

Site Selection Methodology
Consultation Draft
September 2018

1 Introduction

- 1.1 Bromsgrove District Council has commenced a District Plan Review. A plan review is necessary to:
- Identify land to accommodate the remainder of the adopted Bromsgrove District Plan (BDP) housing requirement to 2030;
 - Help to deliver the unmet housing needs of the Greater Birmingham area and;
 - Look beyond 2030 to identify land needed to deliver the full range of needs for the district over the coming decades.
- 1.1 In order to identify land for development, the Council will need to consider a large variety of sites for potential allocation for development. It will be necessary to rigorously scrutinise these sites to ensure the most suitable, sustainable and deliverable sites are taken forward through the Plan Review process.
- 1.2 The Site Selection work will have a close relationship with the Green Belt Purposes Assessment, for which a separate methodology is also being consulted on at this time. This is because approximately 90% of the District is Green Belt, meaning it will be highly likely that the majority of sites needed to meet future development needs will fall within the current Green Belt. When finalised, the two resulting documents will form key components of the evidence base for the District Plan Review.
- 1.3 The site selection process will not be undertaken straight away after the methodology is finalised as this work needs to be informed by the Green Belt Purposes Assessment. It will also be informed by potential development sites submitted to us through a Call for Sites exercise.
- 1.4 This is a consultation draft and we welcome comments to shape our approach on this important piece of work.

2 Why is a methodology needed?

- 2.1 It is important to issue the Council's proposed approach to site selection at this early stage to:
- set out a clear and transparent methodology to be followed by Council officers
 - allow time to refine the methodology;
 - gain buy-in to the process; and
 - help inform the format and nature of the potential site allocations likely to be submitted to the Council.
- 2.2 It is anticipated that the Council will receive a high volume of sites for consideration, some of which may not represent sustainable locations or be consistent with the

spatial strategy for the district which will emerge as the District Plan Review progresses. Therefore an agreed methodology will aid the consistent and objective assessment of these sites in a timely manner to inform the District Plan Review.

What land uses will we need to allocate sites for?

- 2.3 Whilst the quantum and precise nature of development needed to meet the District's needs is unknown at the present time, it is likely that site allocations will be needed for a range of land uses, including:
- Housing (including specialist accommodation for older persons, affordable housing, self-build homes)
 - Economic development uses (including offices, storage and distribution and industrial buildings)
 - Retail
 - Community facilities
 - Traveller sites (including Travelling Showpeople)

Relationship with Call for Sites

- 2.4 A Call for Sites exercise is planned to take place in late 2018. At this time we will invite landowners, their representatives and members of the public to submit sites in the District which they feel could deliver development to meet Bromsgrove's future needs. The process will be guided by this Methodology (as revised following consultation) and a Call for Sites pro-forma setting out the information that the Council requires to analyse and progress potential sites.

Relationship with the SHLAA

- 2.5 The Strategic Housing Land Availability Assessment (SHLAA) is a Council document setting out sites which may have the potential to deliver housing development in the future. The latest version was published by the Council in September 2015 and can be viewed: www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/evidence-base/strategic-housing-land-availability-assessment.aspx
- 2.6 The identification of housing sites for development in the current Bromsgrove SHLAA is limited by the widespread coverage of the Green Belt designation in the District. The vast majority of sites that have previously been submitted to the Council are located within the Green Belt, and cannot come forward for development prior to a comprehensive Green Belt Assessment process and subsequent release of Green Belt land through a Local Plan. The Bromsgrove SHLAA therefore classifies sites with development potential, barring their Green Belt location, in the "Green Belt Potential" category. Such sites do not feature in the District's land supply.
- 2.7 Persons who have previously submitted sites for the SHLAA will be contacted to ascertain whether their aspirations to promote their site for development remain. In many cases, updated information about the site in question will be required, as many of the sites included in the Bromsgrove SHLAA within the "Green Belt Potential" category, date back from the Council's first ever SHLAA document, published in 2009.

