



# Wiltshire Local Plan

Site Selection Methodology

September 2023

Wiltshire Council

# Site Selection Methodology

## Introduction

1. The purpose of this paper is to explain the process for selecting sites to become site proposals in the draft Wiltshire Local Plan Regulation 19 consultation document.

## Summary

2. The strategy upon which the Local Plan Review is premised remains the same as that which underpinned the Wiltshire Core Strategy. Therefore, in considering options for bringing forward land to meet the development needs of the county over the period 2020 to 2038 the primary focus for the delivery of strategic housing and employment sites remains centred on Wiltshire's Main Settlements. The Main Settlements are the Principal Settlements and the Market Towns. The Strategic Housing and Economic Land Availability Assessment<sup>1</sup> (SHELAA) provides a pool of land from which sites may be selected. The SHELAA is a register of land being promoted for development by landowners and prospective developers. Sites are submitted for consideration and are then subject to assessment before being potentially included in Wiltshire Council's plans, as well as Parish and Town Council neighbourhood plans.
3. It is the assessment of sites through plan preparation, and not a site's inclusion in the SHELAA that determines whether land is suitable for development.
4. In 2021, the Council carried out an informal stage of consultation on proposals for the Local Plan (the 'Regulation 18' consultation). At that time, the Council consulted on a pool of 'reasonable alternative' sites that were understood to be available at each Main Settlement<sup>2</sup>. A range of responses were received to this consultation, which in some cases provided additional evidence about the pool of sites that could be considered. In some places, additional sites were submitted, which were subsequently assessed and added to the pool of sites, where appropriate. Conversely, some sites were removed from the pool of sites because there was no longer evidence to say they remained available and/or capable of consideration for potential allocation.

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<sup>1</sup> The Wiltshire Council Strategic Housing and Economic Land Availability Assessment (SHELAA) is available from the council's website. The SHELAA was last formally published in 2017, but new sites submitted to the council since then have also been considered through the site selection process.

<sup>2</sup> At the Principal Settlements (Chippenham, Salisbury, and Trowbridge) the site selection process was advanced up to the end of Stage 4, and preferred site allocations identified. At the Market Towns, only the pool of sites up to the end of Stage 2 were consulted on.



5. Sites have been selected for allocation in the Local Plan in accordance with assessments carried out in four stages that are explained within this paper and summarised in Figure 1 below. The remainder of this paper explains the processes taken at each of these four stages of assessment.

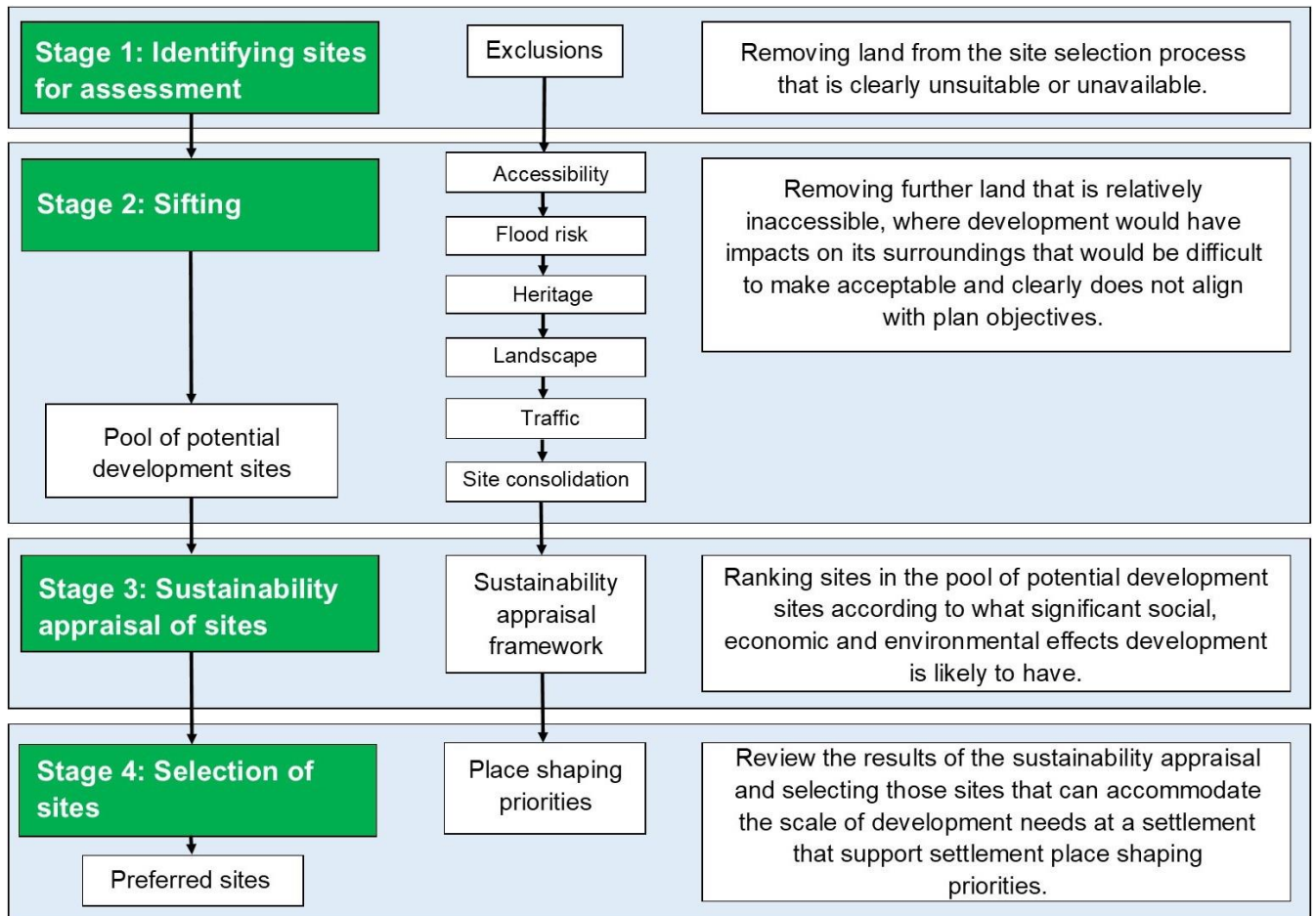


Figure 1: Site Selection Process

## Stage 1 - Identifying Sites for Assessment

6. The Strategic Housing and Employment Land Availability Assessment (SHELAA) provides the pool of land from which land may be selected. The SHELAA is a register of land promoted for development by landowners and prospective developers. Sites are submitted by landowners and developers for consideration by Wiltshire Council when preparing development plan documents, and Parish and Town Councils when preparing neighbourhood plans.
7. Some sites within the SHELAA have been registered with Wiltshire Council for a number of years, and some land may no longer be available. Indeed, at any stage landowners and prospective developers may withdraw their land from consideration for inclusion in the plan. Equally, new SHELAA submissions can be received at any time during plan preparation. These have been included as they have arisen as far as possible.
8. Other land, not included in the SHELAA, may be capable of development but because neither a developer nor landowner has promoted the site for development, it cannot be said to be available within the plan period. Without a clear prospect for delivering development the plan would be unrealistic and ineffective.
9. At this early stage in the process there can be an unambiguous definition of what constitutes unsuitable land. There are several clear barriers to development ruling out a site in whole or part: for example, SHELAA sites being entirely within land at risk of flooding from all sources, including critical flood zones two and three, or protected by a designation for important biodiversity interests or heritage value.
10. Each site is tested against the following Stage 1 exclusionary criteria:

