

**SHELAA Methodology consultation May- July 2018**

**Summary of responses received and officer comments**

Rep No.	Who from	Summary of comments received	Officer comments
001	Bernard Perrins	<p>Para 1.3. -which refers to an update of the VFRTS to be conducted in 2018. In relation to the Village hierarchy Review, the previous assessment of the village’s nearby facilities within VFRTS 10 already demonstrate the adjoining village of Astwood Bank as the nearest service centre.-, in some of the appendices- but other appendices did not score facilities in Astwood Bank.</p> <p>Inserted quotes from appeal decisions in 2015 which refer to facilities at Astwood Bank in relation to Cookhill.</p>	<p>The comments are relevant to the VFRTS methodology and review, but do not require amendments to the SHELAA Methodology</p> <p><u>No Change</u></p>
002	Sandy Peach, of BM Perrins haulage	<p>Paras 1.3; 1.7, 1.8 and 1.19</p> <p>Para 1.3 The SHELAA should not use the VFRTS settlement hierarchy within SWDP 2 strategy. The VFRTS assessment 2010 is invalid and out of date. Cookhill should be a category 1 village. The 2010 survey omitted scores for Cookhill for the village of Astwood Bank.</p> <p>Para 1.7- the main SHELAA report is referenced but does not appear</p>	<p>The comments are relevant to the VFRTS methodology and review, but do not require amendments to the SHELAA Methodology</p> <p>The published SHLAA methodology is available on the SWDP website- and is not part of the amended</p>

		<p>online.</p> <p>1.8- Reference to a desktop review. The last VFRTS review omitted strategic information on the village of Cookhill. <u>No Change</u></p> <p>1.9 Reference to AMR 2018- says the report is not available yet.</p>	<p>methodology.</p> <p>Apologies this was a typo. The AMR 2017 is published on the SWDP website. The next report will be the 2018 one. But the 2017 report shows a large increase in housing completions – which is what the report is referring to.</p> <p><u>No Change</u></p>
003	Terence Bennett- Parish Councillor for Cookhill	<p>Para 1.8 and 1.10</p> <p>As a parish councillor, Mr Bennett is keen to encourage a neighbourhood plan for Cookhill.</p> <p>References a particular site within Cookhill Village. Village washed over by the green belt- stifling any growth or development. The merits of the site are discussed.</p>	<p>Noted. The site could be submitted via the SHELAA call for sites, but this current consultation discusses the overall methodology, not the merits of individual sites. The Green Belt review study will inform SWDP policy on villages in the Green Belt, whether they are washed over by it or not.</p> <p><u>No Change</u></p>
004	Tim Stratton	<p>Para 1.4 What will be the criteria for considering “large landholdings away from settlements” in terms of sustainability.</p>	<p>The criteria has yet to be clarified, and will depend on any steer that comes out of the Issues and Options consultation and the sustainability appraisal. E.g. how much land needs to be found for housing and employment, what land area is required to allow such separate settlements to be considered sustainable etc.</p>

