

Neighbourhood Planning Guidance

How to allocate sites

July 2015

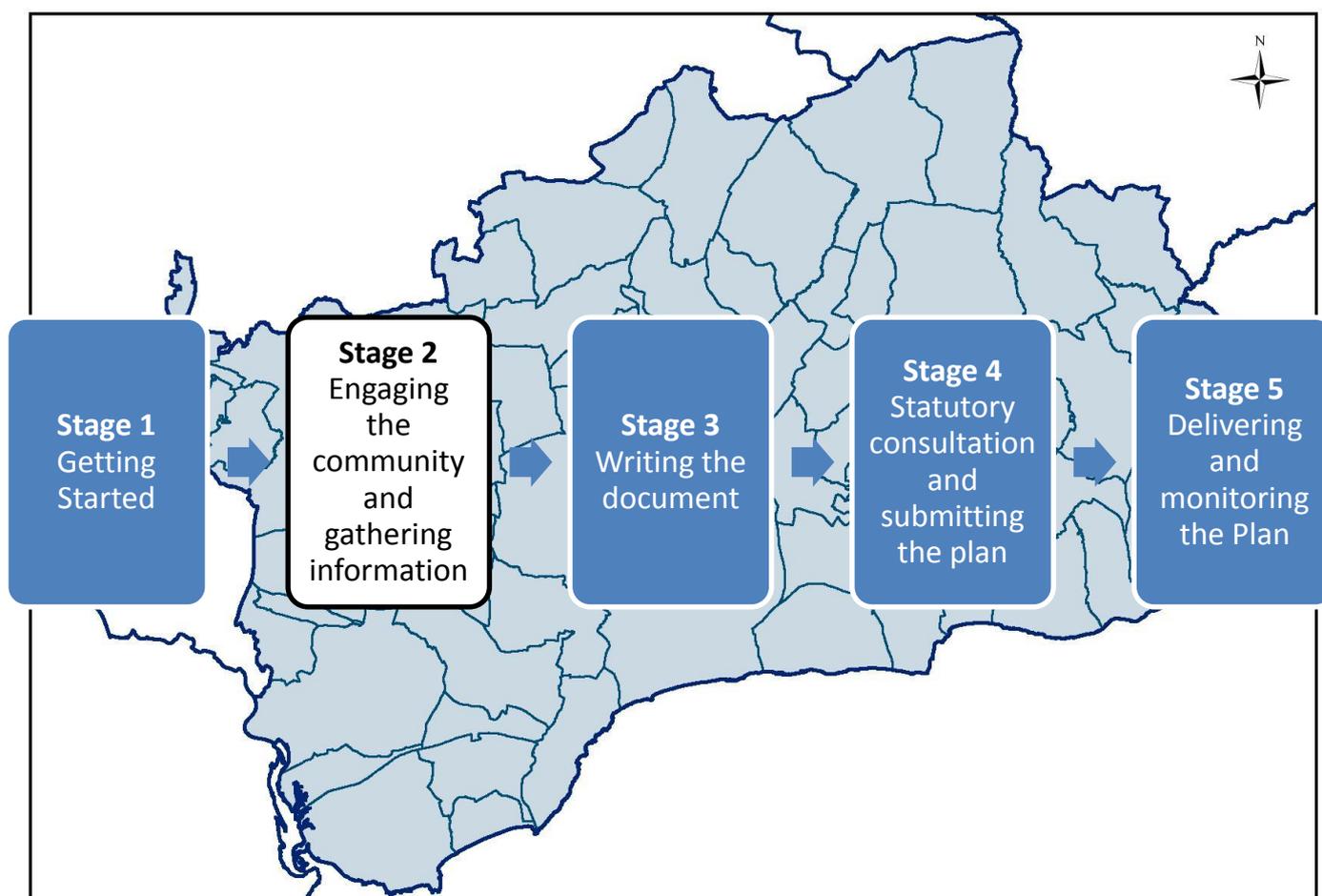
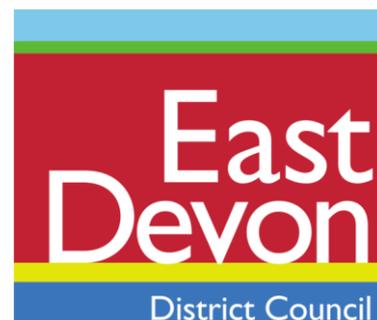


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For most communities, housing and development is the most important issue that the Neighbourhood Plan will tackle. Your Neighbourhood Plan is a document setting out the development guidelines for an area over the coming years. Accordingly, you have the ability to identify and allocate land suitable for development including housing, leisure, business, employment.

Should we allocate development in our plan?