*Table 1: Stage 1 - Exclusionary Criteria*

- The land is known to be unavailable for development.
- Land allocated for employment or housing uses in the development plan.
- Land with planning permission, under construction or being completed.

- Does the site adjoin the settlement boundary or adjoin another site that does?
- Is the site fully or partly within one more of the following environmental designations of biodiversity or geological value?
  - Special Area of Conservation.
  - Special Protection Area.
  - Ramsar sites
  - National Nature Reserve.
  - Ancient woodland.
  - Site of Special Scientific Interest
- Is the site fully or partly within green belt?
- Is the site fully within flood risk areas, zones 2 or 3?
- Is the site fully or partly within areas involving any of the following internationally or nationally designated heritage asset?
  - World Heritage Site.
  - Scheduled Ancient Monument.
  - Historic Park and Garden
  - Registered Park and Garden.
  - Registered Battlefield.
- Is the site within a Ministry of Defence safeguarding zone that prohibits development?

11. Some SHELAA sites may be detached from a settlement's built-up area. Greenfield development should take place in a way that expands an existing built-up area to properly manage the growth of settlements and prevent the premature loss of open countryside.
12. Land allocated for employment development is excluded. A review of allocations has been carried out and substantiates the need to retain each one in the land supply<sup>3</sup>.
13. It has been concluded that it is not necessary to release Green Belt land for development. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. If this conclusion changes, having examined fully all other reasonable alternatives for

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<sup>3</sup> Wiltshire Employment Land Review, Hardisty Jones, 2023

meeting needs for development, this would involve land around Trowbridge and Bradford on Avon.

## Stage 2 - Site Sifting

14. The sites that haven't been excluded at Stage 1, progress to Stage 2.
15. To meet national requirements, plans must be sound, justified by having an appropriate strategy taking into account reasonable alternatives, and based on proportionate evidence<sup>4</sup>. Investigating every detailed aspect of a every potential site is not an effective means to progress. The site selection process investigates the detailed attributes of the strongest candidate sites at each settlement, not all sites.
16. Importantly and common to all settlements, land for development should be in good locations: accessible to jobs, facilities, and other important destinations by a range of modes of travel and their development should have acceptable impacts on the surrounding area.
17. How many sites should be assessed in more detail may also depend upon how much additional land is needed at each settlement; sensibly, which ones is informed by past patterns of growth and major constraints. A strategic context can be a consideration. Site sifting involves removing sites based on two elements:
  - Stage 2A: Accessibility and wider impacts
  - Stage 2B: Strategic context (wider settlement context examined)

### Stage 2A Accessibility and Wider Impacts

18. Sites that are inaccessible, either from the local highway network or local services and facilities (e.g., schools, shops, healthcare) and are considered likely to have a poor or unacceptable wider environment impact are rejected from further consideration. Reasons for rejection will be stated for each site. Sites that do not meet these basic thresholds are not considered to be reasonable alternatives. To record the wider impacts of each site, a Red, Amber, Green scoring is given to each site for each topic area, as a tool to portray sites and help highlight how decisions have been reached.
19. It is important to recognise that this stage does not attempt to assess all the effects a development may have on its surroundings, but the most common and critical ones that are most likely to lead to a site being unsuitable. The topic

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<sup>4</sup> Paragraph 35, National Planning Policy Framework, MHCLG (2021)

areas are judged to involve constraints and issues commonly much less easily surmountable because they result from their location. They affect land outside a developer's ability to provide a remedy.

20. The fact that impacts like pressures on infrastructure, or on protected ecological sites or others impacts, like archaeology or pollution, are not being included at this point, does not prevent land from being rejecting later in the site selection process.
21. The outcome of assessments in the chosen topic areas provide a good basis on which to sift and remove sites. The output from this work is a table like the illustration below.

*Table 2: Stage 2A - Site Assessment Example*

Ref		Accessibility	Flood Risk	Heritage	Landscape	Traffic
524	Broadway Farm	Yellow	Green	Yellow	Green	Yellow
543	Off A342 and Sleight Road	Yellow	Yellow	Yellow	Yellow	Yellow
544	Off A342 (behind Fox & Hounds)	Green	Green	Yellow	Red	Yellow
550	Land to the south of Roundway Hill Farm	Yellow	Green	Yellow	Red	Red
624	Land to the east of Windsor Drive	Yellow	Green	Green	Yellow	Yellow
662	Land Adjoining Lay Wood	Yellow	Green	Green	Yellow	Yellow
806a	Land to the South East of Devizes	Yellow	Yellow	Yellow	Red	Yellow
806b	Land to the South East of Devizes	Yellow	Yellow	Yellow	Yellow	Yellow
1085	Former Dunkirk Hill Farm	Green	Green	Yellow	Red	Red
2090	Dunkirk Hill Farm	Yellow	Green	Yellow	Red	Yellow
3115	Land at Hillworth Road	Yellow	Green	Yellow	Red	Yellow
3211	Land bottom of Dunkirk Hill	Yellow	Green	Yellow	Red	Red
3259	Greenacre Nursery, Green Lane	Yellow	Green	Yellow	Green	Yellow
3374	Caen Hill Farm, Whistley Road	Yellow	Green	Green	Green	Yellow
3614	Land at Roundway / Hopton Industrial Estate, Devizes	Yellow	Green	Yellow	Red	Red
549a	Land to the North East of Roundway Park	Yellow	Green	Yellow	Red	Red
549b	Land to the North East of Roundway Park	Green	Green	Yellow	Yellow	Red
693a	Land at Coate Bridge 1	Yellow	Green	Green	Green	Red
693b	Land at Coate Bridge 2	Yellow	Green	Green	Green	Yellow

357	Lower Wharf / Assize Court	Green	Amber	Amber	Green	Green
419	Land at North Gate/Wharf and Devizes Hospital	Green	Amber	Amber	Green	Green
3794	Southgate House	Green	Green	Amber	Green	Green
3717	Wadworth Brewery	Green	Amber	Amber	Green	Green
3725	Devizes School	Green	Amber	Amber	Amber	Amber
3726	Land east of Windsor Drive (2)	Amber	Green	Green	Amber	Amber
3745	Land south of Marshall Road	Amber	Amber	Green	Amber	Amber
546	Former Council Depot/Bureau West	Green	Green	Green	Green	Amber

22. In most cases land is not taken forward that has a red score under any Stage 2A assessment category. Sites that have more green scores than amber scores will generally be taken forward for further assessment, and sites with more amber may be removed depending on the nature of the constraint. No assessment category is given more weight than others.
23. All assessments at this stage are conducted internally by relevant Wiltshire Council Officers, specialists in their topic area, according to the individual method statements contained in the appendices.

