

Draft Site Assessment and Selection Methodology

East Riding of Yorkshire Council

Version 1 (July 2026)

[BLANK PAGE]

Contents

Introduction.....	5
Policy Context.....	6
Process Overview.....	9
Stage 1: Identifying Sites	13
Stage 2: Assessing Sites	14
Stage 3: Determining the Draft Allocations	55
Stage 4: Confirming the draft allocations and recording our decisions.....	65

Factors

Factor 1: Areas of particular importance for biodiversity	17
Factor 2: Nationally important landscapes.....	19
Factor 3: Local green space.....	20
Factor 4: Designated heritage assets	21
Factor 5: Coastal change.....	23
Factor 6: Functional floodplain.....	24
Factor 7: Health and safety zones	25
Factor 8: Agricultural land quality	30
Factor 9: Mineral safeguarding.....	31
Factor 10: Groundwater source protection zones	33
Factor 11: Compatibility with neighbouring uses	35
Factor 12: Open space	38
Factor 13: Landscape sensitivity.....	40
Factor 14: Access to the highway network.....	42
Factor 15: Biodiversity value	43
Factor 16: Ownership	46
Factor 17: Existing users, tenancies and covenants	48
Factor 18: Likely market attractiveness	51
Factor 19: Viability	53
Factor 20: Spatial strategy/vision	56
Factor 21: Flood risk sequential test	56
Factor 22: Town centre sequential test.....	57
Factor 23: Accessibility	57
Factor 24: Current infrastructure position	58

Factor 25: On-site infrastructure constraints	59
Factor 26: Supporting nature recovery	59
Factor 27: Habitat regulations	60
Factor 28: Blue-Green infrastructure.....	60
Factor 29: Previously developed land.....	61
Factor 30: Remediating contaminated land.....	61
Factor 31: Historic environment.....	62
Factor 32: Issues and opportunities	62
Factor 33: Compatibility with neighbourhood plans.....	63
Factor 34: Air quality	63

Introduction

This document sets out the process that we will follow to assess and compare the development potential of various sites across the authority area. This will help us to determine, together with the views expressed through consultation stages, a preferred list of sites for allocation in the next local plan. There are three key **objectives** for this document:

- To set out the process we will undertake to assess the **availability of land** (to help with the plan making process vision, etc.);
- To set out the process for assessing the **suitability, availability and achievability** of sites (as per the national plan-making guidance); and
- To set out the process for **selecting sites for allocation** that align with the emerging local plan's vision and objectives

This document sets out the **factors** that will be considered in the assessment and selection process. For some factors, such as those relating the spatial strategy of the emerging local plan, we have limited details at this time. As such, we will keep this methodology under review and update it to reflect the emerging plan's vision and strategy, as well as respond to any new pieces of evidence where appropriate.

The methodology is guided by a number of principles that will allow us to prepare a plan that will be found 'sound' when it is examined by a planning inspector. These **guiding principles** are that the approach taken in the methodology should:

- Align with the objectives and requirements of the NPPF;
- Align with the objectives and requirements of the emerging Local Plan; and
- Help meet the requirements of the environmental assessment regulations in respect of sites.

Version

Version No.	Date	Changes
1	July 2026	Draft for public consultation [this document]

Policy Context

National Planning Policy Framework (NPPF)

Both the current National Planning Policy Framework (NPPF) and revised draft NPPF (2025) require local planning authorities to make sufficient provision for homes, employment, retail, leisure and other commercial development. Sufficient provision should also be made for infrastructure and community facilities, and allow for the conservation and enhancement of the natural, built and historic environment.

Plans must do this within the framework of delivering sustainable development, guided by three overarching objectives:

- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

To deliver the development needed, and to ensure that it is sustainable, it is important to set out a clear, consistent and robust methodology from which to select the most appropriate site options. Ultimately, a local plan and the allocations within must be tested at an examination and, for it to be sound. It will need to satisfy tests based on the following:

- Positive;
- Appropriate;
- Realistic;
- Consistent; and
- Conformity.

Plan Making Guidance

The Government has published guidance on [identifying, assessing and selecting sites](#). This is the key guidance around which this assessment and selection methodology has been prepared. The Government regards this guidance as an essential part of preparing a local plan to help meet the expectations of national policy. The guidance focuses on:

- a framework and supporting methodologies for identifying sites
- what data to collect during the call for sites process
- how to assess sites we have identified

- an approach to selecting the sites that meet our plan vision
- documenting our decision making on why we selected these sites

According to the guidance, the site selection process consists of four stages:

- Stage 1 – identifying sites
- Stage 2 – assessing sites
- Stage 3 – determining your draft allocations
- Stage 4 – confirming your draft allocations and recording your decisions

The intention of the guidance is to provide a consistent framework for local planning authorities to work with, though the Government recognises that no two areas are the same. As such, it is flexible enough to account for local circumstances and can be adapted to individual needs.

These stages form the basis for the approach we will take in the East Riding of Yorkshire. Where we have deviated from the framework, or added a more local dimension, we have set this out.

Environmental assessment (SEA)

Proposed plans, policies and strategies must be tested using a systematic, high-level process to evaluate their potential environmental effects before being approved. This is usually carried out through the process of Strategic Environmental Assessment (SEA). Under the new planning system, the Government is intending to replace SEA and Environmental Impact Assessment (EIA) with Environmental Outcomes Reports (EORs). We will respond accordingly to any new regulations and guidance.

At the time of writing, the [Environmental Assessment of Plans and Programmes Regulations 2004](#) (Strategic Environmental Assessment (SEA) Regulations) applies to qualifying plans and programmes. The SEA Regulations require us to:

- assess the likely significant environmental effects of our local plan and reasonable alternatives to that local plan
- consult on an environmental report containing that assessment
- when adopting the plan, explain how the SEA process influenced the plan

For those elements of the assessment and selection process detailed below, we have highlighted where we consider this to be an important factor for undertaking an environmental assessment. We will prepare a separate environmental report that cover the environmental assessment, but the factors highlighted through this methodology will allow us to more effectively record:

- the likely significant environmental effects of our preferred site selection;
- alternatives to the preferred sites, and the likely significant environmental effects of those alternatives; and
- how we have used the information to inform the preferred spatial strategy and site selection.

Spatial Development Strategy

The White Paper on English Devolution Framework is proposing that mayoral combined authorities, such as Hull and East Yorkshire be given expanded strategic planning powers including a responsibility to prepare a Spatial Development Strategy (SDS).

An SDS should set out high-level policies for how land should be used across a wider area than a single local authority, focusing on major issues such as housing, infrastructure, economic growth, climate resilience, and environmental priorities. Whilst it would not allocate specific sites, it would set out broad locations and establish a spatial strategy to direct development to different areas.

At the time of writing, the Hull and East Yorkshire Combined Authority does not have powers to prepare an SDS. As such, there is no spatial policy context for the Hull and East Yorkshire area within which this methodology needs to operate. However, this may change in the future and the strategy taken will need to be reflected in this methodology.

Process Overview

This methodology adopts the broad four-stage approach outlined in national plan making guidance. It has been developed to provide transparency and consistency, whilst also allowing for site-specific circumstances and to be understood as well as the potential benefits of proposals.

We believe it will ensure that the preferred sites identified at the end of the process will help to meet the expectations of national policy.

Stages

The four stages set out in Government guidance have been incorporated into this methodology. A brief overview is provided below (and in Figure 1) with more details set out in the following chapters.

Stage 1: Identify Sites

The first part of the process is to identify the sites we will take through the assessment and selection process. Sites may be identified from a range of sources.

Stage 2: Assess Sites

Sites must then be assessed on the basis of their suitability, availability and achievability. Prior to this, an initial filter that covers some of these characteristics, will be applied to help screen out sites that are obviously unsuitable. To do this assessment, a series of **factors** are set out, based around different themes that seek to identify any constraints or issues that would affect the development of the site. Grading against the factors is on the basis of RAG-ratings – that is, providing a Red (R), Amber (A) or Green (G) ‘score’ for each factor.

The final step in this stage is to determine the development potential of those assessed sites.

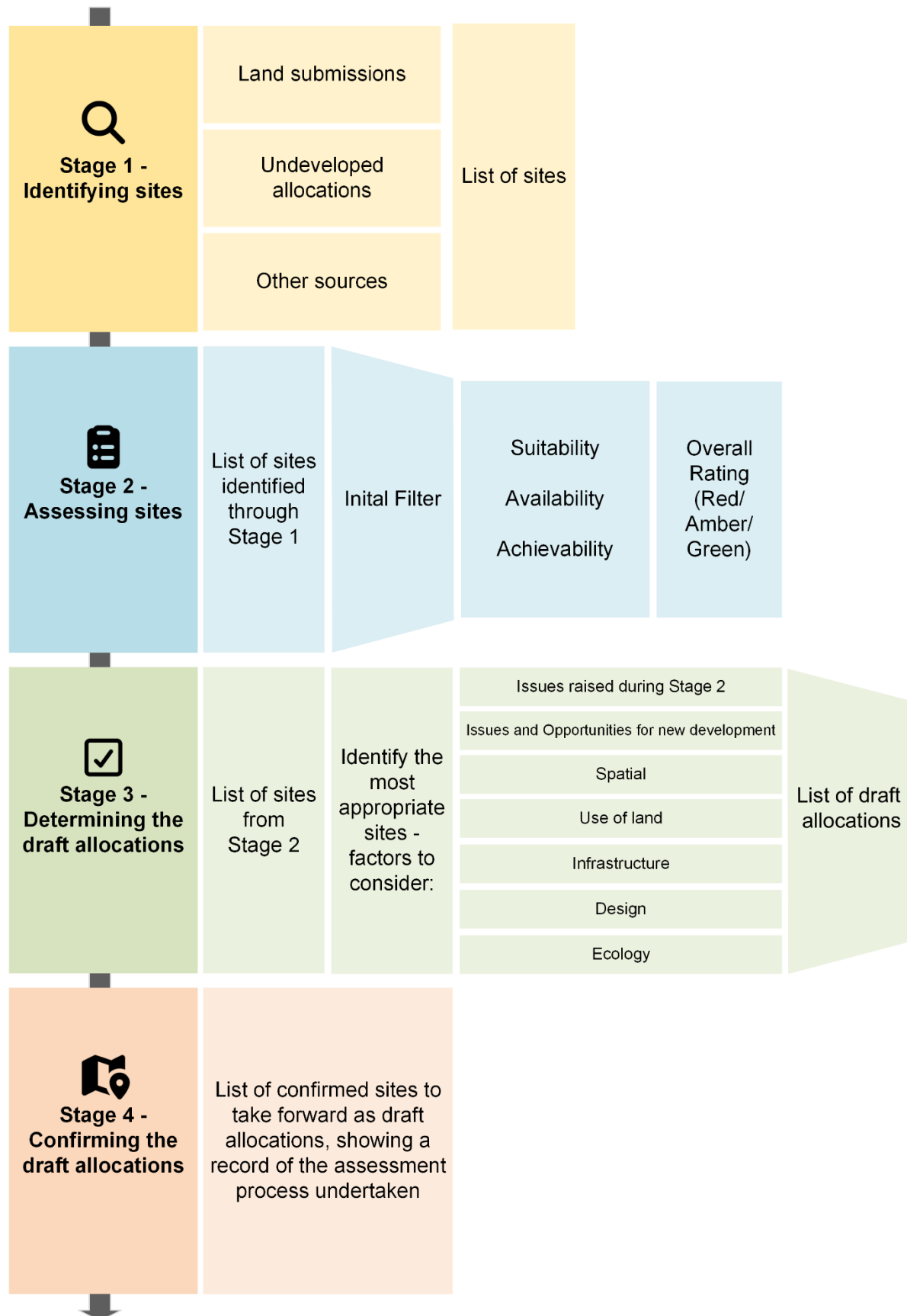
Stage 3: Determine Draft Allocations

The purpose of stage 3 is to identify, from the list collated in stage 2, the most appropriate sites for allocating in the emerging local plan. Stage 3 will involve a degree of planning judgement to help identify the most appropriate sites for allocating, giving consideration to any issues raised in stage 2. It will also involve having regard to a range of additional factors principally covering compliance with planning policy (e.g. the sequential test for flood risk planning) and identifying issues and opportunities that new development may address.

