Ancient Woodland.	Site is adjacent to or contains Ancient Woodland but possible effects can be mitigated.	Site is adjacent to or contains Ancient Woodland. The proposals would likely result in direct loss or harm to Ancient Woodland or cannot be mitigated.

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.3b	Impact on Ancient and Veteran Trees outside of Ancient Woodland	Housing and Employment (B class uses)			No Ancient or Veteran trees are located within the site.	Site contains Ancient and/or Veteran trees but at a sufficiently low density across the site that removal could be largely avoided or possible impacts could be mitigated.	Site contains a higher density of Ancient and/or Veteran trees, or are configured in such a way that direct loss or harm is likely.
1.4	Impact on Epping Forest Buffer Land	Housing and Employment (B class uses)		Site may assist in extending the Epping Forest Buffer Lands	Site is unlikely to impact on Epping Forest Buffer Lands	The effects of the site on Epping Forest Buffer Lands can be mitigated.	Site is likely to result in harm to Epping Forest Buffer Lands which cannot be mitigated.
1.5	Impact on BAP priority species or Habitats	Housing and Employment (B class uses)		Features and species in the site are retained and there are opportunities to enhance existing features.	Site has no effect as features and species could be retained or due to distance of BAP priority habitats from site.	Features and species in the site may not be retained in their entirety but effects can be mitigated.	Features and species in the site unlikely to be retained and effects cannot be mitigated.
1.6	Impact on Local Wildlife Sites	Housing and Employment (B class uses)		Features and species in the site are retained and there are opportunities to enhance existing features.	Site has no effect as features and species could be retained or due to distance of local wildlife sites from site.	Features and species in the site may not be retained in their entirety but effects can be mitigated.	Features and species in the site unlikely to be retained and effects cannot be mitigated.
1.7a	Flood Risk	Housing	Site within Flood Zone 1	Site within Flood Zone 2 and exception test not required		Site within Flood Zone 3a where exception test required	Site within Flood Zone 3b and not likely to be suitable for development

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.7b	Flood Risk	Employment (B class uses)	Site within Flood Zone 1	Site within Flood Zone 2 and exception test not required	Site within Flood Zone 3a and exception test not likely to be required		Site within Flood Zone 3b and not likely to be suitable for development
1.8a	Impact on Scheduled Ancient Monument / Listed Building / Conservation Area/ Historic Park or Garden	Housing and Employment (B class uses)	Opportunity for the site to enhance the significance of the heritage asset / further reveal its significance / enhance the setting.	Site is not likely to affect heritage assets due to their distance from the site.	Site is located within the setting of an heritage asset and effects can be mitigated.	Site is located within a Conservation Area or adjacent to a Listed Building or other heritage asset and effects can be mitigated.	Site would likely result in the loss of a heritage asset or result in a significant impact that cannot be mitigated.
1.8b	Impact on Archaeology	Housing and Employment (B class uses)		There is a low likelihood that further archaeological assets would be discovered on the site	There is a medium likelihood that further archaeological assets may be discovered on the site, but potential is unknown as a result of previous lack of investigation	Existing evidence and/or a lack of previous disturbance indicates a high likelihood for the discovery of high quality archaeological assets on the site	
1.9	Impact of Air Quality	Housing and Employment (B class uses)			Site lies outside of areas identified as being at risk of poor air quality.	Site lies within an area which has been identified as being at risk of poor air quality, but it is likely that the risk could be mitigated or reduced.	Site lies within an area which has been identified as being at risk of poor air quality, and it is unlikely that the risk could be mitigated.