		<p>1.7 What weight will be given to information received in the call for sites consultation, and will there be a period for further consultation to review how this data has, or has not been included in the resultant SHELAA?</p> <p>1.8 When will new information be reviewed for sites already previously assessed where a sites has been rejected. The wording suggests a bias towards outdated information?</p> <p>From the table it does not seem to identify any type put forward by the Call for Sites.</p> <p>1.10 A level 1 site it will not be taken forward as a potential allocation unless it can be clearly demonstrated that the constraints can be</p>	<p>1.7 Information will be published on each site to say if it is ruled out of further assessment as a Level 1 site (e.g. flood risk grounds). It will also depend on how the data submitted meets the criteria in the methodology and if it can be verified. A precis of other sites will be published eventually with reasons why they are ruled in or out. The SHELAA is just about land availability, no planning weight can be attributed at this stage in the consideration of the planning balance</p> <p>1.8 As above, the existing sites that are confirmed as still being available will be judged against the same criteria as any newly submitted “Call for Sites” sites. As regards new settlements, this will depend on any steer that comes out of the Issues and Options consultation and the sustainability appraisal. So a site that was rejected earlier because it didn’t fit the current plan strategy may be relevant this time round if it meets the criteria for a new settlement as advised by the SA approach and the amount of new dwellings / employment land required and associated infrastructure thresholds.</p> <p>The “Call for Sites” sites will all be assessed, and are referred to in para 1.7 and 1.9</p> <p>1.10 The SHELAA does not allocate sites, but rules out early on those with little prospect of being deliverable / fitting the strategy. However, at the</p>
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		<p>overcome without jeopardising development viability or NPPF / strategic development plan policy. If a site is level one, how can a process be identified for the site to demonstrate that the constraints can be overcome.</p> <p>1.12 Does the stipulation of a time period for availability preclude other possibilities- e.g., if it is available now, is it considered to be available for 0-5 years- or the full 0-15 year period?</p> <p>Para 1.16. The methodology no longer suggests that panels are set up to assess viability, but that this is done via the District Valuer. Panels no longer advocated by the PPG .Isn't this diluting the LPA duties, giving it to</p>	<p>plan making stage, site owners can still put their sites forward with information to demonstrate that constraints can be overcome. Initially, very few sites are ruled out as level 1. But as an example, if there isn't enough Flood Zone 1 land on a site to accommodate a minimum of 5 houses it is more likely it will be ruled out as there will be plenty of sites where flood risk is suitably low and the SWC will adopt the precautionary principle.</p> <p>1.12 The LPA has to show that a site is available at some point in the plan period. Assumption is that if it is available now, it is available for the longer period- unless information is given to the contrary. But as the LPA has to "phase" sites through a trajectory, it will still need to come to a judgement about what can actually be delivered now, and at the early stages of the plan, as well as the latter stages. This is a judgement call, and isn't only dependent on the landowner saying it is available now (as there may be constraints to overcome that could delay implementation).</p> <p>1.16.The PPG methodology does not require panels. From experience we found it difficult to put together panels where the advice given was entirely objective, as clearly many developers / agents / architects have local development interests. Many</p>
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		<p>DV?</p> <p>Reference to Appendix 14 of the SHLAA report 2015. Appendix 14 was not attached- this means it is difficult to judge / critique the SHLAA.</p> <p>What provision of appeal or challenge to the resultant methodology will there be in the future.</p> <p>It is based on information that is a snapshot in time- e.g. VFRTS- not a policy, but its findings are employed as policy and a reason for rejection of sites / plans.</p>	<p>are also not experts on viability and in reality will judge viability on knowledge of similar types of sites in the locality, rather than detailed site deliverability/ viability information. The DV can give basic advice about economic deliverability. But this will not replace further more detailed assessment of sites that may go forward for allocation at a later date.</p> <p>Appendix 14 of the earlier SHLAA reports is published and available on the SWDP website as an appendix to the 2015 SHLAA report. Although it was intended to attach it, it was considered that this might confuse things, as the new methodology highlights any changes to the approach.</p> <p>As background evidence to the SWDP review, it can be challenged through the local plan Examination,</p> <p>The VFRTS gathers factual information. This may change as time goes on. But it is only a comparative analysis of facilities and services. Any changes in these can and are looked at, at the planning application/ planning appeal stage. But LPAs have to have something to go on in respect of rural</p>
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		<p>Ruling out sites in lower category settlements at an early stage does not accord with NPPF para 55 or PPG, which says blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. VFRT is applied as policy.</p>	<p>which category a village falls into.</p> <p>This is a policy consideration. The VFRTS also considers evidence as regards clusters of villages, and how they interact, in terms of the survey questions.</p> <p>Para 55 – of the 2012 NPPF is now found in paragraphs 78/79 of the NPPF 2018. This will depend on the policy as it evolves- hence the methodology says that sites ruled out because of village categorisation can be reconsidered if policy changes. The SWDP considered that settlements with very few services and facilities would not be suitable for much housing and employment growth. That is a policy judgement that was discussed at the Examination and supported by the Inspector. Disagree that VFRTS is applied as policy- it provides evidence that the policy responds to.</p> <p><u>No Change</u></p>
005	David Addison, Addison Rees Planning	<p>Appendix 15, page 9</p> <p>a) Ruling out Garden Land for sites in the SHELAA. - It is unclear why such sites would be ruled out. Why is it more attractive to allocate new housing development on agricultural land (Green Field) adjoining a development boundary, than an existing large private residential garden adjoining a development boundary? Allocation of garden land arguably has less of an impact both visually (as it would already be subject to domestic paraphernalia) and clearly no impact on the future</p>	<p>The list on page 9 refers to reasons for ruling out sites. This doesn't mean that all sites will be ruled out for these reasons. This list just explains the reasons if the shorthand words are given.</p> <p>a) So, for instance, PPS3 isn't very clear what it means- but if a site is ruled out because it is garden land, then the wording "garden land" will be used instead of PPG3, which is clearer. The NPPF 2018 at</p>