## Stage 2A assessment: Accessibility

24. This stage is informed by a 'heat map' assessment of travel times to key destinations for future residents. The more accessible a site is to key destinations, the better the site scores. Assessment of accessibility to key destinations is judged against walking, cycling, bus journeys and car travel distances. The key destinations are:
- Town centres
  - Principal employment areas (including employment allocations)
  - Primary and secondary schools
  - Hospital and health centres
25. The location of each site can be scored to provide a potential level of accessibility. Poorly accessible locations may be a factor in rejecting sites from further consideration, noting it as a reason for their exclusion. At this stage, given that travel can be improved by measures as a part of development or in combination with other public and private investments in services or infrastructure, it is difficult to establish beyond doubt that a location by itself is reason enough to reject it from consideration. It is however appropriate to consider it as a factor with others to remove it from consideration. The key



output is a RAG (Red, Amber, Green) rating score for each site based on accessibility score determined by a heat mapping exercise.

## **Stage 2A assessment: Wider Impacts**

26. A site should have an acceptable impact upon its surroundings. These 'wider impacts' are considered under four topic areas:
  - Flood risk
  - Heritage
  - Landscape
  - Transport (Traffic)
27. A site where development would clearly have an unacceptable and unmitigable impact upon its surroundings cannot be considered a reasonable alternative to consider further.
28. These four topic areas were considered the most linked to location. Arguably other impacts could be included, such as ecological impacts. Effects beyond a development site were considered to be of two types: by proximity to a sensitive or protected habitats, but measures could reduce those impacts for example by barriers within a site layout or by measures to divert risks, for example to alternative green spaces; or by cumulative impacts that arise from development wherever it may be located, for example within a river basin that extends over large regions of the County, and would apply to all the land at a settlement. A broader set of assessment criteria (including ecological assessment) are introduced through the more detailed sustainability assessment at Stage 3 of the site assessment process, and only a limited set of high-level considerations are covered through Stage 2A.

### **Flood Risk**

29. All land considered suitable for built form development by this stage of the selection process will be within Flood Zone 1 (areas of lowest flood risk) or contain sufficient land outside of higher risk of flood that development can avoid such land. The site selection process therefore removed site options located wholly within Flood Zones 2 and 3 at Stage 1 in accord with the sequential approach to managing flood risk required by national planning policy.
30. In carrying forward land that can come forward while avoiding development in Flood Zones 2 and 3, this element of the site selection process has effectively undertaken a strategic assessment of reasonable alternative sites (the pool of sites). However, the consideration of flood risk is not limited to that which may occur due to rivers and other main watercourses overtopping their banks. Indeed, all potential sources of flood risk are treated as being as important as fluvial flood risk.

31. It is clear from national planning policy and guidance that flood risks from all sources are a significant planning consideration even on land within Flood Zone 1. Therefore, the next step of the assessment of reasonable alternative site options at the County's Main Settlements (the flood risk sequential test search area) identifies these risks and their likely impact on development. In addition, the assessment also considered whether a source of flood risk, or combination of flood risks, would likely increase flood risks beyond the site options assessed. Where this may arise, there are often measures to deploy that manage surface water and this risk is unlikely to exclude it from further consideration.
32. Nevertheless, in some cases land may be located where risks are too technically difficult and/or exceptionally costly to resolve. These sites may be excluded from further consideration, reasons for rejection recorded. In other cases, the assessment can highlight the form and extent of water management measures that are likely to be necessary, including sequentially planning where built development should be located to reduce flood risk on site. This may in some cases result in a reduced capacity for development and the Sustainability Appraisal process should take account of this at Stage 3.
33. In all such cases the consideration of residual flood risk and the design of mitigation followed the 'Avoid, Control, Manage and Mitigate' advice set out in the Planning Practise Guidance<sup>5</sup>.
34. The key output is a RAG (Red, Amber, Green) rating score for each site based on flood risk score determined by evidence that identifies: land that may increase flood risks elsewhere and, where these risks would be too technically difficult or costly to resolve; where there is a need for management measures and what form this might take; and where the capacity for development should be reduced as a result of the above.
35. Sites may be considered to be within one of three categories, from poor to good flood risk impacts:
  - **Poor:** increasing flood risk elsewhere, likely to be difficult and/or costly to resolve.
  - **Medium:** management measures are achievable and/or the site capacity is likely to be reduced to accommodate them.
  - **Good:** management measures are straightforward and there is no reduction in the site capacity.

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<sup>5</sup> Planning Practise Guidance, Paragraph: 003 Reference ID: 7-003-20220825 and Paragraph: 004 Reference ID: 7-004-20220825

## Heritage

36. Heritage assets<sup>6</sup> outside of the site under consideration may be harmed if development takes place. This stage identifies where those assets are, their nature and importance, and assesses the potential for harm that may result from development. The focus is to recognise the contribution made by the setting to a heritage asset's significance. A setting may be affected by development and cause harm. Where the potential for harm arises, it may be avoided by a sensitive design and layout.
37. If harm cannot be avoided, assessment must reflect the great weight that should be given to an asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm or less than substantial harm to its significance.
38. National planning policy makes clear that any harm to the significance of a designated heritage asset including from development within its setting requires clear and convincing justification<sup>7</sup>.
39. The key output is a RAG (Red, Amber, Green) rating score for each SHELAA site based on potential for impacts of development on heritage assets and/or their settings: This is informed by identification of designated heritage assets, their importance and the role and geographic extent settings contribute to their importance, and assessment to determine where there is likely to be:
  - no harm
  - less than substantial harm; or
  - substantial harm.
40. Assessments will summarise reasoning, referencing evidence, for these judgements. In each case where there is potential for harm the assessment will indicate the degree to which mitigation can be effective, describing what would be required. Sites that are considered likely to involve substantial harm will be excluded from further consideration, reasons for their rejection recorded.