You should give serious consideration over whether to allocate development sites in your Plan. It can be an empowering process which ultimately will provide developers, residents and service providers with a degree of certainty over what is going to be developed in the community. However, it is always a fairly contentious and complicated process, with many residents and sometimes group members holding particular interests in choosing one site over another.

Can we still allocate sites if we don't have a built-up area boundary?

A built-up area boundary (BUAB) is a line drawn around a settlement where development is in principle acceptable.

Strategy 27 of the emerging Local Plan identifies 17 small towns and villages that will have a BUAB, due to them having sufficient facilities and services to accommodate development. We appreciate that local communities may want further development that goes beyond this strategy so we have added a caveat to the policy allowing communities to produce Neighbourhood Plans to bring forward further development and justify how and why, in the local context, the development will promote the objectives of sustainable development.

When determining whether you should allocate sites you should first consider the following questions:

1. Is allocating a site crucial to delivering an objective or strategy in your Plan?

If you have identified a particular housing need through your consultation that you want met or you want to provide for a recreational facility you may not be able to deliver this without allocating specific sites.

2. Do you already have sites allocated in the Local Plan?

You cannot challenge the allocations you already have but you can provide further detail on what those allocations should comprise i.e. particular housing mix, design etc.

3. Can you achieve your objectives without allocating a site through an alternative method?

A less complex and contentious alternative may be to write a criteria-based policy that promotes development in certain types of areas and supports a particular type/mix of development or recreational facility without having the need to allocate a particular site. This approach provides less control but puts the onus on the developer to do the work to justify a particular site.

Note: If you are one of the settlements that is planned to lose its built up area boundary it will be more difficult to have a criteria based policy promoting housing. In these instances we advise that you allocate a specific site to meet local housing need.

4. Does the Local Plan place any particular restrictions on development in your area?

If your parish does not have a built-up area boundary then there is a general presumption against development in these areas. You would have to build a compelling case as to why the development is needed/ acceptable.

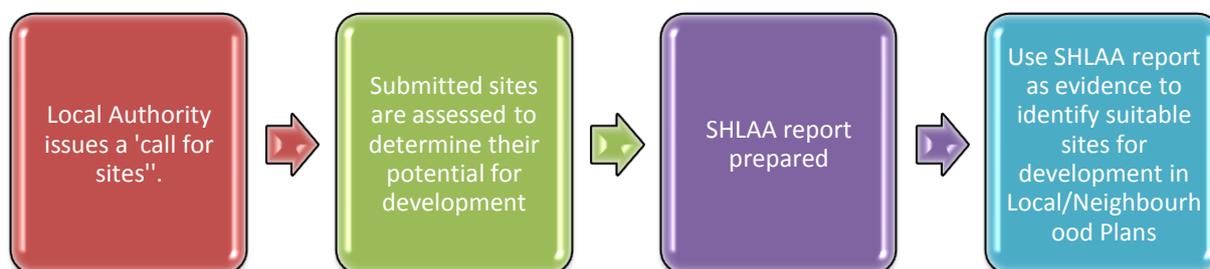
5. Is the landowner willing to release the site and if so, does someone want to build on it?

If there is a particular site you have in mind, you need to ensure that any allocations are deliverable. It is not worth allocating land if the landowner is not willing to sell or there would be no interest in developing it!

How should we go about allocating sites?

If you have answered the above questions and decide that it is necessary for you to allocate a site there will already be a host of information you can draw from including the following:

- **Strategic Housing Land Availability Assessment (SHLAA)** - As part of the background work to our Local Plan, EDDC should keep an up-to-date record of sites that are available for development. It should be noted though, that just because a site has been put forward in the SHLAA this does not mean that it will, or should, be developed, it is an indication that the landowner is willing to develop it and would like it to be added to the record. The last SHLAA was conducted in 2012 and identifies potential sites for housing, employment and traveller uses, it assesses whether these are developable, how much development could be accommodated on them and whether they could be delivered within 5, 10 or 15 year time frames. The process is outlined below:



You can find the SHLAA data on our website at the following location. <http://eastdevon.gov.uk/planning/planning-policy/evidence-and-research/housing-and-population/strategic-housing-land-availability-assessment/> This is a really useful resource as you can see the suitability of land that has previously been put forward for development which can be used inform your site choices.

- **Villages Development Plan Document** - The East Devon Villages Plan was a document produced to inform the housing allocations for the small towns and villages in the Local Plan. Our strategy has now changed and we will no longer be pursuing site allocations in the villages but the work that went into the plan is still useable by neighbourhood plan groups. The process consisted of consulting the parishes on which particular sites (previously submitted in the SHLAA) they would prefer to be developed. We also carried out detailed landscape appraisals on all of the sites in order to draw out a preferred site.