		<p>ability to produce agriculture crops.</p> <p>c) Ruling out Green Belt for sites in the SHELAA. – Given that a number of sustainable villages in Wychavon are washed over by the Green Belt, such a blanket approach would severely limit the opportunity for such settlements to grow. Stifling growth in this way leads to the closure of existing village facilities such as shops, public houses etc., and reduced public transport, all of which have been seen in the district. Settlements such as Hartlebury (Cat 1); Cutnall Green (Cat 3); Wychbold (Cat 1) cannot grow to support existing services and facilities.</p>	<p>para 70 still allows for LPAs to consider a policies <i>“to resist inappropriate development of residential gardens, for example where development would cause harm to the local area”</i>, so sites might be ruled out for this reason.</p> <p><u>No change</u></p> <p>c) Some sites will be ruled out as Green Belt. However, a Green Belt review is being carried out, and its finding will inform the approach to this. NPPF 2018 is still strong on resisting much development on Green Belt sites. But agree to change the methodology to only rule a site out on Green belt if an up to date study shows an area still meets the purposes of the Green belt.</p> <p><b><u>Change</u></b> : Appendix 15 explains why sites may be ruled out. The Green Belt review will establish which areas / sites still serve the purposes of the Green Belt . It is suggested that Appendix 15, reason for ruling out, bullet c) is amended to state:</p> <p>c) Green Belt Any site that is currently situated within the designated Green Belt and is considered by an up to date Green Belt review, which has been commissioned by, and produced for the SWC and is considered therein to still</p>
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		<p>e) Ruling out Category 4a or 4b villages for sites in the SHELAA. As above, a blanket restriction on development in these villages means that the existing services and facilities within them suffer, and can ultimately be forced to close. Whilst it is reasonable to restrict large numbers of new properties in such villages, they should be permitted to grow organically to ensure that the existing services and facilities can continue to be supported, and thus remain open.</p>	<p>serve the purposes of the Green Belt, will be ruled out as a level 1 site, with the reason stated as 'GREENBELT'.</p> <p>e) Re village categories: The methodology specifically states that this is an initial assessment <b><i>“however, these sites can be revisited, if policy changes at a later date suggest that sites in lower level settlements may be appropriate to consider for housing or employment uses at the allocation stage”</i></b>. This is considered a reasonable approach. Furthermore, the VFRTS survey allows for information to be gathered on how facilities and services in some settlements can be used by other villages- hence a “cluster approach”, in line with NPPF. The earlier VFRTS defined some villages as clusters. The economics of rural service provision are such that substantial development is required to retain services let alone bring some back. There could be a role here for Neighbourhood Plans to allocate smaller scale development for socio-economic reasons. <u>No change</u></p>
006	Pegasus Group Ltd for Gallagher Estates	<p>Para 1.3 The settlement hierarchy set out in policy SWDP 2B will need to be reassessed. It should be made clear in the SHELAA that the settlement hierarchy will be revisited in the SWDP Review- in relation to emerging housing and employment growth strategies.</p>	<p>This is mentioned in para 1.3- in that it says in the SHELAA no decision has been taken as to the quantum of development that could be assigned to different areas or settlements.</p>
		<p>Para 1.8 The list of types of sites does not include sites listed in PPG at section 4, para 12.</p>	

		<p>The following should be added:</p> <p>Type of sites</p> <table border="1" data-bbox="544 331 1429 885"> <thead> <tr> <th data-bbox="544 331 1010 400">Type of site</th> <th data-bbox="1010 331 1429 400">Potential data source</th> </tr> </thead> <tbody> <tr> <td data-bbox="544 400 1010 469">Sites in rural locations</td> <td data-bbox="1010 400 1429 469">Local and neighbourhood plans</td> </tr> <tr> <td data-bbox="544 469 1010 624">Large scale redevelopment and redesign of existing residential or economic areas</td> <td data-bbox="1010 469 1429 624">Planning applications</td> </tr> <tr> <td data-bbox="544 624 1010 778">Sites in and adjoining villages or rural settlements and rural exception sites</td> <td data-bbox="1010 624 1429 778">Ordnance Survey maps</td> </tr> <tr> <td data-bbox="544 778 1010 885">Potential urban extensions and new free-standing settlements</td> <td data-bbox="1010 778 1429 885">Site surveys.</td> </tr> </tbody> </table>	Type of site	Potential data source	Sites in rural locations	Local and neighbourhood plans	Large scale redevelopment and redesign of existing residential or economic areas	Planning applications	Sites in and adjoining villages or rural settlements and rural exception sites	Ordnance Survey maps	Potential urban extensions and new free-standing settlements	Site surveys.	<p>These types are generally covered in the list on page 1.8. The right hand column of the table at 1.8 lists sources identified here such as: the SWDP (local plan) and neighbourhood plans/ planning applications/ ordnance survey maps and aerial photographs. These types of sites will also, if available, be picked up through the call for sites approach- which is mentioned in para 1.7 and 1.9. So such sites are not precluded from assessment. But the LPAs have to have regard to availability, so selecting potential sites from, say, aerial photographs will not give information on availability. There is also reference to such sites in Appendix 15 under “widening the search”.</p> <p><b>Change</b> at para 1.8 to add in front of the table add: <b><i>“In addition to the Call for Sites sites”</i></b> the following types of sites will be assessed: (PPG, DCLG, 2014, section 4, para 12):</p>
Type of site	Potential data source												
Sites in rural locations	Local and neighbourhood plans												
Large scale redevelopment and redesign of existing residential or economic areas	Planning applications												
Sites in and adjoining villages or rural settlements and rural exception sites	Ordnance Survey maps												
Potential urban extensions and new free-standing settlements	Site surveys.												
		<p>Para 1.10 Disagree that the SHELAA should discount sites simply because part of a site is subject to flood risk, as it should be able to be demonstrated if such a constraint can be overcome- e.g. through a site specific flood risk</p>	<p>1.10 The SHELAA approach is an early sieve of site potential and deliverability. Flood risk is a key constraint. It is considered that If a site is submitted via an agent, the onus should be on them not to submit sites that are subject to high flood risk, or to reduce the area submitted accordingly, to omit some land that is in a flood risk area- or provide further flood risk information at the Call for Sites stage, in order to inform the site allocation stage. If there isn't enough Flood Zone 1 land on a site to</p>										

