Local Plan Site Selection - Proforma Methodology Paper

September 2024

Introduction

1.1 This report sets out the methodology used to assess sites for allocation in the emerging new Local Plan. The allocations are to deliver a significant proportion of the District's future needs for housing and other uses.

1.2 The original Site Selection Methodology was agreed by the Local Plan Advisory Group, Planning Policy & Climate Committee on 14 June 2022. Work on the site assessment was undertaken following this methodology in draft form to sufficiently inform the Regulation 18 document. This work has now been updated and completed to support the Regulation 19 draft Local Plan. At this stage further information has been included such as the Strategic Flood Risk Assessment Level 2 that was completed in 2024. As always envisioned, the methodology is fundamentally similar to the original agreed approach, but in taking the work forward some matters of detail have developed and evolved.

1.3 The site selection work is set out in Proformas which have been used to assess each site for suitability and are published alongside this Methodology Paper.

1.4 The Local Plan seeks to make the most efficient use of land in the District and has undertaken an extensive and rigorous search for Previously Developed Land (PDL) (also known as 'Brownfield land' in national policy) within existing built-up areas. The approach has been underlain by the concept of 'leaving no stone unturned' in the search for appropriate sites on brownfield land. This extensive search has also included potential PDL opportunities in the Green Belt. However, an insufficient supply of Previously Developed Land led to the requirement to identify sites on Green Belt Land.

Potential Sites on Green Belt Locations

1.5 The Housing and Economic Land Availability Assessment (HELAA) published by the Council in 2022 assessed sites submitted to the Council for consideration from 2016 to the Call for Sites in 2021. The purpose of the HELAA was to consider a wide range of potential options for the future supply of housing and employment land through assessing sites with future development potential.

1.6 Sites which were not considered to be suitable, available or achievable by the HELAA were excluded from further consideration at this stage as part of the Site Selection process. The HELAA identified that 566 out of 678 sites identified for potential residential use would progress to the next stage of the Site Selection process.

1.7 The Council undertook a detailed Green Belt Review in order to understand the impacts of potential development in the Green Belt. While the Stage 1 GBR (2013) assessed the entirety of the Green Belt in St Albans against the NPPF purposes, the GBR Stage 2 fed directly into the site selection process. For this reason it was appropriate to undertake a more spatially focussed piece of work with the initial area

of search defined by applying a buffer around each settlement inset from the Green Belt, which would assist in encouraging a sustainable pattern of development accessible to existing settlements and maintain the integrity of the Green Belt (as supported by the NPPF). The GBR Stage 2 (2023) assessed sub-areas, with these sub-areas driven by the sites promoted and considered through the HELAA process, along with small sites identified in the previous GBR Stage 2 of 2013.

1.8   The outcome of the GBR Stage 2 (2023) was the recommendation of:

- 54 sub-areas for further consideration in isolation – if removed from the Green Belt, these areas are unlikely to result in harm to the wider Green Belt; and

- 29 sub-areas for further consideration in combination – if removed from the Green Belt in combination, these areas are unlikely to result in harm to the wider Green Belt but one of the constituent sub-areas could not be removed in isolation without resulting in harm.

1.9   These recommendations for further consideration are important in site selection and are key elements that inform the proformas. The GBR Level 2, however, is not the only consideration for site selection and other criteria for suitability for the selection of sites in the Green Belt are part of the process that is set out in the proformas.

Potential Sites on Previously Developed Land

1.10   The Council carried out a study for the identification of potential sites on brownfield land through an Urban Capacity Study. The sites were identified through a desktop review of maps, aerial photographs and online street photography and in some cases site visits. Sources of sites included under-utilised sites such as garage blocks and car parks, vacant and derelict land and buildings, and public sector land.

1.11   There were also sites identified for assessment on Previously Developed Land in the Green Belt.

1.12   A further category of sites on Previously Developed Land were those put forward through the Call for Sites that were within the urban areas of the District.

1.13   The site selection process applied to sites on Previously Developed Land in urban locations does not need to take into consideration the Green Belt and this is reflected in the proformas which are significantly shorter and simpler than the proformas for Green Belt Sites.

