

Site Assessment Methodology

October 2019



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1. Introduction

- 1.1. Fenland District Council (the Council) has commenced preparation of a new Local Plan for the district. This new Local Plan will identify sites to meet Fenland's development needs by making site allocations.
- 1.2. The Council will consult on an Issues and Options document between 11 October and 21 November 2019. The Issues and Options Consultation document, online consultation form and other supporting materials are available at: <https://www.fenland.gov.uk/newlocalplan>
- 1.3. As part of the Issues and Options consultation, the Council is carrying out a Call for Sites exercise. This will provide landowners, agents, developers, and other bodies with an interest in land, opportunity to submit sites for the Council to consider including in its Local Plan.
- 1.4. The Council will only allocate a site where it is suitable and available for development and is deliverable. The purpose of this report is to set out the Council's proposed methodology for assessing sites to determine their potential suitability for allocation.
- 1.5. Promoters of sites already known to the Council, such as sites contained in the Local Plan 2014 and sites with extant planning permission, should still make a site submission where they wish their site to be considered for inclusion in the emerging Local Plan. See section 2 for further explanation.
- 1.6. Sites can be submitted using the online form available at: <https://www.fenland.gov.uk/newlocalplan>;

Or by completing *Form B: Site Suggestion Form*, available via the same web link, and must be sent by email to: localplan@fenland.gov.uk

Or by post to:

Local Plan Team
Fenland District Council
Fenland Hall
County Road
March
PE15 8NQ
United Kingdom

- 1.7. All sites submissions must be accompanied by a map showing the location and boundaries of the site on a suitable Ordnance Survey base map.
- 1.8. In addition, the Council is inviting comments on its proposed site assessment methodology, as set out in this report. Comments should be made by email or by post, or using the above email or postal address.
- 1.9. All site submissions and comments on the site assessment methodology must be received by 21 November 2019

2. Overview of methodology

Call for Sites

- 2.1. In October 2019, the Council has launched a 'Call for Sites' exercise as part of its consultation on the Issues and Options document.
- 2.2. Through the Call for Sites exercise, individuals and organisations are invited to suggest sites for potential inclusion in the Local Plan. All sites submitted during the Call for Sites exercise will be assessed to determine whether they are suitable for allocation in the Local Plan, available for development and deliverable.

Consideration of existing sites

- 2.3. In addition to sites received during the consultation exercise, FDC will also consider the following sites:
 - Existing Local Plan 2014 strategic allocations and broad locations for growth which are undeveloped and do not have planning permission;
 - Sites with extant planning permission, or resolution to grant planning permission, for 5 or more dwellings; and
 - Existing business parks / areas of employment not currently allocated by the Local Plan 2014.

Local Plan 2014 site allocations / broad locations for growth

- 2.4. Whilst existing Local Plan 2014 site allocations and broad areas for growth (without extant planning permission) will automatically be assessed through the site assessment process, there is no presumption that such sites will be carried forward into the new Local Plan. Those existing sites/locations for growth will be subject to a fresh assessment, as per the method set out in this report.
- 2.5. Promoters of existing site allocations/broad locations for growth should make a site submission as per the instructions in section 1. Crucially, promoters should demonstrate their site is deliverable, and explain why it has not managed to secure planning permission since adoption of the Local Plan 2014. In the absence of up-to-date evidence that an existing site allocation/broad location for growth is available and deliverable, such sites are unlikely to be selected for allocation in the emerging Local Plan.

Sites with extant planning permission

- 2.6. Sites with extant planning permission, or where planning committee has resolved to grant planning permission, have been determined to be suitable for development through the planning process. This approach secures the principle of development established through planning decisions in the event that planning permission lapses or an alternative proposal is submitted. Sites with extant planning permission for 5 or more units (as at 01 April 2019) will therefore be assessed.
- 2.7. There will be a presumption that sites with planning permission will be suitable for allocation in the new Local Plan where they exceed the threshold of 5 dwellings or 0.15 ha, and subject to confirming the site is deliverable.
- 2.8. In determining whether sites with extant planning permission are deliverable, the Council will apply the definition of 'deliverable' set out in the National Planning Policy Framework¹.

¹Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

- 2.9. In summary, where a site is not major development or has detailed planning permission (e.g. full, reserved matters, prior notification), the site will be assumed to be deliverable.
- 2.10. Where a site has outline permission, or where planning committee has resolved to grant planning permission but a decision has not been issued, the promoter should supply evidence that the site is deliverable, otherwise the site may not be allocated in the Local Plan due to uncertainty regarding delivery of the site.
- 2.11. If the council has evidence that a site has little prospect of being delivered in the plan period, for example where evidence suggests a site is not economically viable, the site will not be selected for allocation in the Local Plan.

Existing business parks

- 2.12. There are a number of existing business parks and employment areas across the districts which, at present, are not allocated in the Local Plan. The Council intends to allocate such areas to provide greater certainty about the types of employment development which will be suitable in these locations.

General approach to site assessment

- 2.13. In summary, assessment of sites included the following stages:

- I. **Data collection** – To inform the site assessment process, data will be collected using a range of methods, including:
 - a. Desktop analysis of sites using data already held by the Council or available in the public domain;
 - b. A ‘Technical Consultation’ through which service providers and public bodies will be invited to comment on each site²;
 - c. A ‘Parish Council Consultation’, to be held in approximately February 2020, inviting parish councils to:
 - comment on each site suggested in their parish;
 - indicate whether they support the site (or not); and
 - rank each site in terms of preference.
 - d. New and updated evidence base studies prepared and commissioned by the Council – notably the Strategic Flood Risk Assessment and Sequential Test ;
 - e. Site visits to collect information about each site’s features and to improve understanding of the local context.
- II. **Scoring and analysis**– Using the data collected, each site will be scored against a number of assessment criteria (see “Chapter 5. Assessment Criteria”).
- III. **Sustainability Appraisal** – the Council will subject all site submissions to a process of sustainability appraisal, in part utilising the scoring and analysis described in Part II. For full details of the Sustainability Objectives, see the Sustainability Appraisal Scoping Report³.

² The following organisations will be invited to take part in the technical consultation – Cambridgeshire County Council, Fenland District Council, Highways England, Historic England. NB: Bodies relating to water infrastructure and the water environment will be consulted as part of the WCS & SFRA projects.