Stage 4: Confirming the draft allocations and recording our decisions

Stage 4 is where we confirm the sites to take forward as the draft site allocations in the plan. It is the output and record of the assessment process we have undertaken. This document is critical to Stage 4 as it sets out the methodology we will have applied. We will record the outputs of the assessment on our website.

Figure 1: Overview of the Site Assessment and Selection process



Uses

This methodology will, in most instances, be suitable for assessing and selecting sites for all different uses. Previously, we have allocated or safeguarded land for the following uses:

- Housing
- Employment (warehouses, offices, factories)
- Retail
- Transport infrastructure
- Flood risk management infrastructure
- Education
- Mixed Use
- Utilities
- Open Space

It is likely that the new local plan will look to allocate much of the same uses again though the need to allocate sites will be informed by various assessments of need (e.g. through an employment land assessment or town centres study). These needs assessments will be progressed at the same time as the site assessment process is undertaken so that, should there be an identified need for a particular use, we will have assessed and identified the most appropriate sites for allocating.

We already have a broad idea of the amount of housing that will be needed in the local plan from applying the Government's standard method for calculating local housing need.

In addition to the above, and to reflect the scope of the new local plan, we will also be looking to allocate sites in respect of:

- Minerals
- Waste management

Evidence

To undertake the site assessment and selection process, we plan to use a wide range of evidence from an array of sources. These include:

- Evidence specifically prepared for the local plan and to support planning decisions (e.g. strategic flood risk assessment, landscape character assessment, infrastructure delivery plan);
- Strategies, assessments and studies published by key stakeholders (e.g. different departments within the council, Local Nature Recovery Strategy, Catchment Flood Management Plans, Local Transport Plan);
- Information from site surveys and visits;
- Documentation submitted by those promoting sites for assessment; and
- Where appropriate, information gained through discussions with those promoting sites, any relevant consultee (e.g. Natural England) and the local community.

Evidence submitted by those promoting land is available on our [call for sites map](#). Other evidence will be in the public domain, and we will seek to draw it all together in our [Local Plan Library](#).

Assessments will take account of the best available information. The key sources of evidence that will be used to appraise sites are highlighted within the guidance notes for each factor. New or updated sources of information that become available following the publication of this methodology will be taken into account. This may include additional information that mitigates a negative effect.

Future Revisions

This assessment and selection methodology has been prepared prior to undertaking the main activities required for plan making. It reflects a certain position in time and responds to the evidence, policy framework and understanding at the time of writing. As the plan making process progresses, revisions to the assessment and selection approach may be necessary. This methodology has been prepared in advance of any consultation on the new local plan. It will need to evolve as a plan vision emerges, and the spatial priorities and strategy will need to be embedded into the process. We anticipate, for example, that Stage 3 (see below) will require further refinement as more is known on the likely spatial strategy within the new local plan. This may be through an SDS for Hull and East Riding or through the work being prepared solely for the emerging East Riding Local Plan.

Stage 1: Identifying Sites

The first stage is to identify potential sites for further assessment from a variety of sources. At this stage we do not need to consider any constraints on land or development.

Output of this Stage

- A list of sites with potential for development in our area that will be assessed in stage 2

Potential Sources of Sites

In line with the plan making guidance, we will consider a wide number of sources to identify sites, including the following:

- Land submissions (call for sites)
- allocations in current local and neighbourhood plans
- the brownfield land register
- planning applications (permissions and previous refusals)
- pre-application submissions (in agreement with developers)
- current or previous land availability assessments
- land owned by the local authority and other public bodies
- new or previous capacity or intensification assessments
- vacant and derelict land and buildings
- land in alternative use that may be suitable for re-development, such as commercial buildings or car parks
- opportunities to intensify uses or redevelop areas (particularly in urban areas)
- opportunities to extend existing settlements

All of the above will be considered but the potential of some sources is likely to be of limited value in the East Riding. **By far the largest source of site options will be come from the call for sites exercises.**

Call for Sites

A [call for sites](#) is an information gathering exercise which helps us to understand what land is potentially available for development in the area to meet future needs. It is principally aimed at landowners, developers, housebuilders and other stakeholders to submit land for consideration in preparing a new local plan.

The call for sites process is an effective way of finding new sites for potential development that may currently be in an alternative use. The process has been developed using an online submission form which captures a range of information that will allow the assessment to take place. The information provides a good indication about the deliverability of specific sites by recording information about landowner aspirations.

Stage 2: Assessing Sites

Stage 2 comprises the main assessment of the sites identified from Stage 1. The aims of this stage are to:

- Filter out any sites obviously unsuitable for development
- Assess each site for their suitability, availability and achievability for development
- Estimate the development potential of sites
- Score/rate each site
- Determine the deliverability or developability of sites proposed for housing use

Output of this Stage

After undertaking this stage, we will have a list of sites with the following information as a minimum:

- Site name or reference
- Land use (existing and proposed)
- Site location
- Site size
- Site categorisation
- The site's development potential - how much could be built on each site
- When it might come forward for development
- A list of constraints to overcome
- Any potential mitigations for the constraints
- Individual RAG ratings (red, amber, green) for suitability, availability and achievability
- Overall RAG rating (red, amber, green)
- Justifications for overall rating
- For sites proposed for housing use, is the site considered deliverable or developable?
- Indication of which sites are to be taken forward to Stage 3 and which ones are not, and the reasons why

Size Threshold

To make the assessment and selection process manageable, we have selected a site threshold 0.25 Ha for proposed housing sites, and 500+ sqm of floorspace if proposed for other uses such as employment or retail.

As part of the local plan making process we will also be undertaking a review of each settlement's development limits (sometimes referred to as settlement boundaries). For some of the sites that are under the threshold, they may be suitable to be incorporated into a revised development limit. We will set out our approach to reviewing developments limits in a separate paper as we advance further with the preparation of the new local plan.

Summary of Assessment

Step	Factor	Description
Initial Filter	1	Areas of particular importance for biodiversity
	2	Nationally important landscapes
	3	Local green space
	4	Designated heritage assets
	5	Coastal change
	6	Functional floodplain
	7	Health and safety zones
Suitability	8	Agricultural land quality
	9	Mineral safeguarding
	10	Groundwater source protection zones
	11	Compatibility with neighbouring uses
	12	Open space
	13	Landscape sensitivity
	14	Access to the highway network
	15	Biodiversity value
Availability	16	Ownership
	17	Existing users, tenancies and covenants
Achievability	18	Likely market attractiveness
	19	Viability
Determining draft allocations	20	Spatial strategy/vision
	21	Flood risk sequential test
	22	Town centre sequential test
	23	Accessibility
	24	Current infrastructure position
	25	On-site infrastructure constraints
	26	Supporting nature recovery
	27	Habitat regulations
	28	Blue-Green infrastructure
	29	Previously developed land
	30	Remediating contaminated land
	31	Historic environment
	32	Issues and opportunities
	33	Compatibility with neighbourhood plans
	34	Air quality

Initial Filter: Unsuitable Sites

The first assessment task is an initial ‘sift’ of the identified sites. This is to rule out sites where constraints are so significant they are likely to make a site unsuitable for development, and where further detailed assessment of the site’s suitability would not be required.

The Government’s [plan making guidance](#) identifies some example constraints that could help filter out unsuitable sites. These will form part of our initial filter, together with a number of other elements identified in the NPPF. One exception we will make to the examples provided in the guidance is the use of Flood Zone 3a as an initial filter. We do not think that it is appropriate at this stage to use such a constraint to filter out sites from further assessment. The nature of flood risk and development in the East Riding demands a more considered approach that is best undertaken in later stages of the assessment and selection process. It will allow us to more sensibly apply the sequential test rather than a binary in/out or a RAG rating (red, amber, green).

As such, we will use the following Factors to perform the initial filter:

Factor 1: Areas of Particular Importance for Biodiversity

Factor 2: Nationally important landscapes

Factor 3: Local Green Space

Factor 4: Principal Heritage Assets

Factor 5: Coastal Change

Factor 6: Functional floodplain

Factor 7: Health and Safety Executive

There are no detailed emergency planning zones or public safety zones in the East Riding.

For each factor, there may not be sufficient evidence at the time of assessment to make definitive conclusions. Therefore, an “Assess” rating will be provided to sites where there is insufficient information to determine whether a “Pass” or “Fail” outcome can be immediately awarded. Sites provided with an “Assess” rating will proceed to the next steps but more information will need to be considered at further stages in the assessment or selection process.

Following this initial filter, sites will be able to progress to the next step.

Factor 1: Areas of particular importance for biodiversity

Would development cause a significant adverse effect on an identified Area of Particular Importance for Biodiversity (APIB)?

Approach to site assessment for all uses:

Pass	Assess	Fail
No loss, fragmentation, impact or further isolation of an APIB or record of protected species and habitats on site	Some loss, fragmentation or isolation of an APIB and/or potential minor impacts of a legally protected species and habitats And/Or Site is within an area that may be functionally linked land	Substantial loss, fragmentation or isolation of an APIB and/or potential major impacts of a legally protected species and habitats Site should not be assessed further
Key Source(s): • Hull and East Yorkshire Local Nature Recovery Strategy • Natural England MAGIC online map • North and East Yorkshire Ecological Data Centre records • National Biodiversity Network Atlas • East Riding Local Plan Update – Habitat Regulations Assessment		
This Factor will inform the new plan's environmental assessment		

Planning decisions must take account of Local Nature Recover Strategies (LRNS), which are a key component of the Environment Act (2021). Each LNRS should identify locations to improve nature and provide other environmental benefits, such as carbon sequestration, flood regulation, and access to nature-rich spaces. These strategies will complement one another to restore, create and connect habitats across England following the principles of spaces for nature being “bigger, better and more joined up”. LRNSs will link with Biodiversity Net Gain, which is the planning requirement to ensure habitat for wildlife is in a better state than it was before development.

