

Sustainability Appraisal and Site Selection Methodology

Sefton Local Plan

November 2014

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1. Introduction

- 1.1 This report provides an overview of the methodology that has been used to select development sites for the Publication Stage of the Sefton Local Plan. It builds on the assessment methodology used at Preferred Option Stage and provides a detailed framework for assessing potential allocations for housing, employment, and gypsy and traveller pitches.
- 1.2 It also sets out a Sustainability Appraisal (SA) of potential development allocations, and incorporates the SA findings within a wider site selection methodology.

Sustainability Appraisal

- 1.3 The Sustainability Appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the Local Plan (and its allocations), when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.4 The draft Local Plan policies have also been subject to SA and this has been undertaken on the Council's behalf by environmental consultants URS. URS have also provided detailed input into the methodology for the SA of potential Local Plan allocations.
- 1.5 For the purposes of selecting Local Plan allocations, SA criteria include:
1. the accessibility of potential sites to services and facilities, and;
 2. an assessment of key environmental constraints.
- 1.6 In addition to these SA criteria (Appendix 1), other planning criteria are also relevant to selecting development sites. These include Green Belt purposes, other constraints (e.g. highways), and wider benefits that could be delivered by developing in a certain location. Both the SA criteria and other planning criteria are set out in Section 2.

Sites in Green Belt

- 1.7 In order to meet "objectively assessed needs", as requirement by national planning policy, a proportion of the Local Plan allocations for housing, employment and gypsy and traveller sites will be on land currently in the Green Belt. Many of these sites have previously been assessed and/or identified as a potential allocation at previous stages of the Local Plan preparation ('Options' and 'Preferred Option' stages). This assessment seeks to build on the work that has already taken place.
- 1.8 A draft Green Belt Study was published by the Council in 2011 to inform the preparation of the 'Options' stage of the Local Plan (then known as the 'Core Strategy'). This study sought to identify and assess 'parcels' of land in terms of their contribution to the 5 purposes of including land in Green Belt, and the constraints that applied. It filtered out land that was considered essential to remain in the Green Belt and land subject to severe constraints,

leaving a 'long list' of areas for more detailed assessment. However, it did not allocate sites / land for development in the Local Plan.

- 1.9 Following the 2011 consultation and changes to national planning policy with the introduction of the National Planning Policy Framework in March 2012, the Green Belt Study was updated in 2013. This was used to inform a 'Red, Amber Green' assessment to identify the sites identified as draft allocations in the 'Preferred Option' draft Local Plan (consulted upon during summer 2013).
- 1.10 This report builds on and updates the previous site selection methodologies in light of consultation responses, updated information (eg relating to Environment Agency flood zones and other evidence commissioned by the Council on behalf of site promoters) and additional information received at 'Preferred Option' stage of Local Plan preparation and subsequently, and best practice from elsewhere. A number of other sites were also promoted by landowners / developers as potential allocations at the 'Preferred Option' consultation. For the purposes of transparency this assessment will review all sites that were promoted to the Preferred Option consultation, as well as the potential allocations that were proposed at the Options stage.
- 1.11 It is considered that this approach has identified a long list of 'reasonable alternatives' for SA / site allocation purposes.

Structure of the Report

- 1.12 The remainder of the report is structured as follows:
- 2. Site Selection Criteria** – the factors that were used to assess in identifying potential housing, employment, and gypsy and traveller sites allocations
- 3. Using the Methodology to Select Allocations** – a summary of how the various factors were be balanced in identifying site allocations

Appendix 1 – Links to Sefton's Sustainability Objectives

2. Site Selection Criteria

- 2.1 In order to identify potential Local Plan allocations a 5 part site selection methodology has been devised, as set out below. Parts 1, 2 and 3a comprise the Sustainability Appraisal, and parts 3b, 4, and 5 comprise other planning considerations relevant to site selection.
- 2.2 The site selection methodology has been informed by Sefton's Sustainability Objectives (see Appendix 1), and other relevant planning and policy considerations. It is structured as follows:

Sustainability Appraisal (SA) criteria:

1. **Access to Services** – an assessment of the proximity to nearby services
2. **Site specific / Wider Benefits** - site specific benefits that could be provided, and wider benefits / needs that could be met
3. **Constraints to development** – an assessment of the constraints affecting the site, including:
 - a. **SA constraints:** that form part of the Sustainability Appraisal

Other planning (non-SA) criteria:

- b. **Other planning constraints:** other constraints relevant to site selection
 4. **Green Belt Purposes** – an assessment of the contribution of the site to each of the 5 purposes of including land in Green Belt (as set out at NPPF para 80)
 5. **Delivery Considerations** – an assessment of the deliverability of the site, including owner intentions, viability, factors that could reduce net developable area, etc
- 2.3 Each of the 5 parts of the assessment are set in detail out below:

