



Draft Technical Site Assessment Criteria

February 2016

Summary of Consultation Responses



Table of Consultation Comments on the Housing Site Assessment Criteria (published in draft Feb-April 2016)

Section (refers to numbering on consultation version of form)	Consultee	Comment (text condensed)	CBC response	Proposed change (question numbers refer to those used on the new form)
General comments				
General	CPRE	There is no exclusionary selection criterion to protect nationally designated heritage assets, ancient woodland and footpaths.	Q4, Q5, Q38, Q39, Q40 and Q41 reviews the impact on heritage/ archaeological assets and ancient woodland. This will involve liaison with CBCs internal archaeology, conservation and environmental policy specialists.	No change.
General	Historic England	Greater detail sought within the site assessment criteria and particular regard to published note ' <i>The Historic Environment and Site Allocations in the Local Plan</i> ' is suggested. SA criteria as published are too broad and need greater details and precision.	In assessing such a wide range of sites using detailed criteria, it would not be suitable to go into much more detail than is already provided. The criteria need to retain some degree of flexibility to be responsive to the diversity of sites submitted. However suggested note may prove useful in Sustainability Appraisal, which is currently being updated and revised.	No change.
General: (Legal duties)	Chilterns Consultation Board	Meeting the statutory duty under the CRow Act will mean avoiding direct harm (avoiding sites in the AONB and taking extreme care in its setting) and indirect harm. The harm should be assessed both individually and cumulatively	In Stage 2, Q38, the sites are assessed as to their impact on landscape; this will include an assessment of setting and also take into account designated landscapes which would include the AONB. However text has been updated in Stage 2 assessment to make clear reference to direct and indirect harm on the AONB. The Sustainability Appraisal will assess the cumulative impact of sites	Q38: 'What would the impacts of development be on the landscape character or setting of the area or any designated landscapes? Would there be any direct or indirect harm on the AONB or Nature Improvement Area?
General: (Cumulative impacts)	Chilterns Consultation Board	There is no mechanism proposed for assessing the cumulative effects of several sites together. Q 23 appears to relate to previous housing growth in the last ten years (which is important), rather than cumulative impacts of several sites proposed now.	The Sustainability Appraisal will assess the cumulative impact of sites. This assessment forms the basis for the SHLAA rather than plan allocations.	No change.
General: (Scoring System)	Harlington PC	Need clear definition for RAG ratings.	RAG ratings are objective, but the form will be updated to clarify that RAG means Red, Amber and Green and also to clarify that a Red rating on any of the Stage 1 assessment criteria will exclude a site.	Header changes: 'Stage 1: Suitability and Availability (Exclusionary Stage): This section will exclude any sites which do not pass the exclusionary suitability criteria and they will not be assessed further.
General: (Scoring System)	Chilterns Consultation Board	Reduces the site assessment process to a scoring system. One 'red' from a substantial impact on a heritage asset, protected landscape or habitat should be enough to exclude a site, irrespective of whether it	The methodology is not intended to be a simple scoring system. Sites will be excluded if they score as 'red' on something which cannot be mitigated.	RAG column clarified 'R/A/G

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		scores well in access to Broadband or School places. The proposed methodology weighs assets in a way they should not be traded.	The RAG scoring has been replaced with Yes/No in certain questions to make the analysis simpler.	(Red, Amber or Green)' R/A/G replaced with Yes/No responses I certain questions
General: (Scoring System)	Optimis	Phrasing of questions may give a mixed message on the "suitability" of a site e.g. does a red flag automatically rule the site out or is there a maximum number allowed? RAG system does not allow weight to be apportioned to each of the questions		
General (scoring system)	Optimis	There are too many questions carrying different weight which is capable of misleading the analysis.		
General: (Scoring System)	Michael Brooks (CRPS)	R/A/G is not defined.	Agreed, this has been added.	
General: (Scoring System)	Shillington Village Design Association	Suggest that the R/A/G ratings be converted into points R = 0, A = 3, G = 5 Except for the following items which we think are of prime importance and should be given additional weight by at least doubling their score: Item 20 - Brownfield Land Items 21 & 22 – Community Support Item 24 – School Capacity Item 32 – Relation with Settlement Item 38 – Agricultural Land Quality Items 33 & 34 – Environmental Constraints. Any sites with Red ratings at any of the Items 40 to 51 should not be selected for development unless no others are available.	The use of a RAG system is intended to guide assessment without being too prescriptive. It is proposed that a balanced assessment is used which considers sites against each of the assessment criteria in context, rather than relying on numbers or weighting which may distort results	No change.
General: (Cumulative Effects)	Harlington PC	Concerns regarding the cumulative effect of sites being developed over and above those already underway/planned and their reliance on the same infrastructure to support them.	The form does assess the cumulative impact of housing growth over the last ten years and the Sustainability Appraisal will assess the cumulative impact of sites in settlements.	No change.
General (site info)	Optimis	There is no definition of developable area, should a clear RICS definition or other definition be applied for consistency.	This refers to the developable area provided on the submission form. The criteria assess site constraints in detail in stage 2.	No change.
Stage 1				
Stage 1a (General)	Optimis	Stage 1A will potentially rule out sites that deliver a small number of units that provide vital enabling development for community projects, or may include rural exception sites. Some questions do not specify whether the assessment relates to the "whole site" or the "developable site".	Rural exception sites can be brought forward using existing plan policies and do not need to be allocated. The Council will include an exceptions policy in the new Local Plan.	No change.
Q1	CPRE	This does not define a maximum amount of land required to accomodate10 dwellings. We recommend sites of 10 dwellings or less are not excluded from	We do not simply rely on submitted number of units for sites. CBC have developed a methodology to assess what number of dwellings	No change.