Areas of Particular Importance for Biodiversity (APIB) are identified in the LNRS for Hull and East Yorkshire. These include national and internationally designated sites, as well as identified habitats that are irreplaceable. Irreplaceable habitats include ancient woodlands and other habitats included in the [Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#).

As such, APIBs include:

- Irreplaceable habitats (incl. ancient woodland, coastal saltmarsh, lowland fen, chalk rivers)

- Special Protection Areas (SPAs)
- Special Areas of Conservation (SACs)
- Ramsar wetland sites
- National Nature Reserves (NNR)
- Sites of Special Scientific Interest (SSSIs)
- Local Nature Reserves (LNR)
- Local Wildlife Sites (LWS)

A Green rating will be given where sites do not intersect an APIB and/or development would not result in any loss, fragmentation or further isolation of the ecological feature. There should also be an absence of protected species or habitats. Where minor loss, fragmentation or further isolation occurs, an Amber rating may be provided where the impact is minor and effective mitigation has been identified. However, due to the importance of these features, it is likely that negative impact would attract a Red rating given the overall approach to minimise impact wherever possible rather than mitigate or compensate for harmful effects.

Evidence from those promoting the site may be required to support the submission through the assessment and Habitats Regulations process.

An Amber rating may also be provided where there is insufficient evidence to make a judgment, where the development of a site is likely to jeopardise any future connectivity between two features, and/or where the site is likely to be located within ‘functionally linked land’.

The term ‘functionally linked land’ refers to terrestrial land that is not designated as part of the Special Protection Area (SPA)/ Ramsar site but used by significant numbers of featured species (mostly birds) for feeding and resting. Therefore, any potential impacts on this land needs to be considered under the Habitats Regulations. For the purposes of this step in the assessment, the following criteria will be used to help identify if a site is potentially functionally linked:

- The site is greater than 2 hectares as a site or as part of a wider plot, field or open area within 2km of any part of the designated sites; or
- The site is greater than 5 hectares as a site part or as part of a wider plot, field or open area between 2km and 10km of any part of the designated sites.

Sites that meet either of the above criteria will be provided with an Amber rating and further consideration will need to be given to undertaking Habitats Regulations Assessment as part of consideration in Stage 3. Consideration will also be given to the ‘matrix of values for functional land attributes’ set out in the [East Riding Local Plan Update Habitat Regulations Assessment – Appendix F](#). This considers aspects such as open vistas, proximity to habitat sites, levels of human disturbance and land cover type.

A negative weighting will be applied where there is a reasonable likelihood of protected species being present and affected by the development of a site. Natural England and the Council’s biodiversity officer will be consulted in cases where potential impact on a protected site/species is likely. Where relevant additional evidence, for example an ecological survey, would be required to demonstrate that the proposed development would not have an adverse impact on these species.

Factor 2: Nationally important landscapes

Would the development harm the special character of the AONB or Heritage Coast?

Approach to site assessment for all uses:

Pass	Assess	Fail
Development is major development and is not located on land within an AONB or Heritage Coast	Development is non major development on land that is located within the AONB or Heritage Coast or Development is major development and would be located on land within an AONB or Heritage Coast but is unlikely to harm the special character of the asset	Development is major development and would be located on land within an AONB or Heritage Coast and is likely to harm the special character of the asset Site should not be assessed further
Key Source(s): • Yorkshire Wolds AONB • Heritage Coast		
This Factor will inform the new plan's environmental assessment		

The East Riding has Heritage Coast designations at Flamborough Head and Spurn Head. Policy N5(2) of the draft NPPF states that planning decisions should be consistent with the special character of the area and the importance of its conservation. Major development, it notes, is unlikely to be appropriate in the Heritage Coast, unless it is compatible with its special character.

At the time of writing, a new Area of Outstanding Natural Beauty (AONB) designation is being considered for parts of the Yorkshire Wolds. If an area is designated, this would be classed as a National Landscape, recognised in the draft NPPF as a landscape to be protected. Policy N4(1) of the draft NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes and that the scale and extent of development within all these designated areas should be limited. Where development can take place, it should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Sites capable of supporting major development in the Heritage Coast or in the AONB will only be assessed further where there is evidence that the development would be unlikely to harm the special character of the asset.

Factor 3: Local green space

Would the development involve the loss of Local Green Space?

Approach to site assessment for all uses:

Pass	Assess	Fail
Development would not result in the loss of a Local Green Space	Development would result in the loss of a Local Green Space but development proposals would replace provision and result in an overall improvement	Development would result in the unacceptable loss of a Local Green Space Site should not be assessed further
Key Source(s): Neighbourhood Plans		
This Factor will inform the new plan's environmental assessment		

Currently in the East Riding, Local Green Spaces are identified in Neighbourhood Plans where they are demonstrably important to the local community for recreational, amenity, cultural, or environmental reasons. If all or part of the site is within or overlapping a Local Green Space, then the proposed development site will fail and be filtered out.

In some instances, a development proposal may result in the loss of an existing Local Green Space but it includes plans to replace it to the betterment of the community. Where this is the case, further assessment may be required to determine whether the loss is unacceptable to the community.

Factor 4: Designated heritage assets

Would the development cause harm to a designated heritage asset?

Approach to site assessment for all uses:

Pass	Assess	Fail
Development would not result in harm to a designated heritage asset	Development has the potential to result in harm to a designated heritage asset.	Development would likely result in substantial harm to a designated heritage asset Site should not be assessed further
Key Source(s): • National Heritage List for England • Humber Historic Environment Record		

The following are defined as designated heritage assets:

- Listed Buildings
- Scheduled Monuments
- Registered Parks & Gardens
- Conservation Areas
- Registered Battlefields
- Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments¹

There are no protected wreck sites or World Heritage Sites in the East Riding of relevance to this assessment.

This test assesses whether a development would cause harm to a designated heritage asset. This is distinct from whether a development would have an impact on the significance of a Designated Heritage Asset. This impact could be negative or neutral, but it might also be positive, such as by sensitively developing a site that currently makes a negative contribution to a Conservation Area, for example.

Sites will fail the test where there is clear evidence that the development would likely result in substantial harm to a designated heritage asset. Development proposed in a Registered Park & Garden, Registered Battlefield or on a Scheduled Monument is likely to cause a high level of harm, though each case will be considered individually. Where the magnitude of harm is less than substantial, further evidence is likely to be required from those promoting the site to support the submission through the assessment process. The greater the potential level of impact, the more detailed the further evidence will need to be.

¹ As per footnote 75 of the NPPF (2025) relating to paragraph 213

Non-designated heritage assets of archaeological interest are those which have been confirmed through archaeological fieldwork to be demonstrably of significance to scheduled monuments, either by investigations on the allocation site itself, or by fieldwork in an adjacent area. Examples of this could include the continuation of cropmark evidence from an adjacent plot where on-site investigation has confirmed significant remains exist, when an allocation plot itself has been subjected to previous evaluation work which confirmed the existence of significant remains, or where the Historic Environment Record contains an abundance of evidence indicating remains of potential national importance.

Factor 5: Coastal change

Would the development be appropriate in the coastal change management area?

Approach to site assessment for all uses:

Pass	Assess	Fail
Development would be appropriate in the coastal change management area	Not applicable	Development would not be appropriate in the coastal change management area
Key Source(s): • East Riding Local Plan Update – Policy ENV6 – Coastal Change Management Area • National Coastal Erosion Risk Mapping		
This Factor will inform the new plan's environmental assessment		

A coastal change management area (CCMA) is a shoreline area identified in a local plan that is likely to be affected by physical changes from erosion, landslip, flooding, or accretion over the next century. CCMA's allow us to plan for risk and manage the types of development that will support the safety and prosperity of coastal communities. It does not, for example, support residential development in areas at risk of coastal erosion.

[Policy ENV6 of the Local Plan Update](#) sets out the current approach to managing development in the CCMA. This will be used to help assess sites against this factor. If the site is within or overlapping a CCMA, and the proposed development is inappropriate for that area, then the proposed development site will fail and be filtered out.

Factor 6: Functional floodplain

Would the development be located in a defined functional floodplain/flood storage area?

Approach to site assessment for all uses:

Pass	Assess	Fail
Development would not be in a defined functional floodplain/flood storage area	Not applicable	Development would be in a defined functional floodplain/flood storage area
Key Source(s): East Riding Strategic Flood Risk Assessment (SFRA)		
This Factor will inform the new plan's environmental assessment		

A functional floodplain (or Flood Zone 3b) is land where water naturally flows or is stored during floods. Functional floodplain will normally comprise:

- land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or
- land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).

The NPPF sets out that only water compatible uses and essential infrastructure uses are compatible in functional floodplains; the latter of which would require the application of the exception test. The exception test requires demonstration of wider sustainability benefits brought about by the proposed development and evidence that the development will be safe for its lifetime.

If the site is within or overlapping a functional floodplain/flood storage area, and the proposed development is incompatible, then the proposed development site will fail and be filtered out.

Factor 7: Health and safety zones

Would the development be located in a defined health and safety zone and is for a type of development that is restricted?

Approach to site assessment for all uses:

Pass	Assess	Fail
The Health and Safety Executive do not advise against development	Not applicable	The Health and Safety Executive advise against development based on the location and sensitivity of the proposal
Key Source(s): Health & Safety Executive		

The Health and Safety Executive (HSE) sets a consultation distance (CD) around major hazard sites and major accident hazard pipelines after assessing the risks and likely effects of major accidents at the major hazard. Major hazards comprise a wide range of chemical process sites, fuel and chemical storage sites, and pipelines. Within CDs, consultation zones are identified to provide a more detailed assessment of the risks and/or hazards. These zones allow, in combination with an assessment of the 'sensitivity level' of the proposed development, the HSE to advise on the potential residual risk of a proposed development.

Sensitivity levels are set out in four categories:

- Level 1 - Based on normal working population
- Level 2 - Based on the general public - at home and involved in normal activities
- Level 3 - Based on vulnerable members of the public (children, those with mobility difficulties or those unable to recognise physical danger) and
- Level 4 - Large examples of Level 3 and very large outdoor developments

Development Types are used as a direct indicator of the Sensitivity Level of the population at the proposed development. Development Type DT1.1, for example can be workplaces such as offices or factories, and these are categorised as Level 1. DT2.1 is general residential development with developments up to 30 dwelling units being classed as Level 2, and larger residential developments classed as Level 3.