			<p>accommodate a minimum of 5 houses it is more likely it will be ruled out as there will be plenty of sites where flood risk is suitably low and the SWC will adopt the precautionary principle.</p> <p>Para 1.14 states: Assessing the suitability of sites or broad locations for development should be guided by (PPG, para 19):</p> <ul style="list-style-type: none"><li>• physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;</li></ul> <p>The 2015 main SHLAA report states-(para 7.2) Level 1 sites are those considered to be unsuitable for housing development due to major physical constraints including:</p> <ul style="list-style-type: none"><li>· Flood Zone 2 or 3 i.e. at high risk of flooding</li><li>· National conservation or wildlife designation constraint</li><li>· High levels of site contamination (where information is available) making them unsuitable for housing development</li><li>· Sites in the Green Belt</li></ul> <p>Criteria within the methodology has allowed sites with severe development constraints (e.g. flooding and national wildlife importance) to be assessed as Level 1 sites and eliminated (176 sites equating to 1,313 hectares of land were ruled out in the previous SHLAA)). These sites have been ruled out with no further work on appraising housing potential. For sites where just part of a site</p>
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			<p>is in flood zone 2/3, a judgement was made by officers as to how much of a constraint (and the impact on development viability in overcoming the constraint) it would realistically be (that is, whether part of the site is still suitable) and whether these should be ranked as a level 2 site.</p> <p><b>Change:</b> Agree to clarify flood risk constraint by adding at para 1.10: after first bullet point:  <b><i>NB. For sites where just part of a site is in flood zone 2/3, a judgement will be made, based on any additional flood information submitted, which is similar to a level 2 strategic flood risk assessment and which is supported by the Environment Agency as to how much of a constraint flood risk would realistically be (that is, whether part of the site is still suitable) and whether such sites should be ranked as a level 2 sites, for further investigation.</i></b></p>
007	Mr O'Brien	<p>Vital features in the 2007 Guidance were ignored, even though the SWCs maintained at the time that they were following it.</p> <p>A main feature of the 2007 PPG for SHLAA was its emphasis on local community involvement from the outset in the SHLAA process.</p> <p>In the 2007 PPG, local communities are "key stakeholders" on an equal footing with house-builders, social landlords and local property agents. Local communities, as key stakeholders, are contributors with whom "The methods, assumptions, judgements and findings should be discussed and agreed upon throughout the process in an open and transparent way..."</p>	<p>The 2007 guidance is no longer extant. The relevant guidance now is the Planning Practice Guidance, which is updated from time to time. This methodology was drawn up in relation to the latest Planning Policy Guidance available at the time which was in relation to SHLAA/ SHELAA is dated 6<sup>th</sup> March 2014. Most of this guidance is still extant. The main update relates to the viability of sites. The only more recent government guidance is in relation to showing the deliverability of sites in the context of having to demonstrate a 5 year supply of housing land [Paragraph: 030 Reference ID: 3-030-20180913 Revision date: 13 09 2018</p>