You can find the Villages Development Plan and the background work at the following location: <http://eastdevon.gov.uk/planning/planning-policy/document-libraries/village-document/>

What is a 'call for sites' and should we do one?

A 'call for sites' is the process where you invite all landowners and developers to suggest sites that they wish to make available for development. It forms the first stage of a strategic housing land availability assessment whereby the submitted sites are then assessed for suitability.

If you intend on allocating development sites you need to demonstrate that you have assessed the reasonable alternatives for allocation. A call for sites is important to this process as you can lay out all of the potential options and then assess each on their own merits.

At District level, we last undertook a call for sites in 2012. Although we plan on conducting another, this is not likely to happen before 2016 which may not be in time to inform your Plan. Given that several years have passed since 2012 there is no guarantee that sites identified in previous SHLAAs will still be available, alternatively there may be other sites that have become available since then that you will want to consider. You should therefore bear this in mind when deciding whether to do a call for sites or not.

Important!

Any housing allocations you make should have a clear purpose or aim. It's no good justifying a development solely on the basis that it's what the community want. All development should achieve some kind of benefit to the community, be it meeting a specific housing need or delivering a service or facility. Bear in mind that small scale housing schemes are unlikely to be sufficient to 'save' existing facilities from closure.

Conversely, we did give the opportunity during the villages development plan process for significant community involvement to select a suitable development site. Depending on the circumstances you may feel that this process was recent enough and provided robust enough evidence to pursue a particular site selection without having the need to do a full call for sites.

Top Tip!

Remember to keep your options open when selecting a site. It's very easy to have decided which site you think should be developed even before you have started an assessment process, in these cases you can fall into the trap of gearing all of your ideas on the assumption that this site will be developed, without ever properly considering the alternatives.

Should you decide to undertake a call for sites, we have produced a site submission form as a template for groups to use- this can be found in appendix 1 and is based on the pro-forma we use at the District Council.

How should we assess sites?

It's crucial that all sites are assessed against a wide ranging and comprehensive list of criteria. To aid you in developing these you may want to consult with the community and stakeholders to ensure that the all relevant issues are addressed.

To help eliminate clearly unsuitable sites it is also worthwhile developing a short list of "major" criteria which would give you the opportunity to exclude potential sites without having to undertake an in-depth assessment.

Major criteria may include the following:

- **Flood risk**

Development within flood risk zones 3a and 3b (based on Environment Agency Flood Risk Maps) should be rejected. For sites in other identified flood risk zones you will need to apply something called a 'sequential test', which is where you assess the suitability of alternative sites.

- **Impact on National and International nature conservation designations**

Sites situated within internationally and nationally recognised wildlife areas should be rejected. For Devon, a list of these can be found at the following link:

http://www.devon.gov.uk/wildlife_designations

Once you have ruled out those that are clearly unsuitable you should form a list of other important criteria that will form the basis of your individual site assessment form. Important criteria are the following:

- Contaminated land
- Transport and highways access
- Proximity to shops, schools, employment and public transport
- Impact upon the landscape and the wider Environment (particularly in the AONB)
- Visual impact
- Connection and availability of utilities

Top Tip!

We have produced an evidence base guide that might provide some assistance in identifying the constraints for specific sites. This can be found on our website at the following location:

<http://eastdevon.gov.uk/planning/neighbourhood-and-community-plans/neighbourhood-plans/>

How should we consult the community?

Throughout the Neighbourhood Plan process, you will need to ensure that the community are behind the entire content of the plan, including any site allocations. Ultimately your Plan will be going to referendum so if they are unhappy with any aspects, they will have the opportunity to refuse it. It is therefore important to ensure that you factor in community aspirations as part of choosing the preferred site.

Once you have identified potential sites and excluded the ones failing the major criteria, you may want to produce a consultation document that can be made available to residents to ask their development site preference which can be used to inform your decisions. We took a similar approach when we were considering allocating sites for the Villages Development Plan so you can always use this as a starting point if relevant. The document can be viewed at the following link: <http://eastdevon.gov.uk/planning/planning-policy/emerging-plans-and-policies/the-villages-plan/>

Top Tip!

It is often the case that there will be considerable support for sites that are a long way away or have few residents nearby. Remember that your site selection should be based on the most suitable site for development in order to meet local needs, not just the site that garners the highest level of support. You will ultimately need to make an informed decision based upon all the criteria including public opinion.

Contact us:

Planning Policy Team
East Devon District Council
Knowle
Sidmouth
Devon
EX10 8HL
01395 571736
ptwamley@eastdevon.gov.uk
crodney@eastdevon.gov.uk

Appendix 1: Site submission form

Site submission form

As part of building the evidence base for our Neighbourhood Plan, [Parish Council] is currently undertaking an assessment of the availability of land for development in the parish. This form should identify sites which will be considered by the Parish Council for their suitability for the use proposed over the lifetime of the plan.