The Sustainability Appraisal is iterative and will be re-visited at each stage of preparing the Local Plan.

IV. Site Selection and Evaluation – the Council will review the results of the site assessment, findings of the Sustainability Appraisal and other evidence base documents, to identify a range of ‘growth options’.

Where a site conflicts with one or more of the **major** criteria (see chapter 4), it will be considered not suitable for allocation and will be rejected from the site assessment process and will not be allocated in the emerging Local Plan.

The various options identified through the evaluation process will be subject to Sustainability Appraisal, the results of which will inform the Council’s selection of its preferred option.

Preferred sites will be set out in the council’s Draft Local Plan, expected to be published in May 2020.

Assumptions

- 2.14. Where a site submission proposing housing development does not indicate the site capacity (i.e. the number of dwellings the site could accommodate) the following assumptions will be applied.
- 2.15. Firstly a percentage will be applied to the total site area (gross) to estimate the proportion of the site which might constitute ‘developable land’ (see Table 1). This provides an estimated ‘net site area’ value.
- 2.16. Where the site promoter has not indicated the site boundary, this will be measured using the Council’s GIS mapping system. In estimating the net developable area for each site, it is assumed that the larger the site, the more associated infrastructure such as roads, open space and schools will be required, thereby reducing the proportion of the site available for residential development.

Table 1: Net Developable Area Assumptions

Site size	Gross to Net Development Ratio
Up to 0.4ha	100%
0.4 - 2ha	85%
2 – 5ha	75%
Over 5ha	65%

- 2.17. The Local Plan 2014 does not directly specify the density at which new developments should be built. The Council’s Annual Monitoring report 2017/18 calculates that, on average, new development in Fenland is built to a density of 33 dwellings per hectare⁴.
- 2.18. To estimate indicative site capacity, the net site area will be multiplied by the 33 dwellings per ha density average. As a worked example, a site of 4 hectares would be estimated to deliver 99 dwellings.

Table 2: Worked example – estimating site capacity

Gross area (hectares)	4	
Developable area	3	Gross area * 75% (see Table 1)
Total dwellings	99	Developable area * 33 dwelling per hectare average

- 2.19. For clarity, published reports will indicate if site capacity has been estimated by the site promoter or by the Council.

³ Available at www.fenland.gov.uk/newlocalplan

⁴ See Fenland Monitoring Report 2017-18, Table 8 –(p14) available at: https://www.fenland.gov.uk/media/15572/Fenland-Monitoring-Report-2017-2018/pdf/Fenland_Monitoring_Report_2017-2018.pdf

3. Making a site submission

- 3.1. To ensure the process of submitting sites is straight-forward, respondents are encouraged to complete a short form, titled *Form B: Site Suggestion Form*, either on paper, electronically or online (see section 1)⁵.
- 3.2. The minimum threshold for site submissions is five dwellings, or a site area of 0.15 hectares (i.e. 5 dwellings at a dwelling density of 33 dwellings per hectare).
- 3.3. The Site Submission Form will require site promoters to provide the following information:
- **Contact details of landowner, and where applicable, agent's contact details:** Personal contact details will be held on Council's database and managed in accordance with General Data Protection Regulations. Anonymous submissions will not be accepted.
 - **Street address of site:** The actual postal address of the site or where not available, an approximate address of the site, for example "land east of High Street".
 - **Site description** – Site promoters should provide a general description of the site and its characteristics.
 - **Known constraints** - Details of any known constraints to development of the site, for example natural features, designations or infrastructure requirements.
 - **Current use** - A summary of the site's current (or last known) use
 - **Site area** - Total area of site in hectares
 - **Proposed use** - Main land use class being proposed by site (e.g. C3 dwellings) see Table 3 for further information.
 - **Description of proposed use** - A clear description of the proposed use of the site or development proposal.
 - **Developments involving development of dwellings:**
 - **Number of proposed dwellings** - Where the proposed use of the site is dwellings, the site promoters estimate of the number of dwellings which the site can accommodate.
 - **Delivery 2020-25 (short term)** - Where the proposed use of the site is dwellings, site promoters estimate of the number of dwellings which their site will deliver in the next five years i.e. short term.
 - **Delivery 2025-30 (medium term)** - Where the proposed use of the site is dwellings, site promoters estimate of the number of dwellings which their site will deliver in the medium term.

⁵ Available at: <https://www.fenland.gov.uk/newlocalplan>

- **Delivery 2030-35 (long term)** - Where the proposed use of the site is dwellings, site promoters estimate of the number of dwellings which their site will deliver in the long term.
- **Delivery 2035-40 (late plan period)** - Where the proposed use of the site is dwellings, site promoters estimate of the number of dwellings which their site will deliver in the last five years of the plan period.
- **Developments which include other forms of residential development:**
 - **Proposed number of Gypsy & Traveller Pitches** - Where the site includes the provision of pitches for Gypsy & Travellers, the proposed number of pitches.
 - **Number of Bedrooms** - For proposed uses falling within use classes C1, C2 and C4 only, indicate the number of bedrooms to be delivered in the proposal description field.
- **Developments which include non-residential development:**
 - **Floorspace** - For all non-residential uses, the amount of floorspace in square metres the proposal could deliver.

3.4. In addition, site submissions must be accompanied by a site plan on a suitable Ordnance Survey map base at an appropriate scale, with the site's boundaries clearly shown. Site submissions not accompanied by a site plan, or with a site plan which is of a poor standard, will not be accepted.

