

Site selection and allocation

1. Introduction

- 1.1. Neighbourhood Development Plans (NDPs) can allocate sites for residential and other land uses, however there is no requirement that they must do so. This Advice Note is primarily residential focused as NDPs tend not to include allocations for other land uses. Nonetheless, the site selection process set out below can be used for uses other than residential.
- 1.2. Carrying out a site assessment will provide the evidence to demonstrate that the site(s) selected for allocation are the most appropriate, are available, and have a good prospect that they will be developed. At the end of the process you will have a site(s) that you can demonstrate to the examiner have been thoroughly and objectively assessed for their suitability.
- 1.3. The site selection process will also tell the story of how the site(s) chosen for allocation have been selected, and why others were not. This will help to demonstrate to the community as well as those who have promoted sites for consideration why their sites have not been allocated and the basis on which decisions were made.

2. What are the benefits and disadvantages of including residential site allocations in a NDP?

- 2.1. Before deciding whether or not the NDP should include residential allocations, it is important to be mindful of the following:

Advantages	Disadvantages
Allocating within a NDP allows the local community to oversee the allocations process and decide where they would like the required growth to be planned	The process will include more work, with additional work such as Strategic Environmental Assessment and possibly also Habitat Regulation Assessment being required.
Taking a plan-led approach ensures that parameters can be set in place for the development, for example access points, and the location of open space and landscaping	There will be difficult choices to make. This means that members of the steering group and the parish council are more directly in "front line" of possible hostility and opposition from residents who do not want development near them. The parish council needs to be prepared to defend unpopular decisions.
Where a NDP makes provision for a housing requirement in full through its policies and site allocations, national planning policy (paragraph 14 of the National Planning Policy Framework (NPPF)) grants extra protection against unplanned developments provided all of the following apply: <ul style="list-style-type: none"> • the NDP became part of the development plan two years or less before the date on which the decision is made; • the NDP contains policies and allocations to meet its identified housing requirement; • West Berkshire Council has at least a three year supply of deliverable housing sites 	There is also the possibility of landowners and/or developers who miss out on a site allocation being unhappy. They are likely to direct their protests at the parish and steering group, not the local planning authority. Again, the parish council needs to be prepared to defend unpopular decisions.

Advantages	Disadvantages
<p>(against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 74); and</p> <ul style="list-style-type: none"> West Berkshire's housing delivery was at least 45% of that required over the previous three years. <p>Details of West Berkshire's current five year housing land supply position and housing delivery can be found at: https://info.westberks.gov.uk/amr.</p>	
<p>A NDP can be more responsive to local opinion on the details of what happens on each housing site and what benefits could be sought. For example, housing sites can be linked to community contributions and benefits. The referendum at the end of the process will focus minds on getting the necessary community support for each option.</p>	<p>The supporting documents required at Regulation 16 submission stage (Basic Conditions Statement and Consultation Statement) are likely to be longer and more complex to prepare. The Consultation Statement presents all comments received on the draft plan and with site allocations included in the draft plan, a greater number of responses is likely to be received. These will all need processing and ultimately responding to through the formal process.</p>
	<p>The independent examination is likely to be more complex due to the site allocations being subject to challenge at this stage. Rather the examination taking place by way of written representations, hearing sessions may be necessary to resolve controversial housing matters before referendum.</p>
	<p>To meet the basic condition d) d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development. The NDP will need to be able demonstrate that it meets the social strand of sustainable development set out in paragraph 8 of the NPPF which states 'to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations'. This may be a challenge without an allocation.</p>

3. What are the indicative housing requirements for the designated Neighbourhood Areas in West Berkshire?

- 3.1. The emerging draft West Berkshire Local Plan Review to 2037 (LPR), which was published for consultation in December 2020, included indicative housing requirements for the Neighbourhood Areas that were designated at the time and where a NDP group had expressed an intention to allocate. The indicative requirements are included within strategic policies SP13 (Sites allocated for

residential and mixed-use development in Newbury and Thatcham), SP14 (Sites allocated for residential and mixed-use development in Eastern Area), and SP15 (Sites allocated for residential and mixed-use development in the North Wessex Downs AONB).