Site Selection Proformas for Green Belt Sites

1.14 Green Belt Sites identified in the HELAA but outside of the GBR buffers were not considered to be suitable due to their less sustainable location and because development on such sites would create holes in the Green Belt, leading to fragmentation.

1.15 In some locations there is more than one HELAA site due to multiple submissions over the course of several Call for Sites between 2016 to 2021. In these cases the most recent submission was considered in the site selection process and included within the proforma.

1.16 The proformas are designed to analyse each site and present the findings. At the top of each proforma is a table setting out:

- A unique proforma site reference
- The HELAA reference
- The Green Belt Review (2023) sub-area reference
- Site address
- Parish
- Area in hectares
- Current land use
- Prosed use

1.17 There are then three maps showing:

- The Green Belt Settlement Buffer and outcome of the GBR Stage 2
- Constraints
- An aerial view of the site

1.18 The red line boundary shown on the maps accords with the HELAA document.

1.19 The proforma then provides a summary description of the site.

1.20 Each site is then assessed in terms of its sustainable development potential which is considered in detail in the next section of this Report and Table 1.

1.21 The proformas then provide tables of major policy and environmental constrains that are set out in Table 2 below.

1.22 Finally, there is a qualitative assessment of the site which draws together the Green Belt Review assessment, the major policy and environmental constraints, and any other relevant important information. The proforma ends with a recommendation that the site either progresses or does not progress.

Site assessment in terms of its sustainable development potential

1.23 This section draws on the Green Belt Review Level 2 (2023) and establishes whether the site is:

- Located in a Green Belt Settlement Buffer (either 400 metres or 250 metres); the buffers are the most sustainable locations spatially in a broad sense as they are adjacent to the larger settlements which offer best access to a range of jobs, schools, community facilities etc..

- Located on Previously Developed Land; usually a brownfield site is acceptable for some form of redevelopment;

- Located within Green Belt Study weakly performing area;

- Located within Green Belt Study less important area;

- Located within Green Belt Study Recommended for further Consideration area.

1.24   The decision-making process is set out in Table 1 below.

Table 1 - Site assessment criterion

Criteria	Land Use	NO	Partially	YES
Located within a Green Belt Buffer or settlement area	Housing, Employment or Other	None of site is in a Green Belt buffer or settlement area (0%)	Site is partially in a Green Belt buffer or settlement area (0.1 - 59.9%)	Majority of site is in a Green Belt buffer or settlement area (60%>)
Located on Previously Developed Land	Housing, Employment or Other	Not Previously Developed Land (0%)	Partially Previously Developed Land (0.1-59.9%)	Previously Developed Land (60%+)
Located in Green Belt study weakly performing sub-area. There are three categories in the ARUP report – counted as the same	Housing, Employment or Other	Outside weakly performing area	Partially within weakly performing area	Completely within weakly performing area or an area that does not meet the overall performance against NPPF purposes
Located within Green Belt study less important area	Housing, Employment or Other	Outside less important area	Partially within less important area	Completely within less important area
Located partially in Green Belt study sub-area recommended for further consideration	Housing, Employment or Other	Outside Green Belt study sub areas Recommended for Further Consideration	Partially within Green Belt study sub areas recommended for further consideration	Completely within Green Belt study sub areas recommended for further consideration

Major Policy and Environmental Constraints

1.25   The approach was to establish the situation of the site in relation to the major criteria and were assessed as weak, medium or strong. The analysis is to allow the Council to understand and assess a site's strengths, weaknesses and attributes that will need addressing through criteria set out in Local Plan policies and allocations, and this should not be seen a scoring exercise.

1.26   Accessibility measured the distances to key infrastructure and services such as public transport, schools, employment, local facilities and GP surgeries. All measurements were from the centre point on a site.