Use classes

3.5. The current and proposed use of land or buildings should be expressed in terms of the *Town and Country Planning (Use Classes) Order 1987 (as amended)*, and using the unit of measurement described in Table 3:

Table 3: Land uses and unit of measurement

Use	Unit of measurement
Agriculture	Hectares
A1 Shops	Square metres of floorspace
A2 Financial & professional services	Square metres of floorspace
A3 Restaurants & cafes	Square metres of floorspace
A4 Drinking establishments	Square metres of floorspace
A5 Hot food takeaways	Square metres of floorspace
B1a Office	Square metres of floorspace
B1b Research & development	Square metres of floorspace
B1c Light industry	Square metres of floorspace
B2 General industrial	Square metres of floorspace
B8 Storage & distribution	Square metres of floorspace
C1 Hotels	Number of bedrooms
C2 Residential institutions	Number of bedrooms
C3 Dwellinghouses	Number of dwellings (units)
C4 Houses in multiple occupation	Number of bedrooms
D1 Non-residential institutions	Square metres of floorspace
D2 Assembly and leisure	Square metres of floorspace
Sui-generis	Square metres of floorspace
Park Homes	Number of park homes (units)
Gypsy & Traveller Pitches	Number of pitches (units)
Moorings/Marina	Number of moorings (units)
Other	Square metres of floorspace

Personal data

- 3.6. Preparing a Local Plan follows an open and transparent process to provide fairness and accountability. Site submissions must therefore include personal data including names and contact information for landowners and agents. Anonymous submissions will not be accepted.
- 3.7. Where an agent is acting on behalf of a landowner, it is acceptable to provide only the name of the landowner, so long as contact information is provided for the agent.

- 3.8. The Council has a duty to manage personal data in accordance with the General Data Protection Regulations. The site submission form requires the site promoter to consent to the Council holding its personal data.
- 3.9. Site submissions which do not give consent to sharing personal data with the Council will not be accepted.
- 3.10. Personal data collected through the site submission form will be held on the Council's database system for the duration of the Local Plan process, including a period of challenge following adoption of the Local Plan.
- 3.11. Fenland District Council's data protection policy is available from the Council's website at: <https://www.fenland.gov.uk/privacy>

4. Assessment criteria

- 4.1. This section provides a summary of each of the Assessment Criteria and corresponding scoring matrices which the Council intends to use to assess all sites.
- 4.2. The assessment criteria have been selected as they reflect national and local policy objectives, and the availability of data. The assessment criteria are relevant to the Council's sustainability objectives and will inform the preparation of the sustainability appraisal.
- 4.3. The Council is inviting comments on the proposed assessment criteria, please refer to *1. Introduction* for further details.

Site Assessment Criteria

- 4.4. The assessment criteria address a wide range of factors to ensure relevant issues are taken into consideration. Where relevant, the assessment criteria have been informed by appropriate national policy and guidance.
- 4.5. Each assessment criterion is categorised as either 'Major Criteria' or 'Minor Criteria':
 - **Major criteria:** Relates to matters of critical importance. Where a site results in conflict with one or more major criterion, development of the site would likely result in significant harm to human health, the environment, or conflict with national planning policy or legislation. For example, high flood risk or incompatibility with national or county-level policy.
 - **Minor criteria:** Relates to important planning issues and policy objectives. Where a site conflicts with one or more minor criteria, there may be potential for the conflict to be overcome, managed or mitigated. For example, where a site is located within a Conservation Area, the Local Plan could prescribe a higher standard of design quality.

Scoring Matrices

- 4.6. Each site will be scored against the assessment criteria, based on the information collected during the 'data collection' stage (see para. 2.13).
- 4.7. For consistency, the assessment criteria will be scored using a five point matrix. A sites' score against the criteria will be represented by both a colour and a letter. Note that the letter and colour have the same value, but are intended to provide a clear and easy to understand scoring system for all users and devices / media. "A" / [bright green] is the highest score value, and "E" / [red] the lowest scoring value.
- 4.8. The use of colour will provide a fair and consistent comparison for a single topic across all sites and also gives the reader an initial clear visual understanding of how a site has scored. However, this may not be suitable for readers with colour blindness or visual impairment. Black and white printing would also render the colour score system useless. By also providing a letter overcomes these accessibility and printing issues, and enables data to be readily coded in the Council's database. However, the letter category is likely to be less intuitive in representing positive and negative values for many readers, hence the inclusion of both a colour and letter score of equal value.
- 4.9. There has been a deliberate decision to avoid using numbers in scoring sites, as the use of numbers implies a relative measure, which often does not exist when comparing economic, social and environmental variables; for example, that a value of 4 is exactly twice the value of 2 or that the social

benefit of having access to open space near one’s home is worth exactly twice that of creating an employment opportunity within walking distance of a development.

- 4.10. An example of the scoring matrix is provided in table 4. In broad terms, if a site scores [red] / “E” it is considered that development could pose significant risk or harm, whereas if a site scores [bright green] / “A” it is considered that there is no risk and/or the site has the potential to bring about clear, economic, social or environmental benefits.

Table 4 - Example of scoring matrix

Theme: [Title]	Question: [Assessment question]
Score	Potential outcome
A	Potential to deliver major economic, environmental or social benefits
B	Potential to deliver minor economic, environmental or social benefits
C	Either neutral impact or middle value
D	Low risk of economic, environmental or social harm
E	High risk of economic, environmental or social harm

Major Criteria

4.11. Major criteria relate to matters of critical importance. Sites which conflict with even a single major criterion could be rejected on this basis.

Criterion 1 - Site availability

- 4.12. National policy places great importance on the ability to demonstrate a supply of specific available and deliverable sites, sufficient to provide five years' worth of housing against their housing requirements (with an additional buffer to ensure choice and competition in the market for housing).
- 4.13. Receipt of a site submission form confirms that a site is available for development, and the form includes specific questions on the site promoter's anticipated timetable for delivery.
- 4.14. Sites which are available in the immediate and short term, and therefore enable the Council to meet the need for new homes in the five year period, are particularly favoured. However, a supply of sites over the mid and late stages of the plan period to 2040 is also required.
- 4.15. Where it becomes known that a site is no longer available for development within the plan period, it will be rejected and will not be allocated in the Local Plan. Site availability will be scored in line with the following scoring matrix (Table 5).

Table 5: Scoring matrix – 1. Site availability

I. Site Availability	When will site be available for development?	
Score	Potential outcome	
	A	Available for development in short term (0 - 5 years)
	B	Available for development in medium term (6 - 10 years)
	C	Available for development in long term (11 – 15 years)
	D	Available for development in late plan period (16 years +)
	E	Site unavailable for development

Criterion 2 - Minerals and Waste: professional assessment

- 4.16. Cambridgeshire County Council's Minerals and Waste team will be invited to comment on individual sites, and identify those sites affected by Minerals and Waste policies.
- 4.17. Due to the nature of the response, no specific scoring matrix will be applied. However, where a site is in direct conflict with a minerals or waste policy, it would be possible to reject a site on this basis.