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<sup>6</sup> National Planning Policy Framework, Glossary, defines heritage assets as: "*Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).*", (MHCLG, 2021)

<sup>7</sup> Paragraph 200, National Planning Policy Framework, (MHCLG, 2021)

## **Landscape**

41. Potential wider landscape and visual effects are considered against landscape character evidence. Development on land that is likely to create a harmful landscape or visual impact that is unlikely to be successfully mitigated will be rejected. This judgement is based upon technical evidence and landscape character assessment, that will indicate an area's likely capacity for development. If development proposals exceed that capacity, then the site will have harmful impacts. It may be possible for adverse landscape impacts to be mitigated through design, layout and landscaping that mitigates these impacts sufficiently to make a site acceptable. Potential adverse impacts may also be mitigated by reducing a developable area. If so, such measures are noted, If not then, a site may be excluded from further consideration and the reasons for rejection recorded.
42. The key output is a RAG (Red, Amber, Green) rating score for each SHELAA site based on landscape assessment containing judgements on each site as to whether they are:
  - acceptable with some mitigation.
  - acceptable only by substantial mitigation (including a large reduction in the developable area); or
  - unsuitable.

## **Transport (Traffic)**

43. Developing some sites may generate traffic that causes an unacceptable degree of harm, in terms of congestion. This can lead to other impacts such as poor air quality or impacts upon the local economy. Other potential developments may require extensive improvements to the network in order to prevent an unacceptable level of harm whilst others, by themselves, may be far more easily accommodated. Likely traffic and congestion impacts are likely to be linked to a site's relationship with services and facilities, so there is a degree of linkage between this assessment criteria, and the assessment of accessibility.
44. It is not practical to carry out a traffic impact assessment of all the opportunities under consideration. The transport assessment identifies which sites are in site proximity to road corridors that are already congested, their distance from the primary road network, and roads designated to accommodate larger volumes of traffic. This will highlight any sites that are likely to have wider detrimental impacts.
45. Sites excluded from further consideration will be identified alongside the reasons for rejecting them. For others it will be possible to identify where it seems likely that there will need for extensive off-site network improvements to



accommodate their development. It may be the case for some that these improvements are so extensive and costly that they should be excluded from further consideration. The key output is a RAG (Red, Amber, Green) rating score for each site based on accessibility score determined by heat mapping exercise which determines:

- Proximity to congested corridors where mitigation is challenging (due to physical constraints); and
- Proposals for new development should not be accessed directly from the national primary route network outside built-up areas.

46. Sites may be rejected where they score very poorly, where development would clearly result in unacceptable levels of congestion on a corridor already congested, and which cannot be improved, where a site is poorly related to the Primary Route Network (PRN). Land is classified according to three categories of performance:

- **Good:** Good access to the PRN and no significantly harmful effects upon congested corridors.
- **Average:** Either good access to the PRN or no significantly harmful effects upon congested corridors.
- **Poor:** Poor access to the PRN and significantly harmful effects upon congested corridors.

## Conclusion

47. Every site will have a poor to good measure for its accessibility and all the wider impacts assessed as above.

48. Any one of these factors may be so severe that this results in a site being excluded from further consideration.

49. A combination of factors affecting a site may also represent obstacles that are so significant that taken together a site does not represent a reasonable alternative that should be considered further.

50. The key output is an overall concluding table for Stage 2, containing all Stage 2A RAG score ratings and commentary summarising outcomes for both Stages 2A and 2B, concluding within a judgement as to whether or not the site should proceed for further consideration at Stage 3 (sustainability appraisal).

## Stage 2B Strategic Context

51. At Stage 2B of the site selection process an examination of the strategic context of the settlement is carried out, to determine strategic issues that may impact on the pool of reasonable alternative sites for further consideration. This considers four broad points for consideration:
- Long-term patterns of development
  - Significant environmental factors
  - Scale of growth and Place Shaping Priorities
  - Future growth possibilities for the urban area

52. This process does not pre-judge more detailed testing through sustainability appraisal but enables sites that are clearly at odds with the strategic context for the settlement to be ruled out at Stage 2.

53. The framework for sustainability appraisal makes clear that all 'reasonable alternatives' are to be considered and compared. This is not the same as saying every possible site that can possibly be developed. What must be clearly stated is how the Council has arrived at its choice of reasonable alternatives.

54. Planning Practice Guidance<sup>8</sup> states that:

*The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to: outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option).*

55. Furthermore, the Strategic Environmental Assessment (SEA)<sup>9</sup> Directive, Article 5, says:

*Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex 1.*

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<sup>8</sup> Planning Practise Guidance, Paragraph: 018 Reference ID: 11-018-20140306, Revision date: 06 03 2014

<sup>9</sup> European Commission, Strategic Environmental Assessment Directive

56. In each instance the guidance allows the plan process to focus, influenced by objectives of the emerging plan. To help in this, one short narrative sets out a strategic context for a settlement and this is used in coming to an overall judgement about land.
57. For the purposes of site selection, strategic context is described using four aspects. The description under each of the aspects leads to a judgement explaining how this strategic context influences site selection.
58. The four aspects are as follows:

*Table 3: Strategic Context Definitions*

<p><b>Long-term pattern of development</b></p> <p>A short description of how the settlement has grown in recent decades, highlighting decisions that have had significant consequences, e.g., Breaching barriers like rivers, major urban extensions, important new infrastructure or absorbing neighbouring hamlets.</p> <p><b>Significant environmental factors</b></p> <p>The purpose of this section is to describe how environmental factors have affected the current pattern of development and how might they affect future growth possibilities. These can be illustrated on a map.</p> <p><b>Scale of growth and strategic priorities (Place Shaping Priorities)</b></p> <p>A description of strategic priorities and how these might influence future patterns of growth and what range of growth is emerging compared to what long term rate of development has been experienced to date.</p> <p><b>Future growth possibilities for the urban area</b></p> <p>This section summarises the range of possible ways a settlement may grow resulting from the above descriptions. In so doing, consideration is given to factors such as how might the scale of growth fit with the above – does it continue past patterns or do there need to be new directions?</p>
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59. An example is shown below:

