



Site Allocations Local Plan

Additional Sites Consultation

8 March to 19 April 2018



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SUMMARY

Selby District Council is holding a six week consultation between 8th March and 19th April 2018 on additional and amended potential sites for development.

What's happening?

The Council is preparing a Site Allocations Local Plan to ensure we identify enough land for the homes and jobs and other needs over the next ten years.

In autumn 2017, as part of the 'Pool of Sites' consultation, we asked for your views on a wide range of sites. As part of that consultation we provided the final opportunity to submit further sites for consideration. Through this we received a further 48 sites which have been submitted for consideration as employment or residential allocations. In addition five submissions were made to amend previously considered sites. Following the assessment of the sites two potential residential sites, six potential employment sites and one potential leisure site have been identified as possible allocations.

In order to ensure these sites have been subject to the same level of scrutiny, we are now asking for your views on whether you think these new and amended sites are suitable for development.

Please note we are not seeking comments on those sites which were included as part of Pool of Sites consultation only the additional or amended sites. Neither are we asking for any more new sites.

Following this consultation the Council will prepare the Publication version of the Site Allocations Local Plan which will allocate sites for new housing, employment, leisure and town centre uses to meet the requirements set out in the Adopted Core Strategy. It is anticipated that consultation on the Publication version will take place in summer 2018.

How do I find out further information?

The document and relevant supporting information may be inspected at the following locations:

- Online (www.selby.gov.uk/planselby)
- In person at our customer contact centre (Access Selby, Market Lane, Selby, YO8 4JS) and at the Civic Centre reception desk (Doncaster Road, Selby, YO8 9FT) during normal office hours – see [website](#) for further details
- At Tadcaster, Sherburn in Elmet and Barlby libraries during normal office hours – see [website](#) for further details

If you require any further information about this consultation, please do not hesitate to:

Email us at: localplan@selby.gov.uk

Ring us on: 01757 292034

Officers will also be attending Community Engagements Forums during the consultation period to provide information and answer questions – see [website](#) for further details

How do I respond to this consultation?

All comments must be made in writing (printed copies, email or via the comments form) if they are to be considered. Your comments will be acknowledged either by email or in writing.

Please note that we are only asking for comments on the sites set out in this document. We are not looking for further comments on sites that were the subject of consultation last year.

Please send your response to us in one of the following ways:

- Online using the [response form](#)
- Complete and email the response form to: localplan@selby.gov.uk
- By post to: Planning Policy Team, Selby District Council, Civic Centre, Doncaster Road, Selby, YO8 9FT

You must submit your comments in writing before 5pm on 19th April 2018. We cannot guarantee that comments received after this deadline will be considered.

Following your response, we will add your contact details to our database so that we can keep you informed of progress.

Will my response be kept confidential?

No. Your comments and some of your personal details such as your postal address will be made publically available on our website and cannot be treated as confidential. Where practical, personal identifiers will be redacted and you can ask us to change or in some cases remove these details, but Selby District Council cannot guarantee that all of your details will be removed before they are published.

What are the next steps?

Following the close of the consultation period, we will consider your comments. Your response, alongside ongoing technical work, will inform final decisions to be taken later this year on which sites will be allocated for development in the Publication version of the Site Allocations Local Plan in summer 2018.