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
2.1	Level of harm to Green Belt ⁵	Housing and Employment (B class uses)	Site provides opportunities to assist in the active use of Green Belt without any loss.	Site is not located in the Green Belt.	Site is within Green Belt, but the level of harm caused by release of the land for development would be none ⁶ .	Site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium.	Site is within Green Belt, where the level of harm caused by release of the land for development would be high or very high.
3.1	Distance to the nearest rail/tube station	Housing and Employment (B class uses)		Site is less than 1000m from the nearest rail or tube station	Site is between 1000m and 4000m from the nearest rail or tube station	Site is more than 4000m from the nearest rail or tube station	

⁵ Paragraph 80 of the NPPF sets out the five purposes of Green Belt. In undertaking its Stage 2 Green Belt Review the Council has considered the extent to which these criteria apply to the District and the areas designated as Green Belt. For the Stage 2 Green Belt Assessment a decision was made that individual Green Belt parcels should not be assessed against purpose 5 (to assist in urban regeneration) as it was not possible to distinguish the extent to which individual Green Belt parcels deliver against this purpose and therefore could not be applied in the context of the District which is predominantly rural in character and with limited derelict or other urban land in need of recycling. The Council has also considered how to treat purpose 3 in its Stage 2 Green Belt Assessment, which relates to safeguarding the countryside from encroachment. Given the rural nature of the District the majority of the District's Green Belt performs strongly against this purpose. Therefore, the Council has undertaken some sensitivity testing in its Stage 2 Green Belt Review to look at how Green Belt performs if purpose 3 is removed from the assessment (and therefore parcels are assessed against purposes 1, 2 and 4). The results of this assessment provide a more nuanced picture of how Green Belt performs across the District. As acknowledged in preceding sections of the SSM, if the Council is to meet its objectively assessed housing and employment needs the case for Green Belt release will need to be considered. It is the Council's view that using the Green Belt assessment which considers the 3 purposes (rather than 4) will provide the Council with a better tool and evidence base upon which to make decisions about the performance of Green Belt across the District and those locations where Green Belt release may be more appropriate. It is on this basis that the Council proposes to use the results of the sensitivity testing for site selection. Further justification for adopting this approach is contained in the Stage 2 Green Belt Assessment.

⁶ It is noted that all releases of designated Green Belt land will result, at least to some extent, in harm due to the loss of land from the Green Belt. This phrasing reflects that based on the draft Stage 2 Green Belt Assessment that some parcels of the District's existing Green Belt do not meet the purposes as set out in paragraph 80 of the NPPF.

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
3.2	Walking distance to nearest bus stop (with at least peak hourly day service)	Housing and Employment (B class uses)		Site is within 400m of a bus stop.	Site between 400m and 1000m of a bus stop.	Site more than a 1000m from a bus stop.	
3.3	Access to employment	Housing		Site is within 1600m of an employment site/location.	Site is more than 1600m and less than 2400m of an employment site/location.	Site is more than 2400m from an employment site/location.	
3.4	Distance to local amenities	Housing and Employment (B class uses)		Site is less than 1000m from nearest town, large village or small village.	Site is between 1000m and 4000m from nearest town, large village or small village.	Site is more than 4000m from the nearest town, large village or small village.	
3.5	Distance to nearest infant/primary school	Housing		Site is less than 1000m from the nearest infant/primary school	Site is between 1000m and 4000m from the nearest infant/primary school	Site is more than 4000m from the nearest infant/primary school	
3.6	Distance to nearest secondary school	Housing		Site is less than 1000m from the nearest secondary school	Site is between 1000m and 4000m from the nearest secondary school	Site is more than 4000m from the nearest secondary school	
3.7	Distance to nearest GP surgery	Housing		Site is less than 1000m from the nearest GP surgery	Site is between 1000m and 4000m from the nearest GP surgery	Site is more than 4000m from the nearest GP surgery	

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
3.8	Access to Strategic Road Network	Employment (B class uses)	The site is immediately adjacent to the Strategic Road Network	The site is within 1km of the Strategic Road Network	The site is 1-3km from the Strategic Road Network	The site is 3-10km from the Strategic Road Network	The site is more than 10km from the Strategic Road Network
4.1	Brownfield and Greenfield Land	Housing and Employment (B class uses)	Majority of the site is previously developed land within or adjacent to a settlement	Majority of the site is greenfield land within a settlement	Majority of the site is previously developed land that is neither within nor adjacent to a settlement	Majority of the site is greenfield land adjacent to a settlement	Majority of the site is greenfield land that is neither within nor adjacent to a settlement
4.2	Impact on agricultural land	Housing and Employment (B class uses)			Development of the site would not result in the loss of agricultural land	Development of the site would result in the loss of poorer quality agricultural land (grade 4-5)	Development of the site would involve loss of the best and most versatile agricultural land (grades 1-3)
4.3	Capacity to improve access to open space	Housing and Employment (B class uses)		Development could provide an opportunity to improve links to adjacent existing public open space or provide access to open space which is currently private.	Development unlikely to involve the loss of public open space.	Development may involve the loss of public open space but there are opportunities for on-site off-setting or mitigation.	Development may involve the loss of public open space with no opportunities for on-site off-setting or mitigation.