- 3.2. There is no set method identified in national planning policy and guidance for calculating the housing requirement, however national planning practice guidance (PPG) does state that local planning authorities will need to take into account their own housing requirement, the spatial strategy set out in the Local Plan, evidence such as the HELAA, and the characteristics of the neighbourhood area, eg. population, its role in providing services. Past delivery performance is not taken into account.
- 3.3. The indicative requirements were based on available development opportunities identified in the Council's February 2020 HELAA. The HELAA is an evidence document that makes a preliminary assessment of the suitability and potential of sites that have been promoted to West Berkshire Council.
- 3.4. Consideration was also given to the placing of a settlement within the settlement hierarchy and constraints. Table 2.1 below sets out the indicative requirements and the justification for these:

Table 2.1: Indicative housing requirements for the designated Neighbourhood Areas included with the draft emerging West Berkshire Local Plan Review (December 2020)

Designated Neighbourhood Area	Indicative housing requirement at December 2020	Justification
Burghfield	0	Burghfield Parish falls within the recently revised Atomic Weapons Establishment (AWE) Burghfield Detailed Emergency Planning Zone. Residential development is unsuitable in this zone, however an Offsite Plan is being produced and this may allow a limited amount of development. The housing requirement for Burghfield will be reviewed following the publication of the Offsite Plan.
Compton	0	Compton is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. There is an allocation within the Housing Site Allocations Development Plan Document (HSA DPD) for 140 dwellings on the site of the former Pirbright site, and the Core Strategy Inspector's report identified that the site could provide a higher level of growth than is normally expected in a service village. Development at the former Pirbright site is still outstanding, however a planning application is currently pending determination. It is proposed to roll forward this allocation into the LPR.

Designated Neighbourhood Area	Indicative housing requirement at December 2020	Justification
		<p>Whilst the HELAA identifies 2 sites that have potential, Officers consider that due to the scale of development that is to take place at the Pirbright site, there should be no further allocations within Compton in the period up to 2036. This is particularly because Compton is located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB), a nationally important and legally protected landscape. The National Planning Policy Framework (NPPF) is clear that great weight should be given to conserving landscape and scenic beauty in AONBs. In addition, although close to the A34 and M4, local roads are rural in nature and not suitable for heavy traffic.</p> <p>It is recognised that windfall development may come forward over the plan period.</p>
Cold Ash	40	<p>The Parish of Cold Ash contains the village of Cold Ash, the hamlet of Ashmore Green, and small parts of the towns of Newbury and Thatcham.</p> <p>Cold Ash village is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Ashmore Green is not included within the settlement hierarchy and is instead a 'smaller village with a settlement boundaries' therefore only suitable for limited infill development subject to the character and form of the settlement. Newbury and Thatcham are both identified as 'Urban Areas' because of the wide range of services they offer and subsequently both will be the focus for the majority of development.</p> <p>Cold Ash sits on the southern edge of the North Wessex Downs AONB. Much of the village is just outside of the boundary, however the houses to the north and east of The Ridge are within the boundary. The AONB is a nationally important and legally protected landscape and the NPPF is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>Within the HSA DPD there are 3 allocated sites in Cold Ash Parish for a total of between 90-100 dwellings. One site is being built out, however 2 have yet to come forward. Of the two outstanding sites, two have outline permission whilst the landowner of the third has expressed their intention for the site to be developed and they are in the process of appointing a planning consultant.</p> <p>The February 2020 HELAA identifies five sites as having potential. Taking the development potential of these sites into consideration alongside the placing of the towns/villages in Cold Ash parish</p>

