

# **TENDRING HOUSING COMPARATIVE SITE ASSESSMENT STUDY**

**(The Process Adopted in Selecting Housing Allocation Sites for  
the First Deposit of the Tendring District Replacement Local Plan)**

## **EXECUTIVE SUMMARY**

**Tendring District Council and  
Land Use Consultants**

**April 2004**



# 1. INTRODUCTION

## Background and Purpose of the Study

1.1 A wide ranging number of studies have been carried out to inform the review of the District Local Plan e.g employment land, retail, urban capacity, open space, tourism and Clacton Town Centre Strategy. Whilst many of the recommendations and conclusions of those studies have been accepted by the District Council in preparing its Replacement Local Plan, this Housing Comparative Site Assessment Study and its companion Housing Technical Paper are somewhat different. This is because they effectively represent supporting technical supplements to the First Deposit Replacement Local Plan by respectively explaining the housing site allocation selection process and other technical housing matters actually adopted in the Replacement Plan.

1.2 Accordingly, the purpose of this study was two-fold. Firstly to develop and explain the methodology adopted by the Council in selecting sites for housing allocation [or mixed development including housing] for the period 2003-2011 in the First Deposit Replacement Local Plan, following a sustainable approach in accordance with Government advice, [primarily PPG3 Housing]. Secondly, to set out in a transparent manner the site specific assessments then carried out.

1.3 The study has been both extensive and labour-intensive. This was because of the number of sites assessed and the complexity of some of the methodology, much of which had to be developed specifically for the study. Most of the study was carried out in-house by officers within the District Council's Regeneration, Planning & Community Service as it was quite clear that considerable local knowledge was required to effectively carry out much of the work. However, Land Use Consultants [LUC], a planning consultancy specialising in environmental planning, was commissioned by the Council to carry out that part of the work where its expertise could be usefully applied. This included knowledge gained from the carrying out of the Tendring Landscape Character Assessment and Greenfield Sites Study for the Council.

**It is important that the Study is read in conjunction with the Tendring District Replacement Local Plan First Deposit, the Housing Technical Paper supporting that Plan, and the Tendring Urban Capacity Study Revised Final Report [March 2002], in order to gain a comprehensive understanding of this work. This includes the mapping identification of most of the sites referred to. [Those with a UCS number will be found in the Tendring Urban Capacity Study mapping]. Dependent upon the site in question, certain other studies are referred to in some cases.**

## Main Framework Against Which Site Selection Has Been Made

1.4 At the outset of the study, the following were identified as the necessary main elements of the framework for considering and deciding sites for allocation for housing:

1. Adopted Essex & Southend-on-Sea Replacement Structure Plan Policy H1 housing provision requirement of 6,250 additional dwellings 1996-2011 for Tendring District.
2. Base date for data on dwelling commitments, completions and additional dwelling potential - April 2003.
3. Allocations to be based on "large" sites with an indicative dwelling capacity for 12 or more dwellings.
4. Site search to follow PPG3 [March 2000] Paragraph 30 sequential approach to sustainable housing that local planning authorities are required to follow i.e:

*"starting with the re-use of previously developed land and buildings within urban areas identified by the urban housing capacity study, then urban extensions, and finally new development around nodes in good public transport corridors. They should seek to identify*

*sufficient land to meet the housing requirement set as a result of the RPG and strategic planning processes. In doing so they do not need to consider all the land in their area: they should not extend the search further than required to provide sufficient capacity to meet the agreed housing requirement”.*

5. Adopted Replacement Structure Plan Policy H2 to supplement the PPG3 site search where necessary, particularly in focussing the maximum amount of housing provision on the existing large urban areas of Clacton-on-Sea and Harwich, including urban extensions if that were to prove necessary to achieve the Replacement Structure Plan provision.
6. From the site search, decide sites to allocate through sustainability testing, assessing sites against the criteria of PPG3 Paragraph 31 i.e:
  - the **availability of previously-developed sites** and their suitability for housing use;
  - the **location and accessibility** to jobs, shops and services by modes other than the car;
  - the **capacity of existing and potential infrastructure**;
  - the **ability to build communities** to support new physical and social infrastructure; and
  - the **physical and environmental constraints on development of land**.

