

Classification: OFFICIAL

## Summary of Responses for the 'Central Buckinghamshire' Housing and Economic Land Availability Assessment (HELAA) Methodology

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May 2015

| <b>Organisation / Contact Name</b> | <b>Summary of Comments</b>  | <b>Response</b>   |
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| <b>AVALC</b>                       | Scope and extent of the assessment - All of the issues relating to the area should be covered and are.  | Support noted.  |
|                                    | Criteria used to exclude sites for the assessment - The criteria cited seem to be logical.  | Support noted.  |
|                                    | Criteria used for determining the suitability, availability and achievability - The explanation is not easy to follow but presumably reflects "planning speak".   | Noted. The terms follow those set out in the NPPF and NPPG. Definitions are set out in the glossary.  |
|                                    | Assumptions used for calculating the development potential including density assumptions - These assumptions are reasonable.  | Support noted.  |
|                                    | Use of windfall - Uncertainty around this term.   | The term 'Windfall' is defined in Annex 2 of the NPPF as 'sites which have not specifically been identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available'. Therefore preparing local plans involves including an allowance for what proportion of supply may come from windfall sites. |
|                                    | If the HELAA is to become part of the Local Plan, then the Neighbourhood Plans, where they exist should be considered as part of this being the evidence of "localism" and the wishes of the local community.   | HELAA is part of the evidence base that informs the preparation of Local Plans but is not 'part of 'the Local Plan or a Neighbourhood Plan.   |
| <b>Barton Willmore</b>             | Not sure whether their PDL site (submitted as part of the Call for Sites consultation) in the Green Belt on the edge of a small settlement would be picked up as part of the HELAA process or Green Belt Study. | Text amended to clarify PDL sites within the Green Belt will be considered as part of the HELAA assessment.   |

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| <b>Bedford Borough Council</b> | <p>The scope and extent of the assessment - In terms of scoping the assessment you state that you will be looking at employment land for the purpose of economic development. It would be useful to understand how (if at all) this will be translated into a trajectory and what level of detail you intend to include in the study about economic development sites and what test you may apply to determine if they are deliverable or developable?</p>  | <p>Details on the employment trajectory will be specific to each district, rather than form part of a joint methodology.</p>                        |
|                                | <p>The criteria used to exclude sites from the assessment - In relation to excluding sites your methodology proposes that constraints such as functional floodplains, SSSIs etc should exclude the site or part of site from the assessment. Where such constraints cover parts of proposed sites rather than the whole site, it might be better to note at the suitability stage that there are significant constraints which will limit the capacity rather than seek to exclude parts of the site at step one.</p> | <p>Point noted. Constraints in Table 2 which cover part of a site will be considered in the overall assessment of suitability.</p>                  |
|                                | <p>The criteria used for determining the suitability, availability and achievability - I note that you appear to have taken a slightly different approach to the NPPG regarding sites with planning permission and how they will be viewed in relation to suitability and availability. What was your reasoning behind this?</p>  | <p>Point noted. Text amended in paragraph 2.31 to reflect that planning permission does not necessarily mean a site is automatically available.</p> |

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|  | <p>Assumptions used for calculating the development potential including density assumptions - The approach outlined appears to require a fairly detailed individual site appraisal. In advance of the new Local Plan policies being agreed it may be useful so include some broad brush assumptions about calculating site capacity to ensure transparency and consistency across the study.</p> | <p>Assumptions for density are set out in Table 2 and paragraph 2.42 to take account of the varying characteristics between the districts.</p>   |
|  | <p>The use of windfall - It may be that some of the residential intensification sites involve the development of garden land which should be excluded from the calculation.</p>  | <p>Point noted. Garden land will not be included within a windfall allowance.</p>  |
| <p><b>Bidwells for Davidson Developments Ltd and also for Careys New Homes</b></p> | <p>There should be a commitment to review HELAA on an HMA basis if one of the authorities cannot demonstrate a 5 year housing supply.</p>  | <p>The requirement for keeping an up to date 5 year supply of deliverable sites is a requirement for the District, not the housing market area.</p>  |
|  | <p>Disagree that the 700 population figure is justified and disagree having a population threshold that means smaller settlements are not looked at. A more robust approach would be to exclude small sites within locations that are not in close proximity to an existing settlement, and where these are not being proposed as part of a new settlement.</p>                                  | <p>The methodology has been amended to remove a settlement size threshold (previously a population of 700 or more). Sites identified within or adjoining all sizes of settlements will be considered through the HELAA process. Sites not adjoining a settlement or not a PDL site will be excluded from the assessment.</p> |
|  | <p>There should be a standard Call for Sites Form across the 3 authorities and clarify if densities are net or gross</p>   | <p>Forms have been amended to make clear gross and net figures.</p>  |
|  | <p>Sites in the Green Belt should not be excluded at an early stage as they may perform exceptional circumstances.</p>   | <p>A separate Green Belt Assessment is being carried out to review the functions of the Green Belt. If areas show to perform weak Green Belt functions, sites will then be assessed through the HELAA process.</p>   |