Criterion 3a – Flood Zone

- 4.18. The National Planning Policy Framework places great importance on addressing flood risk through the planning system.
- 4.19. Due to its low-lying topography, many areas of Fenland are at risk from flooding. There are no Groundwater Protection Zones in Fenland.
- 4.20. National policy is clear that inappropriate development in areas at risk of flooding should be avoided, by directing development away from areas at highest risk - whether existing risk, or vulnerability to increased flood risk in the future as a result of climate change.
- 4.21. National policy requires all plans to apply a sequential, risk-based approach to the location of development, which steers new development to areas with the lowest risk of flooding. National Policy states development should not be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 4.22. The Council has recently gone out to tender to commission a Strategic Flood Risk Assessment (SFRA). The SFRA will provide an assessment of each site's flood risk from various sources.
- 4.23. The findings of the SFRA will be summarised into a simple metric to provide each site with a clear score, classifying each site in terms of the flood zone which covers the majority (i.e. more than 50%) of the site area. In some instances, there may be no single flood zone covering the majority of the site area. This score will be provided for the sake of clarity and does not replace the findings of the SFRA and the Council will have regard to the wider findings of the SFRA when selecting sites.
- 4.24. The Flood Risk scoring matrix is set out Table 6, and is based on the Flood Risk Vulnerability Classification set out in national guidance⁶. Land uses are either, compatible, compatible subject to passing the Exception Test, or incompatible.
- 4.25. A score of 'D' / [orange] indicates that the Exception Test would be required, and must be passed prior to allocating the site. Where a site's proposed use is incompatible with the flood zone it will be scored 'E' / [red], and will be rejected.
- 4.26. Certain developments are classified as water compatible and are compatible with any flood zone. For example, outdoor sports and recreation and marinas are forms of water-compatible development.

Applying the Sequential Test

- 4.27. In selecting sites, the Council will apply a sequential approach, as required by national policy and guidance. The Council will aim to allocate all development in Flood Zone 1.
- 4.28. Where it is not possible to allocate all development in Flood Zone 1, only then will sites in Flood Zone 2 be considered for allocation. Only where development cannot be accommodated in Flood Zones 1 and 2 will sites in Flood Zone 3 be considered. The Exception Test will also be applied as appropriate.
- 4.29. The following diagram illustrates how the Sequential Test will be applied to Local Plan preparation.

⁶ Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table 3 - Flood risk vulnerability and flood zone compatibility .pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility_.pdf)

Application of the Sequential Test to Local Plan Preparation

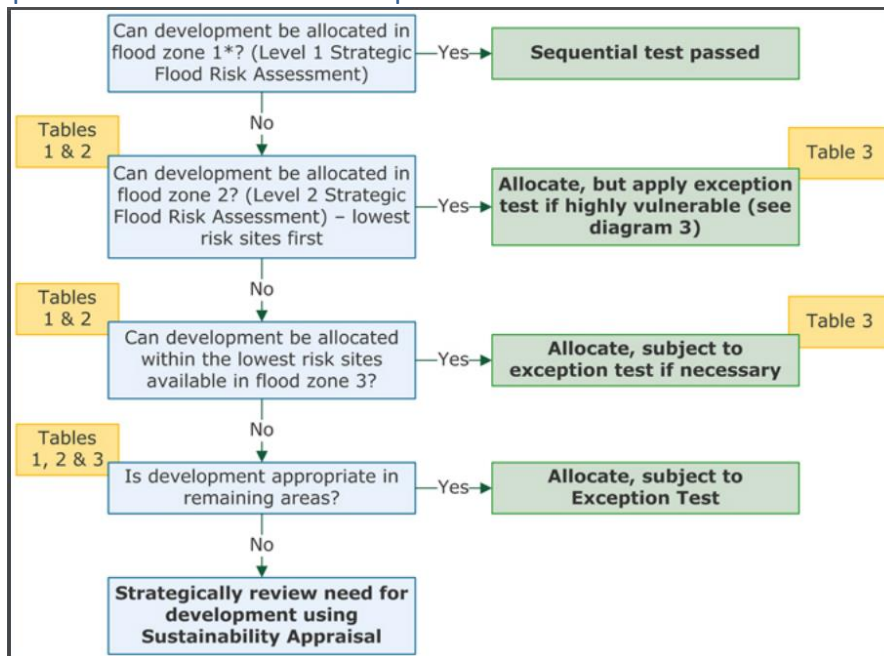


Table 6: Scoring matrix – Flood Zone

3a. Flood Zone		Which Flood Zone is the site mainly located in?		
Score		Potential outcome		
		Highly vulnerable uses - e.g. Caravans, mobile homes and park homes.	More vulnerable uses - e.g. Dwellings, care homes, pubs, hotels, health services and schools.	Less vulnerable uses - e.g. shops, restaurants, cafes, takeaways, offices, general industry, storage & distribution, and leisure.
	A	100% of site area in Zone 1	100% of site area in Zone 1	100% of site area in Zone 1
	B	>50% of site area in Zone 1	>50% of site area in Zone 1	>50% of site area in Zone 1
	C	N/a	>50% of site area in Zone 2	>50% of site area in Zone 2
	D	>50% of site area in Zone 2 - EXCEPTION TEST REQUIRED	>50% of site area in Zone 3a - EXCEPTION TEST REQUIRED	>50% of site area in Zone 3a
	E	>50% of site area in Zone 3a / Zone 3b - INCOMPATIBLE	>50% of site area in Zone 3b - INCOMPATIBLE	>50% of site area in Zone 3b - INCOMPATIBLE
	-	Multiple zones (no majority in single zone) - see SFRA		
	A	Proposed use is 'water compatible'		

Criterion 3b – Surface water flood risk

- 4.30. The SFRA will also investigate the risk of flooding from surface water, based on the probability of a sites risk in a 30 year, 100 year and 1,000 year flood event.
- 4.31. For the purpose of scoring each site, the SFRA data will be generalised due to the complex nature of this data. The SFRA should therefore be read alongside this assessment criterion. Where a site has 0% risk of surface water flooding (30 yr event), the site will be scored “A” / [bright green]. For all other sites, the SFRA should be consulted.
- 4.32. This criterion will likely be developed further as the scope of the SFRA is clarified and agreed. For example, the criterion could indicate if the site is located within the administrative area of an Internal Drainage Board, and whether the site benefits from flood defences.
- 4.33. Where the SFRA concludes a site is not suitable for development due to its risk of surface water flooding, it will be rejected.
- 4.34. For certain sites, the Council may prepare a ‘level 2’ SFRA to gain a greater understanding of how flood risk affects the site.