1.5 Additionally, as part of that assessment:

- to focus consideration of availability on the important issue of **developability** in the Replacement Local Plan period to 2011 and extend assessment of availability to sites other than just previously developed, if it should prove necessary as part of the sequential consideration of sites.; and
- similarly extend consideration of **suitability for housing use** to sites other than previously developed should any prove necessary to assess sequentially if available and suitable previously developed sites were to be judged in the Study insufficient to meet remaining Replacement Structure Plan housing requirements.

## **2. A SUMMARY OF KEY ASPECTS OF THE METHODOLOGY**

2.1 This summary of key elements of the methodology includes an outline of the method by which each of the PPG3 paragraph 31 criteria were considered prior to the actual assessment of sites sequentially by site search tranche, the scoring of which are set out in tabulations in the report.

### **The Sequential Approach**

2.2 In accordance with the PPG3 search sequence, [paragraph 30], the Tendring Urban Capacity Study [TUCS] 84 “large” retained sites were recognised as the obvious starting point for the site search for potential new housing allocations. However, of those sites, 18 had since been completed or committed for residential development at April 2003 and were not proposed for allocation for another use in the Replacement Local Plan. Accordingly those sites were not carried forward for further consideration in this Study, nor another site reassessed as too small in dwelling capacity terms for potential allocation. Reflecting PPG3 and PPG17 advice, a further 9 large TUCS sites, in Urban Greenspace use, were discounted from further consideration as housing allocations.

2.3 Taking account of both PPG3 paragraph 30 and Adopted Structure Plan Policy H2, the following search sequence was then adopted in the Study but followed only as far as it was necessary to extend the search in order to provide sufficient capacity to meet the remaining Adopted Replacement Structure Plan housing requirement for the District:

- Tranche 1 - Previously Developed Land in Urban Areas**
- Tranche 2 - Other Urban Land Not Previously Developed**

**Tranche 3 - Urban Extensions to Large Urban Areas [Clacton & Harwich]**

**Tranche 4 - Urban Extensions to Other Towns [Frinton/Walton, Brightlingsea, & Manningtree]**

**Tranche 5 - Expansion of Villages as Nodes in Good Public Transport Corridors**

2.4 In relation to tranche 2, whilst not specifically referred to in the PPG3 sequential approach, the Tendring Urban Capacity Study identified several sites within the urban areas that were not previously developed and not in open space use. In sustainability terms, it was considered that those sites must logically be considered before greenfield urban extensions.

**The Discounting Process**

2.5 Additional to the accepted earlier discounting process of the TUCS itself and the 28 TUCS large sites not further considered primarily due to commitment status or urban greenspace grounds, the Study assessment included a discounting process. In carrying out the Study it became apparent that the following three criteria would be the key determinants as to whether a site should be discounted:

- **developability**
- **suitability for housing use**, and
- **physical and environmental constraints on development of land**

2.6 In relation to **developability**, clearly the Replacement Local Plan should not specifically allocate sites for residential development that are unlikely to come forward during the plan period. PPG3 “Housing” [paragraph 34] endorses this position in stating:

*“It is essential that the operation of the development process is not prejudiced by unreal expectations of the developability of particular sites...”*

2.7 Secondly, in considering **suitability for housing use** but as a local plan allocation, the District Council clearly needed to consider, as part of a comprehensive, co-ordinated approach, whether a site was better suited to remain in its present use or developed for another use than residential or mixed use including residential. As such this formed a logical extension to the Urban Capacity Study work and necessary part of the process of planning for all appropriate urban uses to meet a community’s needs in the Replacement Local Plan.

2.8 Thirdly, some **physical and environmental constraints** and designations individually or in combination were judged to render housing allocation inappropriate for some sites as part of a sustainable approach to minimise development impact. In relation to environmental designations this was additionally intended to avoid conflicts between policies and proposals in the emerging Replacement Local Plan.

2.9 In the context of the Replacement Local Plan and despite their contribution to sustainable development, none of the remaining PPG3 paragraph 31 criteria were considered a sufficient impediment individually to a residential allocation, so as to be a key determinant to the discounting of a site. Chapter 3 of the Study explains this further. However, following on from this discounting, subsequently where a choice needed to be made between sites to avoid over-provision, assessment of remaining short-listed sites against each of the other PPG3 criteria enabled that informed choice to be made.