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| <b>Bucks County Council</b>                    | <p>Would like to ensure that specialist housing need is continually identified as work progresses on the HELAA and that reference is made to our Market Position Statement.</p>   | <p>The HELAA deals with the ‘supply’ of housing land. The issues on specialist housing need will be picked up as part of the work on the Housing and Economic Development Needs Assessment (HEDNA). Rachel Wileman from BCC is on the steering group for the HEDNA.</p> |
|  | <p>Para. 2.18 refers to leaving it to the Local Plan to identify how constraints such as archaeological findings will be dealt with. Rather than leave it for the Local Plan process we would recommend that the Bucks. County Archaeological Service and its Historic Environment Record are consulted during the HELAA process.</p>   | <p>Wording has been amended in paragraph 1.21 4<sup>th</sup> bullet to include consultation “with Buckinghamshire County Council for issues such as highways, archaeology and nature conservation”</p>  |
| <b>CBRE for Biddulph (Buckinghamshire) Ltd</b> | <p>Biddulph notes that the HELAA methodology highlights the process for separate and subsequent assessment of land within the Green Belt, which is excluded at this stage from the HELAA itself. Biddulph acknowledges the process of undertaking a separate Green Belt review and later consideration of suitable Green Belt sites through the HELAA.</p>  | <p>No change. The point raised is directed to the methodology of the Green Belt Review study rather than HELAA.</p>   |
|  | <p>However, Biddulph considers that this should not be limited to identifying sites that perform none of the Green Belt functions, but should instead focus on the quality and level of the contribution that each site makes to the Green Belt. Therefore, some sites only contributing to one or two purposes of including land within the Green belt may still be deemed suitable for release and further consideration.</p> | <p>Areas of land which are assessed through the Green Belt Assessment and identified to perform ‘weak’ Green Belt functions will be assessed through the HELAA process.</p>   |

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| <p><b>English Heritage</b></p> | <p>“Scheduled Ancient Monuments” – welcome their inclusion as stage 1 constraint in Table 2 but would like “and their settings” added. Listed buildings and their settings and Registered Historic Parks and Gardens (and their settings) should also be identified as Stage 1 constraints.</p>   | <p>Wording amended in the environmental constraints section to include the settings of Scheduled Ancient Monuments and Listed Buildings and their settings. There are no locally Registered Historic Parks and Gardens within the three districts.</p> |
|                                | <p>For stage 2 we consider that conservation areas and locally listed historic parks and gardens and their settings (if local designations such as local wildlife sites and local landscape designations are to be included) should be identified as “more fundamental environmental constraints” in para. 2.17. If listed buildings and their settings are not included in stage 1 they should certainly be included here.</p> | <p>Text has been amended to include all environmental constraints within one list, giving equal importance to all.</p>   |
|                                | <p>Under para. 2.18, it should be noted that archaeological findings may still be of national importance if not scheduled, and accorded the same level of protection as for scheduled remains in accordance with para. 139 of the NPPF. Conservation areas and their settings should be identified as more fundamental environmental constraints.</p>   | <p>Point noted. See comment above.</p>   |
|                                | <p>The list of environmental constraints should include locally listed historic parks and gardens and their settings if not included as more fundamental environmental constraints and other heritage assets, including historic landscapes (as identified through the Bucks. Historic Landscape Character Assessment).</p>   | <p>Wording amended to include Historic Landscapes and their setting. There are no locally Registered Historic Parks and Gardens within the three districts.</p>  |

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| <b>Gavin Lawrie - Individual</b> | <p>Concerned that none of the factors used in the Land Availability Assessment include consideration of the impact of development on existing community infrastructure, for example transport routes or asset constrained social resources such as schools or sheltered care. The closest it comes to acknowledging these issues is in paragraph 2.42, where consideration of these factors is proposed as a modifier for the calculation of the ‘development yield’, which is an assessment of the state of local assets on the development itself - the inverse of the concern I am raising here.</p>  | <p>The level of infrastructure assessment for a HELAA is high level and not the same as a more rigorous and strategic overview needed for a local plan to allocate the sites for development. Details regarding community infrastructure will be considered if a site is taken forward for an allocation in the Local Plan.</p> |
|                                  | <p>Would like the methodology to consider the requirement for these social assets to be augmented if all the candidate sites related to the asset (e.g. in its catchment, or feeding traffic into traffic channels) were to be developed. If the local social asset base is insufficient to accommodate the full set of candidate sites, the methodology should have a mechanism to delay development until such time as the asset base can be improved. Given the timescale for the development of these factors, and likely council budgetary limits, such deferral would almost certainly relegate sites from “deliverable” to “developable” status, or to push sites from “developable” beyond the planning horizon.</p> | <p>In terms of social assets these factors are considered if the site is taken forward for an allocation in a Local Plan, but this level of detail is too detailed for the HELAA.</p>   |
|                                  | <p>Failure to consider these factors from the perspective of the assets affected would likely result in many incremental comparisons that affect the housing density allowed / estimated on a plot by plot basis, but would not prevent multiple developments going ahead and overloading the local asset base.</p>  | <p>These are issues for the Local Plan to consider. The HELAA only considers individual sites and does not look at cumulative impacts.</p>  |