Designated Neighbourhood Area	Indicative housing requirement at December 2020	Justification
		<p>within the settlement hierarchy, existing allocations, as well as the AONB, officers consider that a housing requirement of 40 dwellings would be appropriate.</p> <p>In respect of HELAA site CA15, the eastern site parcel falls within Cold Ash Parish and the western parcel within Shaw-Cum-Donnington Parish. The Council's Highways Team have identified that for this site as well as site SCD4, the provision of a through route from the B4000 to the A339 is required. This site along with SCD4 will only be supported by Highways if this is provided. Combined sites CA15 and SCD4 are of a strategic scale. It is for the local planning authority to plan for strategic sites.</p>
Hermitage	20	<p>The Parish of Hermitage contains the village of Hermitage which is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential.</p> <p>Hermitage sits within the North Wessex Downs AONB, a nationally important and legally protected landscape which national planning policy is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>There are two sites allocated for 25 dwellings in the HSA DPD. Development has not yet commenced on these sites and it is proposed to roll forward these allocations into the LPR. A significant amount of development has taken place in Hermitage in recent years with the development of the former Cementation works.</p> <p>The February 2020 HELAA identifies 2 sites as having potential, although there are concerns about the landscape capacity of site HER4. Taking the development potential of these sites into consideration alongside recent development, the placing of Hermitage within the settlement hierarchy, existing allocations as well as the AONB, officers consider that a housing requirement of 20 dwellings would be appropriate. However the NDP steering group could commission a landscape capacity assessment (or WBC can appoint a consultant and recharge the Parish Council for this work) to determine if there may be potential for a slighter higher number.</p>
Hungerford	55	<p>The Parish of Hungerford contains the town of Hungerford and the small settlement of Eddington. Hungerford is identified as a Rural Service Centre in the settlement hierarchy. Rural Service Centres have a range of services and reasonable public transport provision meaning there are opportunities</p>

Designated Neighbourhood Area	Indicative housing requirement at December 2020	Justification
		<p>to strengthen the role in meeting the requirements of surrounding communities. Eddington is not included within the settlement hierarchy and is instead a 'smaller village with a settlement boundaries' therefore only suitable for limited infill development subject to the character and form of the settlement.</p> <p>Hungerford sits within the North Wessex Downs AONB, a nationally important and legally protected landscape which national planning policy is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>There is one site allocated for 100 dwellings in the HSA DPD. Development has not yet commenced on the site, although it has planning permission, and it is proposed to roll forward this allocation into the LPR.</p> <p>The February 2020 HELAA identifies 8 sites as having potential. Taking the development potential of these sites into consideration alongside the placing of Hungerford within the settlement hierarchy as well its location in the AONB, officers consider that a housing requirement of 55 dwellings would be appropriate.</p>
Lambourn	25	<p>The Parish of Lambourn contains the village of Lambourn and the hamlet of Eastbury. Lambourn is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Eastbury is not included within the settlement hierarchy and is instead a 'smaller village with a settlement boundaries' therefore only suitable for limited infill development subject to the character and form of the settlement.</p> <p>Lambourn sits within the North Wessex Downs AONB, a nationally important and legally protected landscape which national planning policy is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>There are 2 allocated sites within the HSA DPD for 65 dwellings. Development has not commenced on the sites and it is hoped to roll forward these two allocations into the LPR.</p> <p>The February 2020 HELAA identifies 2 sites as having potential. Taking the development potential of these sites into consideration alongside the placing of Lambourn within the settlement hierarchy as well as the AONB, officers consider that a housing requirement of 25 dwellings would be appropriate.</p>

Designated Neighbourhood Area	Indicative housing requirement at December 2020	Justification
Stratfield Mortimer	0	<p>The adopted NDP includes an allocation for up to 110 dwellings. The allocated site has outline planning permission, and there is a Reserved Matters application pending determination for the first phase of development (28 dwellings).</p> <p>The Parish of Stratfield Mortimer contains the village of Mortimer which is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Given the outstanding dwellings still to deliver, officers consider that there should be not any additional allocations in the plan period. It is however recognised that windfall development may come forward over the plan period.</p>
Tilehurst	175	<p>Tilehurst is a suburb of Reading and forms part of the Eastern Urban Area alongside Calcot and Purley on Thames. Within the settlement hierarchy it is identified as an 'Urban Area' because of the wide range of services offered and subsequently will be the focus for the majority of development.</p> <p>The western part of Tilehurst sits within the North Wessex Downs AONB, a nationally important and legally protected landscape which national planning policy is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>There are 3 allocated sites within the HSA DPD for 110 dwellings. One site allocated for 35 dwellings has been built out whilst development has not yet commenced on the other 2 sites. The 2 outstanding allocations will be rolled forward into the LPR.</p> <p>The February 2020 HELAA identifies 4 sites as having potential. Taking the development potential of these sites into consideration alongside the placing of Tilehurst within the settlement hierarchy as part of its location within the AONB, officers consider that a housing requirement of 175 dwellings would be appropriate.</p>