**Developability and Suitability for Housing Use**

2.10 In relation to developability, through a judgemental process sites were assessed against a range of criteria that can individually or collectively operate to delay or prevent sites coming forward. Sites were then divided into three categories according to the extent and nature of constraints present and the likelihood or not of overcoming these during the plan period.

2.11 In relation to suitability for housing use, retained TUCS large sites were assessed in relation to two agreed TUCS site selection criteria as to whether they were better suited to remain in their present use or another use than residential, but taking account particularly of post TUCS other land use studies to inform the Replacement Local Plan. In relation to additional sites not considered in the TUCS, these were additionally considered in relation to the TUCS agreed site selection criterion of whether the site is in a location that does not enable a good quality residential environment or residential amenity to be created.

### **Physical and Environmental Constraints**

2.12 Land Use Consultants [LUC] were commissioned by the Council to develop methodology to assess sites in relation to this PPG3 paragraph 31 criterion. Using the developed methodology, they were then to carry out an assessment of sites abutting the large urban areas of Clacton and Harwich whilst Council officers, using the same methodology, assessed urban sites. The LUC work was completed as a commissioned study in October 2003. However, as a necessary integral part of this wider study, it is set out as a Supplement to the Study report. The reasons why urban extension sites to Clacton and Harwich were assessed at that time on this PPG3 criterion is explained in Chapter 5 and the Supplement to the Study. In the event LUC also assisted the Council with some urban sites by carrying out an ecological and landscape assessment of 14 of those urban sites that an initial desktop survey indicated potentially may have more than negligible sensitivity in ecological and/or landscape terms.

2.13 The developed methodology by LUC included initially discounting from further consideration potential sites covered by selected national and local environmental designations, such as SSSI, coastal protection belt etc. Remaining sites were then subject to detailed assessment against a range of other physical and environmental constraints, eventually resulting in a weighted score for each site on this criterion. Subsequently, at the end of the whole study, in order to achieve an overall percentage score for each short-listed site in relation to all of the PPG3 criteria, the weighted scores on this criterion were adjusted as percentages to relate to "Absence of Physical / Environmental Constraints".

### **Accessibility Assessment**

2.14 This part of the Study included an appraisal of the location and accessibility of potential sites for residential development to jobs, shops and services by modes other than the car. The modes of walking, cycling, bus and rail were considered from the edge of the site being assessed to various existing and proposed facilities providing employment, shops, services or interchange with public transport. A scoring matrix and template was produced to enable an accessibility score to be recorded for each site based on weighted scores for both modes and facilities, including taking account of frequency of bus and rail services and distance/travel time.

### **Building Communities**

2.15 An assessment of the ability of potential sites for residential development to contribute to the building of communities was then carried out based on four identified factors: potential for a planned neighbourhood, contribution to social infrastructure, mixed use potential, and PPG3 affordable housing potential. An important prerequisite to enable completion of the matrix for the four factors was the determination of indicative dwelling capacity for each site as the potential scale of development influenced the scores derived for this PPG3 criterion.

### **Infrastructure**

2.16 In assessing infrastructure capacity in relation to potential housing sites, the four infrastructure facilities of public transport, necessary utilities, school places and healthcare facilities were considered. A matrix was then devised in order to score each site.

### **3. FINDINGS OF THE STUDY (By Search Tranche)**

#### **Assessment of Previously Developed Land in Urban Areas**

3.1 A total of 52 “large” sites were assessed in this first tranche, 47 retained TUCS sites and 5 other sites that have emerged for consideration since the TUCS. 31 of these sites were discounted on developability, suitability for housing use, or physical and environmental constraint grounds. The remaining 21 sites were then assessed against the other PPG3 criteria including, for sites in this tranche, scoring 100% as “available previously developed land” scored as a percentage of a site’s area, [given that previously developed land judged to be unavailable had been discounted in assessing developability].