Table 4: Strategic Context- Malmesbury

Settlement	Malmesbury
Long-term pattern of development	<p>From the hilltop historic core at the confluence of the Tetbury Avon and the River Avon, the town has grown eastward between the course of these two rivers. It then subsequently expanded northward. Since then, it has expanded northward to the parts less environmentally constrained. Burton Hill has been the exception, over the river on the southern approach to the town.</p>
Significant environmental factors	<p>The hilltop defensive character of the settlement is a significant and distinctive characteristic of the town. To retain this value of this feature broad areas around the southern end of the urban area are the most constrained.</p> <p>The Cotswold AONB fringes the town broadly to the west.</p> <p>There are areas of flood risk associated with each river.</p> <p>The lines of the B4040 and B4014 appear broadly to delimit the spread of the current urban area. Development beyond them meets rising land and any significant development would represent a departure and possible precedent.</p> <p>The busier A429 skirts the town at a greater distance and defines a loose eastern extent. It is less clearly in a role like the other minor roads.</p>
Scale of growth and strategic priorities	<p>The scale of growth is relatively modest, and the vast majority is already in the pipeline.</p> <p>Strategic priorities are set against the overriding importance of retaining the important character and setting to the town and its heritage assets. They involve gearing new housing provision to better meet local needs, retaining a flourishing town centre, and improving the spread of local employment opportunities.</p>
Future growth possibilities for the urban area	<p>The likeliest future growth possibilities continue past directions; within the two rivers to the east and, north-east, within the line of the A429.</p> <p>The relatively small proportion of additional land needed to meet the scales of growth envisaged reduces the need to have a large pool of possible sites from which to choose.</p>



	<p>There are SHELAA land parcels outside the broad extent of the urban area that would set possible precedents when a significant departure from past patterns does not appear necessary because of the relatively modest amount of additional land that appears to be needed.</p> <p>The relatively small proportion of additional land needed to meet the scales of growth envisaged at the settlement reduces the need to have a large pool of possible sites from which to choose.</p> <p>There are SHELAA sites being promoted that could continue the past long-term pattern of development. This pattern has reduced conflicts with significant environmental factors.</p> <p>There are SHELAA sites outside the broad extent of the urban area that would set possible precedents when a significant departure from past patterns does not appear necessary because of the relatively modest amount of additional land that appears to be needed.</p> <p>SHELAA sites (502 and 452) adjoin each other and represent an eastern extension of the urban area. It would be logical to consider this area comprehensively, to what extent and for what uses the area may be suitable for development.</p>
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60. A concluding commentary forms part of an overall judgement for stages 2A and 2B. An overall judgement on each site can refer to the conclusions reached in the strategic narrative where this affects a decision to reject or take forward land.

## Site Assembly

61. Land promoted for development is defined by land ownership boundaries and over what land a prospective developer has an interest. It does not necessarily represent what land is needed for a logical or sensible development proposal. A logical proposal may be smaller or larger or combine different owners' interests.
62. A judgement is made which reviews the individual sites and their relationship with other adjoining sites. Where appropriate, closely related sites are combined into sites that can be considered as potential allocation sites.
63. Sites contained within larger ones are absorbed into the large ones and removed.

64. Sites abutting each other, that do not have a strong physical barrier between them, like a railway or road, will be combined to create one larger site, where the land parcels are reasonably related to one another. The amount of greenfield land likely to be required at a settlement may influence these decisions.
65. The protection of important and valued landscape is a key consideration. The objective is to identify logical and effective boundaries to possible plan proposals using the existing natural and man-made features or inherited landscape character. A site may be extended up to a mature hedgerow or tree line. It may be reduced in size too and for the same reason. Where there is a large site under consideration, it may be appropriate to sub-divide it.
66. This approach ensures spaces define the buildings within sites rather than vice versa. It allows for green (e.g., natural areas and open spaces) and blue infrastructure (e.g., streams and water meadows) to have as much emphasis as buildings, recognising their vital role to place making and to both mitigating and adapting to climate change.
67. The key outputs are:
- A table setting out any sites that are to be combined for the purpose of further assessment.
  - A table setting out renumbered sites for the purpose of further assessment.
  - A revised map of the pool of sites (reasonable alternatives) for further assessment through Stage 3, the sustainability appraisal.

# Stage 3 Sustainability Appraisal

## Public Consultation

68. During the Local Plan review public consultation in 2021 ('Regulation 18') the pool of sites for each settlement, resulting from Stage 2, were consulted upon<sup>10</sup>. A range of consultation responses were received, some providing additional detailed evidence about individual sites<sup>11</sup>.
69. The consultation also gave rise to new sites coming forward through representations received. New sites were then subjected to the site assessment process Stages 1 to 2. Some of these new sites were added to the Stage 3 pool of reasonable alternatives.
70. Supporting representations from landowners/developers were received for the great majority of sites consulted on. The owners of sites where no representation was received were contacted to confirm if their land was still available for development. Land that was confirmed to be no longer available, or where no response was received were removed from the site selection process at Stage 1 on the grounds of unavailability.

## Assessment

71. Sustainability appraisal is central to the site selection process. It equitably assesses all sites that have not already been excluded at Stages 1 or 2, i.e., those that do not represent reasonable alternatives.
72. The sustainability appraisal identifies the likely significant effects of each site by assessing them against twelve sustainability objectives covering environmental, social, and economic aspects. These objectives have been developed informed by consultation and refinement<sup>12</sup>. They mirror the three overarching objectives of the planning system<sup>13</sup> and are presented in a sustainability appraisal framework.
73. Sustainability appraisal gauges the level of effect from significant adverse to significant positive effects. Sites are considered on an equitable basis, without taking account of possible mitigation and using a standard set of assumptions

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<sup>10</sup> At the Principal Settlements (Chippenham, Salisbury, and Trowbridge) the site selection process was advanced up to the end of Stage 4, and preferred site allocations identified. At the Market Towns, only the pool of sites up to the end of Stage 2 were consulted on.

<sup>11</sup> Wiltshire Local Plan Regulation 18 Consultation, 2021

<sup>12</sup> Wiltshire Sustainability Appraisal Scoping Report, Wiltshire Council (September 2020)

<sup>13</sup> Paragraph 8, National Planning Policy Framework, MHCLG (2021)

for the form and scale development of each site. Sustainability appraisal uses a common evidence base that encompasses evidence outputs from preceding stages in the site selection process.

74. The types of effects included are summarised below.

### **Social**

75. The ability of sites to provide a good mix of housing types is an important element to meeting social needs; to support all sectors of the community.
76. Providing an appropriate supply of affordable housing is an important element of this objective. A site's ability to provide affordable homes will depend to a large degree on development being clearly viable to meet a target number. At this stage, assuming every site is viable, all sites are considered capable of providing target numbers of affordable homes. Later stages of the site selection process (developing proposals) assess the viability of sites in more detail.
77. Healthy and inclusive communities are a social component of sustainable development. Development targeted toward deprived areas is a means to promote this objective; as also is development nearby education and health infrastructure, green space, and town centre facilities. A choice of good quality transport links is also a factor. Development may also include facilities and infrastructure that support public health which can help to address deprivation.