1.27   Constraints were based around best practice that has been accepted at examination for other local plans, with additional bespoke constraints as follows:

- Existing woodland - to avoid areas of tree cover being excluded or damaged by any development and try to create a buffer area between them and new development;

- Biodiversity - areas of value not mapped on GIS layers but discovered by mapping, aerial photographs and site visits - established trees, hedgerows, bushes, or other features such as a pond;

- Green Infrastructure Corridors - both existing or fragmented areas which could be enhanced into better functionality, such as strips of small woodland plantations (sometimes known as shaws), hedgerows and other features such as rivers and streams that provide wildlife corridors within the District.

1.28   A buffer of 400 metres preventing residential development close to the Buncefield Oil Storage Deport was set to help ensure housing is maintained at a safe distance following a major explosion at the facility in 2005.

1.29   The major policy constraints and the definitions for weak, medium or strong are set out in Table 2 below.

Table 2 - Site assessment – Major Policy and Environmental Constraints

MAJOR POLICY AND ENVIRONMENTAL CONSTRAINTS					
Category	**Criteria**	**Land Use**	**WEAK**	**MEDIUM**	**STRONG**
Environmental	Functional Floodplain - uses South West Hertfordshire Level 1 SFRA October 2018 data, including flood zone 3a + 35% climate change and flood zone 3a + 70% climate change	Housing, Employment or Other	Site is mostly within Flood Zone 2 – 3 (and mostly within climate change map)	Some of site within Flood Zone 2 – 3 (and some within climate change map)	Majority of site within Flood Zone 1 (and outside climate change Map)
Environmental	Heritage Asset/s or their setting (both local and nationally listed buildings), scheduled monuments, historic parks and gardens, conservation areas	Housing, Employment or Other	Site contains a Heritage Asset	Site is adjacent or within 100m of Heritage Assets	Site is more than 100m from any Heritage Assets
Environmental	Ancient Woodland	Housing, Employment or Other	Site contains an Ancient Woodland	Site is adjacent or within 100m of any Ancient Woodland	Site is more than 100m from any Ancient Woodland

ACCESSIBILITY					
Category	**Criteria**	**Land Use**	**WEAK**	**MEDIUM**	**STRONG**
Accessibility by Public Transport	Distance to nearest bus stop (with at least peak hourly day service)	Housing and Employment	Site is more than a 1,000m from a bus stop	Site is between 401m and 1,000m from a bus stop	Site is within 400m from a bus stop
	Distance to the nearest mainline rail station (The Midland Main Line or West Coast Main Line)	Housing and employment	Site is more than 4000m from the nearest mainline rail station	Site is between 1001m and 4000m from the nearest mainline rail station	Site is within 1000m from the nearest mainline rail station
	Distance to the Abbey Line (branch line)	Housing and Employment	Site is more than 4000m from the nearest branch line station	Site is between 1001m and 4000m from the nearest branch line station	Site is within 1000m from the nearest branch line station
Proximity to Employment Centre	Distance to nearest employment site / location	Housing	Site is more than 2,400m from an employment site/location	Site is between 1,601m and 2,400m of an employment site/location	Site is within 1,600m of an employment site/location
Proximity to the Strategic Road Network	Distance to Strategic Road Network for employment sites	Employment	Site is more than 10,000m from the Strategic Road Network	Site is between 3,001m and 10,000m from the Strategic Road Network	Site is within 3,000m from the Strategic Road Network
Proximity to Key Services Local centre	Distance to local amenities (proximity to local centre, nearest city / town / village centre)	Housing	Site is more than a 1,000m from services	Site is between 401m and 1,000m of services	Site is within 400m of services

ACCESSIBILITY					
Category	**Criteria**	**Land Use**	**WEAK**	**MEDIUM**	**STRONG**
Proximity to schools	Distance to nearest infant/primary school	Housing	Site is more than 3000m from the nearest primary school	Site is between 801m and 3000m from the nearest primary school	Site is less than 800m from the nearest primary school
Proximity to schools	Distance to nearest secondary school	Housing	Site is more than 3000m from the nearest secondary school	Site is between 801m and 3000m from the nearest secondary school	Site is less than 800m from the nearest secondary school
Proximity to GPs	Distance to nearest GP surgery	Housing	Site is more than 3000m from the nearest GP surgery	Site is between 801m and 3000m from the nearest GP surgery	Site is less than 800m from the nearest GP surgery