3.5. If you are producing a NDP and want to include residential allocation(s), but your Neighbourhood Area was designated after December 2020, please get in touch with the Planning Policy Team so that an indicative housing requirement figure can be provided.

4. Why are the housing requirements indicative?

4.1. The information published in the HELAA was at a point in time. As work progresses on the LPR and more evidence is gathered, some of the development opportunities the Council originally identified may change as could the settlement hierarchy.

- 4.2. There is also the possibility of further change at independent examination. Planning Practice Guidance (PPG, paragraph: 104 reference ID: 41-104-20190509) comments that there is an expectation that housing requirement figures will be set in strategic policies, or an indicative figure provided on request. Where the figure is set in strategic policies, this figure will not need retesting at examination of the NDP.
- 4.3. Until the LPR is adopted, the housing requirements for the designated Neighbourhood Areas will remain indicative. Therefore, if a NDP examination was to take place before the adoption of the LPR, the housing requirement figure will be tested at the NDP examination.

5. Can the housing requirement be exceeded?

- 5.1. Yes. PPG (paragraph: 103, reference ID: 41-103-20190509) states that:

“Neighbourhood planning bodies are encouraged to meet their housing requirement, and where possible exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale. Where neighbourhood planning bodies intend to exceed their housing requirement figure, proactive engagement with their local planning authority can help to assess whether the scale of additional housing numbers is considered to be in general conformity with the strategic policies. For example, whether the scale of proposed increase has a detrimental impact on the strategic spatial strategy, or whether sufficient infrastructure is proposed to support the scale of development and whether it has a realistic prospect of being delivered in accordance with development plan policies on viability. Any neighbourhood plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally-produced information.”

6. How to identify which sites to assess?

- 6.1. It is important to have a very clear idea as to what and how much land may be available for development. This is so you have as much choice as possible when looking to allocate sites that they provide the greatest opportunity to support the overall vision and objectives for your area, best meet your identified housing needs, whilst minimising any potential impacts. Taking a proactive approach, by using your local knowledge of potential sites, as well as by using information published by the Council, can help to achieve this.

(a) Housing and Economic Land Availability Assessment (HELAA)

- 6.2. The starting point for identifying sites is West Berkshire Council's Housing and Economic Land Availability Assessment (HELAA) which can be viewed at: <https://info.westberks.gov.uk/helaa>. The HELAA makes a preliminary assessment of the suitability and potential of sites (many of which were promoted to the Council), and looks at the capacity for delivering development.
- 6.3. It is important to note that the HELAA does not make recommendations on which sites should be allocated, but it will make a preliminary assessment of their suitability and potential. The sites that we have considered in the HELAA were identified following a 'call for sites'.
- 6.4. The HELAA replaces the Strategic Housing Land Availability Assessment (SHLAA) documents that were previously prepared by the Council. It should be noted that any

sites promoted for the SHLAA have not been automatically rolled forward for consideration in the HELAA. When we held the call for sites we made clear that sites promoted previously would need to be resubmitted.

- 6.5. The identification of potential sites in the HELAA does not state or imply that the council will necessarily grant planning permission for development. All planning applications will continue to be determined against the appropriate development plan and other relevant material considerations.
- 6.6. The HELAA is updated periodically so keep this in mind when undertaking site selection work.