### **Economic**

78. Sites are assessed according to their suitability to provide land for business and premises. Assessment also extends to what infrastructure a site might provide to promote economic growth. This includes opportunities to maximise the generation and use of renewable energy and low carbon sources of energy.
79. Sites may also promote a balance between residential and employment development to help reduce travel to work distances. Development could also support the vitality and viability of town centres by being in close proximity or by having sustainable transport options readily accessible.

### **Environment**

80. Scope for a range of effects on the environment (including land, air, and water) is reflected in objectives including biodiversity, land and soil resources and heritage assets. Most sites assessed at Stage 3 are greenfield sites with a propensity for some harmful effects associated with development. Assessment necessitates a judgement on the degree of adverse effects and how they may be mitigated.



81. The sustainability appraisal notes possible mitigation measures to address adverse effects that have been identified. It also identifies measures to ensure the most positive effects. Measures may also be informed by evidence gathered at preceding stages in the site selection process.
82. Environmental, social, and economic objectives are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). The main output from sustainability appraisal is to identify those sites with more sustainability benefits compared to those with less; those with the least adverse effects and those with more.
83. The sustainability appraisal therefore ranks alternatives from 'most sustainable' to 'less sustainable'.
84. The key output in accordance with regulations and published guidance on best practice, is an independent assessment document of all sites that are reasonable alternative options – the Sustainability Appraisal<sup>14</sup>.

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<sup>14</sup> Wiltshire Local Plan Review Sustainability Appraisal Report (Wiltshire Council, September 2023)

## Stage 4 Selection of Sites

85. Stage 3 provides a comparison of sites. Overall results can be finely balanced, and it is rare that there is one site that clearly dominates the overall site selection process. The purpose of Stage 4 is to undertake further assessment of site options to select a preferred set of sites that address local priorities; that they help deliver the outcomes communities want to see or the very least do not undermine other goals they also want to see achieved. Stage 4 also provides discussion and analysis of the scale of growth that would be required to be drawn from the pool of the most sustainable site options, in order to meet the identified housing and employment needs for the settlement.
86. The remaining sites are evaluated against the Place Shaping Priorities for each settlement. Place Shaping Priorities represent a summary of the outcomes for each main settlement sought over the plan period. They have been discussed with the parish, town and city councils and communities were asked for their views on their content as a part of public consultation.
87. Community aspirations and safeguards are therefore given an important and explicit weight in selecting sites.
88. Sites are evaluated against Place Shaping Priorities, looking at their strengths, weaknesses, opportunities, and threats. For each Place Shaping Priority each site is rated into one of three possible categories.

*Table 5: Strength, Weakness, Opportunity and Threat (SWOT) Analysis*

	Significant strength and/or opportunity to promote or deliver a priority
	No significant SWOTs
	Significant weakness undermining and/or threatening delivery of a priority

89. For each score there is a short commentary to explain the reasons for the judgement made.
90. For each site, the significant effects of potential development identified by sustainability appraisal are rehearsed, cataloguing the differences between sites. This shows the degree to which the ranking positions from Stage 3 may be altered by the further assessment against the Place Shaping Priorities. Sites that score well against the Place Shaping Priorities may be promoted up the ranked list of preferred sites, where poorly scoring sites could be demoted. The assessment is summarised in tabular form, as displayed in the example below.

Table 6: Stage 4 Assessment

Site	Stage 4 Ranking	SA Ranking of Site	PSP1	PSP2	PSP3	PSP4	PSP5	PSP6	PSP7	Change from SA Ranking
1	3 <sup>rd</sup> Joint	5 <sup>th</sup>	✓	+/-	-	+/-	-	-	+/-	↑
2	2 <sup>nd</sup>	1 <sup>st</sup> Joint	✓	+/-	✓	+/-	-	+/-	+/-	↓
3	1 <sup>st</sup> Joint	1 <sup>st</sup> Joint	+/-	+/-	✓	+/-	✓	+/-	+/-	↔
4	1 <sup>st</sup> Joint	1 <sup>st</sup> Joint	+/-	+/-	✓	+/-	✓	+/-	+/-	↔
6	3 <sup>rd</sup> Joint	4 <sup>th</sup>	✓	+/-	-	+/-	-	-	+/-	↓

91. A commentary sets out a more detailed justification for the final ranking of sites, alongside further discussion and analysis of sites and their potential for development.
92. Sites for allocation are selected from the top ranking to the next until residual requirements to meet housing and employment needs can be met.

## Preferred Sites - Developing Proposals

93. The scale of residual requirements for housing and employment are expressed in numbers of dwellings and/or an area of land for industrial and office uses. The Local Plan seeks to allocate sites to ensure residual housing and employment requirements are accommodated in order to deliver the spatial strategy.
94. The majority of sites are proposed to be allocated for residential led development, with most of the land required to meet residual housing requirements. This consideration is therefore pre-eminent in the selection process.
95. Some sites are proposed to be allocated solely for employment uses. Other land is considered for residential and employment use where a site is of sufficient size to accommodate a mix of uses. A mix of uses represents sound place shaping and creating attractive neighbourhoods. The suitability of sites for employment uses is considered on a case-by-case basis bearing in mind each settlements residual employment land requirements. Consideration is recorded in the relevant settlement document.
96. Further work has examined in more detail what land within sites can be developed and what land cannot, having regard to constraints and requirements for mitigation. Work also considers the requirements for infrastructure necessary to support a development, such as new schools, roads, and other facilities. For larger allocation sites, this work informs the production

of a concept plan which illustrates an indicative distribution of uses within the site.

97. How long a site may take to be delivered is also considered. The National Planning Policy Framework categorises housing sites according to their timescales:

*"...planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

*specific, deliverable sites for years one to five of the plan period; and  
specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan".<sup>15</sup>*

98. Occasionally, an assessment of sites will show one so large and complex a good part or even all a site will only be developed beyond the plan period. The Plan must meet forecast housing needs over the plan period and so site selections will need to be adjusted to take account of these circumstances.
99. The spatial strategy also includes a category of reserve sites. These are in addition to those sites necessary to meet residual requirements. They will only be released for development by the local planning authority should for any reason other allocations be delayed, or the contribution from small sites fail to materialise and they are required to maintain the land supply requirements set by national policy. This provides a safeguard to allow the council to bring forward new 'plan led' sites relatively easily and to help guard against a situation where developers seek to promote speculative greenfield sites. In accordance with the site selection methodology, they are the sites next in the final ranking after those allocated in the plan.

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<sup>15</sup> Paragraph 69, National Planning Policy Framework, MHCLG (2021)



## Annex 1 Site Exclusion Method Statement

Potential sites from two different sources were merged together to create one master SHELAA layer from which the exclusions were carried out. These two different sources were:

- SHELAA sites from the council's own 'call for sites'
- A layer showing sites that came forward in response to public consultation events.