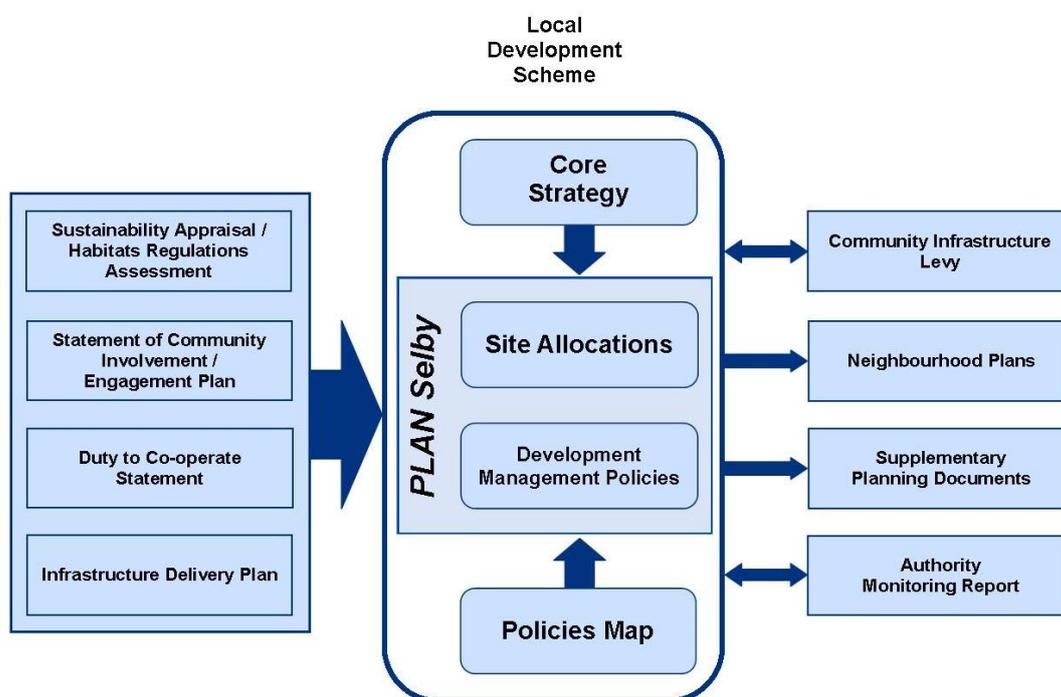
There will be a further opportunity to provide your views on the Publication version of the plan before it is submitted to the government for inspection. At this point, an examination in public will take place. It is anticipated that the plan will be adopted next year.

1. Introduction

Background

- 1.1 The overall planning strategy for Selby District is already in place through the Core Strategy, adopted in October 2013. This provides an overall vision and the strategic policies that broadly direct how much development should take place and where it should be located across the District. We are now looking to add further detail to this approach by identifying and allocating specific sites for future development. This will address the particular issue of exactly where development takes place.
- 1.2 With a Core Strategy in place, the Council recognises that there are two further steps in the Local Plan making process – to identify site allocations and to prepare any necessary updated detailed development management policies. The Council had previously intended to deliver a combined Site Allocations and Development Management Policies Local Plan document. However, in moving forward the Council will progress a Site Allocations Local Plan first, followed by a Development Management Policies Local Plan. These local plan documents which will deliver the strategic policies in the Core Strategy will together form ‘PLAN Selby’.

Figure 1: Local Plan Documents



- 1.3 Allocating sites forms a key part of a planned approach to growth, which gives certainty and confidence to local communities, developers, investors and infrastructure providers. It is for this reason that the Council is now prioritising the preparation of a Site Allocations Local Plan.

Stages of plan preparation

1.4 There have been three previous rounds of consultation, with input from a wide cross-section of local people and organisations.

- Initial Consultation – ‘*delivering the vision*’ (November 2014 – January 2015)
- Focused Engagement – (June – August 2015). Consulted on a variety of evidence base reports and methodologies and discussed with community representatives, developers and businesses the options for developing Selby, Sherburn in Elmet and Tadcaster.

These first two rounds of consultation were on the previously proposed combined site allocations and policies plan.

- Pool of Sites consultation – (October – November 2017). This consultation pulled together and presented all the sites that have been previously submitted to us and asked for views on the suitability of sites and on the key emerging principles that will shape the approach for delivering a Site Allocations Local Plan.

1.5 More information on the previous consultations can be found on our website at www.selby.gov.uk/plan-selby-consultation. The outcome of all the consultations will be taken into account and will help shape the contents of the Site Allocations Local Plan going forward. Comments previously received, which relate to wider development management issues, will be fed into the preparation of the Development Management Policies Local Plan in due course.

1.6 The preparation of Local Plans is set out by Central Government in the Town and Country Planning (Local Plan) England Regulations 2012. All the consultation stages so far are covered by regulation 18.