(b) Sites not considered in the HELAA

- 6.7. The NDP steering group may want to use their local knowledge to identify potential sites as you may find that smaller sites, particularly in more rural locations, may not have been put forward by a local landowner or developer. There is nothing to prevent you from undertaking your own 'call for sites' to supplement what the Council has already done. This will be particularly important if the Council's HELAA has gathered only a limited number of sites in the area, and will be essential if there are no sites at all.
- 6.8. If you do decide to hold your own 'call for sites' then you will need to put together a form that land owners / site promoters can complete. The form used by West Berkshire Council as part of their 'call for sites' can be viewed on the Council's website: <https://info.westberks.gov.uk/helaa>.
- 6.9. There may also be sites that are known to the community which you might want to consider. If there are, then you will need to contact the landowner (if you don't know who the landowner is then you must undertake a Land Registry search: <https://www.gov.uk/search-property-information-land-registry> to see if they are willing for their sites to be considered. If they are, then you will need to ask them to complete the 'call for sites' form. If they do not want their site considered, then it cannot be considered any further. The NPPF is clear that to be considered deliverable, sites must be "...available now...".
- 6.10. The NDP group will need to assess these sites to determine whether or not they should be considered further in the site selection process. Using the Berkshire HELAA Methodology (<https://info.westberks.gov.uk/CHttpHandler.ashx?id=43267&p=0>) will help with this process.

(c) What sites / approaches cannot be used to meet the housing requirement?

- 6.11. It is important to clarify that there are some sites and approaches that cannot be used to meet the indicative housing requirement. Details of this are set out below:

Sites already allocated in the Local Plan or LPR:

PPG (paragraph: 044, reference ID: 41-044-20190509) states that a NDP can allocate additional sites to those in a Local Plan. They cannot however re-allocate sites that are already allocated.

Sites located within the settlement boundary:

Settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.

The West Berkshire Local Plan does not include allocations within settlement boundaries because the principle of development is considered acceptable. Were NDPs in West Berkshire to include allocations within the settlement boundary, then this approach would be inconsistent with the approach taken in the Local Plan and draft emerging LPR.

NDPs must meet a set of tests known as Basic Conditions, and one of these is that the policies in a NDP must be in general conformity with the strategic policies in a Local Plan.

It should be noted that policies in Local Plans in England vary, and as an example not all Local Plans include defined settlement boundaries. Some Local Plans have chosen to define a 'built area' but not actually map this. It is for this reason that there might be some NDPs in England that do include allocations within what West Berkshire would refer to as 'settlement boundaries'.

Reliance on a windfall allowance:

There are several sources of housing supply that will meet the district's housing requirement over the plan period. The sources include:

- Retained allocations in the current Local Plan
- Existing planning commitments (unallocated sites with planning permission)
- New allocations in the LPR
- Allocations within NDPs
- Small site windfall allowance

West Berkshire Council has assessed the contribution likely to be made from windfall sites based on past trends. Windfall sites are defined in the NPPF as being "*sites not specifically identified in the development plan*".

The NPPF allows local authorities to make an allowance for windfall sites as part of anticipated supply provided there is compelling evidence that windfall sites will provide a reliable source of housing supply. Based on past completions data in West Berkshire there is a case for the inclusion of a small site (less than 10 dwellings) windfall allowance.

Though windfall delivery varies from year to year and the allowance is not intended to accurately predict future supply, it is apparent from the monitoring of permissions and completions that it is a consistent source of supply and there is no indication of this supply falling away. Delivery will however continue to be monitored through the Council's Annual Monitoring Report to ensure that assumptions remain robust.

A large and medium windfall allowance has not been included because such developments have not been a consistent source of supply. The Council needs to be able to demonstrate that the housing requirement can be met in a plan-led fashion rather than relying on brownfield land (and in particular permitted development for

office conversions) to come forward at the appropriate time. The emerging draft LPR does, though, support development of previously developed sites within the settlement boundaries and any large and medium sites that do come forward will contribute to the windfall element of supply and add to the flexibility needed to ensure housing needs can be met.