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
5.1	Landscape sensitivity	Housing and Employment (B class uses)			Site falls within an area of low landscape sensitivity - characteristics of the landscape are able to accommodate development without significant character change.	Site falls within an area of medium landscape sensitivity - characteristics of the landscape are resilient to change and able to absorb development without significant character change.	Site falls within an area of high landscape sensitivity - characteristics of the landscape are vulnerable to change and unable to absorb development without significant character change.
5.2	Settlement character sensitivity	Housing and Employment (B class uses)		Development may improve settlement character through redevelopment of a run-down site or improvement in townscape.	Development is unlikely to have an effect on settlement character.	Development could detract from the existing settlement character.	Development is likely to substantially harm the existing settlement character.
6.1	Topography constraints ⁷	Housing and Employment (B class uses)			No topography constraints are identified in the site.	Topographical constraints exist in the site but there is potential for mitigation.	Topographical constraints in the site may preclude development.

⁷ It is noted that topographical constraints will not be a relevant consideration for all residential and employment (Use Class B) sites. Nevertheless, given the large number of sites which will be subject to the SSM and the undulating land form in parts of the District, the inclusion of this criterion is considered to provide additional information which can assist in understanding the characteristics of each site. Also, where appropriate, the Council has sought to align the approach taken in the SSM and TSSM. Discussions with the traveller community have indicated that the topography of a site does materially alter the suitability of a site for stationing caravans; undulating sites are considered less suitable by the traveller community due to the constraints this poses in situating caravans on the site. In light of these considerations, the Council considers it is appropriate to assess sites for their topographical constraints but acknowledges that this criterion should not be given undue weight when deciding which sites proceed to Stage 3. Accordingly, sites will not be discounted from consideration in the site selection process solely on the basis of how they score on this criterion.

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
6.2a	Distance to gas and oil pipelines	Housing and Employment (B class uses)			Gas or oil pipelines do not pose a constraint to the site.	Gas or oil pipelines may constrain part of the site but there is potential for mitigation.	Gas or oil pipelines pose a major constraint to development. They will be difficult to overcome and affect a large part of the site
6.2b	Distance to constraining power lines	Housing and Employment (B class uses)			Power lines do not pose a constraint to the site.	Power lines may constrain part of the site but there is potential for mitigation.	Power lines pose a major constraint to development. They will be difficult to overcome and affect a large part of the site
6.3	Impact on Tree Preservation Order (TPO) trees	Housing and Employment (B class uses)			The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site	The intensity of site development would be constrained by the presence of protected trees either on or adjacent to the site	The site has severely limited feasibility for development as a result of the extensive presence of protected trees, either on or adjacent to the site
6.4	Access to site	Housing and Employment (B class uses)		Suitable access to the site already exists.	Access to the site can be created within landholding to adjacent to the highway.	Potential for access to the site to be created through third party land and agreement in place, or existing access would require upgrade.	There is no means of access to the site and no likely prospect of achieving access.

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
6.5	Contamination constraints	Housing and Employment (B class uses)			No contamination issues identified on site to date.	Potential contamination on site, which could be mitigated.	Potential contamination on site, which is not likely to be able to be mitigated.
6.6	Traffic impact	Housing			Area around the site expected to be uncongested at peak time, or site below the site size threshold where it would be expected to significantly affect congestion.	Low level congestion expected at peak times within the vicinity of the site.	Moderate peak time congestion expected within the vicinity of the site.