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		selection and a maximum area of a 10 dwelling site is set so 'land hungry' sites at inappropriate locations are excluded from selection.	could reasonably be accommodated at an appropriate density (30dph). This builds in deductions for infrastructure where appropriate.	
Q1	O&H properties	Wording should be amended to clarify that the method for the calculation of 'gross to net' ratios apply to this specific part of the assessment only and only to establish if sites have the capacity to accommodate 10 or more dwellings.	Q1 header changed.	'Site size' changed to 'Provisional site capacity'
Q2	CPRE	This criterion will mean 50% of an unspecified size of development site cannot be excluded from selection. The Council has not specified the method it will use to assess flood risk. Provides recommended method.	Q2 and Q3 have now been amended and there is a more detailed question on drainage and flooding in Stage 2, Q34 and Q35. This assessment will be completed using internal /external experts and states all sites will be subject to sequential test.	Q2: 'Is more than 50% of the site located in the Flood Zone 2/3? Q3: Is more than 50% of the site at risk from groundwater or surface water flooding? Q34: Can suitable drainage of the site be provided? Q35: Can the development be accommodated safely and sustainably on site without increasing flood risk on, to, or from the site? (Consider the impact of the risk of fluvial, surface water, ground water, reservoir and sewer flooding, and the need to accommodate water management infrastructure on site, and how this affects the proportion of the site that can safely be developed).
Q2	BLNP	Should change to exclude sites where 25% in flood zone, important that CBC are seen to be seeking to encourage development in non-floodplain areas and not letting highly vulnerable sites through, even if they are likely to be sifted out later in the process.		
Q2	Harlington PC	Should read as follows Is the site located in the floodplain 2/3 Is the site a risk from groundwater or surface water flooding		
Q2	O&H properties	A proportionate approach (as per flood risk) should also be applied to groundwater and surface water drainage.	Agreed.	
Q2 (and Q28)	Environment Agency	Assume 2/3 refers to Flood Zone and not "floodplain" as is stated? Functional floodplain is usually referred to as Flood Zone 3b. Please can it be explained why a site with 50% within flood zone 2 or 3 will be considered. There is no mention of the Sequential Test (ST). All sites in Zone 2, 3a and 3b must be subject to the ST (other than the circumstances stated). Is it that you apply the ST once all sites have been suggested?	Noted, change made. The Sequential Test applies to all sites once they have passed through the Stage 1 sift, the 50% question is simply a way of excluding the less suitable sites because we can be more selective as we have a lot of available sites to consider. Form will be amended for clarity.	
Q2	Optimis	If it can be proven that all of the developable area is outside of the flood zone it should pass this test, even if that means less than 50% of the whole site is outside the floodplain. Moreover, consideration should be given to any evidence provided by experts in the case of flood risk – this is not recorded in the right hand column.	The Strategic Flood Risk Assessment is being updated and all sites that reach Stage 2 will be subject to the Sequential Test.	Q2: 'Is more than 50% of the site located in the Flood Zone 2/3? Q3: Is more than 50% of the site at risk from groundwater or surface water flooding?
Q3	CPRE	This criterion will exclude from selection development sites within a Site of Special Scientific Interest (SSI). We recommend the criterion should also exclude a development site from selection if it is adjacent to a SSSI and adversely affects the environment that	Q40 assesses the impact on biological/ geological/ ecological assets. This would include liaison with the Ecology Officer. Stage 1, Q4 is intended to be a brief exclusionary stage, and therefore more detailed assessments are carried	No change.

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		sustains the sites special characteristics	out in Stage 2.	
Q3	Gerald Gough	This would imply that sites that sit within SSSI's etc are acceptable? I would suggest that question 3 be changed as follows : are there any nationally significant designations (SSSIs, SAMs & CWSs) <u>within 250 metres of the proposal development site?</u>		
Q3	Historic England	Could not find nationally significant designations for heritage assets (Scheduled monuments, listed buildings, conservation areas, registered parks/gardens) these should be included in Stage 1a	Agreed. Form updated to identify which designations are exclusionary; however Listed Buildings and Conservations areas are not being used as exclusionary criteria and will instead be considered in a more detailed Stage 2 assessment alongside all other Historic designations.	'Are there any nationally significant designations within the site? These include: Sites of Special Scientific Interest, National Nature Reserves, Local Nature Reserves, Scheduled Ancient Monuments, Registered Parks and Gardens.'
Q3	BLNP	The Nationally Significant Designations should also include the Forest of Marston Vale and the Greensand Ridge NIA. While not restrictions on development, should be recognised early in process.	This stage is purely exclusionary. The need to recognise these assets is understood, but it is not appropriate for a stage that is purely in place to exclude sites.	No change.
Q3	Harlington PC	Should reword and add agricultural land question: Are there any nationally significant designations <u>within the site or the setting of SSSIs, SAMs & CWSs and AONBs</u> <u>Agricultural Land Quality: Is the site on agricultural land grades 1 – 3 (A&B) inclusive</u>	The impact on the setting of national designations is assessed in detail using internal experts in Stage 2. Stage 1 is intended to be a very brief exclusionary process leaving matters which require more detailed consideration to later stages. Q25 includes an assessment on Agricultural Land.	No change.
Q3	O&H properties	The existence of nationally significant designations on sites does not justify sites to be discounted at Stage 1.If it is considered necessary to retain in Stage 1 then it should allow for an objective assessment as to the level of constraint imposed by the designation Opportunities for mitigation against potential significant effects should for part of Stage 2 of the assessment.	Not appropriate to move this to Stage 2 completely, this is an exclusionary measure for sites where more than 50% of the site is covered by a national designation. Stage 2 provides more detailed assessment and includes assessment of opportunities for enhancements.	No change.
Q3	Optimis	Question 3 must define "site" to mean the "developable site".	Q4 and Q5 wording clarified.	Q4: Is there more than 50% of the site covered by nationally significant designations? These are: Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Registered Parks and Gardens. Q5: Is more than 50% of the site located within the Area of Outstanding Natural Beauty?