1.7 The next stage will be the Publication version Site Allocations Local Plan (the pre-Submission draft). The Publication Sites Allocations Local Plan will be prepared over the coming months and will be subject to a Sustainability Appraisal. The Publication version will set out the Council’s proposed site allocations and will be subject to a statutory consultation exercise in summer 2018 before it is submitted to the Secretary of State early next year. An independent Examination in Public should take place next year with adoption programmed for the end of 2019.

Figure 2: Summary of Next Steps



Table 1 - Stages of Plan Preparation

Stage	Regulation	Role	Timescales
Initial Consultation	Regulation 18	Consultation to help identify the scope of the plan and key issues	2014/15
Focussed Engagement	Regulation 18	Further Consultation on emerging evidence base studies, methodologies and Market Town Studies	2015
Pool of Sites Consultation	Regulation 18	Further consultation to obtain views and information on all potential sites and a final opportunity to submit further sites	Oct-Nov 2017
Additional Sites Consultation	Regulation 18	Further consultation to obtain views on additional sites submitted to the Council during the Pool of Sites consultation	March-April 2018
Publication	Regulation 19 Regulation 20	<p>This is the formal, statutory stage of consultation on the draft Site Allocations Local Plan.</p> <p>We will publish what we consider should be the final version of the plan. We will decide on the exact Policy wording we want to use in the plan for the site allocations.</p> <p>Local people and stakeholders will be invited to make formal comments on this plan.</p> <p>A map showing the sites (e.g. housing, employment and retail space) will also be published.</p>	Summer 2018
Submission	Regulation 22	<p>We will submit to the government the plan which we consider to be sound and legally compliant along with any written responses we received at the publication stage.</p> <p>The government will then appoint an inspector to examine whether the plan complies with the law and the tests of soundness set out in government guidance and relevant acts and regulations.</p>	Winter 2018/ 19

Stage	Regulation	Role	Timescales
Examination	Regulation 23 Regulation 24	This stage will involve a series of public hearings where the inspector will invite people to appear and give evidence on the matters and issues he or she wishes to examine. Any changes needed to make the plan sound and legally compliant at this stage are known as main modifications and we must formally request the inspector to recommend these modifications. Such modifications are normally advertised and subject to consultation. ¹	Summer 2019
Inspector's Report	Regulation 25	The government inspector will provide a report to us (which we must publish) with his/her recommendations on whether the plan is sound and legally compliant and can be adopted or recommend any main modifications necessary before adoption.	Autumn 2019
Adoption	Regulation 26	We will consider the inspector's report and can adopt the plan. At adoption stage, we can make additional modifications which do not materially affect the plan policies. The plan will acquire formal legal status as the local plan making up part of the development plan for the District to allow us to give it full weight in making decisions on planning applications (subject to other material considerations).	Winter 2019

¹ The amended section 20(7) of the 2004 Act indicates that the modifications Inspectors can make must be requested by the local planning authority and are limited to the rectification of issues of legal compliance and/or soundness. The amended section 23(3) differentiates between "main modifications", which have to be recommended by the Inspector, and "additional modifications" which do not materially affect the policies of the plan and which can now be made by the local planning authority on adoption without the need to be examined.

Purpose of this consultation

- 1.8 The Pool of Sites consultation, undertaken at the end of last year, provided a final opportunity for members of the public, agents and developers to submit sites for our consideration. The aim of this document is to share how these sites perform against our Site Assessment Methodology, which is described in Section 3, and to test how appropriate they are through consultation. This consultation will help inform decisions going forward for the Publication Version of the Sites Allocations Local Plan later this year, which will include proposed allocations.
- 1.9 Chapter 3 of this document describes the method used to assess all of the sites and the results of the site assessments are summarised for each settlement in Appendix 1. The sites can be found on settlement maps in Appendix 2. The maps also show some major physical and policy constraints, such as flood risk and Green Belt. For clarity the sites which we have already consulted on have also been identified on the maps, to provide context.
- 1.10 All of the sites presented in this document are for consultation purposes only and none are being given any status at this stage.