		<p>Another important feature of the 2007 Guidance (paras. 37 and 38) was the need, when considering potential sites, to note policy restrictions, e.g., protected areas; and also potential impacts, including the effect upon landscape features and upon heritage conservation.</p> <p>This element, too, was ignored by the SWCs, certainly by MHDC, who insisted that the SHLAA was a purely technical document which was not concerned with planning policies.</p> <p>Thus local community criticisms on policy grounds of the SHLAA sheets for particular sites were dismissed by District officers as irrelevant for the SHLAA stage of the planning process. This District attitude was in total contradiction with Government SHLAA policy.</p> <p>The Government Minister confirmed through the local MP that, with the new March 2014 Guidance, there was no diminution in the Government's concern for local community involvement.</p> <p>But this guidance, too, was ignored by the SWCs.</p> <p>It is not a valid excuse for this failure that in March 2014 the Councils had to act very quickly. Had the appropriate partnership mechanisms been put in place to implement the 2007 Guidance, the work required in 2014 could have been done in the time available.</p>	<p>This methodology is being consulted on widely- including consultation with local communities and developers.</p> <p>The 2018 methodology takes account of constraints such as nature designations / flood risk/ contamination. These are related to national and local policies, but SHELAA sites are not subject to existing planning policy in the same way that planning applications are- as the purpose of the exercise is to review sites' potential in the light of a policy review. It also states:</p> <p>Para1.9: Following the call for sites / sites from other sources, an initial assessment of the constraints against national and local planning policy designations will be undertaken to establish potential for development and inclusion in the site survey. A site survey will ensure:</p> <ul style="list-style-type: none"> <li>- Up to date information</li> <li>- Identify appropriate type and scale of potential development</li> <li>- Understand constraints to inform deliverability / viability</li> <li>- Those sites considered most realistic will require further robust assessment</li> </ul> <p>The SHLAA was subject to consultation, and also,</p>
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		<p>Like the 2007 Guidance, the 2017 [SIC] Guidance states that the SHLAA must take account of Policies, for example, on landscape and heritage conservation.</p> <p>The SWCs, certainly MHDC, are bound to have put many civil parishes at</p>	<p>sites that came through the SHLAA process were subject to further consultation if they reached potential allocation stage. So community comments were not ignored.</p> <p>Agree, parish councils, and local councillors were involved in the last SHLAA, and have been consulted on this current methodology- as well as local residents .</p> <p>Noted, but disagree- the 2014 call for sites work and related SHLAA assessments were published and subject to scrutiny, both in terms of the results and the methodology. The methodology was published as part of the Housing Background paper, published on the SWDP website.</p> <p>Latest Government practice guidance is 2014. It states:</p> <p><u>“How should sites/broad locations be identified? When carrying out a desk top review, plan makers should be proactive in identifying as wide a range as possible of sites and broad locations for development (including those existing sites that could be improved, intensified or changed). Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely</u></p>
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		<p>an unfair disadvantage in the matter of preserving locally valued landscape features.</p> <p>The County Council's LCA at Section 4.2 made clear in October 2011 (i.e., nearly seven years ago) that below the strategic level of LCA study carried out by WCC there were many valuable landscape features which needed to be identified below Land Cover Parcel at local site level by local communities.</p> <p>As far as I know, the SWCs, as the LPAs responsible for ensuring that this work is done, have not ensured that the required Parish Plans, Neighbourhood Plans or Village Building Design Surveys have been carried out in all their respective local communities.</p>	<p><u>restrict development. An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints, rather than simply to accept them”.</u></p> <p>The SHELAA does not rule out sites automatically on the grounds of local landscape or heritage designations- but this is a factor taken into account in further sites assessment.</p> <p>Landscape officers have an input into site assessments where sites that are considered to have further potential are taken forward.</p> <p>The broad LCA work is done at County Council level. Whilst further landscape analysis may be relevant for some sites, such detailed analysis will not be appropriate for all SHELAA sites, and is more appropriate at the planning allocation assessment stage, (the next stage on from SHELAA). Local communities are consulted at the allocation stages too.</p> <p>The District Councils are not responsible for the carrying out of Parish Plans, Neighbourhood Plans or Village Design statements, although they do give a significant amount of assistance to Parish Councils in the case of Neighbourhood Plans.</p> <p><u>No Change</u></p>
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008	Jenny Henderson, of Hunter Page on behalf Mr and Mrs Meadows	<p>One of the reasons for ruling out sites (as outline at Appendix 15) is ‘Village Categorisation’ and the methodology states:  <i>‘Sites will be reassessed to reflect any changes in the village categories informed by the review of the Village Facilities and Rural Transport Study. Initially those sites that are in settlements that are lower than a category 3 village (i.e. 4a and 4b) will not be assessed in detail and will be marked as „CAT 4a“ or „CAT 4b“, as these locations are considered, under the current strategy, to be unsustainable. However, these sites can be revisited, if policy changes at a later date suggest that sites in lower level settlements may be appropriate to consider for housing or employment uses at the allocation stage.’</i></p> <p>It is considered that this approach is inconsistent with the NPPF which states that <i>‘to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.’</i></p> <p>The Planning Practice Guidance goes one step further and states: <i>‘all settlements can play a role in delivering sustainable development in rural areas – and so <b>blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.</b>’</i></p> <p>The approach to immediately discounting sites in Category 4a and 4b settlements is flawed and not consistent with the approach taken in the NPPF and PPG. This is particularly true as some of these settlements are located in very close proximity to other settlements and development in these locations could help support the services and facilities and the overall vitality of these settlements. An example of this is Bredons Norton which is less than 1.5 miles from Bredon (Category 1 Village). It is therefore considered that the SHLAA should assess sites in these</p>	<p>The methodology specifically states that this is an initial assessment <b><i>“however, these sites can be revisited, if policy changes at a later date suggest that sites in lower level settlements may be appropriate to consider for housing or employment uses at the allocation stage”</i></b>. This is considered a reasonable approach. Furthermore, the VFRTS survey allows for information to be gathered on how facilities and services in some settlements can be used by other villages- hence a “cluster approach”, in line with NPPF. The earlier VFRTS defined some villages as clusters, and this may be relevant again for some settlements.</p> <p>The VFRTS is robust evidence to support whatever policy approach to rural development is taken.</p>
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		Villages in line with the approach taken in the PPG.	
009	Walshingham Planning Ltd on behalf of Bovis Homes Ltd	<p>Reference Appendix 15</p> <p>We welcome in general terms the refinements to the SHELAA methodology to reflect the draft revised National Planning Policy Framework and the latest Planning Practice Guidance. However, we object to Green Belt sites seemingly being ruled out of the SHELAA process (as constituting Level 1 sites) for the stated reason ‘in light of the Green Belt Review’.</p> <p>The purpose of the SHELAA is to provide the South Worcestershire Councils with evidence which will inform the spatial development options for consideration as part of the South Worcestershire Development Plan (SWDP) Review. The Review will roll forward the adopted Development Plan from a current end date of 2030 to 2041, and as required by existing and draft national planning policy, the process will be expected to review and update strategic planning policies in line with a re-assessment of local housing needs.</p> <p>In this regard, the Government’s draft Planning Practice Guidance (PPG) reflects the evolving planning policies in the draft National Planning Policy Framework (NPPF), and amongst things this directs Plan-making authorities to establish the overall housing need in their Plans using the new standard methodology, unless there are exceptional circumstances</p>	<p>Noted.</p> <p><b>Change:</b> Appendix 15 explains why sites may be ruled out. The Green Belt review will establish which areas / sites still serve the purposes of the Green Belt. It is suggested that Appendix 15, reason for ruling out, bullet c) is amended to state:</p> <p>c) Green Belt Any site that is currently situated within the designated Green Belt and is considered by an up to date Green Belt review, which has been commissioned by, and produced for the SWC and is considered therein to still serve the purposes of the Green Belt, will be ruled out as a level 1 site, with the reason stated as ‘GREENBELT’.</p> <p>The SWC are aware of the reasons for the review of the SWDP and the SHLAA / SHELAA</p>