Having determined which consultation zone a Development Type falls into, after applying the straddling rule if necessary, and the Sensitivity Level of the development, the following matrix is used to decide HSE's advice.

Level of Sensitivity	Development in Inner Zone	Development in Middle Zone	Development in Outer Zone
1	DAA	DAA	DAA
2	AA	DAA	DAA
3	AA	AA	DAA
4	AA	AA	AA

DAA = Do not Advise Against development

AA = Advise Against development

Those assessments which result in a DAA output will fail and the proposed site will be filtered out.

The summary above is provided as a broad overview of the approach that is set out in more detail on the [HSE website](#). Where there is any doubt, we will defer to the advice of the HSE on a case-by-case basis if necessary.

It should be noted that the village of Easington is largely within a consultation zone that is likely to mean only a limited amount, if any, housing development can take place there.

Assessing suitability, availability, achievability

Following the initial filter, an assessment of a site's suitability, availability and achievability will be undertaken. The purpose of this part of the process is to identify a list for further consideration under stage 3. That is, identifying those sites that perform well against a wide range of assessment criteria and that can be considered for allocating in the emerging local plan.

Approach to the assessment

The plan making guidance advises a RAG-rating (Red, Amber, Green) approach to the assessment rather than a quantitative-based approach. Broadly this means:

Score	Suitability	Availability	Achievability
Green	The site offers a suitable location for the land use, and any known constraints can be feasibly overcome with mitigation.	There is a reasonable prospect the site will be available for development within the time envisioned and there are no known legal or ownership issues.	There is a reasonable prospect that the site is capable of being developed for the land use within the time envisioned.
Amber	The site offers a potentially suitable location for the land use, but has constraints which may impact development potential, or the site needs further assessment before it can be deemed suitable.	The site has legal or ownership issues that are considered capable of being resolved and the site could be available for development within the time envisioned and/or the site needs further assessment before it can be deemed available.	The site's capability to deliver in the time envisioned is limited and the resolution or the timing of the resolution is unknown, or the site needs further assessments of some aspects of its achievability.
Red	Based on information at the time of the assessment, the site does not appear to offer a suitable development location for the land use or there are known constraints which significantly impact development potential. These may not be easily or feasibly overcome with mitigation.	There is no reasonable prospect that the site could be available for development within the time envisioned.	There is no reasonable prospect that the site could be capable of being developed for the land use within the time envisioned.

The general principle taken in the assessment is to avoid harm to, or loss of, existing assets without the need for mitigation. Therefore, a Green rating is likely to be awarded where development will take place away from an asset that needs to be conserved or protected. Standard mitigation measures will be assumed in instances where harm or loss is identified but this is likely to result in an Amber rating. In those instances where more significant mitigation is required, or where there is uncertainty in the evidence to demonstrate that mitigation will be effective, a site may be given a Red rating. Similarly, avoiding risk to new users of a development site (e.g. residents, businesses) will result in a Green rating. Mitigation and compensation should be regarded as secondary measures.

A Red rating does not automatically mean that a site has been discarded and cannot be allocated.

Suitability

A site can be considered suitable if it would provide an appropriate location for development when considered against the:

- relevant constraints and their potential to be mitigated
- opportunities the development of the site could present

The suitability of a site may vary depending on the proposed land use and the extent to which the constraints and potential opportunities affect each site. To determine suitability we will consider national planning policy and other factors we consider to be important when thinking about the nature of development in the East Riding. Broadly, this includes:

- existing assets such as public open spaces;
- environmental constraints and designations such as national landscapes, biodiversity and habitat sites;
- access to the highway network; and
- access to services and facilities.

For the most part, we will rely on published evidence, making use of datasets that are already available and that offer a consistent basis to support our assessments. In some limited instances, and particularly in the first iteration of the assessments, we may use local expert knowledge from officers within the council, and partners where relevant, to flag an issue and identify where additional evidence may be required.

Factor 8: Agricultural land quality

Would development result in the loss of the best and most versatile agricultural land?

Approach to site assessment for all uses:

Green	Amber	Red
Development would not affect land classified as being the best and most versatile agricultural land	Minor loss of the best and most versatile agricultural land	Significant loss of the best and most versatile agricultural land Site may not be suitable for development
Key Source(s): Predictive Agricultural Land Classification (ALC) Map for England		
This Factor will inform the new plan's environmental assessment		

National planning policy identifies that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. It states that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality.

Best and most versatile agricultural land is defined as land that falls within grades 1, 2, and 3a of the Agricultural Land Classification, which has been mapped at a strategic level. This is considered to be the most flexible, productive and efficient land, which can best deliver future crops for food and non-food uses. Proposals that would involve the development of land in these grades will be weighted negatively and any involving the loss of 20ha or more would be considered significant. This threshold is the same as the one used when consulting Natural England on planning applications. Smaller sites that would result in the loss of land in the highest grade (1) may also be assessed as being significant if there is land available in the same settlement that is within lower grades.

Potential development sites that would affect areas of poorer quality (or non-) agricultural land, as identified by grades 3b, 4 and 5 of the Agricultural Land Classification, will be given a Green rating for this factor.

Factor 9: Mineral safeguarding

Would the development of the site lead to the sterilisation of land where mineral deposits may be found?

Approach to site assessment for non-minerals uses:

Green	Amber	Red
Site is not within a mineral safeguarding area, area of search, preferred area or specific site with planning permission for mineral extraction, or pre-extraction is possible	Site falls within a location where there are potentially viable mineral deposits that could be worked in the future and pre-extraction is not possible (or possible later)	Site falls within an area of search, preferred area, minerals allocation or specific site with planning permission for mineral extraction, and pre-extraction is not possible (or possible later) Site may not be suitable for development
Key Source(s): • East Riding of Yorkshire and Kingston upon Hull Joint Minerals Local Plan (2019) – Allocations, Preferred Areas and Areas of Search • East Riding Local Plan Update (2025) – Mineral Safeguarding Areas		
This Factor will inform the new plan's environmental assessment		

National planning policy highlights that mineral deposits should be safeguarded against other types of development where they are, or may become, of economic importance. Whilst this methodology will not be used to assess potential minerals development sites, it recognises that new developments could affect the supply of locally important minerals.

There are a wide variety of valuable mineral reserves within the East Riding, including sand, gravel, chalk, oil, gas, clay, peat and limestone, which can only be worked where they naturally occur. A Joint Minerals Local Plan has previously been adopted (2019) and seeks to promote the most appropriate use of all mineral resources in the interests of the community, the local economy, and the environment. This includes preventing the unnecessary sterilisation of certain minerals, as well as ensuring that there is an adequate and steady supply of aggregates. To support these objectives it identifies a number of locations where minerals development would be commercially viable or where there is an intention for minerals development to take place, including:

- Sites allocated for mineral extraction;
- Preferred areas for mineral extraction;
- Areas of Search where there is a reasonable expectation of minerals being present in viable quantities.
- Dormant sites with planning permission; and
- Sites with planning permission but not yet commenced.

The Joint Minerals Local Plan and Local Plan Update collectively seek to conserve mineral resources by safeguarding deposits. Therefore, site assessments will also consider the value of safeguarding mineral deposits. This will take account of mineral safeguarding areas identified for deposits of sand and gravel, crushed rock, limestone, industrial chalk, clay and silica sand, which are or may become of economic importance.

A negative weighting will be applied where a potential development site is located within a mineral safeguarding area, allocation for mineral extraction, area of search for mineral extraction, preferred area or a specific site with planning permission for mineral extraction. Sites would be assessed as having no impact where they are located outside of these areas, or where relevant additional evidence demonstrates that:

- The mineral is of no commercial value and is unlikely to be so in the future;
- The non-mineral development is temporary and can be completed and the sit restored to a condition that does not inhibit extraction within the timescale that the underlying mineral is likely to be needed; or
- In the case of sand and gravel, there is potential for the mineral deposits to be extracted prior to the non-mineral development proceeding.

Factor 10: Groundwater source protection zones

Could development potentially affect any abstraction of groundwater intended for human consumption?

Approach to site assessment for all uses:

Green	Amber	Red
Development is not within a groundwater source protection zone and would not affect the public drinking water supply	Development has the potential to affect the public drinking water supply. The site is within a groundwater source protection zone. Any impacts can be mitigated	Development is located in a groundwater source protection zone and has the potential to cause pollution of groundwater and affect a public drinking water supply. No satisfactory mitigation measures possible Site may not be suitable for development
Key Source(s): • Environment Agency Groundwater Source Protection Zones • Environment Agency Groundwater Protection guidance		
This Factor will inform the new plan's environmental assessment		

National planning policy highlights that new development can have a significant impact on water quality and therefore affect the environment. It sets out that the planning system should prevent new and existing development from contributing to, or being put at unacceptable risk, or being adversely affected by unacceptable levels of, water pollution.

The Environment Agency is responsible for protecting and enhancing water quality and has defined a number of Groundwater Source Protection Zones within the East Riding. These have been delineated to protect aquifers and groundwater flows including wells, boreholes and springs used for the public drinking water supply. They are used to show the areas where the risk associated with groundwater contamination is greatest.

Source Protection Zones have been split into three main zones, according to sensitivity to contamination:

- Zone 1 (inner protection zone)
- Zone 2 (outer protection zone)
- Zone 3 (total catchment)

In addition to the Source Protection Zones, other potable water supplies will need to be taken into consideration. These include private domestic supplies and abstractions used in commercial food and drink production and will have a default Source Protection Zone of 50 metres radius from the source location.

The Environment Agency's Groundwater Protection guidance outlines those types of development that are unacceptable within a Source Protection Zone. Therefore, a negative weighting will be applied to any proposed site that is located within a Source Protection Zone, where the use is incompatible with the zone, and where there are no identified effective mitigation measures agreed. The Environment Agency will be consulted on any site that may affect a Groundwater Source Protection Zone. Where relevant, additional evidence will be required to demonstrate that the proposed development would not have an adverse impact on water quality. The extent, and possible cost, of any mitigation measures will be discussed with the Environment Agency and those promoting the site.

In respect of availability of both groundwater and surface water for abstraction. This may influence where certain developments/activities that require lots of water can be located. There are parts of the East Riding where no new groundwater abstraction is allowed or where new abstractions will have restrictions applied on them.

Factor 11: Compatibility with neighbouring uses

Is the development compatible with existing or proposed neighbouring uses? Would it create a nuisance that will affect existing residents? Could it lead to placing unreasonable restrictions on the operation of existing businesses or facilities?