Duty to Cooperate

- 1.11 The Duty to Cooperate was introduced in 2011 by the Localism Act and places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis with other duty to cooperate bodies to maximise the effectiveness of Local Plan preparation relating to strategic matters. The duty to cooperate applies to strategic issues which have significant impacts affecting two or more local authority areas.
- 1.12 As part of the Duty to Cooperate the Council has already involved and will continue to involve neighbouring planning authorities such as Leeds, York, East Riding of Yorkshire, Doncaster, Harrogate and Wakefield and other key stakeholder organisations including Highways England, NHS Clinic Commissioning Groups (CCGs), the Environment Agency, Historic England, Natural England, the Homes and Communities Agency and Network Rail in the preparation of the plan.
- 1.13 In November 2014, the Council published a [Draft Duty to Cooperate Statement](#) which sets out the potential strategic cross-boundary issues and have been identified in consultation with neighbouring authorities and prescribed bodies and the actions and/or response to these as part of preparing the Local Plan (at the time the combined Sites and Policies Plan).
- 1.14 The Council's participation in cross-boundary planning with its Duty to Cooperate partners is an ongoing process. The Additional Sites consultation provides an opportunity for partner bodies to identify any strategic issues that these sites may raise.

- 1.15 It is intended that the Duty to Cooperate Statement will be published again at Publication stage and will ultimately provide a log of actions to provide a full account of the collaborative working that has been undertaken. The Statement will then be submitted to the Secretary of State alongside the submission draft Site Allocations Local Plan.

2. What development do we require and where will it go?

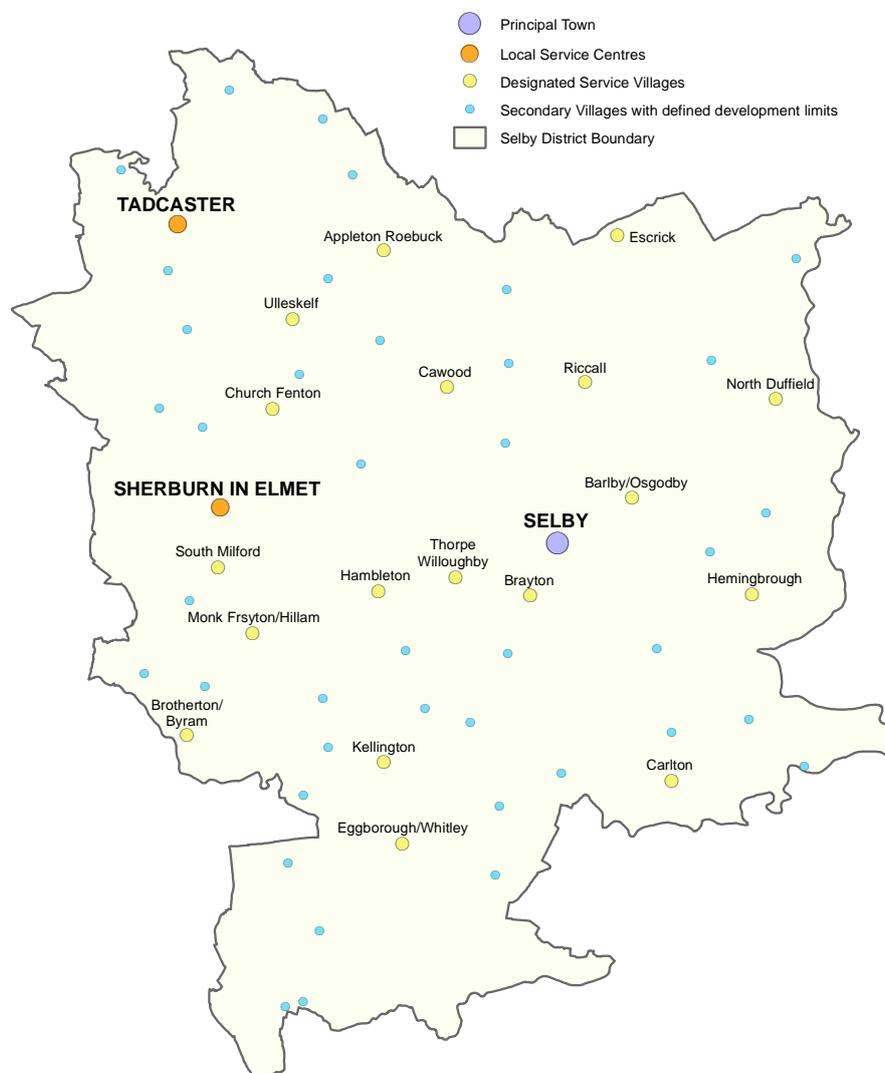
How much new development do we require?