Reliance on past completions:

Past completions cannot be used to meet the housing requirement, nor can they be used to justify the full requirement not being met.

7. How to choose which sites are best?

7.1. To choose which site(s) are the best to allocate, NDP groups will need to undertake site selection work. This work needs to be carried out in an open and transparent way, and should include consultation with the community.

7.2. Carrying out site assessments will provide the evidence to demonstrate that the site(s) selected for allocation are the most appropriate, are available, and have a good prospect that they will be developed. At the end of the process you will have a site(s) that you can demonstrate to the examiner, local community and those who have promoted sites have been thoroughly and objectively assessed for their suitability and are based on sound planning judgements.

7.3. The site selection process will also tell the story of how the site(s) chosen for allocation have been selected, and why others were not.

(a) Set up a working group

7.4. The organisation Locality suggest that a working group is set up to carry out the site assessment process. This should ideally be a core group who are involved in the assessment of each site to ensure consistency.

7.5. One of the challenges that face NDP groups is making sure that, in undertaking the site selection work, the people involved do not have an interest in the sites being considered. The reason that this is a challenge is because those who are doing the assessing live within the community where the sites are proposed to be allocated. However, it is vital that when selecting the members of the working group that this is taken into account, so that there is no opportunity to challenge the outcome because a member of the group is considered to have either a financial or personal interest in which sites are selected. The main areas to consider are:

- whether the person owns land being promoted, or has a more than passing acquaintance with a landowner; and
- whether the person may be seen to be adversely affected if a site were to be allocated (eg. because they live directly next door, or have a more than passing acquaintance with someone who may be seen to be adversely affected).

7.6. These are known as 'pecuniary' and 'personal' interests. It is important that any relevant interests are declared at the outset. Using a reasonable number of people in site assessments is one way of ensuring that such interests are avoided. We would always recommend that you err on the side of caution.

(b) Put together site assessment criteria

- 7.7. You will need to identify a range of criteria so that you can look at each individual site in exactly the same way. This will ensure that you have an audit trail as to why you are proposing some sites and not others.
- 7.8. The criteria that you use will be a combination of criteria that would preclude development for good planning reasons (eg. such as development in high flood risk areas and the functional floodplain), factors that could be impacted both positively and negatively by development (eg. loss or provision of public open space). The criteria could also relate to the NDP Vision and Objectives and also be informed, where appropriate, by any baseline assessment of your community that has been undertaken. The latter may indicate, for example, that there is a strong desire in the community to support the vitality of centres and that new homes, including starter homes, could help to support this.
- 7.9. When putting together the criteria, you will need to make sure that it demonstrates that there is a good prospect that the site can, and will, be delivered. You will therefore need to have evidence that the site is:
- Suitable: there are no insurmountable physical or environmental factors that would restrict development. Factors which could be considered when assessing suitability include: does the site conform with policies in the Local Plan? Are there any physical constraints? Is the site within close proximity to facilities and services? Are there potential impacts upon the landscape? Will there be any environmental or amenity impacts upon potential occupants of the site and neighbouring residents?
 - Available: A site is considered available for development when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. Factors to be considered include: where constraints to suitability have been identified, how can these be overcome and how long will they take to overcome? Does the site have a history of unimplemented planning permissions? Do you know the ownership of the site? You cannot force a landowner to relinquish their land for the development you have identified.
 - Achievable: A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period. Factors to consider when assessing achievability include: have you engaged with the landowner/developer/site promoter to request evidence of viability? Would the site require additional infrastructure? Are there likely to be any major financial costs associated with making the site suitable for development? How long would it take to deliver development on the site?
- 7.10. Where you identify constraints to a site's suitability, availability and achievability, your assessment should consider what would be required to overcome them, along with how and when this could take place, and how likely it is the site would be delivered.