OTHER KEY CONSTRAINTS					
Category	**Criteria**	**Land Use**	**WEAK**	**MEDIUM**	**STRONG**
Environmental	Agricultural Land Classification (ALC) - uses ALC Grades Post 1988 Survey & Provisional ALC	Housing, Employment or Other	Site development would result in the loss of the best and most versatile agricultural land (Grades 1-3)	Site development would result in the loss of poorer quality agricultural land (Grades 4 or 5)	Site development would not result in the loss of any agricultural land
Environmental	Nationally (European) Protected sites (Sites of Special Scientific Interest)	Housing, Employment or Other	Site contains one or more SSSI	Site is within 400m or adjacent to one or more SSSI	Site is more than 400m from one or more SSSI

OTHER KEY CONSTRAINTS					
Category	Criteria	Land Use	WEAK	MEDIUM	STRONG
Environmental	Local or Regional Nature Conservation sites (including Sites of Importance for Nature Conservation (SINCs), County Wildlife Sites (CWSs) and Local Nature Reserves (LNRs))	Housing, Employment or Other	Site contains one or more nature conservation sites	Site is adjacent or within 100m of a nature conservation site	Site is more than 100m from a nature conservation site
Environmental	Priority Habitats (listed on S.41 of the NERC Act)	Housing, Employment or Other	Site contains one or more priority habitat	Site is adjacent or within 100m of one or more priority habitat	Site is more than 100m from any priority habitat
Environmental	Existing non-designated woodland	Housing, Employment or Other	Site contains non-designated woodland	Site is adjacent or within 100m of any non-designated woodland	Site is more than 100m from any non-designated woodland
Environmental	Archaeological Assets including their setting (Archaeological Sites for Local Preservation and Areas subject to recording conditions)	Housing, Employment or Other	Site contains known or likely Archaeological Assets	Site is adjacent or within 100m of any known or likely Archaeological Assets	Site is more than 100m from any known or likely Archaeological Assets
Environmental	Landscape Conservation Areas including their setting	Housing, Employment or Other	Site is entirely within a Landscape Conservation Area	Site is adjacent or within 100m of a	Site is more than 100m from a

Category	Criteria	Land Use	WEAK	MEDIUM	STRONG
				Landscape Conservation Area	Landscape Conservation Area
Environmental	Source Protection Zones	Housing, Employment or Other	Majority of the site is within Source Protection Zone 1	Majority of the site is within Source Protection Zone 2 or 3	Site is not within a Source Protection Zone
Environmental	Access to Open Space	Housing	Site is more than 1,000m from open space	Site is between 401m and 1,000m of open space	Site is within 400m of open space
Environmental	Air Quality	Housing, Employment or Other	Site is within an AQMA	Site is adjacent or within 100m of an AQMA	Site is more than 100m of an AQMA
Physical	Utilities and Infrastructure (Gas Pipeline, Oil Pipeline, Power Lines / Substations, Water Treatment Works)	Housing, Employment or Other	Site has known existing utilities or infrastructure works that would severely constrain the future development	Site has known existing utilities or infrastructure works that would partially constrain the future development	Site has no known existing utilities or infrastructure works that would constrain development
Physical	Tree Preservation Order (TPO) trees	Housing, Employment or Other	Site contains protected trees	Site has protected trees adjacent to the site	Site has no protected trees
Biodiversity	Areas of non-designated biodiversity; established trees,	Housing, Employment or Other	Site contains areas of wildlife or biodiversity value	Site is adjacent to areas of wildlife or biodiversity value	Site has limited/zero wildlife or biodiversity value