- 2.1 The Core Strategy Local Plan for Selby District was adopted in 2013 (based on 2011 figures) and sets out a vision, spatial strategy and broad strategic policies for the District in the period to 2027. The Core Strategy shows how much development is needed, as a minimum, to meet the needs of local communities and businesses.
- 2.2 Specific evidence based studies have helped to re-assess our development needs and ensure that the Core Strategy requirements remain appropriate. Key assessments include:
- A [Strategic Housing Market Assessment Study](#) was completed in 2015 which established a need for 431 new homes per year in Selby District – a very similar level of requirement to the Core Strategy. An update to this document is currently being undertaken.
 - An [Employment Land Review 2015](#) has identified a range of 14-60 hectares - as an employment land requirement taking into account market factors, constraints on existing sites and other trends. An update to this document is currently being undertaken.
 - The [Retail and Leisure Study](#) was published in 2015 and sets out the need for a new food-store in Tadcaster (about 1,000 square metres net) and additional non-food retail in Selby town (about 4,700 square metres gross) as well as the potential to deliver new leisure provision.
 - The [Traveller Needs Assessment \(2016\)](#) concluded that land should be identified and allocated to accommodate sufficient pitches to meet the need for Gypsies and Travellers over the next five years, along with identifying a broad location for growth for the remainder of the plan period. An update to this document is currently being undertaken.
- 2.3 In summary, the minimum scale of development that we need to plan for between 2011 and 2027 is:
- At least 7,200 homes which is 450 per year (*Core Strategy*)
 - 37-52 hectares of employment land (*Core Strategy*)
 - 4,700 square metres gross of non-food retail plus potential for leisure floorspace in Selby town (*Retail and Leisure Study*)
 - A new foodstore in Tadcaster (about 1,000 square metres net) (*Retail and Leisure Study*)
 - 3 additional Gypsy and Traveller pitches (*Traveller Needs Assessment*)

Where will it go?

- 2.4 As well as setting out how much development is needed, the Core Strategy sets out an approach to distributing development across the District. This approach is based on a 'Settlement Hierarchy', which is illustrated in Figure 3. In the hierarchy, Selby is identified as the Principal Town and the focus for new housing, employment, retail, commercial and leisure facilities. The Local Service Centres of Sherburn in Elmet and Tadcaster are designated as locations where further housing, employment, retail, commercial and leisure growth will take place appropriate to the size and role of each settlement. The Designated Service Villages are given some scope for additional residential and small-scale employment growth to support rural sustainability and in the case of Barlby/Osgodby, Brayton and Thorpe Willoughby, to complement growth in the Principal Town of Selby. The Core Strategy specifies that no allocations are proposed in the Secondary Villages.

Figure 3: Map of the Settlement Hierarchy



Housing

- 2.5 The Core Strategy distributes housing development between the towns and villages and states that the following minimum figures should be provided over the plan period (to 2027).

Table 2: Core Strategy minimum housing targets

Location	Number of dwellings
Selby	3,700
Sherburn in Elmet	790
Tadcaster	500
Designated Service Villages	2,000
Secondary Villages	170 (existing planning permissions)

- 2.6 The Site Allocations Local Plan must allocate enough land for housing to meet the minimum housing targets in the Core Strategy and to assist in maintaining a five year supply of housing throughout the plan period. However, as discussed in detail in the [Pool of Sites consultation document](#), Sherburn in Elmet and collectively the Designated Service Villages already have sufficient housing completions and deliverable planning permissions to exceed their minimum targets. As such, there is no apparent need to identify any additional new sites there (over and above existing planning permissions), subject to an agreed approach on providing a ‘contingency’ of housing sites.
- 2.7 The evidence therefore points to only having to find new housing sites in Selby and Tadcaster in the draft Site Allocations Local Plan and this approach has been taken when assessing the additional sites. However this will be informed by the responses to the Pool of Sites Consultation and comments on the issue of contingency.
- 2.8 As part of the Pool of Sites consultation we asked for views on whether we should provide a ‘contingency element’ by over allocating land beyond the minimum housing targets of the Core Strategy. The Council’s preferred approach will be formulated, taking account of the comments we have received, and presented for consultation in our Publication version of the Sites Allocations Local Plan later this year.

