Monmouthshire Replacement Local Development Plan

Candidate Sites Assessment Methodology Updated August 2022



Monmouthshire County Council Replacement Local Development Plan

Candidate Sites Assessment Methodology

Updated August 2022

Planning Policy Service

Monmouthshire County Council

County Hall, Rhadyr, Usk, Monmouthshire NP15 1GA

Tel: 01633 644429

Email: planningpolicy@monmouthshire.gov.uk

Contents

1.	Introduction	1
2.	Overview of the Candidate Site Process Methodology	2
3.	Overview of the Candidate Site Process to date	3
4.	High-level Assessment of Candidate Sites (post Second Call for Candidate Sites)	4
5.	Stage 3 Candidate Sites Assessment	6

1 Introduction

1.1 This paper sets out the methodology and assessment process for the consideration of Candidate Sites submitted as part of the Monmouthshire Replacement Local Development Plan (RLDP) process. This methodology is based on the SEWSPG (South East Wales Strategic Planning Group) Candidate Sites Proposed Assessment Methodology (July 2018) which seeks to establish a common baseline methodology in relation to Candidate Sites for SEWSPG local planning authorities to adhere to when preparing their RLDPs. The SEWSPG approach has been adapted to suit local circumstances in Monmouthshire and updated to reflect guidance in the Welsh Government Development Plans Manual Edition 3 (March 2020) (hereafter referred to as the WG Manual).

Candidate Sites and the RLDP

- 1.2 The RLDP, through the Candidate Sites process, will identify land to address development needs for various land uses, including but not limited to the following:
 - Residential
 - Employment
 - Education
 - Recreation and Leisure
 - Other Community Facilities
 - Retail
 - Tourism
 - Gypsy and Travellers
 - Minerals and Resources
 - Renewable Energy Technology
- 1.3 The evidence gathering exercise is an important process, and Candidate Site submissions must therefore be accompanied with an appropriate level of information to justify the proposed site's inclusion in the RLDP. The WG Manual makes it clear that front loading of the evidence base is critical to maximise involvement and the effectiveness of all stages of plan preparation.

Threshold for Candidate Sites

1.4 As noted in the both the WG Manual and the SEWSPG methodology, the threshold for accepting candidate sites will differ between authorities depending on the type of strategy a planning authority is seeking to follow, and the nature of the authority itself. In a Monmouthshire context, due to the rural nature of the County a lower threshold is required for residential uses. Accordingly, Candidate Site submissions will only be progressed for sites of five dwellings or more. Notwithstanding this, we will accept the submission of proposals for minor revisions to existing settlement boundaries, and these will instead be considered via the settlement boundary review. No minimum thresholds are set for any other land use site submissions.

2. Overview of the Candidate Site Process Methodology

2.1 MCC has undertaken a two-stage call for Candidate Sites in accordance with the SEWSPG methodology.

An overview of the Candidate Site Process is set out in Figure 1 below. An additional stage has been included to provide a further filtering process prior to the Stage 3 assessments in accordance with the WG Manual.

Figure 1: Overview of the Candidate Sites Process (adapted from SEWSPG Methodology)



3 Overview of the Candidate Site Process to date

Stage 1: Initial Call for Candidate Sites

- 3.1 Stage 1 of the process involves an Initial Call for Candidate Sites to assist the Council in understanding what land is available in order to enable the identification of broad locations for development and protection to inform the RLDP **Preferred Strategy**. This process also assists site promoters in that they do not expend resources at the Initial stage on preparing Candidate Site submissions that could be contrary to the Preferred Strategy. The Initial Call involves limited information from site promoters comprising:
 - A plan showing a red line boundary of the proposed site. An Ordnance Survey (OS) map of minimum scale 1:2500 is required which clearly indicates the site boundary. Any adjoining land in the same ownership outlined in blue.
 - Basic information on the proposed site including site size, current/proposed land use(s), and known constraints.
- 3.2 Following the Initial Call for Candidate Sites, a **Candidate Sites Register** is compiled. This is a log of all Candidate Sites submitted and includes information submitted by site promoters. It is important to note that publication of the Candidate Sites Register should not be taken to indicate in any way that a site will be developed, or that it will be included in the RLDP, or that the Council considers that it should be developed.
- 3.3 Sites submitted at this stage are subject to a **high level assessment** (i.e. initial sift) to identify any insurmountable constraints to development, such as flood risk, with particular attention given to 'greater than local constraints' (i.e. constraints imposed by Welsh Government, Natural Resources Wales etc. which are not local constraints). Consideration has also been given to the site's compatibility with the emerging Preferred Strategy. Any sites that fail this initial assessment are filtered out and will not be pursued any further. Those sites that satisfy this initial assessment are taken forward to Stage 2.