- 7.11. The Locality guidance on site assessment includes information on what criteria could be used: <https://neighbourhoodplanning.org/toolkits-and-guidance/assess-allocate-sites-development/>.
- 7.12. It should be noted that further technical studies or advice may be required. Indeed the HELAA identifies if further assessment is required. If this is the case then the NDP group will need to pick this up as part of the site selection work.
- 7.13. Additional work identified in the HELAA includes the following:

(i) *Landscape*

Whilst the HELAA considered the impact of development upon the form, pattern and character of the landscape, it did not assess whether development could be accommodated within the landscape. Landscape capacity assessment will therefore be required. We will be undertaking such assessment for the LPR, however it is likely that it will not consider sites within designated neighbourhood areas, and this is largely due to cost.

As a way around this, the Council could commission this work, but will charge the NDP groups. If groups do not want to take this approach, then the Council would want to be involved in who is selected. This is because West Berkshire Council will help to defend the NDP at examination.

It is worth highlighting that failure to consider the landscape resulted in the examiner of the Stratfield Mortimer NDP recommending that the plan not proceed to referendum. To overcome the examiner's concerns, a landscape capacity assessment was commissioned: (see: <https://info.westberks.gov.uk/CHttpHandler.ashx?id=45325&p=0>).

(ii) *Ecology*

The HELAA identifies if development would have adverse impact on nature conservation designations. The Thames Valley Environmental Research Centre (TVERC) has undertaken this assessment for us at a charge, and they have identified if up to date ecological surveys will be needed to establish current site conditions and the presence of any protected species at the site.

NDP groups will need to liaise with site promoters about ecological mitigation. This can be checked with TVERC – NDP groups are likely to be charged for this.

For any sites not considered in the HELAA, then we can ask TVERC to provide advice. There will be a charge for this.

(iii) *Designated and non-designated heritage assets*

The Council's Archaeology Team and Design and Conservation Officer have provided advice on HELAA sites and recommended if further work required. Generally this can be covered off in a site specific policy, but some information may be required up-front.

The Council's Archaeology Team have produced a note on how they can help NDP groups. The link to the notes is on the neighbourhood planning resources webpage.

(iv) *Transport modelling / assessments*

There is a top level transport model for the district. For the LPR further assessment will be required to look at whether the highway network could accommodate additional growth and combination effects for larger sites. The Council's Transport Planning Policy Team do not consider at this stage further detailed transport modelling will be required for smaller sites, ie. those likely to be allocated in NDPs.

- 7.14. Various evidence documents have been prepared for the LPR, some of which were completed after the publication of the HELAA. Some of this evidence may help with the site selection work. The LPR evidence documents can be found at: <https://info.westberks.gov.uk/evidencebase>.
- 7.15. If the NDP steering group disagrees with the conclusions within the LPR evidence studies, then it will be up to the groups to produce evidence to the contrary.
- 7.16. You will need to document how you decided on the final site assessment criteria. Once you have decided on the criteria you can produce a template site assessment form.

(c) Carry out the site assessments

- 7.17. You will need to produce a site assessment form for each site. All sites will need to be assessed even if they are being excluded. This is where Stratfield Mortimer fell down.
- 7.18. Note that if a NDP group wants to consider allocating a site(s) that were found to not be developable in the HELAA, then you will need evidence to justify the allocation, for example new information has come forward.
- 7.19. Some NDP groups choose to use a traffic light system or numeric scoring. Either way is acceptable. Other approaches may be acceptable. Whatever approach is taken it is vital that individual sites are assessed in a consistent, open and transparent way and that the assessment is presented in such a way that anyone is able to clearly understand why sites have or have not been included. When presenting the results of the assessment it is important to acknowledge that it has been undertaken based on local judgement and knowledge.

(c) Consulting on site options

- 7.20. It is important that the preferred site allocation(s) reflects the community's shared ambition and that everyone has had the chance to have their say.

(d) Make sure you tell the story

- 7.21. Keep a careful record of how you have assessed the sites, why the sites have been rejected, shortlisted or become preferred sites for allocation. This will help you communicate your conclusions to local people, site owners, promoters and other stakeholders. You may want to present the information on the website, at exhibitions and through newsletters.
- 7.22. Many NDP groups have produced a report that pulls together the site assessments in addition to details of consultations. For example:

- Burbage: <http://www.burbage-pc.org.uk/userfiles/files/Burb%20Site%20Selection%20Report%20%20080617%20FINAL%20.pdf>.
- Kingsclere: <https://www.basingstoke.gov.uk/content/doclib/2432.pdf>.
- Plumpton: <https://www.southdowns.gov.uk/wp-content/uploads/2017/09/PPNP-Site-Assessment-Report-Sept-17.pdf>.