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| <p><b>Dacorum Borough Council</b></p> | <p>No detailed comments on the HELAA methodology. Support the consistent and joint-working approach across the Districts in the market area. The broad methodology is consistent with our own.</p>  | <p>Noted. Support acknowledged.</p>   |
| <p><b>Gladman Developments</b></p>    | <p>Sites with planning permission should be included in the 5 year supply, whilst sites without planning permission, such as those identified through the HELAA, should only be regarded as available and deliverable now when there is clear evidence to support their inclusion within the five year supply.</p>  | <p>Agreed, sites with planning permission will normally be included in the 5 year supply. Where a site does not have a current application evidence will be needed to justify its inclusion within the 5 year supply.</p> |
|                                       | <p>The adequacy of the HELAA will be influenced by the assessment of a site’s suitability, availability and achievability. The Councils should ensure that the deliverability and density assumptions include realistic lead in times for larger scale sites. The Councils should avoid applying unrealistic delivery assumptions and consequently artificially enhance its ability to meet its housing need. Includes allowing sufficient time for a site to gain planning approval and to start to deliver housing.</p> <p>For larger schemes the Councils may consider increasing their build out rates, however this should only be in the instance where multiple developers are acting on site.</p> | <p>Point noted. It is intended that assumptions, such as these, will be built into the assessment stage.</p>  |
|                                       | <p>In areas where there are multiple sites of a smaller size coming forward within a similar timeframe, the Councils will need to take into account market saturation and apply an appropriate discount to the expected delivery rates.</p>   | <p>Point noted.</p>   |

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|  | <p>Consider it vital that a steering group is set up in order to ensure a robust methodology (as per para. 1.19 of the Methodology).</p> <p>Sites should not be categorised as deliverable, certainly within the 0-5 year period, if discussions with developers/ agents have not taken place as set out in para. 2.41 of the Methodology.</p>                                    | <p>Each district will consider the level and type of engagement with stakeholders. As a minimum requirements are set out in paragraph 1.21. It is hoped that by establishing a steering group or an alternative method of engagement with developers / agents that issues such as those raised by yourselves above can be addressed.</p> |
|  | <p>Care should be taken that windfall sites aren't double counted.</p>  | <p>Point noted.</p>  |
|  | <p>The sources identified in Table 1 are largely in accordance with the guidance set out in the PPG. Gladman question the inclusion of some of the characteristics to make up residential intensification category. The majority of these sites are likely to come forward as windfalls. All allowance for these sites seems to be at odds with paras. 48 and 53 of the NPPF.</p> | <p>Text has been amended to only include a windfall allowance of small sites (less than 5). A windfall allowance for residential intensification sites has been removed.</p>   |
|  | <p>Question the blanket exclusion of Green Belt sites in Table 1.</p>   | <p>A separate Green Belt Assessment is being carried out to review the functions of the Green Belt. If areas show to perform weak Green Belt functions, sites in those areas will then be assessed through the HELAA process.</p>  |
|  | <p>What evidence has been used to assume the density levels considered in Table 2? Seem to be an overly simplistic approach to considering all sites. The levels identified will need to be robustly evidenced to be considered reasonable in the absence of site specific data.</p>  | <p>Density assumptions within Table 2 are only a starting point. Further considerations for density are set out in paragraph 2.40.</p>   |

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|                                     | <p>It is not apparent from the methodology how the need to provide onsite infrastructure or mitigation measures, such as road access or public open space, will be factored into the methodology alongside density information to identify site capacity. The amount of land taken up by such uses will obviously vary depending on the scale of the development, nevertheless consideration needs to be given in order to avoid an overestimation of site capacity. The methodology states that these will be considered, but does not set out how, in the absence of site specific information it will be important to transparently and robustly explain how these factors will be considered.</p> | <p>The amount of land for onsite infrastructure and mitigation measures will be agreed on a site by site basis. The Council's HELAA reports will identify density assumptions used for each site.</p>   |
|                                     | <p>Re Flood Risk – presume that sites will not automatically be excluded if just a small part of the site sits within such a zone, this should be confirmed within the methodology. Pleas that mitigation measures can be used to remedy any potential flood risk.</p>  | <p>Wording in paragraph 2.7 amended to clarify a site will not automatically be excluded if only part of a site has a constraint identified in table 2.</p>   |
|                                     | <p>Para. 3.7 requires clarification. The paragraph assumes that some level of residential intensification if found could be delivered in 0-5 years. The reasoning behind this needs further consideration and explanation.</p>  | <p>The methodology has been amended to take out the windfall allowance for residential intensification sites. Residential intensification sites which are currently known to be deliverable will be included in the HELAA through the normal process.</p> |
| <p><b>Luton Borough Council</b></p> | <p>Notes that your HELAA methodology will not assess Green Belt sites at this stage but awaits a separate Green Belt review examining areas of Green Belt and their contribution to the purposes of the Green Belt. Luton consider it will be critical to coordinate this work with the HELAA and ask if the Central Bucks authorities could clarify how this will be fed into the HELAA timetable and how the program will coordinate and address the issue of Luton's unmet housing need?</p>   | <p>No change needed to the methodology. AVDC acknowledges the importance of engaging with Luton on wider Duty to co-operate issues concerning Luton's unmet housing needs.</p>  |