For uses introducing potential receptors – including residential, healthcare and education:

Green	Amber	Red
Development is not within a compatibility screening area	Development is within a compatibility screening area	Not applicable – not possible to determine without further assessment
And	Further investigation would be needed prior to allocating the site	
Proposed use is not likely to affect the operation of existing facilities in the vicinity	Any significant impacts are likely to be mitigated	

For uses introducing potential emissions/sources – including employment, commercial, transport, food outlets, open space:

Green	Amber	Red
Development is not within an area close to sensitive uses	Development may potentially give rise to compatibility issues	Not applicable – not possible to determine without further assessment
	Further investigation would be needed prior to allocating the site	
	Any significant impacts are likely to be mitigated	

Key Source(s):

- East Riding of Yorkshire Council – Local Land and Property Gazetteer
- Environment Agency
 - register of waste management licenses
- [Northern Powergrid Assets](#)
- Ministry of Defence

It is important to consider whether new development would be compatible with existing or proposed developments. This will include developments that already have a planning consent but have not yet been built, as well as sites that have been safeguarded for a certain use. Assessing the compatibility of different uses will involve consideration of any localised nuisance or amenity impacts, for example noise, light, dust or odour, which would result from the

proposed development. Noise and light pollution are a typical type of pollution that can affect a resident's quality of life. These impacts are particularly important for rural areas, which are relatively tranquil.

The approach to this factor involves a consideration of receptors and sources. For example, in a housing scheme, we will need to consider whether new residents (receptors) will be impacted by nearby activities such as from industrial processes (sources). Equally, we will need to consider the 'agent of change' principle. The agent of change principle in planning dictates that the party introducing a new land use (the "agent") is responsible for managing the impact of that change, such as noise mitigation. If new residents move near an existing venue, the developer must pay for soundproofing, protecting established businesses. The introduction of a new use should not create pressure for the implementation of unreasonable restrictions on the operation of an existing business or facility.

For uses introducing potential receptors – including residential, healthcare and education, etc.

We will use a screening approach to identify where additional assessments may be required before a site can be considered for allocation. The following sources will be considered in the screening approach:

- Intensive livestock units – protective distances around existing intensive livestock units have previously been set to help minimise future conflict. Therefore, any sites that fall within 800m of an Intensive Livestock Unit will be assessed in terms of any potential adverse impacts. This will be reduced to 400m for rural locations and villages.
- Ministry of Defence (MoD) – two safeguarding zones, where the MoD expects to be consulted on certain applications, have been identified within the East Riding. These are:
 - Cowden (South of Hornsea) – no need to consult on residential proposals
 - Leconfield (North of Beverley) – need to consult on proposals involving the erection of buildings exceeding 15.2m (the average 2 storey residential property is approximately 9m high) or 45.7m depending upon the location within the safeguarding zone.
- Sewage treatment works – these can cause both an odour and noise nuisance and Yorkshire Water will be consulted on any sites that lie near to a sewage treatment works
- Motorways and main roads – can result in both noise and light pollution
- Waste transfer stations/Household recycling centres
- Industrial units - especially general industry, can result in noise, vibration, odour, fumes, smoke, soot, ash, dust or grit, which creates a detrimental impact on the amenity of an area
- Quarries – as with industrial units, the operation of quarries can result in noise, vibration, odour, fumes, smoke, soot, ash, dust or grit

Pipelines, electricity pylons and towers are considered under [Factor 25: infrastructure constraints](#). High pressure pipelines are also considered under [Factor 7: Health and Safety Executive](#).

An amber rating will be provided where sites are within the buffers identified in the screening tool. Whilst a number of mitigation measures can be implemented, and developments will need to comply with relevant legislation, further assessment in the plan making process will be

required. Sites screened out will be provided with a Green rating unless the proposed use itself will interfere with the operation of existing users in the vicinity.

For uses introducing potential emissions/sources – including employment, commercial, transport, food outlets, open space, etc.

For proposals that are likely to introduce new sources of noise, dust, odour or light pollution, consideration will be given to the proximity and quantity of sensitive receptors in the area. These receptors will include, but are not limited to existing and proposed housing, school sites and healthcare facilities.

A Green rating will be provided where the development is away from sensitive receptors. An Amber rating will be awarded where development has the potential give rise to compatibility issues and further assessment will be required.

Factor 12: Open space

Would the development of the site lead to the loss of open space?

Approach to site assessment for all uses:

Green	Amber	Red
Development would not result in the loss of open space, green infrastructure, recreation facilities or a public right of way.	Existing open space, green infrastructure recreation facilities or a public right of way are lost and/or public accessibility is diminished. Replacement or improved provision may be provided on-site or elsewhere.	Existing open space, green infrastructure, recreation facilities or a public right of way are lost, or adversely affected, and public accessibility is diminished. Replacement or improved provision is not provided on-site or elsewhere. Site may not be suitable for development.
Key Source(s): • East Riding of Yorkshire Council opens space review • East Riding of Yorkshire Council public rights of way network • Natural England green infrastructure map		
This Factor will inform the new plan's environmental assessment		

The retention or improvement of existing accessible open space or the provision of new space, green infrastructure, recreational facilities and public rights of way (PROW) can bring about a range of benefits for existing and new residents, including improved health, social inclusion and the potential to reduce carbon emissions.

National planning policy states that open space, sports and recreational facilities should not be built on other than in a limited number of circumstances. Therefore, a negative weighting will be applied where development of a site would result in the net loss of an existing facility.

The current Local Plan Update (2025), which takes account of the Council's Playing Pitch Strategy and Open Space Review, sets out when open space would need to be provided as part of new housing developments. It will be assumed that all potential housing sites that meet the threshold would, as a minimum, provide the required level of new open space. A positive weighting will be provided where the development would not result in the loss of open space, green infrastructure, recreation facilities or a public right of way.

A negative weighting will result where the proposed development site would adversely affect the Public Rights of Way (PROW) network, for example, by diverting, severing or removing an existing PROW. Adverse impacts could include:

- Reduced amenity, convenience, or enjoyment; for example if the PROW would be unsympathetically incorporated into a housing development through enclosure between back gardens;
- Increased walking distance to get to a destination;
- Reduced width creating narrow routes and blind spots; or
- Increased use of PROW by vehicles and conflict between vehicular movement and pedestrian usage.

Factor 13: Landscape sensitivity

How sensitive to development is the landscape character area where the site is located?

Approach to site assessment for all uses:

Green	Amber	Red
Site is within a landscape capable of accommodating development of the type proposed with limited harm identified Landscape may be low quality, low sensitivity and have a high capacity to accept change.	Site is within a landscape capable of accommodating development of the type proposed with some harm identified Landscape may be low-medium quality, low-medium sensitivity and have some capacity to accept change.	Site is within a landscape with limited capability to accommodate the type of development proposed and with significant harm identified Landscape may be high quality, high sensitivity and have limited capacity to accept change Site may not be suitable for development.
Key Source(s): • East Riding Landscape Character Assessment Update • East Riding Landscape Character Assessment – Detailed Assessments		
This Factor will inform the new plan's environmental assessment		

National planning policy highlights the importance of protecting and enhancing valued landscapes and identifies the need to recognise the intrinsic character and beauty of the countryside. The Council has prepared a Landscape Character Assessment Update 2018 to help inform judgements on the possible impact that development may have on the landscape. This describes and classifies the landscapes of East Riding into 23 different landscape types. It also makes judgements on the quality and value of the landscape, as well as its sensitivity, susceptibility and capacity to accommodate new development. The Landscape Character Assessment, which has been supplemented by a more detailed analysis of the landscape and townscape surrounding the larger settlements, will be used to assess the impacts of potential development sites.

A number of areas have been identified in the current Local Plan Update (2025) as being of local importance. These are shown as Important Landscape Areas for the following locations and should be protected.

- The Yorkshire Wolds.
- The Heritage Coast designations at Flamborough and Spurn Head.
- The River Derwent Corridor and Lower Derwent Valley.
- The Thorne, Crowle and Goole Moors.

Therefore, a negative weighting will be applied where a potential development site would likely have a detrimental impact in an 'Important Landscape Area'.

[Factor 2 \(Nationally important landscapes\)](#) under the initial filter step has considered the presence of nationally designated areas, which for the East Riding includes the proposed Yorkshire Wolds Area of Outstanding Natural Beauty and the two areas of Heritage Coast. Where a site that lies within the AONB or Heritage Coast has passed the initial filter stage (for example, it would not constitute major development in the Heritage Coast), it will be considered further under this factor along with all other sites.

To assess the capability of a site to accommodate development from a landscape perspective the factors set out below will be considered:

Quality of the existing landscape	Consider existing local landscape designations and the intactness of landscape characteristics, important views, distinctiveness, and integration with the existing urban edge, diversity of characteristics and presence of any detractors. Low quality landscapes are usually fragmented and already have detractors present.
Sensitivity of the landscape to further change	Based on the effect that a particular type of development might have on the characteristics and landscape features. Sensitivity is assessed against visibility, including the impact on views from public rights of way, tree and vegetation cover, loss of characteristics and landscape quality. High sensitivity would mean that a development would adversely affect the key characteristics of the landscape or a significant detractor would be introduced to the landscape resulting in significant change of views, scale, character or quality.
Capacity of the landscape to take further development	Related to sensitivity. Where a landscape has a low sensitivity to a particular type of development it would have a high capacity to accept change.

The assessment of potential development sites will not consider very detailed matters, such as specifying new building heights or car parking spaces, unless these issues are considered so significant that they may prevent future development on the site.

Factor 14: Access to the highway network

Does the site have suitable access to the highway network?

Approach to site assessment for all uses:

Green	Amber	Red
Site has existing clear unobstructed access to a highway capable of accommodating the development proposed	Site has potential access to a highway though it may require third party land and/or Access to the site is unlikely to accommodate the development proposed without some off-site improvements	Site cannot be accessed on the basis of the evidence provided and/or Site requires significant improvements to the highway network to enable suitable access which is disproportionate to the scale of the development proposal. Site may not be suitable for development.
Key Source(s): East Riding of Yorkshire Council Street Gazetteer		

It is critical that a site can be accessed via an existing or a planned highway. Sites will be given a Green rating where there is already a direct and unobstructed access to an existing highway, recognising that some improvements may be necessary to ensure suitable widths of carriageways or visibility splays. There should be no third-party land between the site and highway land.

In those instances where third-party land will need to be used, sites will be given an Amber rating where there is some confidence that this will not hinder delivery. Additionally, Amber ratings will be provided to sites where more intensive improvements are needed such as off-site improvements (e.g. widening carriageways further down the highway network; re-calibrating roundabouts).

Where a site cannot be accessed, because third party land is required and there is no evidence that this will come forward, a Red rating will be awarded. Additionally, accessing a site may require significant improvements or enhancements to the highway network. Such improvements may be provided or funded through development but in some cases the scale of improvements may be so large that it is unlikely that the scale of development proposed could reasonably be expected to provide or fund the necessary scheme. A Red rating will be awarded in such instances.

Factor 15: Biodiversity value

Would development affect natural features that are important (distinctive) for wildlife or landscape character such as trees or hedgerows, that are not part of designated sites?