In addition to the exclusionary criteria described in the methodology a couple of other exclusions were created in order to ensure that potential SHELAA sites that were big enough and have not already been earmarked in the near future were brought through to the main sift stage. These extra criteria were:

- Sites that were smaller than 0.5Ha
- Sites that feature on the councils Land Use Monitoring System (LUMS) layers: Full18, Outline18, LP18 and NP18

The 18 layers are layers updated by the Monitoring and Evidence team and are a working record of all approved Planning Applications, to monitor housing, employment, and industrial land fluctuation. For example, if a section of the potential SHELAA site already had an extant planning application then this would be excluded at this stage because it is already being built on.

The resulting potential SHELAA site polygons were then overlain with the exclusionary criteria outlined in the site selection methodology and the resulting excluded area was recorded in separate layers. Each exclusion overlap deduction was taken from the original SHELAA polygons, allowing for the maximum areas to be excluded for each exclusionary criterion. This was chosen over 'consecutive deductions' which would have resulted in smaller and smaller portions of SHELAA sites being excluded at each criterion; not giving a realistic representation, whereas any one site could be excluded for any number of reasons. This methodology also allows for each sites' exclusions to be depicted individually or drawn on top of each other to show the full extent of the exclusions for any given site. The individual layers for each exclusionary criterion were then merged back into one file and the resulting attribute table was copied into Excel for cleansing.

Cleansing of the data table involved dissolving the multiple duplications of sites within the table, due to the above methodology, where sites have been excluded for more than one reason, using the VLOOKUPS and CONCATENATION functions within Excel. The output of this was then appended to the original sites to provide one layer which shows all potential SHELAA sites and any exclusions (if any) that affect the overall area.

To provide a visual method of reading this data, separate layers containing all of the excluded areas and all the potential SHELAA sites left after the sifting process were coloured differently to show the overall site areas, within which portions being excluded were clearly defined by a different colour.

# Annex 2 Site Sifting Method Statements

## Accessibility

The NPPF outlines that local plan making authorities should identify suitable locations for development that are to help to deliver identified needs of the community in a sustainable way. It suggests the planning system should actively manage patterns in growth to use opportunities to promote walking, cycling and public transport. Significant development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of travel modes<sup>16</sup>.

Sites for new development that offer the least genuine choice of travel modes may be unsuitable because of their location. They would not support a modal shift away from using private cars. Such a shift produces several benefits: fewer carbon emissions, less congestion and less pollution and healthier lifestyles being among them. Sites that cannot realistically help to achieve such benefits are unsuitable.

To test a sites potential accessibility the software TRACC has been used to undertake detailed analysis that measures journey times by sustainable modes of transport (walking, cycling (including cycle ways) and public transport) from each site to several everyday locations at each settlement (employment areas, town centres, schools, and health facilities).

Accessibility is therefore a consideration at an early stage of plan-making, promoting sustainable modes of transport by focusing significant development on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes<sup>17</sup>.

TRACC is a software developed by Basemap to Department of Transport specifications, the software is a GIS (Geographical Information System) designed to perform transport analysis.

Analysis was run to assess journey times to the following destinations:

- Town Centres
- Principal Employment Areas
- GPs & Hospitals
- Secondary Schools

TRACC creates a series of maps that contain contour lines of journey times around each so there are a set of concentric time bands. The percentage area of each

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<sup>16</sup> Paragraph 106, National Planning Policy Framework MHCLG (2021)

<sup>17</sup> Paragraph 107, National Planning Policy Framework, MHCLG (2021)

contour band is within each site is then calculated (e.g 12% of the site is 0-5 minutes' walk away from the town centre). A value was then applied to the time bandings to calculate an overall score for each site. The time banding values are as follows:

*Table 7: Time banding Values*

Minutes	Value
0 – 5	5
5.01 – 10	4
10.01 – 15	3
15.01 – 20	2
20.01 – 30	1

Taking town centres as an example, using the values above, if 12% of the site was in the 0-5 mins band, it would score 12% of 5 points. If the 5-10 mins band was 23% of the site, the site would score 23% of 4 points etc. Once a 100% of the sites area has been totalled up the score will be the overall accessibility score for access to town centre with three modes of transport, the maximum score for a site access to the town centre is therefore 15 points.

The calculation is carried out for each of the four destinations by each mode of transport and an overall accessibility score is calculated for each site. A total score is recorded out of a maximum possible of 60.

It is important to recognise the objective to focus development on the most suitable locations. The assessment therefore is a comparison of the sites at each settlement. The scores together at each settlement are assumed to be a statistical normal distribution<sup>18</sup>. Sites performing very poorly compared to others at a town are those with a score that fall into the bottom 5%. , using 2 standard deviations from the mean score. The overall time banding score will then be transferred into a RAG score as follows:

**Red** –in the bottom 5% from the mean of a normal distribution

**Amber** – a score below the mean

**Green** – a score above the mean

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<sup>18</sup> On the basis that all greenfield sites will be on the urban edge, and destinations will be within the existing urban area and toward the centre, it is reasonable to assume most of the continuous scores (1-60) in a normal distribution tend to cluster around the mean, and the further from the mean the less likely, and more abnormal, it is likely to be.

## Flood Risk

The NPPF outlines that strategic policies “should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities.”<sup>19</sup> To ensure that all plans take into account the current and future impacts of climate change – so to avoid, where possible, flood risk to people and property, local planning authorities should use opportunities provided by new development to reduce the causes and impacts of flooding<sup>20</sup>.

To determine the potential wider impacts of a site’s development on its surroundings, officers will consider a number of factors using Wiltshire Council’s latest Strategic Flood Risk Assessment and other data. These factors are as follows:

**Cumulative impact Score** defined as the effect of past, present, and future activities on the environment. The overall score will carry a weighting of 15 as it has a pivotal impact on the development of numerous new sites within an area.

**Fluvial Flood Risk** will be assessed by looking at whether the site intersects with flood zones (FZ3b, FZ3a Upper End, FZ2). The weighting for this factor will be 15 as such to align with pluvial and cumulative impact score which are all deemed comparable with no one factor carrying a higher weighting than the other.

**Pluvial Flood Risk** or Surface Water Flooding is assessed by looking at the frequency of flood events, for this assessment the 1 in 30-year, 1 in 100-year and 1 in 1000-year flood events will be assessed. The same weighting of 15 will be given to pluvial flood risk to align with cumulative impacts and fluvial flood risk.

**Groundwater Flood Risk** is a particular issue in Wiltshire and therefore to take account of this it will be considered appropriate to assign a higher weighting of 20. It will be assessed to determine whether the site is in an area where groundwater is lower than 0.025m from the surface, 0.025m – 5m from the surface or that has experienced historic groundwater flooding.