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| <b>Milton Keynes Council</b> | Query the extent of the HMA covering Aylesbury Vale   | The extent of the HMA is defined in the Bucks Housing Market Area and Functional Economic Market Area Study published by ORS. Based on best fit Aylesbury Vale falls within a 'Central Buckinghamshire' housing market area. However it is acknowledged there are strong functional links between Aylesbury Vale, Milton Keynes, Oxford and north of London and there will be a need to maintain Duty to Co-operate dialogue with the relevant planning authorities. |
|                              | Consider that at para 1.9 there should be a reference to local plan making consultation                                       | Text amended to include reference to local plan making consultations.  |
|                              | Para 1.20 should have more clarity explaining the stakeholder consultation with neighbouring authorities                      | Paragraph 1.21 sets out the minimum level of engagement. It is for each district to decide in more detail how this will take place, depending on local circumstances.  |
|                              | Table 1 – box on '360 degree' assessments of land around strategic settlements – query regarding how Keynes would be regarded | Milton Keynes sites have been identified through AVDC's 'Call For Sites' consultation and existing information from previous SHLAA's.  |
|                              | Table 2 – query on 'identified settlement' and if this means 'strategic settlement'   | The term 'identify settlement/ strategic settlement' has been removed.   |
|                              | Table 2 – query on the 700 population threshold not being the defining criteria for sustainable settlements                   | The methodology has been amended to remove a settlement size threshold (previously a population of 700 or more). Sites identified in all sizes of settlements will be considered through the HELAA process.  |
|                              | Para 2.42 – this should be added to/ replaced for 'Major Sites' what would largely set their own character                    | Wording amended to reflect this (second from last bullet).   |
|                              | Para 3.3 - Query on counting windfall allowance on small sites in the first 3 years   | In the housing trajectory small sites are normally completed within the first 3 years, therefore a windfall allowance of small sites will be counted in years 4 and 5 to ensure there is no double counting.   |

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|  | Para 3.5 – Re: Could a similar allowance apply to office-to-residential sites?   | The permitted development rights which allow office to residential conversion is set to ending at the end of May 2016, therefore it wouldn't be appropriate to assume this will continue at this stage. |
|  | Para 3.6 – why is the allowance only applies to years 6-15 of the trajectory?  | Allowance for residential intensification sites has now been removed from the HELAA. Only a windfall allowance for small sites (less than 5) will be included.  |
| <b>Natural England (NE)</b><br>Thames Vally Team | NE supports the identification of Sites of Special Scientific Interest, Special Areas of Conservation, Special Protection Areas and Ancient Woodland in the criteria for sites to be excluded from identification through the HELAA.   | Noted and support acknowledged.   |
|  | Also support the inclusion of AONB, local landscape designations, local nature reserves, Biodiversity Action Plan priority habitat sites, local wildlife sites and biological notification sites in the list of fundamental environmental constraints. However, we consider that the high quality agricultural land should also be included in this list, rather than as a general environmental constraint. This is to support safeguarding the long term capability of best and most versatile agricultural land as a resource for the future. | Paragraph 2.15 to lists agricultural land as environmental constraints.   |
| <b>Newell Projects Ltd</b>                       | Sites less than 5 dwellings – implore Councils to count each and every opportunity rather than leave it to windfalls.  | It would be difficult to identify sites of this size particularly in a District such as Aylesbury Vale.   |

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|  | <p>Not within or adjoining an – implore Councils to consider settlements of much less than 700 population as Bucks is made up of many smaller settlements. If you have a PDL site in the Green Belt/ AONB, then it would not be possible to consider it. This left hand column needs to be better defined.</p> | <p>The methodology has been amended to remove a settlement size threshold (previously a population of 700 or more). Sites identified in all sizes of settlements will be considered through the HELAA process. All PDL sites will be considered through the HELAA regardless of the site's location. Wording amended in Table 2 and paragraph 2.24-2.26 to clarify that PDL sites in the Green Belt and AONB will be considered through the HELAA assessment.</p> |
|  | <p>Employment land reviews need to be subject to an honest approach. Councils are achieving very few mixed use sites and this needs to be rectified.</p>   | <p>No specific change needed to the Methodology.</p>  |
|  | <p>Considers that WDC have misinterpreted the Green Belt as evidenced by recent discussions re Molins PDL. Considers that this section should be rewritten to reflect the NPPF. Points out that he was instructed the firm's QC to take the matter up.</p>   | <p>Wording has been amended to clarify how sites in the Green Belt will be considered in a ' Planning Policy Consideration' section. It is not accepted that the wording is misinformed.</p>  |
|  | <p>AONB – given that this is Article 1(5) land, there should be some special consideration attached to the identification of development in this area, especially for CDC.</p>   | <p>If special consideration is required this will be done through the Local Plan process, as set out in the Methodology, and in keeping with the advice set out in the AONB Management Plan 2014-19. The AONB includes whole settlements in some instances and these settlements may well offer opportunities for development and as such shouldn't be ignored in the search for potential housing and economic development sites.</p>                            |
|  | <p>Locational considerations – difficult to achieve a balanced approach when only considering a 700 population level.</p>  | <p>The methodology has been amended to remove a settlement size threshold (previously a population of 700 or more). Sites identified in all sizes of settlements will be considered through the HELAA process.</p>  |