Please use a separate form for each site and complete the form legibly and to the best of your knowledge.

Sites submitted to the Parish Council will be in the public domain and the information submitted will not be treated as confidential. We may also need to visit the site to assess its suitability for development in person. By completing this form you are agreeing to these terms and giving your consent to a member/s of the Neighbourhood Plan group (very occasionally accompanied by a person with professional expertise, for instance a highway engineer) visiting the site in order to undertake an assessment.

Your details (Landowner):	
Name and company	Address
Telephone Number	Email address

Your details (Agent):	
Name and company	Address
Telephone Number	Email address

1. Site information	
Site Address	OS Grid Reference

Site Area	Previous SHLAA reference (if applicable)

2. Site description	
Current/Existing use	OS Grid Reference
In your opinion, what type of development would the land be suitable for?	Short site description
Housing <input type="checkbox"/> Employment <input type="checkbox"/> Retail <input type="checkbox"/> Other (please state)	
What timescale would the site be available for development?	
Immediately <input type="checkbox"/> Within the next 5 years <input type="checkbox"/> Within a period of 5-10 years <input type="checkbox"/> Within a period of 10- 15 years <input type="checkbox"/> After 15 years <input type="checkbox"/>	

3. Site details	
Access to adopted highway	Existing local plan policies
Vegetation on the site	Topography
Local character	Environmental designations
Contamination / pollution	Flood risk
Infrastructure requirements	Contamination / pollution

Other issues or considerations	

4. Site details	
Access to adopted highway	Existing local plan policies
Vegetation on the site	Topography
Local character	Ownership issues
Environmental designations	Contamination / pollution
Flood risk	Infrastructure requirements
Contamination / pollution	Other issues or considerations

Are you, or a close relative, a member of **XXXX** Parish Council or the **XXXX** Neighbourhood Plan Group? If yes, please give details

Thank you for completing this form. This should be returned together with a map showing the exact location of the site and the extent of the boundary to the address below:

[Address]

[Telephone]

Or email it to: **[Email]**

Appendix 2: Site assessment form

Site assessment form

1. Site info and features	
Settlement	Site name
Site Address	Site Area (hectares)
What is the current use of the site?	Is the site Greenfield, Brownfield or mixed?
What are the surrounding land uses (e.g. housing, industrial, agricultural)	Is the site within the development boundary (if applicable) and/or well related to the settlement built form?
What vegetation is present on the site? (Trees and hedgerows etc.)	What hydrological features are present on the site? (streams, ponds, watercourses etc.)
Does the site have any other features of note? (existing buildings or structures etc.)	Are there any signs of site contamination? (also look at adjoining land uses, old maps etc)

2. Landscape and amenity	
How prominent is the site when viewed from outside it, and from approximately how far away?	Are there any key views out of the site?(e.g. church spires, other key features)
What is the topography of the site? (e.g. sloping upwards or downwards)	Is an adjacent use likely to have an adverse impact on new residents?

3. Access to services and facilities

Is the site within a 400m (or at most 600m) walking distance from the following? (N/A means that no service/facility is located in the parish)	Yes	No	N/A	Comments
Shop				
Post office				
Pub				
Recreation space/facility				
Healthcare facility				
Bus stop				
Church				
School (primary or secondary)				
Community facility/hall				
Local employment opportunities				
Is the route flat? If not is the gradient at an acceptable level for wheelchair use?				Are footpaths available to avoid traffic conflict?
If steep, are resting places available?				Are access routes lit?
Does the site have access to an adopted highway?				Does the site have access via a private road or ransom strip?

4. Policy constraints and utilities

Do any of the following designations affect the site?	Yes	No	Comments
Historic			
Archaeological sites			
Scheduled ancient monument			
Listed building			
Conservation area			
Natural			
AONB			
Flood zone 1			
Flood zone 2			
Flood zone 3			
Tree protection order			
Biodiversity			
Special area of conservation			

Special protection area			
Ramsar site			
SSSIs			
National nature reserve			

Are you aware of any other policy constraints/designations affecting the site?	What utility services are available? (Gas, Electricity, Water, Sewerage)

5. Appraisal suitability and availability findings	
Is the site considered appropriate for development?	Can the entire site be developed?
Which category does the site fall into? Please add comments.	How many homes could potentially be built on the site?
Totally inappropriate <input type="checkbox"/>	
Significant constraints <input type="checkbox"/>	
Minor constraints <input type="checkbox"/>	
Unconstrained <input type="checkbox"/>	
In what time frame could the site be developed?	Final comments
0-5 years <input type="checkbox"/>	
6-10 years <input type="checkbox"/>	
11-15 years <input type="checkbox"/>	
16 -20 years <input type="checkbox"/>	