Criterion 4 – Proximity to hazardous apparatus

- 4.35. Desktop analysis will be undertaken to identify whether each site intersects the ‘Consultation Distance’ (CD) around hazardous apparatus, such as pipelines and gas pressure stations. Where a site intersects the CD, the Council will consult the Health and Safety Executive (HSE).
- 4.36. Any development proposed to be located within the CD of a major hazard chemical installation or pipeline has to be referred to the Health and Safety Executive (HSE), who will either “advise against development” or “not advise against development” on safety grounds. It is therefore possible a site may be rejected where it is in close proximity to such apparatus and the HSE has recommended against development.
- 4.37. Sites will be scored as either “A” / [bright green] where the site does not intersect the CD of hazardous apparatus, or the site intersect the CD but the HSE does not advise against development; or “E” / [red] the site intersects the CD and the HSE advises against development.

Table 7: Scoring matrix – Proximity to hazardous apparatus and HSE advice

4. Proximity to hazardous apparatus and HSE advice		Does the site intersect the CD and does the HSE advise against development?
Score	Potential outcome	
A	A	The site does not intersect the Consultation Distance of hazardous apparatus; or the site intersect the Consultation Distance but the HSE does not advise against development
B	B	N/a
C	C	N/a
D	D	N/a
E	E	The site intersects the Consultation Distance and the HSE advises against development.

Criterion 5 – Proximity to internationally / nationally important habitats

- 4.38. Internationally and nationally important wildlife sites, for example SPAs/SACs, Ramsar and SSSIs are afforded protection by national policy and legislation.
- 4.39. All sites will be assessed to determine their proximity to internationally and nationally important wildlife sites through desktop analysis. Any site falling within an area designated as being of International or National Importance will be rejected on this basis.
- 4.40. There are no National Nature Reserves, Areas of Outstanding Natural Beauty or Local Geological Sites in Fenland.

Table 8: Scoring matrix – Proximity to Internationally / Nationally important habitats

5. European / nationally important sites		Is the site located in proximity of an International / Nationally important habitats?
Score		Potential outcome
	A	More than 5km from the site
	B	2.01 km – 5km from the site
	C	501m – 2km from the site
	D	Within 500m of site
	E	Within site

- 4.41. The individual and cumulative effects of sites will also be considered through the Habitats Regulation Assessment Report (Appropriate Assessment). The HRA report will inform the selection of sites and formulation of policies, including to mitigate impacts on biodiversity or habitats.

Minor criteria

- 4.42. ‘Minor criteria’ relate to a wide range of planning issues and help to determine whether a site should be taken forward as an allocation in the plan.

Locational strategy

Criterion 6 - Settlement hierarchy

- 4.43. The existing Local Plan 2014 sets out a “settlement hierarchy”, which is being reviewed through the new Local Plan, and is the subject of consultation in the current “Issues and Options” document.
- 4.44. The settlement hierarchy ranks settlements, taking account of their population size and range of services and facilities.
- 4.45. All settlements could potentially play a role in meeting Fenland’s growth needs. However, the precise strategy for growth is yet to be determined.
- 4.46. Generally, higher order settlements provide the most sustainable locations for growth, due to the greater access services and facilities they offer. Conversely, development in the open countryside will likely have poorer access to services and facilities, and the greatest potential for environmental harm (to be explored through other assessment criteria).
- 4.47. Sites will be scored against this criterion following desktop analysis. Table 9 provides a matrix which indicates how sites will be scored against the criteria.

Table 9: Scoring matrix – Settlement hierarchy

6. Settlement type	Is the site located within or adjoining* an existing settlement?	
Score	Potential outcome	
A	Market Towns	
B	Growth Villages	
C	Limited Growth Villages	
D	Small Villages / Other Villages	
E	In open countryside, isolated from any settlement	

*adjoining’ means the site is immediately adjacent to the built area of the settlement, and is not disconnected open space or the presence of a physical constraint such as a major road, rail line or river.

Planning Status

Criterion 7 – Planning history

- 4.48. The Council will investigate the relevant planning history of each site by interrogating the Council’s planning application database.
- 4.49. No specific scoring system is proposed, as the site’s planning history will, in most cases, simply be informative about previous decisions on the site. However, where the Council’s records suggest the site is not economically viable, this will weigh heavily against the site unless the site promoter has provided new evidence to counter this.

Travel & transport

Criteria 8a & 8b – Local roads

4.50. Cambridgeshire County Council's Transport Team will be invited to score each site to identify local road impacts, using the following matrix. In addition, the Transport Team will be invited to provide comments and professional advice on each site (Criterion 9b).

Table 10: Scoring matrix – Local road impact

8a. Local road impact		Will the site impact on the highway network?
Score	Potential outcome	
	A	No objection with minor mitigation measures
	B	No objection with moderate mitigation measures
	C	No objections subject to reasonable mitigation measures
	D	Major infrastructure required to off-set safety or acquisition of third party land
	E	Insurmountable safety issues, or cost of mitigation measures likely to render scheme not viable

Criteria 9a & 9b – Strategic Road Network

4.51. Highways England will be invited to score each site using the following scoring matrix, and to provide comments on impacts relating to the strategic road network.

Table 11: Scoring matrix – Strategic road network

9. Strategic road network		Will the site impact on the strategic road network?
Score	Potential outcome	
	A	No objection with minor mitigation measures
	B	No objection with moderate mitigation measures
	C	No objections subject to reasonable mitigation measures
	D	Major infrastructure required to off-set safety or acquisition of third party land
	E	Insurmountable safety issues, or cost of mitigation measures likely to render scheme not viable

Assessment criterion 10 – Public Rights of Way

4.52. Public Rights of Way (PROW) enable vital access to the countryside and often provide opportunities for a range of leisure activities, such as walking, cycling and horse-riding. The PROW network therefore provides a significant opportunity to enhance the sustainability of sites. Cambridgeshire County Council's Highways Team provided an assessment of each site, through scoring in accordance with the matrix in table 13, and provided additional comments and advice (as criterion 7e(i)).