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Q3/4	Optimis	Question 3 and 4 are y/n answers, how does the RAG rating work? Surely the judgement is the degree to which proposals have an impact on these designations rather than their mere existence suggests a 'technical fail'.	Agree on first point but this question is not about making a qualitative assessment of impact. This is done at stage 2 if the site progresses.	These have been amended to yes and no.
Q4	CPRE	Concern expressed that this criterion will mean 50% of an unspecified size of development site within the Chilterns Area of Outstanding Natural Beauty cannot be excluded from selection. As well this criterion would allow development to abut this AONB adversely affecting the character of its setting	Stage 1 is purely an exclusionary stage, and it excludes sites which are more than 50% in the AONB. The setting is considered in detail at a later stage. Stage 2 provides a more detailed assessment of landscape, including effects on setting. This Stage 2 questions has however been re-worded to reflect the importance of the AONB and its setting.	Stage 2, Q38, detailed landscape question reworded as follows: What would the impacts of development be on the landscape character or setting of the area or any designated landscapes? Would there be any direct or indirect harm on the AONB or Natura Improvement Area?
Q4	BLNP	Percentage of a developable site within AONB too high, should be 25%. Could otherwise lead to potentially damaging development, particularly on the edge of the AONB, which would impact on setting/context.		
Q4	Chilterns Consultation Board	Given that submissions have been sought for sites which could accommodate anything between 10 homes and new settlements of 2,000 or more dwellings, the logic of this is that a site in the AONB would not be excluded even if proposed for 1000 plus homes Step 4 should be corrected to: "Is the site proposed for major development and in the AONB? If the answer is yes, then the site will not be assessed further".		
Q5	Harlington PC	The existing CBC Policy re Mid Beds Local Plan and Development Management Policies should be adhered to in relation to sites outside of the village envelope and rural exception sites.	To produce a sound Local Plan which meets objectively assessed housing need it is important to review the Settlement Envelope and potentially allocate sites outside of what currently constitutes the boundary.	No change.
Q5/6	Optimis	If 5/6 posed retrospectively to previous plans, there are sites that may have been excluded, but otherwise are vital to the delivery of homes in the District (Wixams for example). These questions need to be worded to indicate how such a site should be judged by reference to the impact of such a site to the wider character of an area. For Example why are 2,000 homes seen as a bench mark for self-containment? If a scheme of 250 homes plus all facilities suitable for a small village was proposed would this be excluded? Whereas a 2,001 unit scheme in the middle of nowhere with no plans for any facilities would be acceptable. This would encourage vast sites in the countryside rather than carefully planned development. CBC should consider	Agreed. The wording of Q7 has been adjusted to reflect the scale.	Q7: For sites that are not of a sufficient scale to be self-contained, is the scale of the proposed development appropriate in relation to the adjoining/nearby settlement, or does it represent an increase in the area of the settlement by over 25%? Exclude if the scale is not appropriate and a portion of the site could not be considered. Source for self containment threshold provided.

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		whether this is an appropriate way forward given the historical difficulties of delivering housing in the District.		
Q6	O&H properties	Should be clarified as to whether it applies to all sites or just those that are not large enough to be self-contained. The nature of a self-contained, large scale development, is unlikely to be 'in keeping' with nearby settlements.	Agreed.	Q7: For sites that are not of a sufficient scale to be self-contained, is the scale of the proposed development appropriate in relation to the adjoining/nearby settlement, or does it represent an increase in the area of the settlement by over 25%? Exclude if the scale is not appropriate and a portion of the site could not be considered.
Q7	Optimis	How does question 7 work as it is a yes/no answer? What type of site would be allocated as Amber? This precludes all sites in the GB which is unrealistic and takes no account of the Green Belt Review. Given the questions 8-12, is question 7 even necessary?	Agreed. Yes, Q8 is necessary to filter sites and will be linked to the Green Belt Review.	Green Belt section changed to instead use a Yes/ No assessment rather than RAG rating and exceptional circumstances question added.
Q7	O&H properties	Would be beneficial to map the Green Belt as part of National Designations to demonstrate spatially how it interplays with other designations and opportunities for growth.	The maps were proposed as a rough guide to aid Call for Sites submissions. Mapping of designations will made available as part of the New Local Plan and Strategic Green Belt Review.	No change.
Q7	CPRE	Green Belt designation is not included in this criterion. Recommend Green Belt is recognized for what it is a nationally significant designation and therefore an exclusionary criterion.	Review of Green Belt is an important part of a Local Plan as detailed in the NPPF. We will use independent consultants to conduct a review of the Green Belt, and assess whether land in the Green Belt still meets the objectives. An up-to-date review of the Green Belt is important to produce a sound Local Plan An assessment of the Green Belt will be undertaken in Stage 1 and will be informed by the findings of the Green Belt Review.	No change.
Q7	Harlington PC	This stage should be removed see Stage 1 A3 above		
Q8-12	Harlington PC	Green Belt was established in order to fulfil these objectives and therefore this section should be excluded.		
Q8-12	Michael Brooks (CRPS)	Proposed amendment of wording to clearly refer to sites being assessed in their undeveloped or existing state.	The assessment form assesses the site in its current form unless stated otherwise.	No change.
Q11	Michael Brooks (CRPS)	This Green Belt purpose is not irrelevant in Central Bedfordshire. Ampthill would be a good example of a historic town whose setting is protected by the Green Belt.	This will be considered by the Strategic Green Belt Review that has been commissioned by CBC.	Stage 1E Assessment has been reworded to take into account the Strategic Green Belt Review methodology. .
Stage 2				
Q13	Optimis	What does question 13 mean in practice – this is a significantly subjective matter unless there is clear	Agreed. Explanation of critical infrastructure required.	Definition of critical infrastructure provided in footnote to Stage 1C