		<p>that justify an alternative. In addition, the draft PPG reiterates the regulatory requirement to review Local Plans at least once every five years, to ensure that policies remain relevant and effective in meeting the need for housing. The Plan Review Guidance chapter on page 48 of the draft PPG states:</p> <p><i>‘To be effective, plans need to be kept up-to-date. Policies, <b>including strategic policies in spatial development strategies</b>, should be reviewed to assess whether they need revising once every five years’ (emphasis added).</i></p> <p>Green Belt policies in the draft NPPF carry forward the broad principle established in existing national planning policy (NPPF) that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation and updating of Development Plans. <b>Strategic Plans should establish the need for any changes to Green Belt boundaries</b> (emphasis added). Further, Green Belt boundaries should be defined to ensure consistency with the Development Plan’s strategy for meeting the identified needs for strategic development.</p> <p>Guidance in the most up to date PPG (e.g. Housing and Economic Land Availability Assessment, Para. 022 Ref. ID:3-022-20140306) is clear that sites currently in the Green Belt are not automatically ruled out of the SHELAA process. Para. 22 states:</p> <p><i>‘Where constraints have been identified, the assessment should consider what action would be needed to remove them (along with when and how this could be undertaken and likelihood of sites/broad locations being delivered). Actions might include....a need to review Development Plan</i></p>	<p>National guidance in the PPG has now been updated (24<sup>th</sup> July 2018) as far as the standard methodology for establishing housing need is concerned.</p> <p>Agreed- hence the review of the SWDP.</p> <p>The PPG makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.</p> <p>“However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need”.( Paragraph: 044 Reference ID: 3-044-20141006 Revision date: 06 10</p>
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		<p><i>policy which is currently constraining development’.</i></p> <p>Having regard to the policy context and guidance above, it is expected that the SWDP Review will be predicated on an updated assessment of local housing need over an extended Plan period, taking into account evolving national planning policy including the new standard methodology for calculating overall housing requirements. Consequently the SWDP’s strategic polices and development strategy will be revised and updated, and inevitably this will mean identifying new strategic development allocations. However, we fail to see how this can be achieved effectively without considering all potential site options, including Green Belt sites adjoining the area’s larger towns including Droitwich Spa.</p> <p>It is understood that the previous Green Belt Review dates back to July 2010 and is therefore some eight years old. We strongly recommend that in conjunction with the SWDP Review, a further Green Belt Review takes place to comprehensively assess the need for alterations to Green Belt boundaries around the larger settlements to accommodate future growth in sustainable locations. Accordingly it is essential that Green Belt sites are not automatically ruled out of the SHELAA process, but instead are fully assessed as potential locations to accommodate future strategic growth. This would be wholly consistent with existing and emerging national policy and guidance.</p>	<p>2014)</p> <p>Agree that whether the SHELAA rules out sites in the Green Belt should be dependent on the findings of the Green Belt study that is under preparation as part of the evidence base to inform the SWDP review.</p> <p><b><u>Change:</u></b></p> <p>Appendix 15 lists reasons why sites may be ruled out. The Green Belt review will establish which areas / sites still serve the purposes of the Green Belt. It is suggested that Appendix 15, reason for ruling out, bullet c) is amended to state:</p> <p>c)Green Belt Any site that is currently situated within the designated Green Belt and is considered by an up to date Green Belt review, which has been commissioned by, and produced for the SWC and is considered therein to still serve the purposes of the Green Belt, will be ruled out as a level 1 site, with the reason stated as ‘GREENBELT’.</p> <p>NPPF 2018 makes it clear that generally, other options should be explored before releasing land</p>
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			<p>Green Belt land for development.</p> <p>Para 137 says: <i>“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:</i></p> <p><i>a) makes as much use as possible of suitable brownfield sites and underutilised land;</i></p> <p><i>b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and</i></p> <p><i>c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”.</i></p> <p>This approach is particularly pertinent to south Worcestershire where little of the overall area is designated as Green Belt.</p>
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010	<p>Julia Day of Inchbald Day Planning, on behalf of the Estate Office, Holdfast manor, Upton upon Severn</p>	<p>Overall comments:</p> <p>The consultation seems to presuppose the reader’s knowledge of the original 2007 version of the SHELAA and subsequent iterations. Reference to the Appendix 14 being attached at a later date is given, but no appendix 14 is attached.</p> <p>Thus it is not clear what assessment criteria are to be used and why.</p> <p>In consequence it is not clear in particular which assessment criteria are to be used and why, and whether they are soundly based upon and remain relevant in the light of NPPF, proposed changes to NPPF, court rulings and Planning Practice Guidance (PPG). Various older versions of explanations of reasons for ruling sites out appear to be based upon now superseded/cancelled national planning policies and advice (PPS3, PPS 5 for example).</p> <p>Overall the proposed methodology paper is very confusing and calls into question the transparency and fairness of this consultation. A consolidated version containing a simple process diagram and assessment criteria now actually proposed to be used and why etc. would have been easier to follow. This would allow parties wishing to comment on the methodology to be able to understand if the proposed methodology is soundly based.</p> <p>Para 1.3</p> <p>The use of the settlement hierarchy as a basis for the SHELAA appears to discount consideration of sites within or adjacent to or near those settlements lower down in the settlement hierarchy. This does not allow for the promotion of sustainable development in rural areas where there are groups of smaller settlements and development in one village may support services in a village nearby as envisaged by NPPF para 55. Rural settlements do not function in isolation from other nearby settlements.</p>	<p>The earlier versions of the SHLAA are published on the SWDP website. The reference was an internal note so that the appendix 14 will be provided once the revised methodology is adopted.</p> <p>The 2018 proposed SHLAA methodology is a review. It outlines any changes – such as the inclusion of employment land / the inclusion of smaller sites, farm buildings abutting settlements/ scope for looking at land for new settlements/ site thresholds/ reassessment of existing sites ( if confirmed for inclusion by landowners because of GDPR regulations) reference to PPG guidance/ updates to reasons for ruling out sites.</p> <p>The SWC consider as part of the review of the SHLAA / SHELAA, there are few changes, and that these have been highlighted.</p> <p>Para 1.3 refers to a review of the settlement hierarchy. That review does not set the policy thresholds for which categories of village will be considered sustainable/ inappropriate locations for development. That is a policy consideration, as is the case in the adopted SWDP. Sites are not discarded automatically for being in a category 4</p>
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**The methodology should not merely take into account whether a site is in a Cat 4 and disregard automatically – it should consider the sustainability credentials of the settlement and relationship with and its ability to feed into and support higher level settlements (as per that envisaged by para 55 of NPPF).**