Table 12: Scoring matrix - Public Rights of Way

10. Public Rights of Way		Is the site likely to affect Public Rights of Way (PROW)?
Score	Potential outcome	
	A	Opportunities to connect to multiple nearby PRow within the site boundary – including at least one Bridleway
	B	Opportunities to connect to multiple nearby PRow within the site boundary
	C	Opportunities to connect to nearby PRow within the site boundary
	D	Opportunities to connect to nearby PRow outside the site boundary
	E	No PRow connection opportunities

Access to services

Criteria 11a-11h – Proximity to services

4.53. Providing good access to services is important in ensuring the sustainability of developments. Sites in close proximity to services and facilities are generally considered the most sustainable and will be scored favourably in the site assessment.

4.54. Distance to different local services and facilities will be estimated through desktop analysis, including:

- Public transport (criterion 11a.);
- Medical services (criterion 11b.);
- Shops providing basic goods to meet day-to-day needs (criterion 11c.);
- Primary school (criterion 11d.);
- Secondary school (criterion 11e.);
- Employment (existing employment allocations) (criterion 11f.).

4.55. Sites will be assigned a score based on their proximity to services, in increments of 400m i.e. the approximate distance covered in a 5 minute walk, as set out in the scoring matrix.

Table 13: Scoring matrix - Proximity to [services]

11a.,b.,c.,d.,e.,hf		Does the site have good access to [services]?
Score	Potential outcome	
	A	Less than 5 min walk (< 400m)
	B	Less than 10 min walk (< 800m)
	C	Less than 15 min walk (< 1,200m)
	D	Less than 20 min walk (< 1,600m)
	E	Greater than 20 min walk (>1,600m)

Assessment criterion 12a, 12b, 13a, 13b – Available school capacity

4.56. Through consultation with Cambridgeshire County Council’s Education Team, the capacity of local schools will be assessed (primary school capacity - criterion 10a. and secondary school capacity – criterion 10c, using the following scoring matrix.

4.57. If the County Council is unable to provide latest capacity data, the Council will rely on the information contained in the latest Cambridgeshire Education Organisation Plan.

Table 14: Scoring matrix – Available school capacity

12.a & 13.a [Primary/Secondary] School capacity		Do local [primary/secondary] schools have current capacity or opportunity for expansion?
Score	Potential outcome	
	A	Spare capacity in every year
	B	Spare capacity in some years
	C	Limited capacity
	D	No spare places but room for expansion
	E	No spare places, no room for expansion

4.58. The County Council’s Education Team will be invited to provide additional comments on the potential for existing primary and secondary schools to expand. These comments were incorporated into the assessment as criteria 12b and 13b respectively.

Land Quality

Criterion 14 – Proximity to potentially contaminated land

4.59. Each site will be assessed against the Council’s data to assess its proximity to potentially contaminated land data will be

4.60. Whilst land contamination may not necessarily render a site unsuitable for a development, the added cost and time in remediating contamination could impact upon a site’s viability and deliverability. Therefore, potentially contaminated sites will be scored ‘E’ / [red], and sites will be scored more positively as distance from contaminated land increases.

4.61. It is an objective of the Sustainability Appraisal to reduce pollution from contaminated land. Despite the scoring matrix, there may be some instances where it is desirable to allocate a contaminated site for development to bring about its remediation. The Environmental Health team’s assessment is likely to provide greater clarity in such circumstances.

Table 15: Scoring matrix – Land contamination

14a. Land contamination		Is the site located on or in proximity of potentially contaminated land
Score	Potential outcome	
	A	Site located more than 250m from potentially contaminated land
	B	Site within 250m of potentially contaminated land
	C	Site within 100m of potentially contaminated land
	D	Site within 50m of potentially contaminated land
	E	Site located on potentially contaminated land

Assessment criteria 14b – Contaminated land professional assessment

4.62. The Council’s Environmental Health team will be consulted to identify any likely impacts arising from contaminated land on, or in close proximity to sites.

Assessment criterion 15 – Agricultural land classification

- 4.63. The majority of Fenland is rural farmland. The Fens plays a vital role in food production. The district’s agricultural land is therefore an important resource of national significance.
- 4.64. The protection of high quality agricultural land forms an important sustainability consideration. Loss of high grade agricultural land should be avoided, with development being directed to land of a lower grade, unless inconsistent with other sustainability considerations.
- 4.65. Desktop analysis will be undertaken using the national agricultural land classification data to make an estimate about the land classification applying to the majority of the site area. It should be noted that the data is indicative and does not offer a detailed assessment of the agricultural quality of each site.
- 4.66. Sites not in agricultural use (for example Brownfield Land) will be scored more favourably than sites likely to offer high quality agricultural land, as per the following scoring matrix:

Table 16: Scoring matrix - Agricultural land classification

15. Agricultural Land Classification		Is the site located on the best or most versatile agricultural land?
Score	Potential outcome	
A	A	50 % (of the site) or more is not agricultural land
B	B	50% or more is Grade 4 or 5
C	C	50% or more is Grade 3
D	D	50% or more is Grade 2
E	E	50% or more is Grade 1

Species & habitats

Assessment criterion 16a – Proximity to County Wildlife Sites & Local Nature Reserves

- 4.67. Proximity to County Wildlife Sites & Local Nature Reserves was measured through desktop analysis and scored in accordance with the following scoring matrix.
- 4.68. The criterion scores sites based on their proximity to a County Wildlife Site or Local Nature Reserve. Scores furthest from a CWS/LNR are scored more favourably than those with a CWS/LNR on-site, to protect those habitats and the biodiversity they contain from human disturbance.
- 4.69. However, it is an objective of the Sustainability Appraisal to encourage access to wildlife and nature. Therefore, being in close proximity of a CWS/LNR can be a positive attribute from the perspective of future residents of the site. The assessment of the Wildlife Officer, at criterion 16e, is expected to provide greater clarity regarding the impacts of the site on CWS/LNR.