Access to Services

- 2.4 Potential development sites were assessed against their proximity to key services and facilities. This included proximity to:
- Train stations (employment, housing and gypsy and traveller sites)
 - Bus stops (at a frequency of at least 2 services per hour - employment, housing and gypsy and traveller sites).
 - District and Local centres, and shopping parades (housing and gypsy and traveller sites)

- Neighbourhood parks (housing and gypsy and traveller sites)
- GP surgeries /health centres (housing and gypsy and traveller sites)
- Primary schools (housing and gypsy and traveller sites)

2.5 Site accessibility is expressed as the percentage of the site that is either of high, medium, or low accessibility in terms of walking distance to the service / facility. The following 'straight line' accessibility distances were applied:

	High	Medium	Low
Train Stations	<800m	<1,200m	>1,200
Bus stops (min. 2 services per hour)	<400m	<800m	>800m
District / Local Centres / shopping parades	<800m	<1,200m	>1,200m
Neighbourhood Park	<600m	<900m	>900m
GP surgeries / health centres	<800m	<1,200m	>1,200m
Primary School	<800m	<1,200m	>1,200m

2.6 Sites were not selected or ruled out solely on accessibility grounds. Many accessibility deficits can be addressed, including through developer contributions and off-site improvements. In addition, potential development sites in Green Belt will inevitably be located on the urban edge, and may therefore be less accessible than sites located within urban areas.

2.7 There are a large number of services and facilities that could be used to score the accessibility of a given site. However, for the purposes of site selection the assessment has been restricted to those services and facilities that are considered to be the most important and/or frequently used. Other possible accessibility criteria were considered and rejected, for the following reasons:

- **Secondary schools:** it is common for pupils to travel much further to secondary schools than to primary schools (e.g. many Hightown and Ainsdale pupils attend Formby secondary schools). Many families also send their children to a more distant secondary school out of choice.
- **Town Centres:** in Sefton, the two largest centres are Bootle and Southport town centres. These centres contain a higher proportion of shops that sell items such as electronics and clothing. This type of shopping is generally not represented to the same extent in smaller centres, which tend to cater for local convenience needs. People are prepared to travel further to the larger centres, which are in any event highly accessible by public transport.

- **Dentist surgeries:** dentists surgeries are generally used less frequently than GP surgeries and people are often prepared to travel further to use these services.
- **Post Offices:** these are generally located in existing town and local centres, which are highly accessible by public transport
- **Existing cycle routes:** links to any nearby cycle route (if present) can be incorporated into and provided as part of any new development.
- **Other services** (e.g. leisure centres, libraries, etc): other services are typically less widely or less frequently used, and people are often prepared to travel further to these.

Site specific / wider benefits

2.8 The assessment also took into account the ability of potential allocations to deliver site specific or wider benefits to the local area. These included:

2.9 **Site specific benefits:**

Will the site involve the redevelopment of brownfield land (Yes / No / Partially)

- Identified using aerial photographs and local knowledge

Would the development provide new or improved road / rail infrastructure? (Yes / No)

- Based on supporting information, local knowledge, and draft policy requirements.

Would the site offer any other specific benefit? (Yes / No)

- Based on supporting information submitted and local knowledge

2.10 **Wider benefits / needs**

Will the site contribute towards the regeneration of a deprived area? (Yes / No / Partially)

- Based on the location of the site in either an identified regeneration area, or in an area identified as being in the most 20% deprived of Super Output Areas nationally. Also dependent on the current condition of the site.

Would the site create jobs in an area of high unemployment (employment allocations only - Yes / No)

- Is the site in an area identified as being in the most 20% deprived of Super Output Areas nationally?

Would the site provide affordable housing in an area of high need? (Yes / No / partially)

- Sefton’s 2014 ‘Strategic Housing Market Assessment’ (SHMA) identifies affordable housing need by settlement. This found there was a very high need for affordable housing in Southport and Maghull/Lydiate/Aintree, and a high need in Crosby and Formby. Conversely, this study found a lower need for affordable housing in Bootle and Netherton.