Gypsies & Travellers

- 2.9 The latest evidence for the district is provided by a [Traveller Needs Assessment](#) (TNA), which was undertaken in 2016. This is currently being updated, but the existing evidence indicates that we need to plan for only three additional pitches in the next five years.

Employment

- 2.10 Core Strategy Policy SP13 sets out a requirement for between 37-52 hectares of employment land, to provide a range of high quality employment and office sites. The Council's [2015 Employment Land Review](#) (ELR) suggested between 13.97 hectares and 59.99 hectares is an appropriate range, which is broadly similar to the range identified by the Core Strategy. The ELR is currently subject to a review and an update will be published, later this year, to sit alongside the Publication version of the Sites Allocations Local Plan.
- 2.11 The Core Strategy indicates that employment development should be distributed as follows (Figure 12 of the Core Strategy):

Table 3: Core Strategy indicative employment land distribution

Location	Area
Selby and Hinterland	22-27 ha
Tadcaster	5-10 ha
Sherburn in Elmet	5-10 ha
Rural areas (including Eggborough and the A19 corridor)	5 ha
Total	37-52 ha

- 2.12 The evidence suggests that the Site Allocations Local Plan should allocate enough land across the District to meet the upper end of the range identified by the Core Strategy. Consideration will also be given to allocating a “contingency element”, to ensure that there is more choice and flexibility in employment land provision during the plan period.
- 2.13 The Olympia Park Strategic Development Site is already allocated in the adopted Core Strategy and is set to provide around 23 hectares of employment land up to 2027. It is proposed that this site along with other smaller sites will be allocated to meet the needs identified by the Core Strategy. It is however recognised that there is already an existing large scale planning permission at Sherburn in Elmet (at a site known as S2) and that the Council has recently been minded to approve the redevelopment of the former Kellingley Colliery site (subject to the signing of a S106 agreement). There may be other sites that come forward outside of the Local Plan process which will be similarly dealt with on a case-by-case basis.

Town Centre & Retail Uses

- 2.14 The Council consulted on a [Retail and Leisure Study](#) in 2015. The study identified a need to plan for enhanced retail and town centre uses in Selby town, specifically to accommodate up to 4,700 square metres gross of non-food retail, plus investigate commercial potential for leisure floorspace in

Selby town. In Tadcaster, the study identified the need for a new foodstore (about 1,000 square metres net). The study did not identify any needs in any other settlements.

- 2.15 In allocating sites for town centre uses in Selby and Tadcaster, the sequential test must be rigorously applied to ensure that any proposals do not have a negative impact on the vitality and viability of the existing centres.

3. Additional Sites

Where have the additional sites come from?