Table 17: Scoring matrix - Proximity to County Wildlife Sites & Local Nature Reserves

16a. Proximity to County Wildlife Sites		Is the site located in close proximity to a County Wildlife Site (CWS) & Local Nature Reserves (LNR)?
Score	Potential outcome	
	A	CWS / LNR within 2.01 km – 5km of site
	B	CWS / LNR within 1.01 km – 2km of site
	C	CWS / LNR within 501m – 1km of site
	D	CWS / LNR within 500m of site
	E	CWS / LNR located within site

Assessment criterion 16b, 16c, 16d – Species & Habitats

- 4.70. The Council will undertake desktop analysis to identify whether there are internationally or national protected species of flora and fauna known to be present on the site using data supplied by *Cambridgeshire & Peterborough Environmental Records Centre*; whether the site intersects habitats as defined by the *Cambridgeshire Habitats Mapping*; and will assess whether the site is located within Natural England's in the *Goose and Swan Functional Land Impact Risk Zone*.

Assessment criterion 16e – Ecology professional assessment

- 4.71. Through the technical sites consultation, the Council's Wildlife Officer will be invited to comment on the potential impacts of sites on species and habitats.
- 4.72. The individual and cumulative effects of sites will also be considered through the Habitats Regulation Assessment Report (Appropriate Assessment). The HRA report will inform the selection of sites and formulation of policies, including to mitigate impacts on biodiversity or habitats.

Protected trees

Additional criterion 17 – Proximity to TPOs

- 4.73. The presence of Tree Protection Orders issued for trees on or in close proximity to the site will be investigated through desktop analysis, and scored as per the following scoring matrix.
- 4.74. The presence of a protected tree is not necessarily a constraint to development but, where the site is selected as a draft allocation, may inform the preparation of a policy to ensure the long term protection of the tree.
- 4.75. There are no Ancient Woodlands in Fenland.

Table 18: Scoring matrix - Tree Preservation Orders

17. TPOs		Proximity to TPO tree
Score	Potential outcome	
A	No TPO within 15m of the site	
B	TPO tree within 15m of the site	
C	TPO tree on site	
D	Not used	
E	Not used	

Historic Environment

4.76. In formulating assessment criteria, the Council has had regard to Historic England's guidance *the Historic Environment and Site Allocations in Local Plans*⁷. The approach to assessment includes two steps. Firstly, evidence collection in terms of each site's proximity to assets; and secondly *understanding* the contribution the site makes to the significance of heritage assets, using information supplied by key stakeholders. Through the technical sites consultation.

Assessment criteria 18(a) to (d) – Historic environment

4.77. Proximity to Conservation Areas and heritage assets (namely, listed buildings, scheduled monuments and Registered Parks & Gardens) was estimated using desktop analysis. To limit harm to the historic environment, sites which do not include a heritage asset or are not within a conservation area were scored more favourably than sites which include a heritage asset or are located within the Conservation Area, in accordance with the following matrix.

4.78. There are no designated Historic Landscape Areas in Fenland.

Table 19: Scoring matrix - Proximity to heritage assets

18(a) – Conservation Area; 18(b) – Listed building; 18 (c) – Scheduled Monument; 18 (d) – Registered Parks & Gardens.		Is the site likely to affect a heritage asset?
Score		Potential outcome
	A	[Heritage asset] more than 2km from site
	B	[Heritage asset] within 1.01km – 2km of site
	C	[Heritage asset] within 500.1 – 1000m of site
	D	[Heritage asset] within 500m of site
	E	[Heritage asset] located on site / site intersects asset

Assessment criterion 18e, 18f & 18g – Heritage & archaeology: Professional advice

4.79. The Council's Conservation Team and Historic England will be invited to comment on sites during the technical sites consultation to provide a greater understanding of the significance of heritage assets and the potential impacts of submitted sites.

4.80. Cambridgeshire County Council's Archaeology team will be invited to comment on each site to identify any archaeological assets or sensitivities with the potential to be affected by submitted sites.

⁷ Available at: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/>

Character & place

- 4.81. The Council's Planning Officers will undertake site visits for all new site submissions. To avoid duplication of work, existing Local Plan allocations and sites with extant planning permission will generally not be visited.
- 4.82. Planning Officers will have particular regard to matters relating to local character and sense of place. The criteria for assessing character and guidance have been informed by Historic England's guidance, *Understanding Place: Historic Area Assessments*.
- 4.83. Specifically, officers will collect evidence and exercise professional judgement on the following criteria:

Assessment criteria - Character & Place

- Topography & Landscape: Description of relief, aspect and wide landscape character
 - Accessibility: Whether the site appears generally accessible to all users
 - Land use: Is the proposed land use likely to be compatible with neighbouring land uses?
 - Description of:
 - Built form, layout, scale, density;
 - Street pattern, regularity, density, width, etc.;
 - Building types, architectural styles, and materials;
 - Boundaries, enclosures, routes (e.g. roads, rail, waterways), hedgerows and vegetation;
 - Other features such as structures, earthworks, watercourses & wetlands, planting & vegetation, public art, street furniture, etc.; and
 - Sight-lines and vistas.
 - Potential impacts of development proposal:
 - Relationship with existing built form;
 - Visual impact on landscape / streetscape;
 - Historic features;
 - Aesthetic quality e.g. effects on intrinsic visual quality of architecture, layout, form and materials, or setting; and
 - Key considerations for formulation of policy relating to site.
- 4.84. An overall score will be assigned to each site, based on the findings of the site visit as set out in the following scoring matrix.

Table 20: Scoring matrix - Character & Place

19a. Character & Place		Impact on local character and sense of place
Score	Potential outcome	
	A	Development of site will likely enhance local character and/or sense of place significantly
	B	Development of site will likely contribute positively to local character and/or sense of place (this may be subject to the development providing mitigation measures and/or meeting specific policy requirements).
	C	Development of site is likely to have a neutral / negligible effect on local character and sense of place (this may be subject to the development providing mitigation measures and/or meeting specific policy requirements).
	D	Development of site will likely be detrimental to local character and sense of place (regardless of mitigation measures and/or meeting specific policy requirements).
	E	Development of site is likely to result in adverse harm to local character and/or sense of place

Assessment criteria 19b - Character & Place score justification

4.85. The Character & Place score will be supported by justification to explain why the score has been assigned.

Local Preference

4.86. The Council places great importance on engaging communities in the planning process. Public consultation will be carried out at the statutory stages of the plan-making process.

4.87. To inform the site assessment and selection process, the Council will invite Parish Councils to comment on, and express their preference on, site submissions in their parish area. Some parish councils may choose to involve the wider community in this process. However, this will be a matter for each individual parish council to decide.