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|                              | <p>The text in para. 2.14 needs to be carefully defined in order to avoid the ‘coalescence of settlements’. Para 2.15 seems to be encouraging the coalescence of settlements.</p>  | <p>The intention of paragraph 2.13 is not to encourage the coalescence of settlements. Each site of this nature will be considered individually.</p>   |
|                              | <p>It is inconceivable that major development would take place in the AONB, other than strictly on PDL (where impact has to be considered) and otherwise to a very minor extent. What happens in situations where Green Belt coincides with AONB? Can’t allocate mass housing in the Green Belt. The SoS’s rulings must be included in the considerations. Correct anomalies in the current GB boundary.</p> | <p>At this stage the study is looking for potential sites. This is an issue for the Green Belt Assessment Study and not the HELAA. We are aware of the SoS’s rulings but this hasn’t ruled out large housing schemes in the Green Belt around, for example, Coventry. The purpose of this study isn’t to correct Green Belt anomalies but to look for potential housing sites.</p> |
|                              | <p>Residential intensification sites don’t normally comprise PDL. This should be recognised.</p>   | <p>Allowance for residential intensification sites has now been removed from the HELAA. Only a windfall allowance for small sites (less than 5) will be included.</p>  |
|                              | <p>How many years will it take to consider all of the sites in the depth specified and decide where building will happen?</p>  | <p>It is anticipated that HELAA reports for each authority will be published before the end of 2015.</p>   |
| <p><b>Nexus Planning</b></p> | <p>The Draft Methodology is unclear on the status of those Green Belt sites that do not serve a Green Belt function. It does not outline when or even if those sites will be included in the HELAA. The Draft Methodology is also unclear on the circumstances surrounding revised evidence, when this will be submitted and how it will be assessed.</p>  | <p>Wording has been amended in Table 2 to clarify the status of sites which are identified to show a weak Green Belt function through the Green Belt Assessment.</p>   |

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|  | <p>In any event, discounting all potential housing sites located within the Green Belt without making any assessment of their housing potential is in our view inappropriate. The HELAA should provide an assessment of all sites. Sites located within the Green Belt should be technically assessed to determine their potential as housing land. As assessment of the future housing potential of these sites will aid decision making if, in the long term, there is insufficient housing capacity within the existing urban area.</p> | <p>A separate Green Belt Assessment is being carried out to review the functions of the Green Belt. If areas show to perform weak Green Belt functions, sites within that area will then be assessed through the HELAA process. Green Belt sites put forward for the HELAA will be appended to each of the Council's HELAA's.</p> |
|  | <p>The PPG seeks to ensure that all land is assessed together so as to identify which sites or broad locations are the most suitable and deliverable. Specifically, the guidance states that sites with policy constraints should be included in the assessment for the sake of comprehensiveness.</p>   | <p>Agreed. Each assessment will include policy constraints.</p>   |
|  | <p>The Draft Methodology does not make it clear how future Employment Land Reviews will correspond with the on-going HELAA process. Councils should establish an appropriate process to make sure the identification of suitable employment sites are able to be included in the HELAA review process in an efficient way that aligns with the completion of Employment Land Reviews. This will ensure assessment work is not doubled up, and sites can be brought forward in an efficient and timely manner.</p>                          | <p>Employment Land Review's will look at existing employment sites, whereas the HELAA will focus on the identification of potential new employment sites. This is further clarified in a new 'Planning Policy Considerations' section.</p>  |

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|  | <p>The HELAA should include large scale existing residential sites and economic land which could be suitable for alternative uses. Discounting these sites prior to them being assessed as part of the HELAA process may result in beneficial redevelopment opportunities being overlooked.</p>  | <p>Agreed. These types of sites will be considered through the 'Call for sites' category in Table 1.</p>  |
|  | <p>Para. 1.16 states that in addition to the call for sites the HELAA will be open to further potential site identification during other key stage consultations. Supportive of this approach.</p>   | <p>Support welcomed.</p>  |
|  | <p>Para. 5.5 states councils will publish a 'closing date' on their respective websites for new site submissions each year until a Development Plan is in place which has secured sufficient land to meet the identified growth needs. Generally supportive of this approach, some clarification as to when and how revised evidence or new sites can be submitted and how these will be assessed is requested.</p>                                    | <p>Each Council will identify when the next 'Call for sites' consultation will take place. This is likely to align with the development of new Local Plans.</p> |
|  | <p>Given the likelihood of changes in the deliverability of sites it is recommended that councils adopt an annual process which allows additional evidence, along with new sites, to be submitted as part of the AMR. This process should continue after a Development Plan is in place. This will aid the councils to make sure all developable and deliverable sites are technically assessed and can assist to meet objectively assessed needs.</p> | <p>Agreed and sufficiently covered in para. 5.3 of the Methodology.</p>   |

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|                       | Inland Homes would welcome the opportunity to assist in identifying appropriate sites. Inland Homes would also be willing and able to provide a member to sit on the steering group.  | Invitation welcomed.   |
| <b>Planning Works</b> | Table 1: The Prior Approval Office to Residential Accommodation is a temporary measure which is currently due to expire on 30 <sup>th</sup> May 2016 by which time schemes must be 'completed'. Some further assessment is therefore required in relation to the contribution that these sites can make as a source of supply beyond what is currently being suggested. | Point noted. Whilst it is true that this scheme is currently temporary until May 2016, the Technical Consultation on Planning of July 2014 suggested that it might be extended for a three year period until May 2019. However this change has yet to be confirmed and therefore it would not be appropriate to rely on this source of supply beyond May 2016. |
|                       | Page 13 – To achieve maximum consistency between authorities, sites of 5 dwellings should be excluded and individual authorities should not be given the opportunity to include these sites in individual studies   | A consistent approach across the HMA is being taken. For each district sites of 5 or more will be considered through the HELAA. This is in accordance with the Planning Practice Guidance.   |
|                       | Page 14 – Not within ...identified settlement. "Near" needs to be quantified in some way so as to achieve maximum consistency e.g. 400m walking distance?   | Agree that the wording needs to reduce the chance of ambiguity in interpretation and be more carefully defined. Wording amended to remove 'near' and replaced with 'adjoining'.  |
|                       | Page 15 – Sites within Green Belt. Green Belt sites should be included in some way in the document, perhaps as a separate appendix rather than being excluded totally pending separate GB reviews. The potential source of supply could then be seen.   | Comment noted. Green Belt sites will be appended to each HELAA report.   |