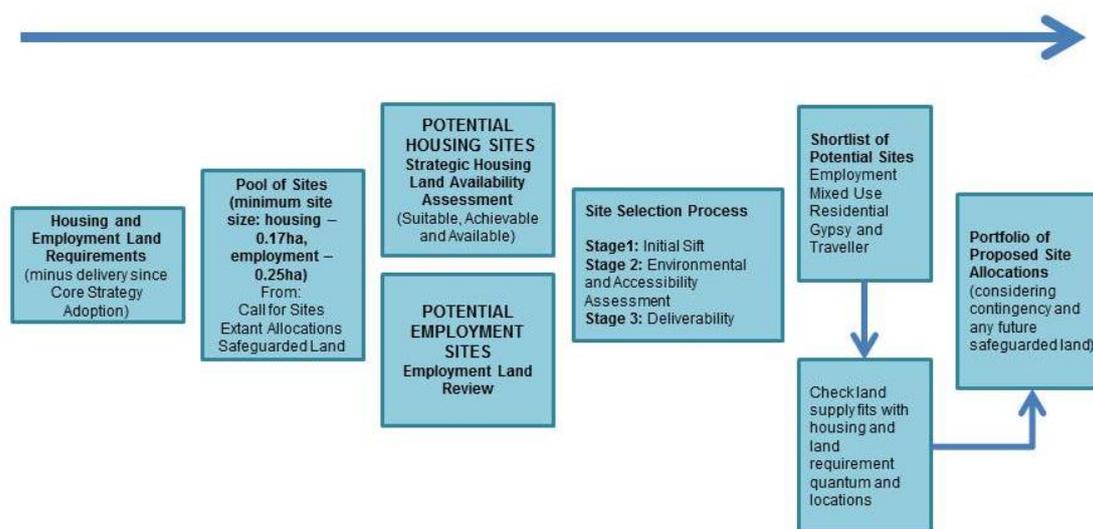
- 3.1 The Council has encouraged landowners, agents and other organisations to submit sites so that their land can be considered for allocation in the Local Plan. The majority of these sites were assessed and consulted upon last year as part of the 'Pool of Sites' consultation. The 'Pool of Sites' consultation also provided the final opportunity for sites to be submitted and an additional 48 sites were submitted at this stage. In addition, amendments were made to 5 sites which were included in the Pool of Sites Consultation.
- 3.2 The 53 additional sites have been assessed in the same ways as those which were set out in the Pool of Sites Consultation. This chapter describes the method used to assess these additional sites.

Site Assessment Methodology

- 3.3 Our approach to assessing sites reflects national and local priorities, through a [Site Assessment Methodology \(SAM\)](#). This document was initially prepared by planning consultants ARUP and was then subject to an 8 weeks public consultation as part of the focussed engagement exercise which took place during summer 2015. The methodology was also consulted upon as part of the 'Pool of Sites' consultation last year and the document will be amended to take account of comments received during the public consultation exercises.
- 3.4 The way sites are assessed in the SAM involves a three stage process. The first stage involves an initial sift of sites; sites are considered against fundamental constraints, both in physical terms and policy terms. These are:
- Minimum site size (0.17 hectares for housing, 0.25 hectares for employment)
 - Sites proximity to a settlement in the Core Strategy hierarchy
 - Flood risk (3b)
 - International and national environmental designations (SPA/SAC/SSSI/RAMSAR)
 - Ancient Woodland
 - Health and Safety Executive Zones (inner zones)
- 3.5 If a site has one or more of these fundamental constraints and can't be mitigated, then a site fails the initial sift and is assessed in no more detail. Sites which have none of these constraints go on to be assessed in stage 2.
- 3.6 The second stage involves environmental and accessibility assessments. Sites have been assessed to determine their sustainability, for example their proximity to local services and employment, infrastructure constraints and various other factors. This stage also considers environmental, social and economic criteria. There are 27 questions in total and this is where the bulk of information on a site is gathered and assessed.

- 3.7 The final question in stage 2 of the assessment determines whether a site promoted for housing is needed to meet that settlement's minimum housing target. For example, and as described in Chapter 2 of this document, Sherburn in Elmet and the Designated Service Villages have already met their minimum housing targets – so the approach we are taking is that allocated residential sites in these settlements are unlikely to be required.
- 3.8 The third stage involves an assessment of a site's availability and viability in order to determine its deliverability. Determining a site's deliverability is crucial because if a site is not deliverable within the plan period to 2027, it cannot provide the housing or employment development that the District needs. Specific factors involved are ownership, existing land uses, market attractiveness and financial viability. If a site has a deliverability issue which cannot be mitigated, then it has been classed undeliverable and won't be allocated for development.
- 3.9 The site selection processes are explained in full detail in the SAM document. Figure 4 below shows a flow diagram of the process.

Figure 4: Site Assessment Methodology Summary Diagram



Results of Site Assessments

- 3.10 A total of 53 sites are outlined in this document, these sites comprise 48 new sites and five sites which have had significant changes to their boundaries.
- Of the 53 sites that have been assessed:
- 20 sites have been discounted – these sites do not pass the first sieve stage of the SAM, which leaves 33 sites remaining.
 - A further 24 sites are located in settlements which have already met their minimum housing targets (as set out in Core Strategy policy SP5).
 - The maps identify two potential residential sites, six sites as potential employment sites and one potential leisure site.