4.88. It is important to note that where a site is not favoured by a parish Council, it does not mean that the site is not suitable. However, the Council will endeavour to allocate sites which are favoured by Parish Councils, and which are suitable, available and deliverable.

4.89. In approximately February 2020, for each site in their parish, Parish Councils will be invited to:

- Indicate whether they support the site;
- Assign each site a rank in order of preference from “*first*” to “*fifth or more*”; and
- Provide comments to explain their views about the site.

5. Relationship between Site Assessment and Sustainability Appraisal

- 5.1. Preparation of a sustainability appraisal is a statutory requirement of the Local Plan process. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 5.2. Site Assessment and Sustainability Appraisal are separate processes, but with a clear relationship between them and exist for the same purpose – to achieve sustainable development.
- 5.3. The Sustainability Appraisal involves the assessment of the individual and cumulative effects of each policy in the Local Plan, including site allocations, and involves the appraisal of a range of options.
- 5.4. The Site Assessment involves the collection of data, scoring and evaluation of the impacts of individual development sites. The information collected through the site assessment process, along with other sources of evidence, will directly inform the sustainability appraisal of those sites.
- 5.5. To demonstrate that the Site Assessment criteria are relevant to the Sustainability Appraisal process, the table in Appendix 1 provides a cross-reference between the Site Assessment criteria and the Sustainability Appraisal objectives, highlighting which criteria are relevant to which objectives.

6. Site Selection and Evaluation

- 6.1. The Council will review the results of the site assessment, the findings of the Sustainability Appraisal and other evidence base documents (for example, the Strategic Flood Risk Assessment, Water Cycle Study, Transport Assessment, Habitats Regulation Assessment, etc.).
- 6.2. Sites which conflict with one or more major criterion will be rejected from the site selection process.
- 6.3. Sites will be shortlisted into a range of 'growth options', taking into account:
 - The settlement hierarchy and overarching growth strategy;
 - The sustainability and suitability of each site, based on the findings of the Site Assessment and Sustainability Appraisal;
 - The availability and deliverability of each site, as identified by the Site Assessment process; and
 - Local preference, based on consultation with parish councils in approximately February 2020.
- 6.4. Where a site conflicts with one or more of the **major** criteria (see chapter 4), it will be considered not suitable for allocation and inherently unsustainable, and will be rejected from the site assessment process and will not be allocated in the emerging Local Plan.
- 6.5. Each of the various growth options identified through the evaluation process will be subject to further Sustainability Appraisal, the results of which will inform the Council's selection of its preferred option.
- 6.6. Preferred sites will be set out in the council's Draft Local Plan, expected to be published in May 2020.

Appendix 1 – How Site Assessment criteria and Sustainability Objectives relate

Site Assessment Criterion	1. Healthy Communities			2. Jobs, Education and Housing			3. Transport			4. Heritage, Place making and Landscape:			5. Resilience to Climate Change and Flood Risk			6. Land use and Wildlife			7. Water Resources			8. Pollution			9. Sustainable Resources			Summary of relationship between Site Assessment Criteria and SA Objectives
	1.1 Provide for an ageing population, and redress inequalities related to age, gender, disability, race, faith, location and income	1.2 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities and community activities); and ensure all groups thrive in safe environments	1.3 Create and enhance multifunctional open space that is accessible, links with a high quality green infrastructure network and improves opportunities for people to access and appreciate wildlife and wild places	1.4 Encourage healthy choices and opportunities for the consumption of locally produced food by maintaining and enhancing the provision of allotments, community orchards and farmers' shops and markets	2.1 Help people gain access to a range of employment and training opportunities	2.2 Support investment in people, places, communications and other infrastructure to improve the efficiency, competitiveness, vitality and adaptability of the local economy	2.3 Help provide decent and affordable homes for all in appropriate locations	3.1 Reduce the reliance on private motor vehicles and encourage more sustainable transport modes such as walking, cycling and public transport and contribute to the safety of all highway users.	3.2 Seek to ensure that all new developments can be accessed by a variety of transport modes and provide permeability	4.1 Conserve and where appropriate, enhance heritage assets, their setting and the wider historic environment	4.2 Create places, spaces and buildings that are well designed, contribute to a high quality public realm and maintain and enhance diversity and local distinctiveness of townscape character.	4.3 Retain the distinctive character of Fenland's landscape.	5.1 Limit or reduce vulnerability to the effects of climate change	5.2 Minimise and wherever possible remove the vulnerability of people, places and property to the risk of flooding from all sources	6.1 Minimise the irreversible loss of undeveloped land, particularly high grade agricultural land	6.2 Utilise brownfield sites for re-development in appropriate circumstances	6.3 Minimise and avoid where possible impacts to biodiversity and geodiversity, both within and beyond designated sites of international, national or local significance, and on protected species	6.4 Achieve net gains in biodiversity and create and enhance an ecological network that is resilient to the effects of climate change	7.1 Minimise water consumption and encourage re-use	7.2 Avoid any deterioration of water quality in rivers and other water bodies	8.1 Reduce emissions of greenhouse gasses and other pollutants (including air, water, soil, noise, vibration and light)	8.2. Reduce the risk of pollution to the environment from contaminated land	8.3 Support and enhance opportunities for waste reduction, reuse and recycling	9.1 Reduce energy consumption and increase the use of renewable and low carbon energy sources	9.2 Support the use of locally sourced materials in all new developments			
1. Site Availability																										The purpose of the criterion is to assess the time at which the site will be available for development. This information will enable the Council to plan for a supply of available sites over the course of the plan period to meet the housing requirement for the area.		
2. Minerals and Waste: professional assessment																										The criterion will assess whether the site accords with minerals and waste policies for the area. Minerals & Waste resources are an important sector of the local economy, and therefore new development should avoid prejudicing the operation of such sites. Extraction of local mineral resources and waste processing is an important aspect in the sustainability; utilising local resources and facilities can reduce the carbon footprint of new development.		
3a. Flood Zone & 3b. Surface water flood risk																										Due to its low-lying topography, Fenland is especially vulnerable to the increased risk of flooding which is predicted to arise from climate change. The criterion assesses each sites flood risk from multiple sources, informed by the forthcoming SFRA.		