Would the site meet any other wider need or provide any other wider benefit? (Yes / No)

- Based on supporting information and local knowledge

Constraints to Development

- 2.11 Potential allocations were assessed against a series of typical development constraints. These constraints were divided into those that are relevant for the purposes of Sustainability Appraisal, and other planning constraints that needed to be considered in site selection.
- 2.12 In addition, the constraints were divided into ‘Tier 1’ constraints (that could rule a site out regardless of other considerations) and ‘Tier 2’ constraints (that would not be of sufficient weight to rule a site out). The rationale for whether a site has been banded a ‘Tier 1’ or ‘Tier 2’ constraint, and a description of how the constraint was assessed is set out below:

Sustainability Appraisal Constraints:

Constraint	Tier	Description
‘Best and most versatile’ (BMV) agricultural land	2	What proportion of the land comprises ‘best and most versatile’ agricultural land and the grade of land (where known). Informed by the Agricultural Land Study or national data A ‘tier 2’ constraint as there are insufficient non-BMV sites available in suitable locations that are not subject to other constraints. BMV land can therefore be allocated for development consistent with NPPF para 112.
Ecology	1	Impact on protected habitats, species, and trees. Based on comments provided by the Merseyside Environmental Advisory Service’s (MEAS) and the findings of the HRA assessment.

		A 'tier 1' constraint as sites with high level ecological designations could be ruled out.
Flood Risk	1	<p>Based on evidence from Sefton's recent 'Strategic Flood Risk Assessment (SFRA) and the latest Environment Agency's flood risk data. Includes an assessment of flood risk from all sources including tidal, fluvial, surface water and groundwater flooding, assessed against the extent, severity and type of flood risk affecting the site. This constraint was also assessed in light of the Sequential and Exception tests where necessary.</p> <p>A 'tier 1' constraint as sites with a severe flood risk could be ruled out.</p>
Heritage	1	<p>Impact on designated heritage assets and their settings, including listed buildings, Conservation Areas, Scheduled Ancient Monuments, Historic Parks and Gardens, etc. Assessed by Sefton Council, taking account of submitted Heritage Assessments where available.</p> <p>A 'tier 1' constraint as sites with major heritage impacts could be ruled out.</p>
Pollution	1	<p>Air quality, noise, vibrations, and light pollution. Includes proximity to Air Quality Management Areas (AQMAs), motorways / railways, landfill sites and proximity to other polluting and 'bad neighbour' uses.</p> <p>A 'tier 1' constraint as severe cases could rule out development on part or all of a site.</p>
Landscape	2	<p>An assessment of the landscape sensitivity of the proposed site, and the impact on protected trees. This was informed by Sefton Council's landscape appraisal.</p> <p>A 'tier 2' constraint, as there are no sites in Sefton that are subject to either national or local landscape designations.</p>

Other Planning Constraints:

Constraint	Tier	Description
Ground	2	Presence of any known problematic ground conditions, including

conditions		peat, land requiring deep piling, and contaminated land. A 'tier 2' constraint as can usually be mitigated through on-site measures without adversely affecting viability.
Site access	1	Whether safe and suitable access can be achieved to the site. Assessed by Sefton Council, taking account of submitted Transport Assessments where available. A 'tier 1' constraint as sites could be ruled out if a safe and suitable access cannot be provided.
Highways network capacity	1	The impact of the development on the wider highway network, including roads / junctions with known capacity issues. Assessed by Sefton Council, taking account of submitted Transport Assessments where available. A 'tier 1' constraint as sites could be ruled where the impact on network capacity is considered to be severe.
Utility infrastructure	2	Whether the site can be serviced by gas, electricity, and water. Based on discussions with the major utility providers. A 'tier 2' constraint as can usually be mitigated through investment / on-site improvements.
Constraints Other		Any other constraint that may apply, e.g. airport flight path, proximity to a level crossing, right of way, hazards, etc. Tier of constraint depends on severity of particular constraint

2.13 Each constraint was graded by site against a 5 point scale, as follows. Tier 2 constraints were never scored as either a 'significant constraint' or a 'severe constraint':

No constraint on development - No constraint

Minor constraint

- A minor constraint that can be satisfactorily addressed without mitigation, or with limited mitigation.
- A constraint that only affects a small part of the site and can be addressed without significantly reducing the amount of development

- Moderate constraint**
- A constraint that requires more extensive / costly mitigation to satisfactorily address, but that can be overcome.
 - A constraint that affects a larger proportion of the site - requiring mitigation that would reduce the amount of development that can be built, albeit it would not prevent development from taking place.
- Significant constraint (tier 1 only)**
- A significant constraint that requires very substantial / very costly mitigation to overcome
 - Alternatively, a constraint where it is not clear that it is capable of being satisfactorily addressed
 - A constraint that would very significantly reduce the proportion of the site that can be developed (e.g. less than half can be developed)
- Severe constraint (tier 1 only)**
- Constraint that cannot be overcome. Site cannot be allocated for development.