- 3.11 The full list of the 53 sites and their outcomes after applying the Site Assessment Methodology is provided at the front of Appendix 1. The summary results of the site assessments are provided in the schedules, in settlement order in Appendix 1. The sites can be found on the settlement maps in Appendix 2 using its reference number. The maps also show some major physical and policy constraints, such as flood risk and Green Belt.
- 3.12 The settlement summaries in Appendix 1 are colour coded to show their status in the SAM process:
- **Red:** Failed the initial sift – the site has a fundamental constraint according to Stage 1 of the SAM
 - **Yellow:** Residential may not be required – this applies to sites submitted for housing in a settlement that has met its Core Strategy minimum target
 - **Blue:** Permission – site has an extant planning permission, as of the 31 March 2017
 - **Green:** Potential site – sites that are not subject to one of the three factors described above and remain as options to consider as potential new allocations in those areas of the district where allocations are required
- 3.13 The sites on the maps are colour coded by their land use type (Residential / Employment / Mixed Use etc.) and are also classified as one of the four categories the site falls into after the SAM process described in paragraphs 3.3 to 3.9 above. Please note the appendices show the status of all sites at the Pool of Sites consultation for consistency, any subsequent planning permissions will be identified in the Sites Allocations Local Plan.
- 3.14 All of the sites presented within this document are for consultation purposes only. The fact that a site has been included within this document as a potential allocation is no guarantee that it will eventually become an allocation as part of the final adopted document. Conversely, although sites may have been discounted at this stage it does not rule out their further consideration following consultation. Inclusion of a site in the previous Pool of Sites or 'Additional Sites' documents is not a material consideration for development management decisions. The Council has not made any decisions yet on any site allocations. This will come with the Publication version of the Sites Allocations Local Plan stage later this year.

Strategic Environmental Assessment / Sustainability Appraisal / Appropriate Assessment

- 3.15 Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are both statutory requirements of plan making and are very closely linked. SA aims to integrate sustainability issues into decision making by appraising the plan or strategy using environmental, social and economic objectives. SEA also aims to facilitate sustainable development but its emphasis is on integrating environmental issues. It is possible to satisfy the requirements of both pieces of legislation through a single appraisal process.
- 3.16 At the Initial Consultation stage for the sites and policies plan, a scoping was undertaken for the SEA/SA and a baseline position established. Because the

Initial Consultation did not set out any specific proposals, the Sustainability Appraisal Report which accompanied that consultation simply sets out a methodology for the next stages. More detail on the process is contained in the [Sustainability Appraisal](#) which accompanies PLAN Selby.

- 3.17 The Appropriate Assessment, also known as the Habitats Regulations Assessment (HRA), is a separate regulatory requirement. Its main purpose is to ensure that the plan will not result in an adverse effect on the integrity of a 'European Designated Site'. These designated sites are internationally important for nature conservation and wildlife and are sometimes also referred to as Natura2000 sites.
- 3.18 At the Initial Consultation stage, the Council developed the methodology to allow the first stage ('screening') to happen which would identify if a more thorough 'appropriate assessment' is required. More detail on the HRA process may be found in the [separate document](#) that accompanies PLAN Selby.
- 3.19 The Site Assessment Methodology (SAM) for the emerging Site Allocations Local Plan has integrated the Sustainability Appraisal (SA) process by considering the SA framework as part of the site selection criteria. This approach ensures that the SA of individual sites is built into the site selection process.
- 3.20 At this stage, we are not identifying which sites will be proposed for allocation. Following this further consultation exercise and analysis of the comments received, and subject to further technical work, a Publication version of the Sites Allocations Local Plan will be prepared which will set out the Council's proposed sites for allocation. This will be subject to Sustainability Appraisal, and a draft final sustainability report will be published, which will be submitted to the Secretary of State alongside the Submission plan.
- 3.21 The 'Additional Sites' subject to this consultation have been subject to screening as part of the updated [Habitats Regulations Assessment](#). Overall this assessment has found that none of the individual allocations would result in a 'likely significant effect' alone. Further work will be undertaken on the HRA, following identification of preferred sites, and this work will include an assessment of the cumulative impact of proposed allocations.