Approach to site assessment for all uses:

Green No natural features on site Or Any habitats and/or ecological features are classified as being low-medium distinctiveness	Amber A small part of the site accommodates distinctive habitats or important ecological features but these can be retained and/or enhanced Or A small part of the site accommodates distinctive habitats or important ecological features. Their removal may be mitigated.	Red A significant proportion of the site accommodates highly distinctive habitats or important ecological features Site may not be suitable for development.
Key Source(s): • Natural England Living England Habitat Map • East Riding of Yorkshire Council Local Nature Recovery Strategy • Natural England MAGIC online map • North and East Yorkshire Ecological Data Centre records • National Biodiversity Network Atlas • National Tree Map (BlueSky)		
This Factor will inform the new plan's environmental assessment		

Beyond Areas of Particular Importance for Biodiversity (APIB – see [Factor 1](#)), sites may accommodate a number of biodiversity features. Through planning applications, applicants can determine the biodiversity value of a site before and after development. Planning policy requires a [biodiversity net gain](#); that is, the development should result in a net improvement in biodiversity compared with the baseline position. This is evidenced using a nationally prescribed metric.

We are not proposing to use this metric for the purposes of plan making, but we do consider that a high-level assessment of the biodiversity value of a site is useful for the site selection process. It will allow us to identify those sites with a high biodiversity value, where assets should be preserved rather than replaced. This supports the application of the mitigation hierarchy:

- Avoid (most preferable)
- Minimise/Mitigate
- Restore/Rehabilitate
- Offset/Compensate (least preferable)

Further, achieving a net gain in biodiversity value on sites that have a strong baseline position (i.e. there are several important/distinctive features already on-site) will be challenging and is likely to affect the deliverability of a scheme.

It will not be possible for the council to undertake a site-specific ecological evaluation of all sites at this stage in the assessment process. As such, this factor will consider the presence/absence of the following features:

- Protected species
- A 'high' or 'very high' distinctive habitat identified in the BNG matrix
- Hedgerows
- Trees (including TPOs)
- Water features
- Areas that could become of importance for biodiversity (ACBs)

The Statutory Biodiversity Metric, used in the BNG appraisal process, provides a view on the 'distinctiveness' of habitats from 'very low' to 'very high'. As a simple assessment, this Factor will attempt to identify those habitats in the 'very high' and 'high' categories, using evidence such as the Living England Habitat Map.

Areas that could become of importance for biodiversity (ACBs) are part of the Nature Recovery Network and are additional areas that, along with APIBs ([see Factor 1](#)), can be regarded as 'strategically significant' for the purposes of nature recovery. These areas contain habitat types that have been formally identified as the most important and effective places for achieving landscape-scale nature recovery and delivering wider environmental benefits. Whilst there may be opportunities to support ecological enhancement through new development ([see Factor 26 – Supporting nature recovery](#)), the ACBs, as strategically significant, provide an indication of the potential biodiversity value of that area.

Where highly distinctive habitats or important ecological features cover a significant part of the site, a Red rating will be provided. Whilst it may be possible to mitigate or compensate for the loss of such features, the avoidance of disturbance is the most desirable outcome. As such, a Green rating will be awarded to sites where there are no natural features on site, or where the habitats and features are of a low to medium distinctiveness.

Availability

An assessment of availability is based on whether there is a reasonable prospect that the site will be available for development at a particular point in time. This requires consideration of a number of matters including:

- multiple ownerships with no agreements in place
- unresolved ransom strips
- tenancies
- covenants

Based on outcomes of the Factors identified below, we will categorise the sites into three broad timescales:

0-5 years	Site would likely deliver some units (dwellings/employment spaces, etc) within 5 years of the likely adoption date of the Plan
6-10 years	Site would likely deliver some units (dwellings/employment spaces, etc) between years 6-10 after the likely adoption date of the Plan
10+ years	Site would not likely deliver any units (dwellings/employment spaces, etc) until 10 years after the adoption date of the Plan

The above timescales are in respect of time taken after the plan is adopted, as opposed to the time at which the assessments are undertaken. They assume that the principle of development – via the allocation of a site – has been established and that decisions on planning applications will be positive.

Factor 16: Ownership

Are there any ownership constraints that would delay or prejudice the delivery of the site?

Approach to site assessment for all uses:

Green	Amber	Red
Site is within single ownership or Site is within multiple ownership but evidence provided of agreement with all parties	Site is in multiple ownerships and no initial evidence provided of agreement with all parties Site may not be available for development.	Clear evidence is available to demonstrate a site cannot be delivered due to an unwillingness by the landowner(s). Site may not be available for development.
Key Source(s): • Land submissions (call for sites) • Land Registry		

The willingness of a landowner to see their site come forward for development is clearly critical to establishing the availability of a site. The vast majority of sites likely to be considered through this process will have come through the call for sites process. Generally, such sites have been put forward by landowners and/or agents acting on their behalf. Some may have also been put forward by prospective developers or housebuilders who have an agreement or contract in place to promote the site on the landowner's behalf. Information provided through the call for sites process will assist in assessing sites against this factor.

Where a site is within a single ownership, and there is evidence that the landowner is willing to see the site developed (e.g. by submitting a site through the call for sites), this will be provided with a Green rating.

Some sites will be in multiple ownership² and to determine whether it is truly available, evidence will need to be provided that demonstrates an agreement and willingness for landowners to work together in bringing the site to the market. Where evidence is compelling, sites will be assessed as Green. Where there is no evidence, or where there are critical gaps in ownership agreements, an Amber rating will be awarded.

We recognise that site assembly and agreements can take time and may be contingent on certain milestones so it is unlikely that any sites will be awarded a Red rating in the first iterations of the site assessment process. Ultimately, a site may not be selected for allocation if progress has not been made on reaching agreements further along in the plan making process.

One key factor to consider is the presence of 'ransom strips' – small or narrow pieces of land in a third party ownership often located in positions where access to a wider site would be

² Sites may have been submitted on behalf of multiple owners or we may have combined land submissions together to make a more coherent development site for assessment/allocation.

provided. The intention of these strips is to extract a proportion of the uplift in land value from the potential development of an adjacent site. Whilst perfectly legal, they can often prejudice the delivery of a scheme in terms of layout (sometimes a sub-optimal workaround design is presented) and viability. Where viability is affected, this can reduce the level of public benefits delivered, disadvantaging existing and new communities. As such, they are an important aspect in assessing the availability and the presence of such strips may yield an Amber rating.

A Red rating will only be given to those sites where there is clear evidence that the landowner or landowners do not wish to see the site come forward for development of the nature being considered. As the vast majority of sites being considered are likely to have been put forward by landowners, it is unlikely that many, if any, sites will achieve this rating.

Factor 17: Existing users, tenancies and covenants

Are there existing users, operators or tenancies on the site or any known covenants that would prevent the site being used for the development being considered?

Approach to site assessment for all uses:

Green	Amber	Red
No operators or users on site. Or Where tenants are on site, they are on short term contracts or contracts which allow for them to relocate elsewhere. And No known relevant covenants that would restrict use.	Operators or users on site. And/Or Where tenants are on site, they are on medium term contracts or contracts which allow for them to relocate elsewhere though no known locations have been identified. And/Or Identified covenants that would restrict use.	Clear evidence is available to demonstrate a site cannot be delivered due to ongoing user activities, tenancy agreements and/or covenants. Site may not be available for development.
Key Source(s): • Land submissions (call for sites) • Land Registry • East Riding of Yorkshire Council Local Land and Property Gazetteer • East Riding of Yorkshire Council Non-Domestic (Business) Rates		

The presence of operators, tenants and other users on a site has implications for the expected timescale for delivery, and in some cases, whether a site can be delivered at all. Green ratings will be provided where there are no ongoing operations, tenancies or active uses on a site. For agricultural land, particularly where there are no buildings on the site put forward, there may be no obvious obstacles to bringing a site forward other than that dictated by planning timescales and crop growing schedules. Where we are aware that tenant farmers may be working the land, this could result in an Amber rating as various matters would need to be resolved before a site could come to market.

Similarly, a site may accommodate an existing business with buildings and infrastructure that would need to relocate or wind down operations. This has implications for a delivery timeframe and may ultimately prevent a site from being brought to the market. An Amber rating will be awarded in these circumstances.

In some instances, covenants may exist that restrict the use or sale of land for particular purposes. If known at the time of the assessment, these will be considered. However, due to the resource required to consider this issue, it is likely, from a practical point of view, that this will be

more thoroughly considered for those sites that are identified as draft allocations at the next stage.

A Red rating will only be given to those sites where there is clear evidence to demonstrate a site cannot be delivered due to ongoing user activities, tenancy agreements and/or covenants. As the vast majority of sites being considered are likely to have been put forward by landowners in control of the sites, it is unlikely that many, if any, sites will achieve this rating.

Achievability

Achievability is assessed on whether there is a reasonable prospect, based on the information available, that a site is capable of being developed at a particular point in time, including if the site is likely to be viable.

Factor 18: Likely market attractiveness

How attractive is the market for the type of development proposed?

Approach to site assessment for all uses:

Green	Amber	Red
Site is within an attractive market area for the use proposed And/Or Site is being promoted by a developer or house builder with a record of delivering similar schemes	Site is within an area with some appeal to a narrower band of developers/ residents/ users Or Site is within an attractive market area for the use proposed but there are site specific issues that may limit the appeal of the site	Site is within an area which is not attractive to the market Site may not be achievable for development
Key Source(s): • Homes England • East Riding Local Plan Viability Assessment • Planning applications and development monitoring		

Assessing the likely market attractiveness of an area is principally a planning judgement but we will seek to incorporate evidence where appropriate to inform decisions and aid transparency. Further details are set out below. We also recognise that what is attractive to one developer, may not be to another because of different types of business models, operating constraints, market expertise, local knowledge and many other factors.

Residential development

For proposals that involve residential development, we will use various pieces of evidence to determine the market attractiveness of an area in which the site is located.

- Have other residential developments of a similar size been delivered in the local area within the last 5 years?
- What is the affordable housing requirement for the area? *This provides a proxy indicator for providing some understanding of the viability and demand for new homes in an area.*
- What do house prices tell us about the area relative to the East Riding average?
- What is the spatial demand identified in evidence such as the council house waiting list and the self and custom build housing register?

We may undertake separate discussions with house builders and developers to build up a picture of market attractiveness.

Employment development

For proposals that involve employment development, we will use various pieces of evidence to determine the market attractiveness of an area in which the site is located. This could include:

- Assessments within previous and emerging Employment Land Reviews/Need Assessments
- Sales and rental values data
- Have other similar developments been delivered in the local area within the last 5 years?

As with residential development, we may undertake separate discussions with developers and operators to build up a picture of market attractiveness.

Other development

For other uses, we will consider these on a case-by-case basis having regard to any relevant evidence that may be available.

Factor 19: Viability

How viable is the site likely to be for the type of development proposed?