3.2 In overall terms against the five PPG3 criteria those 21 previously developed sites within the five main urban areas all scored from good, [in excess of 60%], to excellent, and would potentially deliver some 695 dwellings. However, the separate Housing Technical Paper had identified a requirement of some 1,850 dwellings as new housing allocations in the Replacement Local Plan, [over and above rolled forward large site commitments according with the Plan, appropriate small sites and other “large” windfall sites on previously developed land]. Therefore those suitable 21 sites warranted allocation and the site search assessment needed to extend to the second tranche.

#### **Assessment of Other Urban Land Not Previously Developed**

3.3 A total of 5 “large” retained TUCS sites in the urban areas were assessed in this second tranche. All but one were discounted on developability or suitability for housing use grounds. The remaining site, at Harwich, was then assessed against the other PPG3 criteria and received an overall fairly good score, warranting allocation given that it only contributed potential delivery of a further 30 dwellings.

#### **Assessment of Urban Extensions to Large Urban Areas**

3.4 This third tranche relates to urban edge sites to the two large urban areas of Clacton-on-Sea and Harwich. The limitation of site search for this tranche to fields abutting settlement edges and not covered by particular environmental policy designations, both have the effect of discounting from consideration large numbers of potential sites. Prior to that discounting LUC identified some 50 sites in this tranche. Beyond this initial discounting, this search tranche followed the same approach as for tranches 1 and 2.

3.5 From the remaining 15 short-listed sites in this tranche, after that initial discounting, a further four sites were then subsequently discounted on developability, suitability for housing use, or physical and environmental constraints grounds. The remaining 11 sites in this tranche were then assessed against the other PPG3 criteria. In overall terms those 11 sites all scored from fair, [over 40%], to good and could be regarded as suitable potential allocation sites in relation to the PPG3 criteria if there existed a housing capacity requirement to allocate them all.

3.6 The two best scoring urban edge sites were actually previously developed land but would contribute only some 37 dwellings. With the indicative dwelling capacity for some 725 dwellings from tranche 1 and 2 sites within the urban areas, this would leave a shortfall of some 1,088 dwellings. However, the remaining 9 urban edge greenfield sites could potentially deliver some 1,427 dwellings. Therefore, the four lowest scoring sites, yielding some 313 dwellings, [close to the surplus capacity figure of 339 dwellings], were discounted from allocation in the Replacement Local Plan period to avoid over-provision.

#### **Assessment of Urban Extensions to Other Towns and Expansion of Villages as Nodes in Good Public Transport Corridors**

3.7 The first three site search tranches identified more than sufficient housing land suitable in terms of the PPG3 paragraph 31 criteria. Accordingly, in accordance with the PPG3

sequential approach, there was no need to extend the assessment and search for housing allocation sites to further, potentially less sustainable, locations as urban extensions to smaller towns [tranche 4] or expansion of villages in good public transport corridors [tranche 5].

#### **4. CONCLUSIONS**

4.1 The study identified, through the PPG3 sequential approach and assessment against PPG3 paragraph 31 criteria, the 28 new housing allocation sites listed in Appendix 2 to the Tendring District Replacement Local Plan First Deposit. These comprise a total indicative dwelling capacity of 1,876 dwellings [and are additional to those rolled forward large site commitments in Appendix 1 of the Plan].

4.2 PPG3 paragraph 30 emphasises that a site search should not extend further than required to provide sufficient capacity to meet agreed housing requirements. Accordingly, three important conclusions can be drawn from this assessment:

- 1) At the end of the tranche 1, 2 and 3 assessments of the five urban areas and edges of the large urban areas of Clacton and Harwich, remaining sites, suitable for residential development in terms of meeting the PPG3 criteria, would more than meet the dwelling requirement to be identified on allocated large sites.
- 2) There was accordingly no need to extend the tranche 3 site search assessment of fields abutting the urban edges of Clacton and Harwich to those Local Green Gap sites otherwise identified as relatively unconstrained in desk-top analysis. [See Study Supplement paragraph 2.11].
- 3) There was accordingly also no need to extend the site search to other tranches [i.e tranches 4 and 5 sequentially; tranche 4 relating to urban extensions to other towns and tranche 5 to expansion of villages in good public transport corridors].