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|                         | <p>Page 18 – Provide a detailed list of General Physical Constraints that should be completed including 1) Topography 2) Existing landscape 3) Sudden changes in levels and any sign of historical remodelling. Whilst steep embankments can restrict the type of development and its potential development there is very limited situations within the UK where land cannot be developed. 4) Former site use history 5) Site orientation 6) Sun rise and setting information, shadowing of adjacent developments must be noted 7) Adjoining development outlooks can also have a direct influence on any potential sites view in and out. 8) The site must be considered in its wider context with information supplied on flooding and ecological interest both locally and regionally. 9) Highway and transport interlinking into the wider network must be considered. 10) Provision of employment for the residential property occupiers and their route to work must be reviewed.</p> | <p>Points noted. Whilst some of these suggestions will be considered, it will not be possible to identify this level of detail for every site in the HELAA. If a site is taken forward for allocation, then these factors will be considered in more depth.</p> |
|                         | <p>Page 18 para. 2.23 In any assessment for potential development, the service locations, wayleaves and statutory authority maintenance requirements must be fully considered. Options may exist for diversion of the utilities either within the potentially allocated site or its immediate periphery. They may be master planning principles that can be established in any layout to allow the diversion or retention of the utility routes e.g. by a road following the line of any services. Additional information should be sought from the land owner/ promoter to justify the inclusion of a site submission affected by utilities.</p>   | <p>As above.</p>  |
| <p><b>Runnymede</b></p> | <p>Para. 1.12 windfall can contribute to five year supply if they consistently come forward.</p>  | <p>Agreed. Text has been amended to add “in the five-year supply” after ‘windfall sites’.</p>   |

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|  | <p>Para. 1.20 Last bullet point Surely you will know the site owner/ agent etc as a result of your call for sites exercise and won't therefore need to contact them twice.</p>  | <p>This will only be carried out for the sites where sufficient information hasn't been received from a landowner / developer or agent.</p>  |
|  | <p>Table 1 p. 11 Should there not also be a 'source' referring to Prior Approval Certificate for retail to residential?</p>   | <p>Agreed. Table amended to include Prior Approval Certificate for retail to residential.</p>  |
|  | <p>Table 2 p. 15 "If the GB Assessment identifies that the site no longer performs the GB functions, it will then be reassessed through the HELAA process." We would be reticent about saying it will be reassessed, because surely the land is still GB until the Local Plan has been adopted, and it must also be a political decision to agree whether the land can be released before this is even tested at examination. To assess the land in the way suggested would be premature.</p> | <p>Text amended to identify sites will be assessed through the HELAA if the site is identified to perform weak Green Belt functions. The purpose of the HELAA is to identify potential sites for residential and economic development purposes. The allocation of these sites will be done through the formal process of preparing the Local Plan. It is not therefore considered premature to include such sites within the HELAA and complies with the advice in both the NPPF and NPPG. Further wording on this issue is identified in a new 'Planning Policy Consideration' section.</p> |
|  | <p>Table 2 p. 15 Flooding. Clarification sought re 3A. Does national guidance not say that residential development can be considered in 3A if the exception test is passed? 3A is not functional floodplain.</p>  | <p>Agree this text in Table 2 has been amended accordingly.</p>  |
|  | <p>Para. 2.37 Runnymede BC is proposing a stakeholder group also suggested in their draft methodology. This group could be useful in helping officers determine viability of a particular site.</p>   | <p>Noted.</p>  |

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| <b>Royal Borough of Windsor and Maidenhead</b> | There is likely to be more uncertainty over viability and deliverability of the sites if sites are received as internal site suggestions from Planning Officers. The position could be clarified by seeking to engage with the landowner and for sites to be fully considered within the HELAA only if they are deemed to be deliverable.                  | All sites will be assessed to determine their suitability, achievability and availability. This will then inform whether the site is 'deliverable' (within 5 years) or 'developable (within 15 years). In the majority of cases sites are normally identified by developers/agents and landowners.  |
|  | RBWM would like to understand the reasoning behind excluding Green Belt sites from the HELAA. They suggest that sites located within the Green Belt are documented in the HELAA and could be assigned no housing number until such a time that it is shown that the Green Belt is to be reviewed. This would accord with the approach set out in the NPPF. | A separate Green Belt Assessment is being carried out to review the functions of the Green Belt. If areas show to perform weak Green Belt functions, sites in those areas will then be assessed through the HELAA process. Green Belt sites put forward for the HELAA will be appended to each of the Council's HELAA's. Further detail is set out in a new 'Planning Policy Consideration' section of the methodology. |
|  | Such an approach should also be taken for sites which would fall within the criteria of "housing sites within functional flood plains 3A and 3B" as the clarity to pass a sequential/ exception test is not known until later on in the plan process.  | Text in Table 2 has been amended to identify Land that is in flood zones 3a and 3b will not be included in the HELAA unless it can be demonstrated, through a planning application, that satisfactory mitigation measures can be put in place.  |
|  | Definition needed of what is meant by 'identified settlement'. In what circumstances would the councils consider sites in settlements below a population of 700?   | The methodology has been amended to remove 'identified settlements' which were settlements with a population of 700 or more. Sites identified within or adjoining all sizes of settlements will be considered through the HELAA process. If a site is PDL it will be considered regardless of its location.   |
|  | Table 2 excluding sites in SSSIs, SACs, SPA, SAMs, Ancient Woodlands and Designated Local Green Spaces. It would be helpful to clarify if adjoining sites would be included at this stage.   | Adjoining sites would not automatically exclude the site. This will be considered through the more detailed 'suitability' assessment. Wording amended in paragraph 2.9.   |