			OTHER KEY CONSTRAINTS		
Category	Criteria	Land Use	WEAK	MEDIUM	STRONG
	hedgerows, bushes, or other features such as a pond, wildflower meadow, watercourse				
Green Infrastructure Corridors	Established woodland, hedgerows and other features that provide wildlife corridors within the District	Housing, Employment or Other	Site will sever Green Infrastructure corridor	Site will affect Green Infrastructure corridor, but mitigation or site reduction could help	Site will not sever any Green Infrastructure corridor
Physical	Access to the Site	Housing, Employment or Other	Site has no means of access and no likely prospect of achieving access	Site is challenged, but has ability to gain access (nearby road)	Site has suitable access (nearby or internal road)
Physical	Contamination	Housing, Employment or Other	Site is likely to be contaminated	Site is adjacent to land that is likely to be contaminated	Site is not located on or adjacent to land that is likely to be contaminated
Physical	Mineral Resource	Housing, Employment or Other	Site is within a Mineral Safeguarding Area	Site is adjacent or within 100m of a Mineral Safeguarding Area	Site is not located within 100m of a Mineral Safeguarding Area
Physical	Waste	Housing, Employment or Other	Site is within a Waste Safeguarding Area	Site is within 100m of a Waste Safeguarding Area	Site is not located within 100m of a Waste Safeguarding Area

OTHER KEY CONSTRAINTS					
Category	**Criteria**	**Land Use**	**WEAK**	**MEDIUM**	**STRONG**
Physical	Is the site located within the Chiltern Beechwoods SAC Zone of Influence	Housing, Employment or Other	Site is located within the Chiltern Beechwoods SAC Zone of Influence	Site is adjacent/very close to the Chiltern Beechwoods SAC Zone of Influence	Site is not located near the Chiltern Beechwoods SAC Zone of Influence
Physical	Buncefield Protection Zone	Housing, Employment or Other	Site is within 400m of the Buncefield Protection Zone	Site is adjacent/very close to the 400m Buncefield Protection Zone	Site is not located near the Buncefield Protection Zone

GBR Stage 2 Recommended Sites that are Not Recommended to Progress by the Proformas

1.30 Some Green Belt sites that were recommended for further consideration by the Green Belt Stage 2 were not recommended to progress by the proformas due to the following reasons:

- The site being too small to accommodate 5 or more home once the site restrictions (e.g. flooding, protected trees) were taken into consideration;

- Where it is considered that a suitable access and transport solution does not have a reasonable prospect of being provided within the Plan period;

- The site having been already developed to the extent that 5 or more homes could not be accommodated;

- The requirement to retain the existing use (eg children's play area);

- The site having characteristics that met the criteria for an extension to the Chilterns National Landscape into St Albans City & District where technical work is being undertaken by Natural England.

Site Not Recommended by GBR Stage 2 that are Recommended to Progress by the Proformas

1.31 Some Green Belt sites that were not recommended for further consideration by the Green Belt Stage 2 were recommended to progress by the proformas due to the location of the site next to a Tier 1 or 2 settlement and the potential of the site to deliver a wide range of significant Economic, Environmental and Social benefits including housing, affordable housing, schools, and a significant scale of sustainable transport improvements and jobs.

1.32 Those sites within the Hemel Garden Communities (HGC) area will also support a comprehensive approach to the delivery of HGC including joint work with Dacorum BC to deliver Duty to Cooperate outcomes. As part of the overall HGC programme there are considerable further benefits including supporting delivery of schools, sports and health facilities and around 10,000 jobs across HGC and the Hertfordshire Innovation Quarter.

Proforma Summary Table

1.33 The table below summarises the number of proformas carried out by category.

Proforma Categories	Number of Proformas
Green Belt Sites – Recommended to Progress	
Hemel Garden Communities	4
Broad Locations	12
Large	3
Medium & Small	19
Green Belt PDL	3
Other Sites	4
Total	**45**
Green Belt Buffer Sites – Not Recommended to Progress	
Green Belt Buffer Part 1	48
Green Belt Buffer Part 2	38
Green Belt Study Recommended	8
Chilterns National Landscape	4
Total	**98**
Urban Sites – Recommended to Progress	
Urban HELAA	3
UCS	54
Total	**57**
Urban Sites – Not Recommended to Progress	
Urban HELAA	17
UCS (post Reg 18)	3
Total	**20**
Overall Total	**220**