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		guidance given on assessment?		Assessment.
Q14	O&H properties	Should be expanded to provide a rating for each type of transport route located in proximity to sites. For example sites located in close proximity to existing or planned strategic road networks and existing or planned rail networks should receive two positive ratings. Sites only located in proximity to existing or planned strategic road networks should receive one positive rating.	Proposed new infrastructure is considered in Stage 2. The form does not use a numerical scoring system as it is appropriate for the detailed suitability assessment to be qualitative.	Q26 to Q30 have been reworded.
Q15	BLNP	Contribution a development site could make to local identity and sense of place should be considered here, for example opportunities to create places for social interaction or where character could be developed.	Too detailed and subjective for this type of technical assessment	No change.
Q15	BLNP	Physical proximity to greenspace should be considered here.	Stage 2 open space question assesses capacity to provide required open space/ GI. Many of the sites assessed will provide open space/GI on site as part of the development, so proximity to existing greenspace may not be as crucial in this respect. Stage 2 infrastructure questions consider infrastructure opportunities in relation to GI and Open Space.	No change.
Q15	Michael Brooks (CRPS)	R/A/G assessment according to the fixed distance ranges given too inflexible, the R/A/G distance ranges for 15a to 15f should be given separately in each case. Acceptable maximum distance to services is different for each.	Agreed. This approach will be reconsidered.	Q26 to Q30 reworded to provide RAG ratings for each facility.
Q15	Optimis	Badly worded and impractical as an assessment tool. The definition of distances in will mean different level so suitability depending on the nature of a facility. There is no definition for the assessment of journey time so how are questions d, g and h assessed? Assume the word "time" should be deleted from e and f? What is the definition of a local or strategic employment area? Furthermore, what is the relevance of this category considering that most 'jobs' are located away from employment areas, such as construction, retail, agriculture or education.	Agreed. This question has been removed from the assessment.	Question removed.
Q16-19	BLNP	Proximity to the strategic cycling and walking network should also be included in 'transport and movement' section	This is considered in a different question, agreed it should be moved.	Form re-ordered to bring this question into the transport and movement section.
Q15-19	O&H properties	Criteria should be amended to make consideration for the opportunities to deliver new facilities and services through the delivery of strategic development.	Agreed, new facilities will be assessed in qu. 26-28	New category for new facilities added

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Q16	Michael Brooks (CRPS)	The distance of the site from a bus service to a major centre should be further qualified by service frequency, e.g. weekday daytime better than hourly (G), hourly (A) or less frequent (R).	Agreed.	Q28: Distance to a bus stop with a frequent service.
Q17	Optimis	Considered most of the District will have a Red flag for this question, is this appropriate?	At Stage 2 a site will not be immediately excluded based on one Red rating.	No change.
Q18 – 19	Michael Brooks (CRPS)	Is there not unintended overlap between these two?	Agreed. Duplicate question.	Q30 has been reworded: 'Is the site accessible from the existing road network?'
Q18/19	Optimis	Judged by distance or by travel time? What relevance does this have to the desirability of a site for development?	Agreed that this question is difficult to measure.	Question removed
Q20	Optimis	Badly worded and judged. Is this based on developable area?	Question re-worded using NPPF definition.	Q17: Is the site Previously Developed Land in accordance with the NPPF definition?
Q20	CPRE	Brownfield is not a designation. Previously developed land in the Green Belt is Green Belt. We are therefore concerned this criterion will mean a new site on previously developed land within the Green Belt cannot be excluded from selection.	Previously developed land is defined in the NPPF and if sites in the Green Belt get through to this stage they will be those where exceptional circumstances have been established or those within parcels recommended for release by the Strategic Green Belt Review.	Question header changed to Previously Developed Land
Q21	Optimis	Should be removed or reconsidered. How is this judged, given the different weight to be applied to the stages of a NP and the lack of credibility of a NP in the early stage.	Agreed -question re-worded.	Q18: Neighbourhood Planning (only applicable in designated areas) Is the site identified as a housing allocation in an emerging Neighbourhood Plan?
Q21-22	CPRE	The Council has not specified a criterion for assessing community support for a site in a designated Neighbourhood Plan area. We recommend such sites are excluded from assessment until a Neighbourhood Plan is supported by a referendum	We cannot exclude sites until Neighbourhood Plans come forward. We will liaise with Neighbourhood Plan groups where possible, and of course take into account well advanced Neighbourhood Plans.	No change.
Q22	Optimis	Wording of question implies that if no community support is given it should be a Red – why? This is not necessarily indicative of an inappropriate site	Noted.	RAG rating amended to Yes/No
Q23	Michael Brooks (CRPS)	Does this refer to an existing development site that may have additional potential or to a new site that is now being put forward for only partial development initially? Clarification needed.	Noted. Q21 and Q22 amended.	Q21: Considering housing completions over the past 10 years, what has the been the level of housing growth in the parish? <ul style="list-style-type: none"> - Less than 5% (G) - 5% to 20% (A) - More than 20% (R) Q22: What level of housing growth would there be is all the