Approach to site assessment for all uses:

Green	Amber	Red
Site is within an area and typology that is likely to be viable and there are no significant abnormal costs identified	Site is within an area and typology that is likely to be only marginally viable and there are no significant abnormal costs identified And/Or Site is likely to have abnormal costs that will reduce the viability of development	Not applicable
Key Source(s): - Homes England East Riding Local Plan Viability Assessment		

We plan to update our local plan viability assessment. The previous version that supported the Local Plan Update (2025) provided a broad indication of the viability of different areas and scheme types (e.g. by size and greenfield/brownfield status). We will use a similar classification and assessment to provide a general view on the likely viability of developing each site. The specific approach to testing viability across the local plan is yet to be determined so the approach to this Factor is likely to evolve throughout the plan making process.

In addition to this, we will need to reflect on any site-specific issues that have been highlighted within the overall assessment that may have an impact on viability. This will include consideration of issues such as:

- Contamination
- Flooding
- Infrastructure
- BNG / Ecology mitigation
- Heritage

A Green rating will be given to those sites where the general viability evidence suggests there would be suitable returns for the developer and where there are unlikely to be any abnormal costs. Amber ratings will be given to sites in more marginal areas and/or where constraints/costs have been identified that would have a tangible impact on the viability of a scheme.

At this time, we do not anticipate that a Red rating would be necessary. However, this may change if the evidence identifies areas and types of schemes that are likely to be unviable.

Overall Rating

Based on the above assessment, each site will be given an overall RAG-based score: Green, Amber or Red.

Green means this site is a strong candidate for allocation in the local plan, with few or no constraints that need mitigation.

Amber means this site is currently a candidate for allocation, but has a number of constraints to be mitigated against or further assessment is required.

Red means this site is not currently a candidate for allocation in the local plan (although some red sites may need to be re-considered at later stages, depending on the outcomes of any consultation, examination or further assessment work).

Assessing development potential

Alongside an overall rating, we will set out the development potential for each site. That is, we will determine how much development we think each site could deliver.

For sites considered for residential use, we will estimate the development potential using the following elements to determine the capacity of each site:

- Density assumptions – the number of dwellings per hectare); and
- Net developable area – the amount of land that is developable for dwellings, and excluding areas for other use

We will use the approach set out in the latest [Housing Land Supply Position Statement \(HLSPS\)](#) to help us identify a benchmark for each of these elements, but we will also have regard to national planning policy, any site-specific considerations and material (analysis) submitted by those promoting sites.

For other uses, the development potential will be determined on case-by-case basis. It is likely that floorspace or land take will be the best measure of potential as needs are usually expressed in this way (e.g. for retail or employment development). We will also have regard to any evidence documents we have prepared (e.g. an employment land review/needs assessment or town centre study) and the submitted material.

Stage 3: Determining the Draft Allocations

The purpose of stage 3 is to identify, from the list of sites assessed in stage 2, the most appropriate sites for allocating in the local plan. Selecting the most appropriate sites will depend on the local plan's objectives.

Output of this Stage

The outputs from this stage are:

- a list of draft allocations for our local plan
- a clearer view of any evidence we may need to support the draft allocations

Approach

As government guidance notes, this stage will inevitably involve a high degree of planning judgement. It will, by necessity, be a qualitative assessment. The guidance notes that the local context is key to making decisions, and we should consider the needs of the area and the proposed vision for the plan. The selection of sites will depend on the factors unique to our plan's environmental, economic and social objectives.

At the time of writing, a number of issues important to the plan making process are still to be determined which makes it difficult to pinpoint exactly how draft sites will be selected. This includes the spatial strategy, vision and plan objectives.

For now, we have set out some broad areas that would influence the site selection approach. These have been provided to give some transparency to the process as early as we can, but they will continue to be refined throughout the plan making process and this methodology may need to be updated.

We will not apply a RAG rating or scoring approach to the broad areas and factors we have identified. Instead, we envisage that a brief comment or narrative can be provided for each to help articulate the decisions we will make. **These will be considered alongside the outputs from Stage 2 as part of the overall selection process.**

For many Factors, we will be starting to think about what a proposal could look like. As such, the material submitted by those promoting the site will be a key source of evidence. Many will have started to draft out how a proposal could look, drawing on an analysis of evidence and consideration of the constraints and opportunities that a site offers.

Key principles

- Select sites which help deliver the local plan's vision and strategy
- Select sites which minimise harm to the built and natural environment, and to local communities
- Select sites which present an opportunity to address existing issues
- Select sites which bring additional benefits to the local areas

Spatial

We will consider how a site performs in respect of its compatibility with national planning policy on the location of development and the emerging spatial strategy of the new local plan. As noted above, the spatial strategy will develop over time so this section, and the specific Factors to be considered, is likely to be updated as the plan making process progresses.

Spatial strategy/Vision

Factor 20: Spatial strategy/vision

Will the site help deliver the spatial strategy and vision from the emerging Local Plan (and Spatial Development Strategy?)?

- Is the site in or adjacent to the current development limits of a settlement in the emerging settlement network?
- Does the site have the ability to deliver strategic development, either alone or combined with other sites (linking to the plan vision and spatial strategy)?
- For non-residential development proposals – Is the site within an area where a need for this development has been identified or where local strategies would support growth?
- For residential development proposals – Is the site in an area where additional jobs and economic development are planned?

At the time of writing, a Spatial Development Strategy (SDS) has yet to be prepared for the area so there are no higher level spatial policies to currently consider. Whilst the SDS will provide a spatial strategy and help determine different levels of development in different broad locations, it is not yet known whether it will include policies of practical relevance of the site assessment process. This issue will be re-visited.

Key source(s)

- East Riding Local Plan Update (2025) development limits ([Policy S3/S4](#))
- Emerging local plan evidence on spatial strategy
- Emerging Spatial Development Strategy and evidence

Flood risk

Factor 21: Flood risk sequential test

Is the site sequentially preferable in flood risk terms having regard to other options?

Managing development in respect of flood risk is a significant issue for the East Riding. Planning practice guidance requires the application of the sequential approach for plan making. Therefore, we will identify if alternative sites at a lower risk of flooding are available within the appropriate area of search. We will use the NPPF and PPG to guide this process, informed by evidence from the Environment Agency and the council's latest Strategic Flood Risk Assessment (SFRA).

As noted earlier, we do not consider it appropriate to screen out sites in Flood Zone 3a at the initial filter stage. For a location such as the East Riding, the application of the sequential test will be of greater value. There may, for example, be some exceptional circumstances where

sites partially or wholly at risk of flooding could be selected for allocation, subject to provisions regarding the safety of residents/users. For example, a previously developed site in a sensitive town centre location may deliver public benefits that outweigh the residual risk of flooding.

Key source(s)

- [Environment Agency Flood Map for Planning](#)
- [East Riding Strategic Flood Risk Assessment \(to be updated\)](#)

This Factor will inform the new plan's environmental assessment

Town centres

Factor 22: Town centre sequential test

Is the site sequentially preferable in town centre terms having regard to other options?

For main town centre uses only.³

For main town centre uses, a sequential approach is required where suitable and viable sites in a defined centre are preferred. Only where suitable and viable sites are not available, should we look at 'edge of centre' sites. Beyond that, other accessible locations that are well connected to the town centre can be considered where sequentially preferable sites are not available.

We will use, as a starting point, the defined town centre boundaries of the current Local Plan Update (2025) to undertake this assessment. We will also consider any evidence that arises from preparing new assessments/studies to support the new local plan.

Key source(s)

- [East Riding Local Plan Update \(2025\) town centre boundaries \(Policy S7\)](#)
- [East Riding Town Centres, Retail and Leisure Study \(to be updated\)](#)

Accessibility

Factor 23: Accessibility

How accessible is the site relative to alternative options?

- What is the score for the site using the Connectivity Tool?
- Is there a train station nearby?
- Is there a bus route currently in place?
- Are there any committed plans to improve accessibility in this area?

Promoting accessibility to jobs, shopping, leisure facilities and services by public transport and other modes of sustainable transport is critical to good planning. Local planning authorities should support measures that reduce the need to travel, especially by car for a range of social, environmental and economic benefits, including health and well-being. Accessibility is the ease by which an individual can access services and facilities that he or she needs or desires.

³ Main town centre uses are as defined in the NPPF. Examples include: retail development, banks, offices, hotels, restaurants, bingo halls.

The Department for Transport's (DfT) [Connectivity Planning Tool](#) is based on the connectivity metric, which measures an individual's ability to reach employment, services, and social destinations. The metric evaluates the value of these destinations and the opportunity to reach them using various modes of transport, including walking, cycling, driving, and public transport.

We plan to use this tool and the scores it generates to build a picture of accessibility. The tool allows us to take a relative approach, accounting for the general rural nature of the East Riding, and ensuring that we can select sites which give residents/users opportunities for accessing key destinations easily and quickly.

In assessing sites, account will also be taken of Public Rights of Way (PROW) and how a proposed development site could improve the existing network. This may be through the creation of a new PROW, improving access to an existing one or other recognised improvements such as:

- Upgrade to a bridleway;
- Diversion of a PROW which would help better connect people to the wider settlement, important facilities, the town/village centre, or reduce walking distance to a particular destination;
- Visual amenity improvements, for example through considering the location of open space and/or green infrastructure in relation to the PROW; or
- Improvement of the route in its wider setting, for example through the removal of a noise source close to the route, or improved lighting.

Key source(s)

- [Department for Transport Connectivity Tool](#)
- [East Riding Local Transport Plan](#)
- [East Riding Local Cycling and Walking Infrastructure Plans](#)
- [Public Rights of Way Improvement Plan](#)

Infrastructure

Factor 24: Current infrastructure position

Are there gaps currently in infrastructure provision?

- *What gaps are there at a settlement level?*
- *What gaps are there at a site level?*
- *How severe are these gaps?*
- *Would new development help to address these gaps (with or without planned investment)?*

An understanding of infrastructure is critical to plan making. We will prepare an Infrastructure Delivery Plan to support the preparation of the local plan which will assess the provision of a wide range of infrastructure in the East Riding, including but not limited to:

- Utilities – electricity, gas, water supply, sewerage, telephony and digital communications
- Flood risk and drainage management
- Health services – GP surgeries, dental services, hospital services

- Education – pre-school and early years, primary, secondary, further and higher education, SEND education
- Transport infrastructure – highway network, public transport

Due to the strategic nature of the Study, it may only identify gaps on a settlement- or area-wide basis. However, there may be more localised results that can help inform the selection of preferred sites for development. The magnitude of the infrastructure gaps will be considered and we will seek to gain an understanding as to whether there are planned investments in place and/or whether new development could help to address these gaps. In some instances, new development may present an opportunity to deliver infrastructure (on-site or off-site) which provides added value to the broader community.