Green Belt Purposes

- 2.14 Each site was assessed against its contribution to the 5 purposes of including land in Green Belt (NPPF para 80). The severity of the impact was graded as follows:
- No impact on Green Belt purpose
 - Minor impact on Green Belt purpose
 - Moderate impact on Green Belt purpose
 - Significant impact on Green Belt purpose
 - Severe impact on Green Belt purpose
- 2.15 The severity of the impact on any Green Belt purposes was assessed by Sefton Council's Planning Department, based on professional judgement. A detailed explanation is set out for each score.
- 2.16 Sites that were assessed as having a 'severe impact' on any Green Belt purpose were not allocated for development. In addition, the purpose "to assist urban regeneration" was graded as 'unable to assess' as it is not possible to assess this impact on a site by site basis.
- 2.17 The approach that was taken to each of the 5 purposes of including land in Green Belt is set out below:

Green Belt Purpose	How will impact on the GB purpose be assessed
To check the unrestricted sprawl of large built-up areas	<ul style="list-style-type: none"> • How well contained are potential Green Belt sites by physical boundaries? Do proposed sites breach an existing physical boundary to the urban edge?

	<ul style="list-style-type: none"> • What proportion of the site’s boundaries abuts an existing urban area? Do proposed sites ‘round off’ an existing urban area?
To prevent towns merging into one another	<ul style="list-style-type: none"> • To what extent does the site narrow any gap between towns? How severe is the impact on the existing gap?
To assist in safeguarding the countryside from encroachment	<ul style="list-style-type: none"> • Open, ‘greenfield’ sites to be scored as “moderate impact on Green Belt purpose”. • Previously developed sites to be scored as “No impact on this Green Belt use” <p>No site was ruled out for development as a result of its existing use.</p>
To preserve the setting and special character of historic towns	<p>No site in Sefton had an impact on this Green Belt purpose, and hence all sites were assessed as having ‘no impact’.</p> <p>However, where a site would impact on heritage, (e.g. because there is a listed building, scheduled ancient monument or conservation area etc that may be impacted on as a result of development), this will be considered in the “constraints” section of the assessment.</p>
To assist urban regeneration	<p>“Unable to assess” for all sites. It is not possible to assess this impact on a site by site basis.</p>

Delivery Considerations

2.18 This section of the assessment comprised a record / assessment of:

- Owner intentions – does the owner wish to promote the site for development, and to what timescale?
- Any known viability issues
- Any known issues (including covenants) that would constrain or delay development

2.19 This section of the assessment was expressed as a commentary. If the owner of a site did not wish to promote it for development then it was not be allocated in the Local Plan.

Site assessment conclusion

- 2.20 The final section of the assessment provided an overview of the site's performance against each section of the assessment. This section indicated how these factors had been balanced and whether the site is proposed to be allocated for development.

3. Using the Methodology to Select Allocations

3.1 The factors that were considered in assessing potential housing allocations are set out above. The following principles were used to apply these criteria to select sites for allocation:

- **Assessment of constraints:** sites that are subject to any single 'severe constraint that cannot be overcome' were not proposed for allocation. Sites that were subject to any single 'significant constraint' were only allocated where this constraint can be satisfactorily addressed/mitigated through development.
- **Access to services:** the accessibility criteria will be used to highlight any potential mitigation that may be required. No site was ruled out (or selected for allocation) solely due to its accessibility to services.
- **Green Belt purposes:** sites that were judged to have a 'severe impact' on any Green Belt purpose were not allocated for development. Sites that are judged to have a 'significant impact' on any Green Belt purpose will only be allocated where there are insufficient alternatives in the area that are not subject to any other major constraint.
- **Delivery considerations:** sites were ruled out where the owner is not interested in promoting the site for development.
- **Wider or site specific benefits:** there are various benefits that individual sites may be able to offer. In addition, there are wider needs within Sefton that only some sites will be able to address. For example, there is an acute need for affordable housing in Southport (and elsewhere) that is specific to that settlement, and could not be met in other parts of Sefton. There are also distinct needs for employment land in both north and south Sefton.

3.2 Balancing these considerations in determining which sites should be allocated comes down in part to professional judgement. Whilst a proportion of sites were ruled out due to specific constraints, or Green Belt impacts, a further planning judgement was required to select which of the remaining sites were proposed to be allocated. This included weighing the importance and magnitude of the various 'scores' for each site against the benefits that could be delivered. In coming to this judgement, some sites that can offer 'wider or site specific benefits' were allocated in preference to more accessible sites that do not offer these benefits.