**Suggest the wording of para 1.3 is amended to say all sites (above the size threshold) in all settlements will be considered within the SHELAA.**

village- although that may be the case for other reasons such as scale. The last sentence of para 1.3 states, “...no decision has been taken as to the quantum of development that could be assigned to different areas or settlements”.

**Under Updated reasons for ruling out sites from the SHLAA**

The methodology specifically states that this is an initial assessment ***“however, these sites can be revisited, if policy changes at a later date suggest that sites in lower level settlements may be appropriate to consider for housing or employment uses at the allocation stage”***. This is considered a reasonable approach. Furthermore, the VFRTS survey allows for information to be gathered on how facilities and services in some settlements can be used by other villages- hence a “cluster approach”, in line with NPPF. The earlier VFRTS defined some villages as clusters, and this may be relevant again for some settlements.

The VFRTS is considered appropriate technical evidence to support a policy approach.

The proposed wording does not relate to the level 1 and 2 site approach outlined in para 1.10. No sites are ruled out as level 1 sites just because of their village categorisation.

No change

Para 1.4

We do not object to the suggestion that ‘a new settlement’ may be part of the development strategy and therefore large land holdings will be considered as part of the SHELAA. This does however appear to be pre-judging the outcome of the SWDP review in terms of its future dispersal strategy. It also appears to be unduly favouring large landholdings at this initial stage instead of smaller land-parcels which may equally placed to deliver sustainable development.

In addition, small land holdings are not generally subject to the delays legal/ownership complexities or infrastructure requirements normally associated with large sites; therefore smaller sites can help deliver the housing and employment land earlier in the plan period than larger sites and should not be disregarded at this SHELAA stage.

