

Comments and Response to SHLAA Methodology

Representation Summary

Representation Response

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| 1 | 1 In practice it may prove difficult for sites identified in the SHLAA not to be perceived as sites with "hope" value. | The Council within the draft Strategic Housing Land Availability Assessment (SHLAA) methodology and other documentation has made it clear that the purpose of the SHLAA is to provide an assessment of housing land availability and that the identification of sites should not be taken as representing either an intention to allocate these sites for housing, or as material planning consideration in the determination of a planning application. |
| 1 | 2 Sites that have been refused. If these have been refused for good reason, the SHLAA will hopefully ensure that they do not keep on coming back and over-burdening the planning system. Can they be added to Table 1 p8? | The Strategic Housing Land Availability Assessment (SHLAA) provides an assessment of housing land availability and identifies land as deliverable, developable or not currently developable. It does not allocate or rank sites but is rather an assessment of all housing land availability to be used as evidence base to inform the Site Allocation Development Plan Document (DPD) and other documents within the Local Development Framework (LDF). |
| 1 | 3 Objection to the inclusion of Ridgeway Farm as the site is in North Wiltshire and part of Moredon Bridge. | Only sites within the Swindon Borough administrative area that meet the assessment criteria of the Strategic Housing Land Availability Assessment (SHLAA) methodology will be considered within the SHLAA. The SHLAA does not allocate or rank sites or consider representations in respect of sites brought forward, rather it provides a housing land availability assessment of all sites which are used as evidence base within the Local Development Framework (LDF) including the Site Allocation Development Plan Document (DPD). Once complete the SHLAA will be published for consultation and any representation made thereto will be considered as part of the Site Allocation DPD. Potential sites for new housing which have been identified through the SHLAA will be further tested through the plan making process for Development Plan Documents, including Sustainability Appraisal/Strategic Environmental Assessment, appropriate assessment, stages of public participation and independent examination. |

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| 1 | 4 | While infrastructure capacity is mentioned in 4.36, only "any exceptional work necessary" is referred to in 4.39. Major infrastructure is needed before further development in Swindon especially with regard to sewage treatment, water supply and transport. It is important that the costs of external consultants are not committed until infrastructure is in place. | The Strategic Housing Land Availability Assessment (SHLAA) will have a wider value in identifying areas where infrastructure will be required to support sustainable communities. |
| 2 | 1 | The Parish Council does not agree with the methodology of the SHLAA for Secondary Rural Settlements. The Parish Council feels landowners/developers should not be asked to put forward land for development when their sole priority is to make a profit. | Government requires that local planning authorities prepare a Strategic Housing Land Availability Assessment (SHLAA) as part of a more responsive move towards identifying potential housing land supply at a local level. The SHLAA Practice Guidance, published by the Department of Communities and Local Government in July 2007 requires local planning authorities to identify as many sites as possible with housing potential in and around settlements, which may contribute towards sustainable, mixed communities. The Swindon SHLAA methodology intends to follow the methodology set out in Strategic Housing Land Availability Assessments Practice Guidance. It is strongly recommended that this Practice Guidance methodology be used, as it will ensure that the Assessment findings are robust and transparently prepared.
The Strategic Housing Land Availability Assessment (SHLAA) does not allocate or rank sites or consider representations in respect of sites brought forward, rather it provides an housing land availability assessment of all sites which are used as evidence base within the Local Development Framework (LDF) including the Site Allocation Development Plan Document (DPD). Once complete the SHLAA will be published for consultation and any representation made thereto will be considered as part of the Site Allocation DPD. Potential sites for new housing which have been identified through the SHLAA will be further tested through the plan making process for Development Plan Documents, including Sustainability Appraisal/Strategic Environmental Assessment, appropriate assessment, stages of public participation and independent examination. |