- 2.8 Sites that currently fall within the 'Green Belt Potential' category in the SHLAA will need to be considered again in light of both this methodology and the separate Green Belt Purposes Assessment Methodology. It does not automatically follow that sites in this category will be released from the Green Belt, as they would need to be rigorously assessed against the Green Belt purposes assessment criteria.
- 2.9 An addendum to the most recent SHLAA, published in 2015, will be produced ahead of the Call for Sites exercise. This will detail the sites that have been submitted to the Council for consideration since the completion of the last full SHLAA and 31 March 2018. This will allow landowners, stakeholders and members of the public to see all the sites that have been submitted to the Council as potential development sites. It will not be a full update of the SHLAA document as there is limited merit in this ahead of a comprehensive Call for Sites exercise later this year and the subsequent Green Belt Assessment which has the potential to change the landscape of potentially developable land in the District.

3 Undertaking the Site Selection process

Site Size Thresholds

- 3.1 Thresholds for the variety of land uses need to be established to give a consistent basis for considering sites. Given the time and resource required to progress Site Allocations through a Local Plan process, it is also prudent to define a minimum site size so as not to overburden the process. A variety of sites of differing sizes will be needed to serve the needs of the different communities of the district. Sites which fall below the thresholds are unlikely to be considered for inclusion in the Plan Review, but can still be considered for development through the normal planning application processes and would be regarded as 'windfall development'.

Type of use	Minimum Size	Minimum Capacity
Housing	0.16ha	5 dwellings
Economic development (including retail and leisure)	0.25ha	500m ² of floorspace
Traveller and Travelling Showpeople	N/A	One mobile home and One Touring Caravan
Park / Mobile Homes		5 dwellings

Table 1: Site size thresholds

Identification of Sites

- 3.2 Potential sites for development will be drawn from a range of sources, namely:
- Strategic Housing Land Availability Assessment (SHLAA)
 - PBA Economy Study
 - Current allocations in the Bromsgrove District Plan
 - Sites submitted through the Call for Sites process
 - Broad areas identified in the GBHMA Strategic Growth Study
 - Opportunity areas identified by Planning Officers which accord with the Spatial Strategy
 - BDC Asset Register

- Sites identified in Neighbourhood Plans
- Other evidence base documents

Applying Constraints

- 3.3 Constraints are environmental or heritage designations which may restrict development from occurring. Constraints which will prohibit or limit the development of land have been split into two categories.
- Hard Constraints – Where an existing designation means development is generally unacceptable, or could only be justified in wholly exceptional circumstances. See **Table 2** for hard constraints relevant to Bromsgrove District.
 - Soft Constraints - Where an existing designation could place limitations on the nature or scale of the development.
See **Table 3** for soft constraints relevant to Bromsgrove District.
- 3.4 Figure 1 below maps a number of key 'hard constraints' across the District. Some of the constraints (such as listed buildings) cannot be mapped on an image at this scale, but this Figure gives an indication of the restrictions affecting the District. The extent of the current Green Belt is shown to give context but will be subject to the separate assessment and review process discussed above and should not be viewed in the same way as the hard constraints listed in Table 2 below.