**Suggest the wording of para 1.4 is amended to include reference to all landholdings being included in the assessment regardless of size.**

Para 1.7

Refers to ‘sources of information identified in Appendix 14’ – but we can’t see such a list at Appendix 14.

Para 1.10 Site assessment.

This suggests that level 1 sites will not be taken forward for assessment however it is not clear which will constitute a ‘major planning/ physical constraint.

**Suggest the methodology is to include clarification on such matters so as to ensure consistency with NPPF, PPG etc. And if appropriate the proposed methodology should be subject to further consultation.**

The methodology should not disregard out of hand sites on the basis of existing policy designations such as green belt or significant gap. If that

1.4 The SHELAA methodology does not pre-judge the outcome of the SWDP review- but seeks to accommodate potential options. Neither are small land holdings ruled out- and the SHELAA’s thresholds for sites are very low ( see para 1.6)

It is a generalisation to say that small sites are not subject to delays or legal ownership / infrastructure requirements. It is not for the SHELAA to favour small sites over large sites. [Although in terms of policy making NPPF now addresses a need to identify 10% of their housing requirement as sites no larger than 1ha ( NPPF para 68)].

No change

1.7 The reference is not to a list- but appendix 14 identifies a range of different sources of information.

1.10 Level 1 sites are explained in Appendix 14 as:  
**Level 1:** Sites unsuitable because of major planning / physical constraints

- Flood Plain considerations- in Flood Zones 2 & 3 (EA Flood Zone Maps)
- National (and international) and local nature designations (e.g. SAC;

were the case, a LPA would never for example be able to assess any site or allocate if most of the area falls within green belt. The suitability, availability, achievability of the site etc. should be the main basis of the assessments as per PPG and not plan policies.

In any event the criteria quite wrongly pre-supposes that existing policy designations, and indeed the spatial strategy in SWDP are to be maintained in their present form and not evolve in the light of changing circumstances and national policies. The result may be to disregard perfectly acceptable sites on the basis of outmoded policies. For instance the now SWDP 'significant gap' policy had a previous incarnation as 'strategic gap' in the Local Plan for Wychavon but had to be revised and downgraded in light of the then changes to PPS7

**The methodology should be reworded so that the assessment does not take into account to any existing non statutory policy designations such as 'significant gap'.**

Additional commentary

In preparing the previously approved SWDP larger villages were categorized as 1,2, 3, etc. and the tone of the policies was that smaller settlements were considered not appropriate for sustainable development. This has had the unintended consequence of villages not being able to support their own natural growth – older people downsizing but wishing to stay in their communities, young people and families seeking to stay close to families providing the support network that intergenerational living can provide. Therefore, we urge the local authorities to consider a wider definition of sustainability that allows for organic growth of the rural villages in the SWDP area.

SSSI; LNR; biodiversity priority habitat);

- High level of land contamination (PPS23: Planning & Pollution Control).

The published methodology will explain the level 1 and level 2 approach as part of Appendix 14.

See previous responses above as regards constraints such as Green Belt. The suitability of a site does relate directly to whether a site is confirmed as being in an area that fulfils the purposes of the Green belt, through a Green Belt review. The criteria aren't pre-supposing that existing designations are to be maintained- as that will be informed by the evidence review.

A significant gap designation should be noted, but isn't shown as an absolute constraint to site assessment going forward.

This suggested wording doesn't help assess different types of sites in terms of their form and function.

No overall change, except to bring forward the types of sites in Level 1 and level 2 into the revised methodology rather than just in the appendix

This is a misinterpretation of policy SWDP 2. The approach to organic growth in rural villages is a policy response- not one for the SHELAA- which is about potential land supply.



Equally sites next to existing large settlements should not be unduly favoured. New houses on the edge of towns and larger settlements away from services and facilities are not automatically more sustainable than rural locations. A site can be as or more sustainable within or adjacent to a smaller settlement if accessible to higher level settlements, than (say) a large new housing development stuck on the edge of, and away from, the existing services/facilities.

The proposed changes to NPPF were published in March 2018 for consultation. Paragraph 68 of the draft NPPF requires that planning policies should identify a sufficient supply and mix of sites, and, in particular, paragraph 69 states;

*“ Small sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should: ensure that at least 20% of the sites identified for housing in their plans are of half a hectare or less”*

The SWDP Review should ensure that it meets the required small site allocation across the Districts.

The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) is concerned with increasing the availability of land for self-build and custom housebuilding. The Act requires that local authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area.

The SWDPR should include relevant policies to meet a range of housing needs, including those applicable to the necessary provision of self-build plots.

The SHELAA methodology does not favour sites next to large settlements- that would be a policy response if thought appropriate.

NPPF para 68 has been amended from the draft. The new wording states:

*68. “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*

*a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved”;*

This is a comment on policy, not the SHELAA methodology, so is not addressed here.

No change