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| 2 | 2 | Parish Council supports paragraph 4.36 and 4.37 "Site Suitability Appraisal", however they request comments made by the Council on the suitability of the site should be taken into consideration before a decision is made. | The Strategic Housing Land Availability Assessment (SHLAA) does not allocate or rank sites or consider representations in respect of sites brought forward, rather it provides an housing land availability assessment of all sites which are used as evidence base within the Local Development Framework (LDF) including the Site Allocation Development Plan Document (DPD). The final SHLAA report will be published for consultation. Representations in respect of the SHLAA report will be considered as part of the Site Allocation Development Plan process. |
| 2 | 3 | The Parish Council object to the following sites being put forward; land at Pond Farm, Triangle of land at Ham Road and land south of Springlines stretching to Church Road, owned by Bloor Homes Ltd, currently leased to Parish Council. | The Strategic Housing Land Availability Assessment (SHLAA) does not allocate or rank sites or consider representations in respect of sites brought forward, rather it provides an housing land availability assessment of all sites which are used as evidence base within the Local Development Framework (LDF) including the Site Allocation Development Plan Document (DPD). The final SHLAA report will be published for consultation. Representations in respect of the SHLAA report will be considered as part of the Site Allocation Development Plan process. |
| 3 | 1 | Small sites adjacent to settlement boundaries, but within AONB should also be considered in the SHLAA process. Providing that sites already form a visual part of the village i.e. a garden, and sites that can be brought to a 'defensible boundary' i.e. road | Within the Swindon Strategic Housing Land Availability Assessment (SHLAA) methodology, sites to be excluded from assessment within the SHLAA include sites within the Wessex Downs Area of Outstanding Natural Beauty (AONB) that are adjacent to settlement boundaries. Strategic Housing Land Availability Assessments - Practice Guidance permits that particular types of land or areas may be excluded from the Assessment, although the reason for doing so will need to be justified. AONB is a national designation. Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS 7) confirms that AONBs have the highest status of protection in relation to landscape and scenic beauty, and states that 'The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas'. As such, sites within the AONB that are adjacent to settlement boundaries will not be considered within the SHLAA. |

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| 3 | 2 Support inclusion of site as proposed in the Core Strategy - Southview, 22 Ham Road, Wanborough. | Only sites that meet the assessment criteria of the Strategic Housing Land Availability Assessment (SHLAA) methodology will be considered within the SHLAA. |
| 4 | 1 It is considered that greater flexibility in the proposed SHLAA methodology is justified to successfully identify and consider land for later stages of the SHLAA process rather than excluding sites unnecessarily which could contribute to government aims. | The Practice Guidance identifies that the scope of the Assessment should not be narrowed down by existing policies designed to constrain development. However, particular types of land or areas may be excluded. The proposed Strategic Housing Land Availability Assessment (SHLAA) methodology does not seek to limit sites being brought forward for consideration within the SHLAA as a result of policy restrictions. However there are exceptions to the methodology. Sites not within/adjacent to settlement boundaries will not be included as a site is only suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. It is further proposed to exclude sites within the AONB (outside settlement boundaries), sites with SSSI status and Scheduled Ancient Monuments. National Policy advises against development that would adversely impact on national and internationally important nature conservation interests, landscapes and archaeology. Finally it is proposed to exclude sites within Flood Risk Zone 3. National Policy advises that only water compatible uses and essential infrastructure that has to be there should be permitted in Flood Risk Zone 3b. Although an element of residential development is permitted within Flood Risk Zone 3a, such land would be subject to an exception test and only be considered through sequential testing. It is not within the scope of the SHLAA methodology to undertake exception tests as relates to properties and as such, sites within both Flood Risk Zone 3a and 3b will be excluded from the SHLAA. |
| 4 | 2 Specific reference is made to land at Thorney Park, nr Wroughton, which is subject to 'a call of sites' submission and considered an unusual circumstances not provided for in the SHLAA methodology. | Within the Strategic Housing Land Availability Assessment (SHLAA), sites are only considered suitable for housing development if they offer a suitable location for development and would contribute to the creation of sustainable, mixed communities. Sites that do not fall within or adjacent to settlement boundaries do not meet with this criteria. |