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				<p>outstanding permissions (as of April 2016) were to be completed?</p> <ul style="list-style-type: none"> - Less than 5% (G) - 5% to 20% (A) - More than 20% (R)
Q23	Optimis	Should not be in the site assessment this is a matter for the overall plan	Disagree. It is important to take into account previous housing growth on settlements.	No change.
Q24	Sue Rowell	Impacts on schools but not Health care facilities considered when they are already oversubscribed in some areas?	Noted. Access to a GP surgery or medical centre assessed in Q26d. We have ongoing liaison with the NHS/CCGs to understand the provision across CBC.	No change.
Q24	Optimis	Impossible to judge unless an applicant has refused to deliver education at a planning application stage. The Allocation process is perfectly able to insist upon this, so its omission from a call for sites submission should not lead to a site being excluded.	Important to engage with Education at this stage. Q31 and Q32 reworded.	<p>Q31: Do the local schools have capacity at all tiers?</p> <p>Q32: If not, has a commitment been made to address this?</p>
Q27	Chilterns Consultation Board	The third column refers to a Water Cycle Study. It will be important to ensure not just that water supply and wastewater facilities can be provided, but that they can be provided without harm to chalk streams.	Noted. Qualitative assessment should pick this up.	No change.
Q28	Optimis	This is a repeat of Q2	No, this is a more detailed assessment.	No change.
Q28	Resident	The expected impacts of Climate Change should be considered in relation to predicted increased rainfall patterns and river flows, as well as the historical records from EA. Also reviewing the relationship of any large scale site proposed to the EA Catchment Management Plans and Waterbody Action Plans required to comply with the Water Framework Directive which may have implications for the use of that site	Sustainability Appraisal Framework will assess the impacts of climate change as will the wider evidence base for the plan including the Water Cycle Strategy, the Strategic Flood Risk Assessment and the Environmental Framework.	No change.
Q29	Optimis	Red flag if remediation were required? If it were required and the proposals are to remove environmentally degraded land that ought to be a beneficial aim. This would run alongside the benefits of being a brownfield redevelopment site.	This will be assessed objectively by internal environmental health experts.	No change.
Q29 and 31	Resident	Should add Environment Agency here too as a consultee regarding e.g. old/current landfill, COMAH sites, Waste Transfer stations and other potential nuisances and hazards that LA Env Health do not regulate or have oversight of.	Noted. EA will be engaged through Sustainability Appraisal process.	No change.
Q30	Optimis	Would not be relevant if the assessment was based on the developable area of a site.	Physical constraint assessment is objective and will take into account the site as a whole and opportunities for mitigation.	No change.

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Q33- 38	Chilterns Consultation Board	A further step should be added under Environmental Constraints to test whether the site is in the setting of the Chilterns AONB.	Noted. Q38 reworded to clarify this.	Q38: Landscape character: What would the impacts of the development be on the landscape character or setting of the area or any designated landscapes? Would there be any direct or indirect harm to the Area of Outstanding Natural Beauty or the Nature Improvement Area?
Q33- 38	Chilterns Consultation Board	The adequacy and depth of the assessment to reach a conclusion on Red/Amber/Green or environmental constraints is unclear. For example, properly assessing sites under step 33 'impact of development on the landscape character/ setting of the area or any designated landscapes' would involve fieldwork to assess, landscape sensitivity, landscape value and landscape capacity.	We will consult internal colleagues to get their professional views on these areas. For example on Q38 we will go to our landscape specialists for detailed comments.	No change.
Q33- 38	O&H properties	Agree with the inclusion of an assessment as to whether there is any opportunity for enhancement within some of these criteria. However, this should be included in the 'Landscape Character' criteria.	Noted. The questions have been reworded to be more open-ended so could include enhancement.	Q38 to Q41 have been amended.
Q33- 38	BLNP	Criteria are weak on the ability to assess wider environmental sustainability of sites, including contribution to 'ecosystem services' (renewable energy, mitigate/ control air/water pollution).	Sustainability Appraisal Framework will include environmental sustainability indicators. Some of those areas are too detailed for this level of assessment.	No change.
Q33- 38	BLNP	Where Environment is considered it is largely on the basis of being a constraint. Opportunities for development to make a positive contribution to GI network should be taken into account.	Noted. The questions have been reworded to be more open-ended so could include enhancement.	Q38 to Q41 have been amended.
Q34	Chilterns Consultation Board	The third column refers only to 'Liaison with Archaeology' does the Council also have specialist historic conservation skills available beyond this e.g. Heritage and Design team? If so they should be referred to here.	Agree	Consultees will include historic conservation specialists
Q34	Historic England	Q38 should make reference to conservation areas, registered park or gardens, schedules monuments and listed buildings. Important to understand the significance of any heritage assets and their settings, that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on	Noted. Q39 reworded.	Q39: Heritage/Archaeology: What would the impacts of development be on any heritage or archaeological assets and their setting? Are there any opportunities for enhancement of these assets?

