

Stanstead Abbotts Neighbourhood Plan Site Assessment Review

1. Introduction

As part of the Site Assessment Technical Support awarded to Stanstead Abbotts Parish Council through the national neighbourhood planning support programme, it was agreed that AECOM would review the site assessment work carried out by the neighbourhood plan steering group. This note sets out the initial findings of that review to advise whether the approach complies with National Planning Practice Guidance and the documents prepared are robust, defensible and able to justify proposed site allocations in the Neighbourhood Plan.

The documents received and assessed as part of this review are:

- The Neighbourhood Plan Site Assessment Ratings Matrix (2019);
- Neighbourhood Plan Site Assessment List (2019);
- Neighbourhood Plan Site Assessment Maps 1, 2 and 3;
- Neighbourhood Plan Site Assessment Spreadsheet MRD Updated (2019);
- Neighbourhood Plan Site Ranking; and
- Call for Sites completed submission documents for sites C1, C2, C3, C4, K and L.

2. Review of site assessment documents

The site assessment appears to have been carried out in two parts. The first part – Round 1 (documented in the Neighbourhood Plan Site Assessment List) sets out the original list of sites, identified through a Call for Sites, sites identified by the Steering Group and sites and through consultation. It sets out a shortlist of sites to proceed to full site assessment and rules out a number of sites. This document has been reviewed and ‘sticky notes’ have been added to the PDF document highlighting a number of issues that it is advised are explored further.

The second part of the assessment is an assessment of the sites from Round 1 against a set of criteria. The table below compares the criteria used in the Steering Group assessment to assess the sites against the standard assessment criteria used in the AECOM site assessment, which follows both National Planning Practice Guidance¹ and the Locality Neighbourhood Planning Toolkit². National Planning Practice Guidance is not prescriptive in terms of a set of criteria to use, so it is acceptable to use a different set of criteria. This review is to ensure that the key ‘tests’ of whether a site is deliverable/developable and therefore can be allocated in a development plan, i.e. that sites are suitable, available and achievable are all covered and that there are no weaknesses in the assessment that could leave it open to challenge by landowners and site promoters or by the Local Planning Authority or Neighbourhood Plan examiner. The notes column at the right of Table 1 identifies potential issues with the criteria used or the way it has been applied.

Table 1. Standard Assessment Criteria

Standard Assessment Criteria	Included in the Stanstead Abbotts assessment?	Notes/ Importance of criteria
Site reference/ name	Yes	
Site address/ location	Yes	
Map	Yes	
Gross area	Yes	

¹<https://www.gov.uk/guidance/neighbourhood-planning--2> and <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

²<https://neighbourhoodplanning.org/toolkits-and-guidance/assess-allocate-sites-development/>

Standard Assessment Criteria	Included in the Stanstead Abbotts assessment?	Notes/ Importance of criteria
SLAA reference	No	It is helpful to review the SLAA findings to understand what the LPA findings are and what constraints have been identified
Existing land use	No, however this information is included on the call for sites submissions for sites C1,C2,C3 and C4.	This can be added in to the assessment
Neighbouring land uses	No	This can be added in to the assessment
Land use being considered	No, however this information is included on the call for sites submissions for sites C1,C2,C3 and C4.	This can be added in to the assessment
Site source /identification method	Yes	
Planning history	Partly looked at in initial sift, looks like it has just looked at current applications and not past apps.	Important to understand whether there have been relevant planning decisions on any of the sites
Proximity to statutory environmental designations	Partly / No	This is a key criteria that should be considered
SSSI's and Risk Zones	Partly / No	This is a key criteria that should be considered
Proximity to non-statutory environmental designations	Partly / No	This is a key criteria that should be considered
Flood Zone	Yes, covered in criteria 2.11.	
Surface water flooding risk	Partly covered in 2.11.	
Agricultural land grade	No	This should be included if choices need to be made between sites
Priority habitats/ species	No	This is a key criteria that has to be considered
AQMA	No, but not relevant the area	
Topography	No	This should be included
Existing vehicle access/ possibility to create access	Yes, covered in initial sift	Not clear whether the possibility to create access has been included. E.g. for site E the assessment puts no to access however, access could be created to this site if adjoining sites were developed.
Pedestrian access	No specific reference /covered as part of overall access	This is a key criteria that has to be considered
Cycle access	No specific reference / covered as part of overall access	This is a key criteria that has to be considered
TPO's	No	Not necessary
Significant trees	No	Should be noted
PROWs	Yes, covered by criteria 2.4	
Ground contamination	No	Ideally should be included
Utilities infrastructure	No	Ideally should be included
Would development result in a loss of social, amenity or community value?	Not directly included however, criteria 2.5 may be trying to point in this direction.	
Distances to key facilities; local shop, bus stop, train station, primary school, secondary school, open space/ recreation, cycle routes	Partly covered by criteria 2.8, does not state individual distances/ name any facilities.	
Landscape sensitivity	No	Key criteria that should be considered but this may be covered by Visual amenity
Visual amenity sensitivity	Yes, covered in criteria 2.7	
Designated heritage assets	Yes, covered by criteria 2.14	
Non designated heritage assets	Yes, covered by criteria 2.14	