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| 5 | 1 | The Agency supports the Council's approach to identify as many sites as possible with housing potential. However it is considered that clarification should be provided for consultee's regarding the aim of achieving sustainable, mixed communities. | Noted. |
| 5 | 2 | In response to the methodology of the assessment we would advise the Council that we seek to maximise growth in locations that are accessible by alternative means of transport to the private car. | Noted. |
| 5 | 3 | The Agency would be concerned over development in more remote areas such as sites within rural or new free standing settlements unless they are supported by adequate public transport, walking and cycling links. | Sites within and adjacent to the Secondary Rural Settlement will be considered within the Strategic Housing Land Availability Assessment in line with Practice Guidance. However, it should be noted that as part of the Core Strategy Preferred Options Draft, rural settlement analysis was undertaken to identify sustainable rural settlements based on a number of criteria. Only those settlements which meet the sustainability criteria were included within the Preferred Options Draft as proposed Secondary Rural Settlements. Badbury, Hannington, Hinton Parva, Lower Blunsdon and Stanton Fitzwarren were omitted, as they did not meet the sustainability criteria. As part of the SHLAA assessment, sites which do not contribute to the creation of sustainable, mixed communities will not be considered suitable for housing development. |
| 5 | 4 | The Agency would be keen to see the sustainability agenda promoted in paragraph 4.22. The Agency would also like to see reference made to land in sustainable locations accessible by a range of means of transport. | The Strategic Housing Land Availability Assessment (SHLAA) is a technical evidence base document to inform the development of the Local Development Framework (LDF). Its purpose is to assess housing land availability as broadly as possible and to identify potential constraints on the site, sustainable infrastructure being one of the considerations. |
| 5 | 5 | The Agency acknowledge that some greenfield sites may need to be released however we will only be able to support greenfield sites if robust evidence demonstrates an overriding need and there are no alternatives. | Noted. The draft South West Regional Spatial Strategy identifies Swindon as a Strategically Significant Town and sets out proposals for the strategic distribution of housing growth including 12,000 dwellings as an urban extension to the east of the town and 2,000 dwellings on further urban extensions within Swindon Borough. |

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| 5 | 6 | The Agency would like to see specific reference to highway improvements to the SRN listed within cost factors, as it is considered that this will be an essential component in the delivery of certain sites. | Noted. As part of Stage 7c - Assessing achievability for housing, appointed consultants will be assessing achievability for housing which will include cost factors related to Section 106 contributions. |
| 6 | 1 | Our objection is that the methodology does not include the site Meadow Way as it is stranded between the Swindon Urban Area Boundary and the Secondary Rural Settlement of Badbury and additionally it lies within the North Wessex South Downs (AONB). | Within the Swindon Strategic Housing Land Availability Assessment (SHLAA) methodology, sites to be excluded from assessment within the SHLAA include sites within the Wessex Downs Area of Outstanding Natural Beauty (AONB) that are adjacent to settlement boundaries. Strategic Housing Land Availability Assessments - Practice Guidance permits that particular types of land or areas may be excluded from the Assessment, although the reason for doing so will need to be justified. AONB is a national designation. Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS 7) confirms that AONBs have the highest status of protection in relation to landscape and scenic beauty, and states that 'The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas'. As such, sites within the AONB that are adjacent to settlement boundaries will not be considered within the SHLAA. |
| 6 | 2 | One minor observation, in section 5.2 - we have no idea what a windfall is in the context described. | Noted. Windfall sites are those which have not been specifically identified as available in the local plan process. They comprise previously developed sites that have unexpectedly become available. |
| 7 | 1 | At stage 7a of the SHLAA and with reference to para 38 of the CLG practice guidance, it is clear that one needs to consider the historic environment as a determining factor in the process of establishing when and whether sites are likely to be developed. | Noted. |
| 7 | 2 | The extent to which the historic environment affects the principle of deliverability will depend on particular characteristics of the site in question. Our advise would be to identify at an early stage the deliverability of the estimations you suggest. | Noted. |

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| 7 | 3 | The setting of designated heritage features is a key component of their character and importance and needs to be considered as part of the site identification process. | Noted. |
| 7 | 4 | All designated historic assets should be considered together with non-designated features of local historic or architectural interest and value since these can make an important contribution to creating a sense of place and local identity. | Noted. Within the Strategic Housing Land Availability Assessment (SHLAA) methodology, sites designated as Scheduled Ancient Monuments are excluded from assessment within the SHLAA as National Policy advises against development that would adversely impact on national and internationally important nature conservation interests, landscapes and archaeology. |
| 7 | 5 | We advise that you engage conservation, archaeology & urban design colleagues to ensure you are aware of all relevant features of the historic environment & that the historic environment is effectively & efficiency considered as part of the SHLAA. | Noted. The Conservation Officer within the Forward Planning is part of the Strategic Housing Land Availability Assessment (SHLAA) team. |
| 8 | 1 | It would be useful for a list of key stakeholders to be identified in the methodology document. | Noted. |
| 8 | 2 | The Council should review their position upon visiting all sites identified within the desk-top review as to ensure a robust study is conducted. | Within the Strategic Housing Land Availability Assessment (SHLAA), sites brought forward within the SHLAA database will be visited and surveyed including existing housing allocations. Sites to be considered within the SHLAA, but which will not be surveyed include the major urban extension identified at the Eastern Development Area and small scale urban extensions. Further, housing projections for the Swindon Central Area as set out in the Swindon Central Area Action Plan Submission Paper - Part 111: The Implementation Plan will be taken up within the SHLAA without survey. Sites with planning permission or which have approved site development briefs will also not be surveyed as such sites have been subject to review and existing proposed dwelling numbers will be included within the SHLAA. |