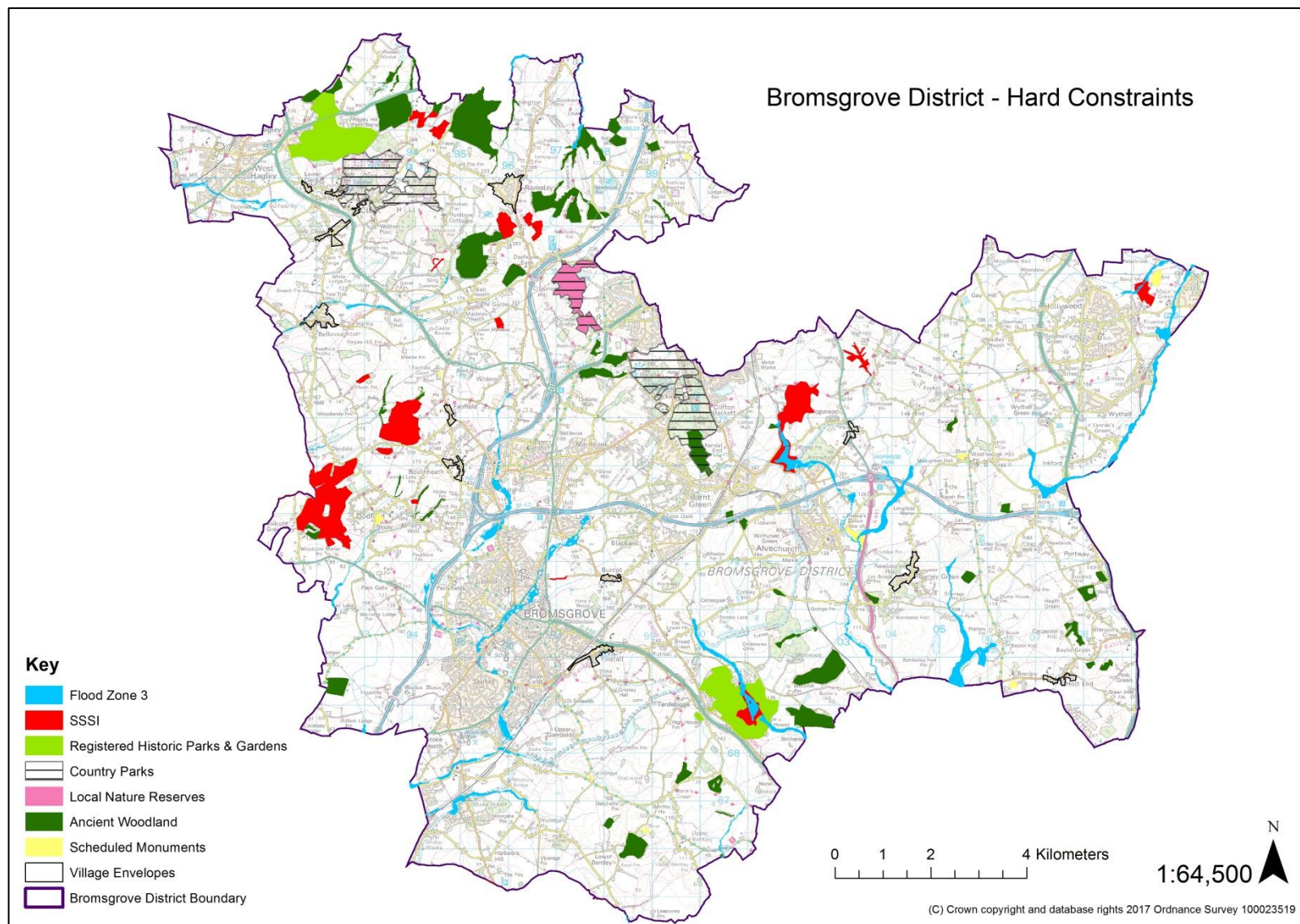


Figure 1: Hard Constraints in Bromsgrove District

Table 2: Identified Hard Constraints¹

Type of constraint	Data source	Definition	Legislation affording protection
Natural Assets			
Site of Special Scientific Interest (SSSI)	GIS	There is a general and overarching duty on a range of authorities, including Local Authorities to take reasonable steps, to further the conservation and enhancement of the features for which sites are of special interest.	Wildlife and Countryside Act 1981 NPPF. Paras 11b)i, 20d), 175b) Circular 06/2005 Development within or outside of a SSSI which is likely to have an adverse effect should not normally be permitted.
Local Nature Reserve (LNR)	GIS	Local Nature Reserves are sites containing special interest within the administrative area of a Local Authority for their flora, fauna, geological or physiographical features, and which are managed for the purpose of their preservation or for providing opportunities for related study and research.	National Parks and Access to the Countryside Act 1949 -Section 21 – "Establishment of nature reserves by local authorities" NPPF. Paras 171, 174
Country Park	GIS	Managed by local authorities and primarily intended for recreation and leisure opportunities close to population centres and may not have any nature conservation importance. However, they are areas of semi-natural habitat and form a valuable network of locations at which informal recreation and	Countryside Act 1968 Worcestershire Green Infrastructure Strategy (2013-18) – Strategic Green Infrastructure Assets NPPF. Paras 174a), 171, 99, 100

¹ There are no natural heritage designations in Bromsgrove District which have been afforded the highest level of protection in the UK (Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites). Nor are there any Areas of Outstanding Natural Beauty (AONB).