Standard Assessment Criteria	Included in the Stanstead Abbotts assessment?	Notes/ Importance of criteria
Green Belt	Yes, covered by criteria 2.15	East Herts Council Green Belt Review
Is the site allocated for a particular use in the Local Plan	Yes, covered by criteria 2.12	
Relevant planning policies	Partly, 2.1 and 2.2 ask about ribbon development and isolated buildings both of which are relevant planning policies.	This needs to be covered fully to ensure any allocated site is in full compliance with Local Plan policy
Typology (greenfield/ PDL/ mix)	Yes, covered by 2.13	
Relationship to built up area	Yes, covered in initial sift and criteria 2.6	
Potential coalescence	Yes, covered in initial sift	
Is the site large enough to change the size and character of the existing settlement?	No	Not necessary
Availability	Yes, covered by criteria 3.1	
Legal ownership issues	Yes, covered by criteria 4.1	
Time frame for availability	Yes, covered by criteria 4.2	
Viability	Partly addressed in criteria 2.3.	
Estimated capacity of development	No	
Justification for rating/ scoring	No	This could be added

The review above shows that most of the key criteria have been covered in the Stanstead Abbotts assessment. However there are a small number of key factors that may not been adequately assessed, in particular:

- Whether development of the site would conflict with specific Local Plan policies
- Whether the site falls within a statutory or non-statutory environmental designation
- Ecology considerations
- Whether there is potential to create access to the site, even if none exists currently.

Table 2 reviews the additional criteria included in the Steering Group assessment that is not covered in the Locality site assessment toolkit.

Table 2. Additional Criteria used in the Stanstead Abbotts Assessment

Criteria	Comments
5.1 Community View	Community views are important but should only be used in the site selection process once the assessment has demonstrated which sites are suitable, available and achievable for development and ruled out those that aren't. These two steps should be clearly separated as the community views should not be used to rule out sites that could be suitable for development. This could be challenged by landowners/site promoters.
2.12 has the site been identified as one that should be protected by outside bodies or as identified within this plan?	This is not a clearly defined criteria and it would need to be qualified. Ideally this would be dealt with by assessing whether there are any statutory or non-statutory environmental designations or planning policies that would either preclude development entirely or reduce the developable area.
2.10 Does the site have potential to provide community infrastructure?	This falls into the same category as community view – if it is a priority for the neighbourhood plan/community then it should be sued in the site selection process but only once all sites had been assessed for their suitability.
2.9 Can the site deliver affordable homes and a mix of types and sizes?	As above, this should be a criteria used to refine the site assessment and shortlist sites for allocation, but not in the first stage of the assessment.

Criteria	Comments
2.5 Will the development result in the loss of open space?	This would benefit from being clearly defined. What is meant by open space? There is a difference between protected open space, valued open space and less valuable open space. It is also partly covered in 2.13 typology of the site (greenfield/PDL) – any greenfield would be open space presumably.

The criteria in Table 2 are important as a way of selecting sites from a shortlist of suitable sites. However, it is easier to demonstrate how the preferred site(s) have been selected if the site assessment and site selection processes are separate. Site assessment is the assessment of whether a site is suitable, available and achievable. Site selection is the application of local criteria such as loss of open space, what types of housing the site can deliver and whether the site can provide community infrastructure. Whether the site is supported by the community should be the last part of the site selection process, and should be as a result of consultation with the community to allow them to see all the information on the sites including the constraints and opportunities.

In addition, it is difficult to justify the scoring/ranking of sites and it is usually possible to challenge this approach. Scoring can be appropriate, but only in the site selection part once the shortlist of developable sites has been identified. Community views should not be a consideration in suitability of a site and should only be applied to the assessment once the other 'tests' have been applied.

3. Conclusions

The points above indicate that there are some issues with the site assessment as it stands. It may be that the answers are correct, but the way it has been presented could be improved. The key issues are:

- Potentially ruling out sites at the initial sift without proper justification. This should be checked to ensure ruling the reason for ruling particular sites out is justified.
- Robust application of suitability criteria. The key criteria should be checked to ensure everything is covered.
- Use of scoring/ranking in site assessment. A clearer way of setting out the assessment would be to assess the sites for suitability, then apply the 'local' criteria to the suitable/potentially suitable sites.
- The assessment does not provide any detail on how the constraints impact the site or could be mitigated. This should be added to allow a greater understanding of the constraints and justification for ruling out sites.

The assessment carried out by the steering group has largely followed Planning Practice Guidance and correctly applies the tests of whether a site is suitable, available and achievable. However, there are a number of issues with the assessment that have been highlighted that could lead to challenges by site promoters, or by the Neighbourhood Plan examiner. Although the results may be correct, the process for ruling out sites, the application of criteria and the way the assessment results are presented would benefit from a reworking. Our recommendation is that either the current site assessment is improved to address the issues above or that a new site assessment is carried out, either by the group focusing on the points above or by AECOM. In either instance this would build on the work already completed but would present it in such a way to ensure that the assessment process was transparent and the results were fully explained and defensible.