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| 8 | 3 | The Scoping Assessment does not identify either a housing requirement or the proposed lifespan of the SHLAA. | Within the final Swindon Strategic Housing Land Availability Assessment (SHLAA) 2008, housing requirements will be set out. The draft Strategic Housing Land Availability Assessment methodology considers the proposed methodology of the SHLAA and does not set out the broader framework. To remain a useful tool in planning for the delivery of housing, the SHLAA will need to be comprehensive in its identification and assessment of sites and updated on an annual basis as part of the Annual Monitoring Report exercise, in order to update the housing trajectory and the five-year supply of specific deliverable sites. |
| 8 | 4 | It is considered inappropriate for sites identified within the Preferred Option Core Strategy to be considered within the planning system as the Preferred Option has yet to be subject to Examination in Public and only been subject to public consultation. | Noted. |
| 8 | 5 | The sources of supply identified in paragraph 4.13 of the proposed SHLAA methodology are considered to be more appropriate. | Noted. |
| 8 | 6 | The approach to excluding sites is broadly supported however it is only considered appropriate for the study to exclude sites that are located within the identified designations and not within close proximity. | Noted. |
| 8 | 7 | The approach for assessing the deliverability and developability of sites should be identified within the proposed methodology. It would have been useful to include the assessment proforma as part of the consultation exercise to ensure its robustness. | Assessing deliverability and developability of sites encompasses assessing suitability, availability and achievability of sites for housing. These stages encompass a wide range of assessment factors and residual valuation models to be applied by consultants. Within the final Swindon Strategic Housing Land Availability Assessment (SHLAA) 2008, the approach for assessing the deliverability and developability of sites will be set out. |

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| 8 | 8 Some sites would score low against the Council's current suitability criteria, however they may have the ability to provide facilities and improve accessibility at a cost borne to the developer in the future. The final SHLAA should recognize this. | The Strategic Housing Land Availability Assessment (SHLAA) does not rank or allocate sites but rather provides an assessment of housing land availability including where constraints have been identified to consider what action would be needed to remove them. |
| 8 | 9 A concern is the potential reliance upon windfalls which is contrary to policy. | PPS 3 suggests that windfalls should not be included within housing land availability assessments unless there are particular local circumstances that justify it. The Practice Guidance suggests that where a windfall allowance can be justified this should be based on an estimate of the amount of housing that could be delivered in the area on land that has not been identified in the list of deliverable/developable sites, or as part of board locations for housing development. If a windfall allowance is justified, then this will be determined by estimating the housing potential from each likely source of land for housing as described in the Guidance. The SHLAA report will make it clear whether or not there are genuine local circumstances in its administrative area which may prevent potential housing sites being identified. Where such circumstances exist, and where there is a likely insufficient number of dwellings through the SHLAA to meet Development Plan provision totals, a windfall allowance may be used. |
| 9 | 1 We object to the following sites being put forward in Wanborough: Old Bakery/Contact House site, land south of Springlines stretching to Church Road, land at Pond Farm and triangle of land between Parsonage Farm - Ham Road - Southdown. | The Strategic Housing Land Availability Assessment (SHLAA) does not allocate or rank sites or consider representations in respect of sites brought forward, rather it provides an housing land availability assessment of all sites which are used as evidence base within the Local Development Framework (LDF) including the Site Allocation Development Plan Document (DPD). Once complete the SHLAA will be published for consultation and any representation made thereto will be considered as part of the Site Allocation DPD. Potential sites for new housing which have been identified through the SHLAA will be further tested through the plan making process for Development Plan Documents, including Sustainability Appraisal/Strategic Environmental Assessment, appropriate assessment, stages of public participation and independent examination. |