**Other Flood Risks** are to be assessed by looking at recorded flood outlines, sewer flooding, canal flooding and reservoir flooding. The weighting for this factor is considered higher than other risks due to the criteria representing historical flooding impacts, however the risks above are predominately based on risk and potential flooding. For this reason, the weighting will be 35.

The weightings will be applied to each site to give an overall score which will determine the overall RAG for each site. This final RAG status will still be at the

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<sup>19</sup> Paragraph 160, National Planning Policy Framework, MHCLG, (2021)

<sup>20</sup> Paragraph 161, National Planning Policy Framework, MHCLG, (2021)

officer's discretion as in some circumstances the site can score a low RAG score whilst still having severe flood risk from a single source.

The RAG scoring for flood risk is as follows:

**Red** – An overall score equal to or more than 50 (Increasing flood risk elsewhere, likely to be difficult and/or costly to resolve).

**Amber** – An overall score equal to or more than 25 and less than 50 (Management measures are achievable and/or the site capacity is likely to be reduced to accommodate them).

**Green** – An overall score of less than 25 (Management measures are straightforward and there is no reduction in the site capacity).

## Heritage

The NPPF defines heritage asset as “a building, monument, site, area, or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)”<sup>21</sup>.

The Historic Buildings and Conservation Areas Act 1990 places legal duties on local authorities to have regard to the need to preserve heritage assets, such as with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area<sup>22</sup>.

At this stage of site selection, assessment will not consider non-designated heritage assets. The effect of development proposals on the significance of such assets is generally taken into account in determining planning applications. Potential impacts influencing site selection are more usefully considered at a later and more detailed stage in developing site proposals.

National Planning Policy also states that “when considering the impact of a potential development on the significance of the heritage asset, great weight should be given to the asset's conservation (the more important the asset, the greater the weight should be)”<sup>23</sup>.

Officers will identify those assets that development of site may have potential impacts upon outside the site since the purpose of this stage of the selection process is consider a site's impacts upon its surroundings. Officers will describe the significance of the asset affected and then the nature, extent, and likelihood of loss to its significance resulting from development.

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<sup>21</sup> Annex 2 Glossary, National Planning Policy Framework. MHCLG (2021)

<sup>22</sup> Section 72, Historic Buildings and Conservation Areas Act (1990)

<sup>23</sup> Paragraph 199, National Planning Policy Framework, MHCLG (2021)

The designations and assets that will be assessed are as follows:

- **a conservation area**
- **a registered park or garden**
- **a scheduled monument**
- **a listed building**
- **a world heritage site**

It may be possible to outline briefly what measures would be effective in avoiding or minimising any conflict between an asset's conservation and development of the site. The final step will then be to judge the degree of harm without mitigation, reflecting guidance that 'great weight' should be given to an asset's conservation<sup>24</sup> and that any mitigation will generally involve some degree of risk. A short set of comments will describe the reasoning leading to a judgement in line with these steps.

NPPF distinguishes between substantial and less than substantial harm. The assessments concentrate on what impacts development may have on their surroundings. Consequently, the potential for substantial harm will be exceptional and most results will conclude none or less than substantial harm. It will be necessary, as a result, to gauge impacts in more detail using the officer's commentary and where heritage impacts are a factor contributing to the exclusion of a site from further consideration, factors in the commentary will be highlighted. The number of assets affected, and their combined significance will be a factor in determining the suitability of a site.

The RAG score for heritage follows the approach in NPPF as follows:

**Red** – likely to cause substantial harm to heritage assets.

**Amber** – likely to cause less than a substantial harm to heritage assets.

**Green** – likely to cause little or no likelihood of harm to heritage assets.

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<sup>24</sup> Paragraph 201, National Planning Policy Framework, MHCLG (2021)

## Traffic

National Planning Policy Framework states that transport issues should be considered from the earliest stages of plan-making<sup>25</sup>; to enable the potential impacts of development on transport networks to be addressed. The potential impacts of development on the local road network may be unacceptable and difficult to mitigate.

Development may, in other circumstances, alternatively provide roads and/or traffic management methods that may help to improve existing problems as a wider benefit from measures necessary to enable development to go ahead.

The above is also replicated on a local level where Wiltshire has placed high priority on maximising sustainable transport availability and reducing carbon emissions<sup>26</sup>.

To assess this at this strategic second stage of site selection a sites proximity to congested corridors and Air Quality Management Areas (AQMAs) will be assessed. Officers will conduct an analysis using GIS to determine the sites distances to these areas are used as factors that indicate sites likely to be problematic.

### **Proximity to congested corridors.**

Any significant development, taking into consideration improvements in sustainable transport infrastructure, remains likely to place increase pressure on the associated road network. The work focuses on identifying links in the network that are already congested or forecast to be so.<sup>27</sup> AM and PM peaks are used to identify locations on the highway network that will reach 85% capacity or more by 2038. This modelling looked into core growth up until 2038 and took into consideration likely infrastructure improvements to the improvements to the network within the time period.

### **Proximity to AQMA**

Within Wiltshire there are eight Air Quality Management Areas (AQMAs). The primary source of pollutants within these areas are produced by vehicular emissions. The management and improvement of air quality in these specific locations is challenging party due to the increased use and reliance on private cars. While sustainable transport solutions are a focus for future growth, it is likely that development will further increase the number of private car journeys.

Each potential site is placed in a distance band from AQMAs and congested corridors. The further way a from each of these elements, the less problematic a site will be. They are scored as follows:

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<sup>25</sup> Paragraph 104, NPPF, MHCLG 20121

<sup>26</sup> Wiltshire Local Transport Plan 3, 2011 – 2026. <http://www.wiltshire.gov.uk/ltp3-strategy.pdf>

<sup>27</sup> Action DSP01, Wiltshire Council Air Quality Action Plan (2015)



Distance bands from congested corridors and AQMAs have been established to score sites on their proximity to these areas, each banding is scored from 1-4, the scoring is as follows:

*Table 8 Distance Bands and Scoring*

<b>Category</b>	<b>Distance from congested corridors and AQMAs</b>	<b>Scoring</b>
Very weak	0-500m	4
Weak	501-1000m	3
Moderate	1001-1500m	2
Strong	1501-2000m	1

The above criteria will be used in combination to produce a RAG score for each site. A commentary will indicate whether development might help to reduce existing issues or not. The methodology does not automatically reject sites solely on their proximity.

A site will be able to score a maximum of 8 and the RAG scoring will be as follows:

**Red** – An overall score higher than 7 (Significantly harmful effects upon congested corridors and AQMAs)

**Amber** – An overall score of between 3 and 7 (Potentially harmful effects upon congested corridors and AQMAs)

**Green** – An overall score of 2 or below (No significantly harmful effects upon congested corridors and AQMAs)