Type of constraint	Data source	Definition	Legislation affording protection
		the natural environment coexists.	
Ancient Woodland	<p>GIS WCC Worcestershire Woodland Guidelines</p> <p>Landscape Description Unit Ecological Profiles & Biodiversity Baseline (WCC Landscape Character Assessment Webpages)</p>	<p>Any area that has been wooded continuously since at least 1600 AD.</p> <p>Defined as an irreplaceable habitat.</p>	<p>NPPF. Para 11b)i, 171, 175c)</p> <p>Development would not be permitted unless the need for, and benefits of, clearly outweigh the loss.</p>
Ancient and Veteran Trees	<p>http://www.ancient-tree-hunt.org.uk/</p> <p>WCC Worcestershire Woodland Guidelines</p> <p>Landscape Description Unit Ecological Profiles & Biodiversity Baseline (WCC Landscape Character Assessment</p>	<p>A tree which, because of its great age, size or conditions is of exceptional value for wildlife, in the landscape or culturally.</p>	<p>NPPF. Para 11b)i, 171, 175 c)</p> <p>Where these are found outside of ancient woodland, development would not be permitted unless the need for, and benefits of, clearly outweigh the loss.</p>

Type of constraint	Data source	Definition	Legislation affording protection
	Webpages		
BAP Priority Habitat	<p>Worcestershire Habitat Inventory – online tool</p> <p>Landscape Description Unit Ecological Profiles & Biodiversity Baseline (WCC Landscape Character Assessment Webpages</p>	Species and Habitats of Principle Importance included in the England Biodiversity List published by the Secretary of State.	<p>NPPF. Paras174a), 175.</p> <p>Natural Environment and Rural Communities Act 2006 – Section 41.</p> <p>Circular 06/2005</p>
Heritage Assets			
Grade I or II* Registered Park or Garden	GIS	Consisting of the grounds of private houses, public parks and cemeteries which have been merited registration on the basis of being of “Special Historic Interest”. They are Graded I, II* or II.	NPPF. Para 184, 189, 190, 192, 194b). Substantial harm to or loss should be wholly exceptional.
Scheduled Monument	GIS	A nationally important archaeological site including Roman remains, burial mounds, castles, bridges, earthworks, the remains of deserted villages and industrial sites. They are not graded.	<p>NPPF. Para 194b).</p> <p>Substantial harm to or loss should be wholly exceptional.</p> <p>Must be listed on the Schedule kept by the Secretary of State for Digital, Culture, Media and Sport.</p>
Grade I or II* Listed Building	GIS	Grade I buildings are of exceptional interest. Grade II* buildings are particularly important	NPPF. Para 184, 189, 190, 192, 194b). Substantial harm to or loss should be wholly

Type of constraint	Data source	Definition	Legislation affording protection
		buildings of more than special interest.	exceptional.
Grade II Listed Building	GIS	Grade II buildings are of special interest	NPPF. Para 195. Substantial harm to or loss should be exceptional.
Vulnerable Areas			
Flood Zone 3b (The Functional Floodplain)	SFRA	The Functional Floodplain is land where water has to flow to be stored in times of flood. It has a High Probability. (1 in 100 or greater annual probability of river flooding). Only water compatible land uses and Essential Infrastructure (subject to the Exception Test) are appropriate in Zone 3b.	NPPF para 155, 156, 157. National Planning Policy Guidance Flood Risk Vulnerability Classification

Table 3: Identified Soft Constraints

Type of constraint	Data source	Definition	Legislation affording protection
Natural Assets			
Local Sites (Wildlife and Geological)	GIS	The term used to describe sites of wildlife or geological importance at a local level. The term 'Local Site' incorporates other terms such as Site of Importance for Nature Conservation (SINC), Special Wildlife Sites, Local Wildlife Sites and Sites of Geological Importance.	Non-statutory designations not directly protected by law. BDP21 – Natural Environment
Tree Preservation Order	Local information Landscape	An order made by the Local Planning Authority to protect specific trees, groups of trees or woodlands in the interests of amenity.	The Town and Country Planning (Tree Preservation) (England) Regulations 2012