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		distance or visibility alone as a gauge is not appropriate. Site allocations which include heritage assets may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable terms.		
Q35	Michael Brooks (CRPS)	As well as the general question on impact, specific mention should be made of known (non-national) designations, e.g. County Wildlife Sites, Local Nature Reserves and Nature Improvement Areas.	Noted. Q40 reworded.	Q40: Ecological Assets: What would the impacts of development be on any biological, geological or ecological assets and are there any opportunities for their enhancement.
Q38	CPRE	Concerned this criterion will mean 50% of an unspecified size of development site on agricultural land grades 1, 2 and 3a cannot be excluded from selection.	This is not part of the exclusionary assessment, and has been consolidated to provide only three categories (RAG)	Q25: Agricultural Land Quality: Would the development impact on high quality agricultural land? <ul style="list-style-type: none">- 50% or more in non-agricultural land (G)- 50% or more in Grade 3b, 5 or 5 (A)- 50% or more in Grade 1, 2 or 3a (R)
Q38	Optimis	Question provides too many variables and places far too great a weight on the classification of farmland rather than other factors such as the impact on a farmstead and usability of the parcel of land. A one acre site of Grade 1 agricultural land that is isolated, unusable in any practical way should not necessarily be red flagged.		
Stage 3				
Q40-44 Stage 3	BLNP	The main question asked is “Can the site make infrastructure provision appropriate to its scale?” This question should be supplemented with “and its setting” to ensure opportunities for developing GI Network.	Noted. Question reworded and covered by Section 1C Assessment: Critical Infrastructure (Q8).	Q8: Can the site meet the critical infrastructure requirements that will enable delivery?
Q41	Michael Brooks (CRPS)	Add: "Would any important Public Rights of Way (such as recognised through routes, named long-distance/regional paths or locally important recreational routes) be affected?" I don't suggest that this is a 'show-stopper' but this is an important opportunity to identify any such impacts.	Noted. Covered by Q41.	No change.
Q41	Optimis	This does not deal with negative impact of development, merely the resultant effect of a development relative to the scale of development. A small development of 25 dwellings is likely to Red flag, which makes little sense.	Noted. Question removed and covered by Q8.	Question removed and covered by Q8.
Q42-44	Optimis	Provide little assistance in determining the suitability of a site for development. Where a local authority requires infrastructure improvements to render it	Agreed	Questions removed.

Table of Consultation Comments on the Housing Site Assessment Criteria (published in draft Feb-April 2016)

		acceptable, it is a given that community infrastructure provision will be forthcoming either through CIL or section 106. How does this process judge the suitability of a site based on the summary of information on the submission form. Does ticking the various boxes generate a Green even if when during a later planning application the LPA may otherwise not be able to justify contributions towards particular facilities?		
Q48	Harlington PC	As separate site assessment criteria for G&T and TSPs yet to be established and consulted on, this cannot form part of this site assessment criteria process. If included it should read - does any part of the site meet the requirements of the site acceptance criteria for G&T or TSPs?	This question is intended to identify where sites might be able to offer a proportion to meeting G&T needs. All potential G&T sites will be assessed using separate assessment criteria, this is simply about identifying any sites which may be able to offer some land to G&T sites as part of a larger site.	No change.
Q48	Optimis	Very difficult assessment to make. If a landowner explicitly does not want his site allocated for gypsy and travellers, why should the site be considered less suitable for development?	We need to consider the potential for sites to provide G&T accommodation, but this is part of the overall assessment.	Site will not be rated as red if a G&T use is excluded by the site promoter
Q49	Optimis	No requirement to provide a viability assessment as part of this process, therefore how is this question assessed	Will clarify question	Question clarified to state that viability study by consultants will be used and the assumptions to be used will be made available in a report.. Any additional information required for sites that progress through to stage 3 will be requested if needed.
Q51	Optimis	Only question that does not have a RAG rating; why?	Noted. Error in form.	RAG analysis included in Q11.

Appendix A

Draft Site Assessment Criteria Form (February 2016 consultation version)

Draft Site Assessment Framework for HOUSING¹ February 2016

Site details	
Reference Number	
Site Name	
Site Address	
Settlement	
Size	Developable Area: Whole Site:
Proposed Use	
Any other information	

STAGE 1 : EXCLUSIONARY STAGE

Stage 1A Assessment

This stage of the assessment rules out sites that are too small or conflict with national policy designations. If the answer to any of those below is yes, then the site will not be assessed further.

Site size

1	<p>Will the proposal accommodate less than 10 dwellings?</p> <p>Work out the number of new homes from site size using density of 30dph and exclude up to 40 % depending on site size (see note saved in this folder) of land for infrastructure and services, take into account topography or significant areas of undevelopable land.</p> <p>Site Size Gross to net ratio standards Up to 0.4 hectare 100% 0.4 to 2 hectares 80%</p>	R/A/G	Number of proposed dwellings as per proforma:
			Number of proposed dwellings as per

¹ Employment sites and Gypsy and Traveller sites will be assessed using separate bespoke site assessment criteria which will be set out as part of the relevant studies.