Stage 2: Further Call for Candidate Sites and Detailed Information

- 3.4 The Second Call for Candidate Sites involves:
 - An invitation to submit new candidate sites which are considered compatible with the Preferred Strategy.
 - A request for the submission of detailed information for those sites submitted during the Initial Call for Candidate Sites that are compatible with the Preferred Strategy. In accordance with the WG Manual this is essential in order to provide evidence on a site's deliverability and viability.
- 3.5 The Second Call for Candidate Sites Form includes detailed criteria to assist the Council in assessing the suitability of Candidate Sites for inclusion as potential allocations in the RLDP. A Guidance Note on how to complete the form is also available to assist in the completion of the form, along with other topic specific guidance notes.
- 3.6 Following the close of the Second Call for Candidate Sites, the Candidate Sites Register will be updated to include any new or amended Candidate Sites submitted during the Second

Monmouthshire Replacement Local Development Plan Candidate Sites Assessment Methodology Updated August 2022 Call, and published for information purposes on the Council's website, and at County Hall, Usk. Sites submitted during the Initial Call that were not resubmitted will not be included in the Register. The submission of a Candidate Site and its inclusion in the Register should not be interpreted as a commitment that such sites will be taken forward into the Deposit RLDP.

4 High-level Assessment of Candidate Sites (post Second Call for Candidate Sites)

High-Level Assessment

- 4.1 The high-level assessment is the first stage of the candidate site assessment process following the Second Call for Candidate Sites. This involves a desk-based assessment of all submitted sites, identifying and discarding sites that do not meet the following initial filtering assessment criteria¹:
 - Compatibility with the RLDP Preferred Strategy
 - Site Size²
 - Fundamental Constraints
 - Site Viability Assessment³

Compatibility with the RLDP Preferred Strategy

- 4.2 Candidate Sites are filtered according to whether or not the sites submitted broadly comply with the location of future growth as set out in the RLDP Preferred Strategy. When assessing whether a site is compatible with the Preferred Strategy a number of factors are taken into account including:
 - Whether the site, either individually or in combination with an adjoining Candidate Site, is located within or adjacent to an existing settlement boundary⁴.
 - Whether the site is located within a tier of the settlement hierarchy that allows for growth in the Preferred Strategy.
 - Whether the site is located within the upper River Wye catchment area. Water quality issues in relation to Phosphates are affecting the River Wye and River Usk, with developments required to demonstrate betterment or neutrality. Due to the lack of an identified strategic solution for the treatment of phosphates at the Monmouth WwTW within the Plan period, no new site allocations are proposed in the primary settlement of Monmouth or within the upper River Wye catchment area north of Bigsweir Bridge.
 - Sites that are not compatible with the Preferred Strategy, for example sites in the open countryside unrelated to any settlement identified in the settlement hierarchy, are ruled out at this stage.

¹ This approach is in accordance with the Development Plans Manual, Edition 3, March 2020

² Relates to residential candidate sites only

³ Relates to residential candidate sites of 10 or more dwellings

⁴ Consideration will be given to whether candidate sites are of an appropriate scale to a settlement's tier in the hierarchy.

Site Size

- 4.3 Residential Candidate Sites are filtered according to whether they meet the specified Candidate Site size threshold of five or more units. Only sites which are proposed for more than five dwellings or are considered able to accommodate five or more dwellings proceed to the next stage of the Candidate Site assessment process (i.e. Stage 3A).
- 4.4 Residential Candidate Sites below this threshold will not be allocated for development in the RLDP. They will be considered via the settlement boundary review as appropriate. Sites submitted for non-residential uses are not filtered according to their size.
- 4.5 It is not considered prudent to identify a minimum site area when assessing Candidate Sites as it could omit a site which may realistically accommodate five or more dwellings. Instead, consideration will be given to the type of site proposed for development, the characteristics and the form of the site, and its surrounding area.

Fundamental Constraints

- 4.6 This assessment criteria seeks to identify sites which have fundamental constraints that cannot be overcome or mitigated for, including:
 - Candidate Sites proposing development in TAN 15 flood risk zones. For the purposes of assessing the Candidate Site submissions, the Council will use the revised TAN15⁵ (December 2021) and associated Flood Map for Planning in accordance with the approach detailed in the Welsh Government letter dated 15 December 2021⁶.
 - Candidate Sites that lie wholly within sites designated for their importance to nature conservation including Ramsar, Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR).
- 4.7 Such sites are filtered out of the Candidate Site process at this stage. If the constraint forms part of the site boundary, further consideration will be given as to whether the impact of the proposed development could be mitigated.

Site Viability and Deliverability

4.8 Residential Candidate Sites are also filtered based on their viability and deliverability. To be considered for inclusion in the Deposit RLDP, it is essential that residential sites are viable and deliverable within the Plan period. The requirement for Candidate Site submissions for 10 or more dwellings to be accompanied by a viability assessment is made clear throughout the Candidate Sites process. Sites submitted without the required supporting viability information will not be assessed and will not be given further consideration in the RLDP process.

⁵ Should there be any amendments to the formal release of TAN15 in June 2023, any changes that affect Candidate Site assessments will be considered as necessary at that time.

⁶ <u>Technical Advice Note (TAN) 15 (gov.wales)</u> The Flood Map for Planning will be updated biannually and as a consequence further updates may need to be made before the Deposit Plan is finalised.