Type of constraint	Data source	Definition	Legislation affording protection
Natural Assets			
	<p>Description Unit Ecological Profiles & Biodiversity Baseline (WCC Landscape Character Assessment Webpages</p> <p>WCC Worcestershire Woodland Guidelines</p>		
Public Open Space	Local GIS	Locally designated open spaces including Parks and Gardens, Provision for Children, Outdoor Sports Facilities and Allotments.	BDP25 – Health and Well Being
Minerals Safeguarding Areas	WCC	An area designated by a Mineral Planning Authority which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development	NPPF Para 204c) Emerging Worcestershire Minerals Local Plan
Heritage Assets			
Conservation Area	GIS	An area “of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance”	The Planning (Listed Buildings and Conservation Areas) (England) Regulations 1990
Locally Listed Buildings		Buildings or sites that make a positive contribution to an area’s local character and sense of place because of their heritage value.	BDP20 Protection afforded to ‘heritage assets’ in the

Type of constraint	Data source	Definition	Legislation affording protection
Natural Assets			
			NPPF Para 184.
Other non-designated Heritage Assets	HER	These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets	NPPF Para 197
Vulnerable Areas			
Flood Zone 3a	SFRA	High Probability - Land having a 1 in 100 or greater annual probability of river flooding. The application of the Sequential Test is in order to keep development away from medium and high flood risk areas. Even after the Sequential Test, Highly Vulnerable land uses and More vulnerable land uses (subject to the Exception Test), are not compatible with Zone 3a.	NPPF para 155, 156 & 157. National Planning Policy Guidance Flood Risk Vulnerability Classification
Flood Zone 2	GIS	Medium Probability - Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding. The application of the Sequential Test is in order to keep development away from medium and high flood risk areas. Even after the Sequential Test, Highly Vulnerable land uses will be subject to the Exception Test to demonstrate compatibility with Zone 2.	NPPF para 155, 156 & 157. National Planning Policy Guidance Flood Risk Vulnerability Classification
Air Quality	GIS	Areas designated by local authorities because	NPPF para 181

Type of constraint	Data source	Definition	Legislation affording protection
Natural Assets			
Management Area		they are not likely to achieve national air quality objectives by the relevant deadlines.	

- 3.5 The hard constraints affecting sites either submitted to the Council or identified by Council officers will be recorded to 'filter out' sites where development would not be achievable. Soft constraints will then be applied to determine whether the site area should be reduced to exclude a highly constrained element of the site, or whether mitigation will be necessary to overcome the constraints affecting a site. The level of the constraint will be assessed using a RAG (Red, Amber, Green) rating along the following lines:

Rating	Comment
Red	Significant and unacceptable adverse impacts would mean development of the site is unachievable
Amber	Adverse impacts can only be partially mitigated
Blue	Any adverse impacts can be completely or substantially mitigated
Green	No adverse impacts are anticipated

Table 4: RAG rating of constraints

- 3.6 Examples of mitigation include:
- Providing new or enhanced open space where existing habitats or open space could be impacted by new development
 - Using landscape design and sustainable drainage systems to manage or reduce flood risk

4 CONSULTATION AND NEXT STEPS

4.1 Comments are invited on this draft Site Selection Methodology as part of the wider Bromsgrove District Plan Review Issues and Options consultation. Comments are welcome on the whole document. Please note that this consultation focuses purely on the refining the methodology rather than on the merits of individual sites. An agreed methodology will aid the consistent and objective assessment of these sites in a timely manner to inform the Plan review.

4.2 As part of the Duty to Cooperate, this methodology will be shared with Bromsgrove District's neighbouring authorities and their views sought.

4.3 After the consultation period has closed, any comments received will be considered and the methodology revised as appropriate. The Methodology will then be pivotal in guiding the information we require to be submitted alongside sites at the time of the Call for Sites exercise, currently envisaged to be in early 2019. It will be made clear that in order for sites to progress towards allocation in the Bromsgrove District Plan Review, the information submitted alongside the site should be sufficient for the process outlined in this methodology to be followed.