	2 hectares or above 60%		CBC methodology:
Flood risk			
2	Is more than 50% of the site located in the floodplain 2/3? Is the site at risk from groundwater or surface water flooding?	R/A/G	Details on flood risk and coverage. Refer to Local Flood Risk Assessment Data.
Nationally significant designations			
3	Are there any nationally significant designations within the site? (SSSIs, SAMs & CWSs)	R/A/G	Details on designations and coverage
4	Is more than 50% of the site located within the AONB?	R/A/G	Details on coverage
Stage 1B Assessment This stage of the assessment rules out sites that are not well related to existing settlements but of insufficient size to be self contained. If sites are not going to be well related to what already exists, but are unable to stand alone then they will not be assessed any further.			
Relationship to Settlement			
5	For sites that are not of a sufficient scale to be self-contained e.g., 2000 homes plus and are not on previously developed land, is the site a logical extension to the settlement or are there any major physical constraints that separate it from the main settlement?	R/A/G	Analysis
6	Is the proposed development in keeping with the scale and local character of the adjoining/nearby settlement? Exclude if the scale is not appropriate and a portion of the site could not be considered.	R/A/G	Analysis

Stage 1C Assessment			
Each site will need to be evaluated in terms of how it meets the 5 purposes of green belt. This analysis will only be required for sites within the Green Belt and will be determined using the evidence from the Council's Strategic Green Belt Review			
Greenbelt			
7	Is the site located within the Green Belt?	R/A/G	Yes or No and coverage
Greenbelt Objectives			
8	Does the site check unrestricted sprawl of large built-up areas?	R/A/G	Analysis
9	Does the site prevent neighbouring towns merging into one another?	R/A/G	Analysis
10	Does the site assist in safeguarding the countryside from encroachment and if there a defensible boundary?	R/A/G	Analysis
11	Does the site preserve the setting and special character of historic towns? (N/A in CBC)	R/A/G	Analysis
12	Does the site assist in urban regeneration, encouraging the recycling of derelict and other urban land	R/A/G	Analysis
Green Belt Assessment Conclusion:			

STAGE 1 ASSESSMENT CONCLUSION

STAGE 2: SUITABILITY DETAILED ASSESSMENT			
Critical Infrastructure			
13	Can the site meet the specific critical infrastructure requirements that will enable delivery?	R/A/G	Requirements and proposals
14	For sites of 200+ dwellings, is the site located along a key transport corridor (e.g. A road, Strategic Road Network, planned road infrastructure or planned/existing rail infrastructure)?		
Social Sustainability			
15	Facilities and services This assessment considers the suitability and sustainability of the site for housing. Transport models will be used to assess the distance to key services, in each case based upon a realistic route that residents could reasonably be expected to take. The criteria are based on distances and are converted to a score between 1 and 5 and given the corresponding RAG rating. Issues relating to capacity are assessed separately Distances Under 500m – 5 (G) 501 - 1000m- 4 (G) 1001 - 1500m – 3 (A) 1501m - 2000 – 2 (A) over 2000m -1 (R)		
15a	Distance to lower/primary school	R/A/G	Details
15b	Distance to local shop/s (convenience)	R/A/G	Details
15c	Distance to Health centre/GP	R/A/G	Details
15d	Journey time to Town centre	R/A/G	Details
15e	Distance time to middle school	R/A/G	Details
15f	Distance time to upper/secondary school	R/A/G	Details
15g	Journey time to employment area (local)	R/A/G	Details
15h	Journey time to employment area (strategic)	R/A/G	Details

Transport and Movement			
16	Site proximity to bus services to major service centres Less than 200m (G) 200m-400m (A) Over 400m (R)	R/A/G	Details
17	Site proximity to train station Less than 400m (G) 400m-800m (A) Over 800m (R)	R/A/G	Details
18	Site proximity to strategic road network (M1, A1, A421, A5)	R/A/G	Details
19	Site Proximity to Strategic Road Network (M1, A1, A421, A5) and Local Road Network (e.g. A507)	R/A/G	Details
Brownfield Land			
20	Previously developed land/brownfield land 100% = 5 (G) 76 – 99% = 4 (G) 51 – 75% = 3 (A) 26-50% = 2 (A) 1-25% = 1 (R) Greenfield = 0 (R)	R/A/G	Analysis
Community			
21	Neighbourhood Planning Is the site located within an area designated for a Neighbourhood Plan and is this site is an area that is supported?	R/A/G	Analysis
22	Community Consultation Has effective community consultation taken place? If yes, was proposal supported?	R/A/G	Analysis
Capacity Issues			
23	Housing Growth Is there capacity for more housing and what has been the level of housing growth over the last 10 years?	R/A/G	Analysis