Key source(s)

- [East Riding Infrastructure Delivery Plan](#)
- East Riding GIS datasets

Factor 25: On-site infrastructure constraints

Are there any on-site infrastructure constraints that will impact or restrict the development of the site? For example:

- *Pylons*
- *Pipelines*
- *Cables*
- *Other electricity or gas infrastructure*
- *Flood and drainage infrastructure*

At a site level, the presence of certain elements of infrastructure may mean that the site is undevelopable, particularly where the costs of moving or modifying the assets would severely impact the viability of development. In most cases, however, it is likely that the presence of infrastructure will simply reduce the developable area of a site and/or be a design consideration.

Key source(s)

- [East Riding Infrastructure Delivery Plan](#)
- East Riding GIS datasets

Ecology

Nature Recovery Network

Factor 26: Supporting nature recovery

Will the development of the site deliver improvements and enhancements to the local nature network in line with the objectives of the Local Nature Recovery Strategy?

As identified in Stage 2, the Local Nature Recovery Strategy (LNRS) identifies a Nature Recovery Network (NRN) comprising Areas of Particular Importance for Biodiversity (APIBs) and Areas that could become of importance for biodiversity (ACBs) (see [Factor 1](#) and [Factor 15](#)

respectively). Each of these is regarded as 'strategically significant'. The ACBs offer opportunities to link APIBs and create or enhance the ecological network. If planned carefully, developments could deliver significant biodiversity net gain⁴.

We will have regard to NRN in selecting sites and will seek to highlight specific measures identified in the LNRS that could be supported through the careful development of a site.

Key source(s)

- [Hull and East Yorkshire Local Nature Recovery Strategy \(ongoing\)](#)

This Factor will inform the new plan's environmental assessment

Habitats Regulations

Factor 27: Habitat regulations

Will the development comply with various regulations around habitats and designated sites?

In addition to the elements considered in [Factor 1 \(loss, fragmentation or isolation of an APIB\)](#), we will also consider additional impacts on designated sites in line with Habitat Regulations and our obligations under other environmental regulations. Some areas of potential impact have already been highlighted in the assessments supporting the current Local Plan Update (2025) and include:

- Recreational pressure – where new development leads to an increase or change in recreation activities (e.g. an increase in dog walking by new residents close to a designated site) affecting the integrity of sites and disturbance of featured species
- Air quality – where new development has an adverse impact on air quality, affecting the integrity of sites and introducing additional pollutants
- Water quality – where new development could result in an increase in discharging water pollutants (such as nitrogen and phosphorus), affecting the integrity of sites

A Habitats Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA) will be carried out to support the preparation of the new plan. The results of that assessment will feed into this site assessment process.

Key source(s)

- [Habitats Regulations Assessment](#)

This Factor will inform the new plan's environmental assessment

Blue-Green Infrastructure

Factor 28: Blue-Green infrastructure

Will the development impact Blue-Green infrastructure?

Natural England defines blue-green infrastructure as a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide

⁴ Habitat creation or enhancement projects located in a "strategically significant" area receive a 15% uplift (a 1.15x multiplier) in the number of biodiversity units they generate.

range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity. It includes parks and gardens, green spaces, green corridors such as rivers and canals, sustainable drainage systems, features for species, street trees and community orchards. Plans should identify opportunities for enhancing and expanding the network to help deliver further benefits and this should be an integral part of the design process.

We will consider how development could impact the existing blue-green network, recognising that isolated losses of particular features may have a wider impact on the corridor/network. Development sites will need to meet policy requirements such as biodiversity net gain or open space provision, but there may also be opportunities, through good design, to enhance, expand and further connect the network.

Key source(s)

- [Natural England Green Infrastructure Map](#)

Efficient use of land

Factor 29: Previously developed land

Will the development of the site involve the use of previously developed land?

The government sees the use of previously developed land – also referred to as brownfield land – as a mechanism for making the most efficient use of land and minimising the impact of development on the natural and historic environment. Local planning authorities are charged with accommodating as much development as possible on previously developed land. The nature of individual sites will therefore be a consideration in the site selection process. This does not mean that all brownfield sites will be allocated – there may be a number of other constraints affecting the suitability of such sites, including the site's location.

This assessment and selection methodology recognises that there are limited opportunities to redevelop brownfield land in the East Riding and we accept that a number of allocations are likely to come forward on greenfield land for this reason. Other Factors are set out in this paper to ensure that where this is the case, those sites of least environmental value are recognised.

Key source(s)

- East Riding GIS datasets

This Factor will inform the new plan's environmental assessment

Factor 30: Remediating contaminated land

Would the development of the site lead to the remediation of contaminated land or removal of a potential risk to public health?

The presence of contaminated land can result from the nature of previous on-site activities and can affect or restrict the beneficial use of land. The Council is required to identify contaminated land within the East Riding and ensure land is suitable for use, via appropriate remediation if necessary. This process, and the approach to the management of other land contamination issues, is set out in the Council's [Contaminated Land Inspection Strategy](#).

To date over 32,000 records of potential contaminated land have been identified. It is important to note that this figure does not refer to individual plots of land, as some sites may have had more than one potentially contaminating land use, and these will be recorded separately. As part of the Inspection Strategy, the council has prioritised sites for further investigation, concentrating initially on those sites categorised as 'A(1)' based on a human health receptor. When planning detailed inspections, priority will usually be given to those sites where potentially the largest number of receptors is present.

The development process is often the most effective way of removing unacceptable risks arising from contaminated land. As such, we will take account of opportunities to address an existing problem, such as a former industrial site that has left a legacy of contamination. New development may allow for remediation to the benefit of the wider community, bringing contaminated land back into productive use where practicable. Guidance on developing sites where contaminated land is present is available on the [council's website](#).

Key sources:

- [East Riding of Yorkshire Council Contaminated Land Public Register](#)
- East Riding of Yorkshire Council Contaminated Land Data

This Factor will inform the new plan's environmental assessment

Historic environment

Factor 31: Historic environment

Does the proposed development offer an opportunity to better reveal the significance and understanding of designated and/or non-designated heritage assets?

The historic environment is a significant source of pride for the East Riding, which makes a considerable contribution to establishing its sense of place. This is reflected in the breadth of Designated Heritage Assets within the boundary of the authority, which includes 109 Conservation Areas, 344 Scheduled Monuments and nearly 2,500 listed buildings. New development can breathe new life into the historic environment, for example by furthering our understanding of a Designated (or non-designated) Heritage Asset, by reinstating lost elements or addressing those that may be viewed as harmful, or by securing a heritage asset with a new sensitive viable use. We will have due regard to such positive interventions in selecting sites for allocation.

Key source(s)

- [National Heritage List for England](#)
- [Humber Historic Environment Record](#)
- Submitted material

Issues and opportunities

Factor 32: Issues and opportunities

Does the site help to address identified local issues or challenges, and/or does it offer opportunities for public benefit?

We anticipate that all sites will meet national and local planning policy requirements, where relevant to the proposed use, such as biodiversity net gain, affordable housing, open space, etc. We also understand that development can deliver wider social, economic and environmental benefits – e.g. through employment in construction, creating demand for local commercial services, etc.

We are of the view that the new local plan should maximise opportunities for public benefit resulting from new development. In addition, our evidence may have identified specific local issues which may be addressed through new development (see also [Factor 24 in respect of infrastructure](#)). We will have regard to these elements in the selection process.

New development may present opportunities to:

- Deliver infrastructure for the wider public benefit – whilst new developments should be supported by relevant new infrastructure to make it acceptable, there may be instances where this has wider public benefits beyond the new residents/occupiers of the site.
- Remove a risk, hazard or a use which gives rise to complaints – development may present an opportunity to remove or address an ongoing issue which is affecting amenity or business.

Where sites are selected with reference to the opportunities offered, a requirement to deliver them will be built into any subsequent local plan policy allocating the site for development.

Key source(s)

- [East Riding Infrastructure Delivery Plan](#)
- Submitted material

Factor 33: Compatibility with neighbourhood plans

Would development support the objectives of a made Neighbourhood Plan for the area?

With a neighbourhood plan, communities can create a vision and planning policies for the use and development of land in a neighbourhood. Neighbourhood plans can be general or more detailed, depending on what local people want – so long as they are in general conformity with the strategic policies in the council's adopted Local Plan. As adopted (made) neighbourhood plans are part of the development plan for an area – used to make decisions on planning applications – it follows that they should be a factor when considering the selection of sites through the local plan making process.

Key source(s)

- [Neighbourhood plans](#)

Factor 34: Air quality

Would the development remove an existing source of air pollution?

There are a range of different pollutants that are covered by the responsibilities imposed on local authorities under the Local Air Quality Management (LAQM) principles of the Environment

Act, however those most commonly referenced in air quality assessments are nitrogen dioxide (NO₂) and particulate matter in the form of both PM₁₀ and PM_{2.5} (fine particulate matter).

The government has defined national air quality standards and objectives and requires the Council to review and assess ambient air quality within the East Riding. If there is a risk that levels of particular pollutants will be higher than a nationally prescribed level, as set out in the [Air Quality \(England\) Regulations 2000](#) and [amending regulations 2002](#), the council is required to designate a local Air Quality Management Area. The council's review and assessment process is continuous and monitoring is undertaken at a number of locations with relevant pollutant exposure. There are currently no local Air Quality Management Areas in the East Riding.

Those promoting certain types and scales of development should set out what actions and/or mitigations have been considered to [reduce PM_{2.5} exposure](#) for development users and nearby receptors (houses, hospitals, schools etc.). They should also set out how they plan to reduce emissions of PM_{2.5} and its precursors within their design. Guidance for undertaking assessments of air quality include:

- [Institute of Air Quality Management \(IAQM\)](#)
 - Planning for air quality
 - Assessment of dust from demolition and construction

The focus through the site allocations process will be on existing uses and whether development provides an opportunity to remove an existing source of air pollution.

Key Source(s):

- Site submission material
- East Riding GIS datasets

This Factor will inform the new plan's environmental assessment

Stage 4: Confirming the draft allocations and recording our decisions

Stage 4 is where we confirm the sites to take forward as the draft site allocations in the plan.

Output of this stage

- a list of draft allocations included in our plan
- a list of sites we have rejected
- a record of our rationale for each selected and rejected site, and the evidence to support these decisions

Approach

We will document a record of the process we have undertaken and we will publish the outputs of the assessment. We will set out the following details for each site:

- site name or reference;
- site location (cross referenced to maps of sites);
- site category;
- how much can be built on each site;
- the time it will take to build out each site, including details on phasing larger sites where appropriate;
- individual RAG scores for suitability, availability and achievability;
- overall RAG score;
- justifications for overall score, including detail on any changes between Stages 2 and 3;
- for housing sites, if a site has been determined to be ‘deliverable’ or developable; and
- indication or ordering of the sites to show which ones we have deemed unsuitable, and which ones are our draft allocations.