7.23. These reports will form part of the evidence base for the NDP.

(e) Reserve sites

7.24. The NDP groups may wish to consider including a reserve site in the document. Planning Practice Guidance on Neighbourhood Planning states that neighbourhood plans should consider 'allocating reserve sites to ensure that emerging evidence of housing need is addressed'. The PPG sets out that the reason for this is that it 'can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan' (PPG: Neighbourhood Planning Paragraph: 009 Reference ID: 41-009-20190509).

8. What about infrastructure?

8.1. When carrying out site assessments you may wish to start considering what infrastructure needs to be provided in the neighbourhood area (ie. the Parish) alongside development such as homes, shops, or offices. Infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way. You may therefore want to consider the following when addressing infrastructure in a NDP:

- What additional infrastructure is needed to enable development proposed in a NDP is delivered in a sustainable way.
- How many additional infrastructure requirements might be delivered?
- What impact the infrastructure requirements may have on the viability of a proposal in a draft NDP and therefore its delivery.
- What are the likely impacts of proposed site allocation options or policies on physical infrastructure and on the capacity of existing services, which could help shape decisions on the best site choices

8.2. NDP groups will need to engage with infrastructure providers, eg. utility companies, Clinical Commissioning Groups, transport infrastructure providers, the Council's Education Team. National Planning Practice Guidance states that draft NDPs should set out the prioritised infrastructure required to address the demands of the development identified in the plan.

9. Writing site allocation policies for the NDP

9.1. The way site allocations are presented in a NDP depends on the style of the plan and the complexity of the allocations.

9.2. Locality recommend that that as a general rule, the principle should be detailed enough to ensure that development comes forward is in line with community aspirations but not so onerous that the delivery of the site becomes unviable for a development.

9.3. Detailed information on writing site allocation policies is contained within the Locality guidance on site assessments (pp. 34-44): <https://neighbourhoodplanning.org/wp-content/uploads/Site-Assessment-and-Allocations-Toolkit-FINAL-exceptions-removed-110220-1555.pdf>.

9.4. Regard may also be given to the site allocation policies within the Stratfield Mortimer Neighbourhood Development Plan (Policies SDB1 – SDB4, pp.36-41): <https://info.westberks.gov.uk/CHttpHandler.ashx?id=44058&p=0>.

10. Further reading:

10.1. There is various information available on undertaking site assessments as part of the preparation of a NDP:

- Locality: good piece of guidance that is aimed at NDP groups: <https://neighbourhoodplanning.org/toolkits-and-guidance/assess-allocate-sites-development/>.
- Locality case study (Braughing Neighbourhood Plan): https://neighbourhoodplanning.org/case_study/site-assessment-support-braughing-hertfordshire/.
- Planning Advisory Service: <https://www.local.gov.uk/pas/pas-topics/neighbourhood-plans/plan-making-neighbourhood-plans-advice-evidence/plan-making-1>.
- Cotswold District Council (see pages 23-26): <https://www.local.gov.uk/sites/default/files/documents/Cotswold%20District%20Council%20Community%20Toolkit.pdf>.
- Herefordshire Council: https://www.herefordshire.gov.uk/download/downloads/id/3712/guidance_note_2_1_guide_to_site_assessment_and_choosing_allocation_sites.pdf.
- St. Albans Council: <https://www.local.gov.uk/sites/default/files/documents/A%20toolkit%20for%20neighbourhood%20planning%20groups%20that%20are%20allocating%20sites.pdf>.
- Test Valley Council: available via <https://www.testvalley.gov.uk/planning-and-building/planningpolicy/neighbourhood-planning/neighbourhoodplanning>.