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|  | <p>Clarify what is meant by the following sentence “Only sites located within or close proximity to an ‘identified settlement’ will be considered through the HELAA process unless it has been previously developed anywhere within a District.”</p> | <p>The methodology has been amended to remove ‘identified settlements’ which were settlements with a population of 700 or more. Sites identified within or adjoining all sizes of settlements will be considered through the HELAA process. If a site is PDL it will be considered regardless of its location.</p> |
|  | <p>Environmental constraints section – factors such as flooding and Green Belt should also be considered on their merits and so included in this section.</p>  | <p>Wording has been amended to include flooding in the ‘suitability’ stage of the assessment. If a Green Belt site is identified in the Green Belt assessment to perform weak functions of the Greenbelt, it will then be considered through the full HELAA process.</p>   |
|  | <p>It is unclear how existing policy allocations and safeguardings relevant to Bucks will be applied and allowed to influence the HELAA process.</p>   | <p>The methodology has been amended to include a new section on planning policy considerations to address issues such as this.</p>   |
|  | <p>Question the consistency of the years mentioned in paras. 3.3 and 3.6.</p>  | <p>Text has been amended to only include a windfall allowance of small sites (less than 5) for year 4 and 5 of the trajectory. The windfall allowance for residential intensification sites has been removed.</p>  |

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| <p><b>Savills</b></p>                      | <p>Not appropriate to exclude sites within the Green Belt. Aware of the Green Belt Review but still consider that it is not appropriate to discount Green Belt sites without further testing their suitability. The HELAA methodology states that the Council will usually consider sites with good access to the strategic transport network as being suitable for employment development. By excluding sites within the Green Belt, accessible areas which could potentially accommodate employment, will be discounted without further consideration of the benefits that such sites may have. PPG advice in relation to GB – it would not therefore be appropriate to exclude Green Belt sites without further testing their appropriateness and a detailed assessment of their suitability.</p> | <p>A separate Green Belt Assessment is being carried out to review the functions of the Green Belt. If areas show to perform weak Green Belt functions, sites for housing and employment will then be assessed through the HELAA process. PDL sites in the Green Belt will be picked up and assessed as a potential source of land for residential and economic development uses as part of the HELAA work (see Table 1).</p> |
| <p><b>South Bucks District Council</b></p> | <p><b>Table 1:</b> This table sets out the sources of sites. Although probably not a matter for inclusion in Table 1, it would be helpful if the methodology could make clear whether such sites will only be considered for the use for which permission was previously sought or for which the site has an outstanding planning permission. In principle there does not seem to be any reason for any such restrictions.</p>   | <p>All sites will be considered for housing and economic development, regardless of their application status. Details of a planning application will be considered in determining the deliverability of the site.</p>   |
|  | <p><b>Table 2:</b> The methodology does not explain why a population threshold of 700 has been chosen for 'identified settlements'. 700 therefore appears to be entirely arbitrary but in any event, it is questionable whether the identification of any threshold is consistent with the NPPG which appears to advise a more comprehensive approach (ID 3-010-20140306).</p>   | <p>The methodology has been amended to remove 'identified settlements' which were settlements with a population of 700 or more. Sites identified within or adjoining all sizes of settlements will be considered through the HELAA process. If a site is PDL it will be considered regardless of its' location.</p>   |

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|  | <p><b>Table 2:</b> The methodology would exclude sites that are subject to policy constraints. The list appears to reflect NPPG 3-044-20141006, although AONB is not included in the table. However, NPPG 3-011-20140306 suggests a different approach whereby sites which have particular policy constraints should be included in the assessment for the sake of comprehensiveness with the constraints clearly set out. Whilst the proposed methodology may be pragmatic, it may be more robust not to automatically exclude the sites, but include them and document the constraints.</p> | <p>Sites within the AONB will be documented within the report, with the suitability considered on a site by site basis.</p>          |
|  | <p><b>Stage 2:</b> Although the methodology deals both with sites and with broad locations for development in accordance with the NPPG, the methodology should perhaps acknowledge that the level of detail available in relation to broad locations may not be as great as that for sites. This is not picked up in the NPPG (though arguably should be).</p>  | <p>Agreed. Text amended in paragraph 4.8.</p>  |
|  | <p><b>2.13:</b> The term 'close proximity' is used here. In Table 2 it is 'adjoining/nearby'. These terms should be tightened up and defined in the glossary.</p>   | <p>The terms 'nearby' and 'close proximity' have been removed. Only sites within or 'adjoining' settlements are now referred to.</p> |
|  | <p><b>Page 18:</b> Immovable communication links are referred to twice, once as a general physical constraint and once as a utility. Suggest it only needs to be picked up once?</p>  | <p>Agreed, text amended accordingly.</p>   |
|  | <p><b>2.24:</b> This paragraph does not appear to relate to the sub-heading above it.</p>   | <p>This section has now been amended to include a section on 'Planning Policy Considerations'.</p>                                   |
|  | <p><b>2.29:</b> 'will be excluded <i>from the HELAA ...</i>'</p>  | <p>Sentence now completed.</p>   |