	Cumulative Impact on successive growth in the area.		
24	School Capacity Do the local schools have capacity at all tiers? If no, has a commitment been made to address this (see qu.42) or have the revenue funding implications of providing school transport been modelled?	R/A/G	Liaison with Education
Physical constraints			
25	Access 1 Are there any local highways constraints? Any transport impact?	R/A/G	Liaison with Highways Development Management & Transport Strategy Teams
26	Access 2 Are there opportunities for travel bicycle or foot?	R/A/G	Liaison with highways and site details
27	Utilities Is there the capacity to provide all required infrastructure?	R/A/G	Liaison with utility providers, Water Cycle Study
28	Drainage and Flooding Can suitable drainage of the site be provided and will the site increase the risk of flooding?	R/A/G	Liaison with EA and IDBs, internal CBC teams
29	Contamination Are there any contamination constraints on site and will there be any remediation required?	R/A/G	Liaison with Environmental Health
30	Physical constraints/permanent features that affect developability E.g. pylons, gas works, sewage treatment works, topography	R/A/G	Analysis
31	Adjoining uses Would any adjoining uses have the potential to cause conflict with the proposed use? (for example; noise and smell)	R/A/G	Liaison with Environmental Health

32	Relationship with settlement -Within settlement envelope = 5 (G) Outside settlement and: -bordered by settlement on 3 sides = 4 (G) -bordered by settlement on 2 sides = 3 (A) -bordered by settlement on 1 side = 2 (A) -Not bordered by settlement (unless a new settlement proposal) = 1 (R)	R/A/G	Analysis
Environmental constraints			
33	Landscape character Impact of development on the landscape character/setting of the area or any designated landscapes??	R/A/G	Liaison with Landscape Officer
34	Impact on heritage/archaeological assets (including their setting) Potential impact on these assets, opportunity for enhancements?	R/A/G	Liaison with Archaeology
35	Impact on biological/geological/ecological assets Potential impact/harm or opportunity for enhancement	R/A/G	Liaison with Ecology Officer
36	Impact on safeguarded minerals and waste sites?	R/A/G	Liaison with M&W Officer
37	Open space/leisure and green infrastructure designations Are there any potential conflicts with open space/leisure designations and will it increase accessible open space? Is there capacity to provide the required levels of open space and green infrastructure within the site on good quality land rather than simply on undevelopable land? Are there any conflicts with sites identified as open space in the Leisure Strategy?	R/A/G	Liaison with GI Officer and Leisure team
38	Agricultural land quality Would the development impact on high quality agricultural land? 50% or more in non-agricultural land – 5 (G)	R/A/G	Any relevant additional detail

	50% of more in Grade 4 or 5 – 4 (A) 50% or more in Grade 3b – 3 (A) 50% or more in Grade 3a – 2 (R) 50% or more in Grade 2 – 1 (R) 50% of more in Grade 1 – 0 (R)		
Planning History			
39	What is the sites planning history? (For example planning applications and submissions to previous Allocations Plans)	R/A/G	Details

STAGE 2 ASSESSMENT CONCLUSION			
Is the site suitable for the proposed development?			

STAGE 3: SITE AVAILABILITY, ACHIEVABILITY AND DELIVERABILITY			
Can the site make infrastructure provision appropriate to its scale? (All infrastructure sought must be in full compliance with regulation 122 of the CIL Regulations 2010 (as amended))			
40	ENVIRONMENT Use of renewables Green infrastructure Waste minimisation Enhancement of habitats Sustainable Drainage Schemes Enhancement of Historic Environment	R/A/G	Summary of information on site submission form
41	TRANSPORT New road links Road improvements e.g. new roundabout New public transport facilities (bus and rail) New pedestrian routes and cycle ways New Public Rights of Way	R/A/G	Summary of information on site submission form

	Other sustainable transport infrastructure e.g. interchange		
42	EDUCATION Early Years Provision Extensions to existing lower school New lower school Extensions to existing primary school (Dunstable area) New primary school (Dunstable area) Extensions to existing middle school New middle school Extensions to existing upper school New upper school Extensions to existing secondary school (Dunstable area) New secondary school (Dunstable area) Further or Higher education Other education contribution	R/A/G	Summary of information on site submission form
43	UTILITIES Contribution to electricity infrastructure Contribution to sewage treatment works Access to Broadband network	R/A/G	Summary of information on site submission form
44	COMMUNITY & LEISURE Community Building provision Indoor Sport Provision Outdoor Sport Provision e.g. pitch or MUGA New healthcare facilities: primary care New healthcare facilities: secondary care Recreational Open Space Formal Children's Play Space Other community facilities	R/A/G	Summary of information on site submission form

Availability			
45	Existing use: What is the existing use of the site? Would the existing use limit the development potential?	R/A/G	Analysis
46	Is the land controlled by a developer or land owner who has expressed an intention to develop the site?	R/A/G	Analysis
47	Are there any legal or ownership problems that could delay or prevent development? Can these be issues be realistically overcome?	R/A/G	Analysis
48	Is there any reason why a proportion of the site could not be considered for the delivery of Gypsy and Traveller or Travelling Showpeople Pitches?	R/A/G	Analysis

Achievability			
49	Viability Is the site viable and are there any factors which could impact on viability, such as infrastructure needs or remediation costs? What action is needed to remove any viability barriers?	R/A/G	Analysis
50	Timescales When can development realistically be commenced on this site? This should take account factors such as indicative lead-in times and plan adoption.	R/A/G	Analysis
51	Five Year Land Supply Has an initial commitment been made to deliver the site within five years of the adoption (2018/19 – 2022/23) of the development plan	Y/N	

STAGE 3 ASSESSMENT CONCLUSION			
Is the site deliverable or developable, i.e. is it in suitable location, is there a reasonable prospect that it is available, and could it be viably developed at the point envisaged?			

OVERALL CONCLUSION

SUPERSEDED