Appendix 1 - Sefton's Sustainability Appraisal Objectives

This appendix sets out how Sefton's Sustainability Appraisal Objectives have been used as a framework for identifying appropriate site appraisal criteria. The Sustainability Appraisal objectives which make up the SA Framework have been developed over a number of years following an assessment of the key sustainability issues in Sefton.

The Sustainability Appraisal objectives were developed to appraise the Plan as a whole and thus are not particularly suited for appraising the merits of individual sites. Nevertheless, the agreed list of sustainability objectives provide an appropriate framework for determining what site selection criteria should be considered when assessing potential development sites for the Local Plan.

The table below sets out the linkages between the SA Framework Sustainability Objectives and the criteria which have been identified to assess potential site allocations:

Sustainability Objective	Site selection criteria arising from the Objective
<p>1. Encourage economic growth and investment</p> <p>SA Topics: Population, Material Assets</p>	<p>Can the development provide or cross-subsidise the provision of new employment land?</p> <p>All major residential, employment, and mixed use developments will create jobs and investment. This is a common benefit to all sites and cannot be used to distinguish between potential allocations.</p>
<p>2. Reduce unemployment and improve skills</p> <p>SA Topics: Population</p>	<p>Is the site within a deprived area with high unemployment? (of particular relevance to employment sites)</p>
<p>3. Support the rural economy</p> <p>SA Topics: Population, Material Assets</p>	<p>What proportion of the site 'best and most versatile' agricultural land? What proportion of the site is Grade, 1, 2, or 3a?</p>
<p>4. Maintain vibrant town, local and village centres</p> <p>SA Topics: Population, Material Assets, Cultural Assets</p>	<p>Is the site within walking distance to local and district centres and shopping parades?</p>
<p>5. Provide the required infrastructure to support growth</p> <p>SA Topics: Population, Material Assets</p>	<p>Can the site be satisfactorily accessed?</p> <p>Is there sufficient capacity in the highways network to accommodate the development?</p>
<p>6. Reduce inequalities and social deprivation</p> <p>SA Topics: Population, Human Health</p>	<p>Would development of the site Contribution towards regeneration?</p> <p>Would an employment allocation create jobs in an area of high unemployment?</p>
<p>7. Reduce crime and improve safety</p>	<p>Neutral impact for all sites, and therefore not distinguishable for site selection purposes</p>

Sustainability Objective	Site selection criteria arising from the Objective
SA Topics: Population, Human Health	
8. Meet Sefton's diverse housing needs SA Topics: Population, Material Assets, Human Health	Will the development help to meet local affordable housing, or other specialist housing needs?
9. Provide better access to services and facilities, particularly by walking, cycling and public transport SA Topics: Population, Human Health, Material Assets, Air, Climatic Factors	Is the site accessible to schools, services, and public transport?
10. Provide environments that improve health and social care SA Topics: Population, Human Health, Material Assets	Is the site accessible to open space? Is the site of ecological value? Does the site contain a right of way?
11. Strengthen communities and help people to be involved in local-decision making SA Topics: Population	Neutral impact for all sites, and therefore not distinguishable for site selection purposes
12. Adapt and mitigate to climate change SA Topics: Climatic Factors, Biodiversity, Fauna, Flora, Soil, Water, Air	Is the site subject to flood risk? Is the site accessible to public transport?
13. Reduce the risk from flooding SA Topics: Climatic factors, Human Health, Material Assets, water	Is the site subject to flood risk?
14. Reduce pollution SA Topics: Biodiversity, Fauna, Flora, Human Health, Soil, Water, Air	Is the site potentially subject to contamination or other ground condition issues? Is the site of ecological value?
15. Reduce waste and the use of natural resources SA Topics: Climatic Factors, Material Assets	Neutral impact for all sites, and therefore not distinguishable for site selection purposes
16. Protect Sefton's valued landscape, coast and countryside SA Topics: Biodiversity Fauna, Flora, Material Assets, Cultural Heritage, Landscape	Is the site subject to any landscape or other sensitive designation? Would the development affect any protected trees?
17. Bring back into use derelict and underused land and buildings	Would the development re-use previously developed land?

Sustainability Objective	Site selection criteria arising from the Objective
SA Topics: Material Assets	
18. Protect and enhance biodiversity SA Topics: Biodiversity, Fauna, Flora	Is the site of ecological value?
19. Protect and enhance Sefton's culture and heritage SA Topics: Cultural Heritage, Material Assets	Would the development have an impact on a designated heritage asset, or the setting of a designated heritage asset?
20. Provide a quality living environment SA Topics: Population	Neutral impact for all sites, and therefore not distinguishable for site selection purposes
21. Land Resources SA Topics: Material Assets, Cultural Heritage, soil	Would the development re-use previously developed land?