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|  | <p><b>2.33:</b> The assumption in the final bullet point is that sites with planning consent are automatically considered to be available. NPPG 3-020-20140306 states that the existence of a planning permission does not necessarily mean that the site is available. Other information should also be considered. The methodology should reflect the approach in the NPPG.</p> | <p>Text has been amended accordingly. Planning applications will be considered but also deliverability information will still be sought from landowners and developers/agents.</p> |
|  | <p><b>2.37:</b> Clarify whether the reference to viability is financial viability, or to viability more generally.</p>  | <p>The intention is for general viability.</p>   |
|  | <p><b>2.42:</b> This paragraph should recognise that the development yield may be floorspace rather than dwellings.</p>   | <p>Wording amended to include floorspace.</p>  |
|  | <p><b>3.3:</b> Is there an argument that any windfall allowances could reasonably start from Year 1 of the Plan period?</p>   | <p>A windfall allowance has been counted for in years 4 and 5, to take account of small site commitments which are likely to be completed within the first 3 years.</p>            |
|  | <p><b>Residential intensification:</b> Suggest that to improve clarity the point in 3.7 about double-counting immediately follows 3.5.</p>  | <p>The methodology has been amended to remove a windfall allowance for residential intensification sites.</p>  |
|  | <p><b>4.2:</b> Will the trajectory not be based on stages 1-3 (rather than 1-2)?</p>  | <p>Agreed. Wording amended to stage 1-3.</p>   |
|  | <p><b>Ramsar sites:</b> Included in the glossary – but are there any in Central Bucks?</p>  | <p>None within Central Bucks, definition has been removed.</p>   |
|  | <p><b>References to NPPG:</b> Given that we have already seen a number of revisions, I think it is good practice to date the paragraph references.</p>  | <p>Agreed. Dates now included.</p>   |

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| <b>Sport England</b>                 | Playing Fields should be added to the first column of Table 2: Sites to be excluded. The reason for exclusion is set out in para. 74 of the NPPF.  | Not agreed, however new text has been included in a 'Planning Policy Considerations' section to deal with open space, which identifies open space and recreation land for communities will normally be protected from development. |
| <b>Three Rivers District Council</b> | Para 48 of the NPPF allows for the inclusion of windfall sites within the five year supply, however the paper refers to them being included from year 3. I understand your reasoning behind this; however I would recommend that the allowance is included in the first five years only.   | Text amended to clarify that windfall sites will be included in years 4 and 5.   |
|                                      | In regard to back gardens, we removed any Greenfield development, including the back garden development, from the evidence when calculating the windfall allowance. This was explored at our Site Allocations EIP, the Inspector appeared confident with this approach.  | Point noted.   |
| <b>Land and Partners Ltd</b>         | Question the exclusion of Green Belt sites. It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is the role of the development plan to determine which of those sites are the most suitable to meet those needs. In practice sites which are released from the Green Belt will often perform some degree of Green Belt function; the issue is the importance relative to other parts of the Green Belt having regard to the number of functions performed and the significance of each. | Agreed. A separate Green Belt Assessment is being carried out to review the functions of the Green Belt. If areas show to perform weak Green Belt functions, sites will then be assessed through the HELAA process.                |

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|  | <p>Seek clarification re Flood Zone 3 and how a sequential test can be applied on a site by site basis. Unclear from the table how flooding is being treated i.e. does any land in Flood Zone 3 exempt the site from development or whether it should just be taken into account in assessing development yields? The level of the constraint should be assessed before ruling sites out from consideration as implied in Table 2.</p>   | <p>Text has been amended in Table 2 to clarify ‘ Land that is in flood zones 3a and 3b proposed for residential development or zone 3b for economic development will not be included in the HELAA unless it can be demonstrated, through a planning application, that satisfactory mitigation measures can be put in place.’</p> <p>Sites which have a constraint identified from Table 2 only on part of the site will not be excluded from the assessment.</p> |
|  | <p>The minimum population of 700 from a settlement would need further evidence to back up this threshold.</p>  | <p>Agreed. The methodology has been amended to remove ‘identified settlements’ which were settlements with a population of 700 or more. Sites identified within or adjoining all sizes of settlements will be considered through the HELAA process. If a site is PDL it will be considered regardless of its location.</p>   |
|  | <p>Consideration might be given to justifying a threshold of 10 units rather than five to reduce to volume of sites to be assessed, so that the focus is on sites that can make the greatest contribution to housing numbers and deliver affordable housing. Given the national threshold of ten units for affordable housing this would align well but would need to be justified by local evidence. A sample study of small sites could be undertaken so that the small site allowance could be accurately determined.</p> | <p>Due to the different varying nature of the district a threshold of 5 would be more robust and it also accords with that set out within the NPPG</p>   |
| <b>West Northamptonshire Joint Planning Unit</b> | <p>Thank you for consulting the Joint Planning Unit on the HELAA methodology. On this occasion we do not have any comments to make.</p>  | <p>Point noted.</p>  |
| <b>Wokingham Borough Council</b>                 | <p>No comments to makes but ask to be kept informed throughout the HELAA process and the Green Belt Assessment.</p>  | <p>Point noted.</p>  |



Classification: OFFICIAL