4.9 Sites which do not meet any one or more of these criteria are filtered out at this stage and will not be considered further in the RLDP process. All other sites will be progressed to the next stage of the Candidate Sites assessment process (stage 3A – Detailed Assessment).

5 Stage 3 Candidate Sites Assessment

5.1 The Stage 3 Candidate Sites Assessment process is split into two sections. Stage 3A involves a more detailed assessment of Candidate Sites at an officer level using a 'traffic light' coding system. Stage 3A also includes incorporation of comments from internal departments of the Council and an assessment against the Council's SA/SEA Framework. Stage 3B involves external consultation with statutory agencies.

Stage 3A

5.2 A 'traffic light' coding system devised as part of the SEWSPG methodology is used by Planning Policy officers in order to identify which sites are more desirable and which sites are less so. The 'traffic light' coding system is as follows:

	Impact
Proposed site is expected to have significant positive impacts	
Proposed site is expected to have some positive impacts	
Proposed site is expected to have a neutral impact	
Proposed site is expected to have some negative impacts	
Proposed site is expected to have significant negative impacts	
The impact of the proposed site cannot be predicted at this stage	

- 5.3 The assessment template for Stage 3A adapts the proposed template included in the SEWSPG methodology. The criteria to be assessed are:
 - Land/Location The proximity to existing settlements is a key consideration for residential proposals. Planning Policy Wales emphasises the importance of re-using brownfield sites, previously developed land will therefore rank higher than greenfield sites, however, it is noted that there are limited opportunities for brownfield development in Monmouthshire. Consideration will also be given to whether the site is proposed on Best and Most Versatile Land, given the high proportion of Best and most Versatile Land within the County. Physical constraints are also considered along with other locational factors such as location within mineral safeguarding areas and the potential green belt area proposed by Welsh Government in Future Wales 2040.
 - Accessibility The importance of reducing the need to travel and new developments having access to a range of key services is set out in national policy.
 - Deliverability, Viability & Availability The Council will need to have a reasonable degree
 of confidence that the site will be delivered within the RLDP Plan Period and there are no
 obstacles to delivery; legal or otherwise. The Viability Assessments of sites of 10 or more
 dwellings will be scrutinised and a high-level review will be undertaken to check the
 appropriateness of the information provided by the site promoter as part of the appraisal.

Additional information may be required before it can be determined whether a site is capable for potential inclusion in the Deposit Plan.

- Environmental Consideration will need to be given to sites located within the River Usk and River Wye Catchment Areas due to the on-going impact of phosphates on the riverine environment. Proposals will also need to demonstrate whether appropriate measures will be taken to address climate change, including through the use of low and zero carbon technologies. Schemes which have an impact on air quality will need to demonstrate appropriate mitigation.
- Economic and Other Benefits Certain development schemes may bring additional benefits to a locality, for example; assisting regeneration, bringing improvements to a local highway, or helping to support a school at risk of closure.
- Heritage & Landscape Potential impact on historic landscapes, Conservation Areas, and listed buildings will need to be considered.
- **Ecology** Sites which impact on the following environmental designations will need careful consideration:
 - Special Area of Conservation (SAC)
 - Site of Specific Scientific Interest (SSSI)
 - o Ramsar Site
 - Special Protection Area (SPA)
 - Sites of Important Nature Conservation (SINC)
 - Loss of protected woodland/trees/hedgerows will need to be avoided as much as possible.
- 5.4 Comments received from internal departments of the Council such as highways, ecology, heritage and environmental health are also incorporated at Stage 3A.
- 5.5 At this stage the sites will also be assessed against the Council's SA/SEA Framework. Candidate Sites will need to be assessed against these objectives to determine whether they will contribute positively or negatively.

Stage 3B

- 5.6 Stage 3B involves the assessed sites going out to consultation with external statutory agencies including Dwr Cymru/Welsh Water and Natural Resources Wales. This split approach is intended to filter out any non-deliverable or inappropriate sites so that statutory consultees are only commenting on sites that have a reasonable chance of being allocated in the RLDP and ultimately being delivered.
- 5.7 New development can often place additional pressure on existing infrastructure, such as water supply, drainage, sewerage, power, and communications. In addition, community facilities such as schools, surgeries, and recreational space could also come under pressure. Consequently, the Council will need to consult the infrastructure providers on all sites that have successfully made it through Stage 3A.
- 5.8 The Council will encourage the infrastructure providers to assess the sites and identify any potential issues and what mitigation measures are likely to be necessary in order to overcome these issues.

- 5.9 It is likely that the Council will have to contact the developer or land agent to understand whether the mitigation measures are acceptable, achievable and do not impact on the overall viability of the site. Those sites with constraints that are proving insurmountable following comments received at Stage 3B will be filtered out of the process.
- 5.10 Following the conclusion of Stage 3A and 3B, a clear indication of which sites are more suitable for development will emerge.

Deposit RLDP

5.11 Following the conclusion of the Candidate Sites Assessment, the Council should have a list of viable, deliverable, sustainable sites for potential inclusion in the Deposit RLDP.