



Strategic Housing Land Availability Assessment
2008

Appendix 2
Response to comments received on Methodology



Introduction

The Council prepared its methodology for conducting the Strategic Housing Land Availability Study in May 2008 and sent it to a number of stakeholders from the development sector, neighbouring local authorities and SHMAA* partners, social landlord and town and parish councils. In response to the comments received a more thorough methodology was produced and further comments were sought from the Home Builders Federation.

In August 2008 landowners, developers and agents were invited to complete Availability of Potential Sites forms. A copy of the detailed methodology accompanied the forms.

In accordance with the methodology a Panel of representatives from the development industry, stakeholders and the community was established to consider all the sites. At the Inception meeting of the Panel in November 2008 the methodology and the comments received were discussed and changes agreed. At the Panel's meeting in March 2009 the Council suggested a further minor amendment to methodology which was also agreed.

The following table sets out the comments received on the methodology and the Council's response and an explanation to changes made.

* Strategic Housing Market Area Assessment



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Stakeholder	Comment	Response
Andrew Martin Associates	All sites should be cross referenced to maps. Final report or its appendices should clearly show the analysis of each site.	Each site appraisal sheet will include a map and appraisal of the site. Composite maps showing the sites in each settlement are also included
	SHLAA should include consultation with development industry and other stakeholders	The methodology includes a panel of stakeholders considering each site.
Drivers Jonas	Welcomes Core Strategy representations as a source of information	
	The deliverability of sites which have remained undeveloped for a long time needs to be carefully considered.	Site appraisal will assist in determining when it is considered a site will become available.
	The Council is urged to deliver a flexible housing supply beyond the minimum requirement of the regional plan.	The aim of the SHLAA is to show that there are sufficient deliverable and developable sites. Should this not be the case then the SHLAA will need to widen its scope and consider further sites.
Roger Tym & Partners	Satisfied that the sources of sites and sources of information is comprehensive	
Melville Dunbar Associates	No comment on methodology	
Bidwells (Cambridge)	No comment on methodology	
Bidwells (Chelmsford)	Satisfied that the sources of sites and sources of information is comprehensive	
Home Builders Federation (Eastern Region) 30.5.08	Initial draft methodology is too general. Sites in rural settlements are mentioned but not sites on the edges of rural settlements No information on the threshold of site size. Unrealistic timetable	More detailed methodology prepared. See comments below



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Home Builders Federation (Eastern Region) 02.07.08	Involve key stakeholders in updates and reviews.	The assessment will be kept up to date in accordance with paragraph 17 of the guidance.
	Consultation is not a substitute for partnership working.	The reason why the Council has decided not to undertake the SHLAA in partnership with other authorities is set out in the methodology and also will ensure that the assessment will be available when required by the District Council. This approach was accepted by the Panel.
	Sites with planning consent; housing allocations and employment allocations should not be included without being considered against robust evidence and taking into account implications of planning applications lapses and renewals.	This will be taken into account when the sites are considered by the Panel.
	Should include 'additional housing opportunities adjoining established residential areas'.	Methodology amended to include this source of site.
	Gross to net developable area seems overly optimistic in what is realistically achieved.	In the absence of any published studies this is was considered to be a reasonable approach based on the Regional Annual Monitoring Report
	SHLAA should not be restrained or have policy filters.	Whether a site is Greenbelt, Greenfield or Brownfield will be noted under the assessment and will not filter out sites as being unsuitable solely for that reason.
	If availability cannot be determined then site should not be included and further work undertaken to inform annual review.	Lack of information on availability will be noted in the assessment and will be taken into account in the final conclusions of the assessment.
	Build out rates should be agreed with industry/panel.	Build out rates will be discussed with the Panel.
	Market viability needs to be properly factored in.	This will be taken into account in the site assessment. The issue of how to assess the



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		viability of sites in the current market situation was discussed by the Panel. It was suggested that one approach would be to highlight the fundamental constraints and separate these from the constraints which could be overcome at a cost and/or over time
	In overcoming constraints sites should not be considered in isolation but the Council should look into whether sites can be considered together to overcome constraints.	This will be considered
	Sites should be assessed on facts rather than opinions.	The site suitability appraisals will be based on published information which can be consistently applied across all the sites.
	Site suitability appraisal form seems overly cumbersome.	This was discussed by the Panel. There is a need to strike a balance between simplicity and accuracy and providing the level of information required. It was agreed that the traffic light system on a spreadsheet would give a useful overall impression.
Scott Wilson Ltd	Assessment being carried out late in the LDF process.	The assessment will be ready for the Submission of the Core Strategy and the Examination.
	Assessment should be accompanied by fuller evidence base such as housing needs survey, broader Historic Settlement Character Assessment covering more villages and information on key stakeholders regarding impacts of development options.	A Strategic Housing Market Assessment is being undertaken at the same time. The annual review of the SHLAA can take into account new evidence as it becomes available.



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	Initial draft methodology is too general and better explanation of how each stage is carried out is needed.	A more detailed methodology was prepared
	Methodology lacks local distinctiveness, failing to take into account the circumstances of Uttlesford.	The site suitability appraisals take into account local circumstances.
	Core strategy representations should not be used in isolation of supporting information and parties who made these representations should be consulted.	All those who made representations on the Core Strategy promoting a site for residential development will be contacted.
	Urban Capacity Study should not be sole source of information on potential sites.	The Urban Capacity Study is one of a number of sources to identify sites. The urban capacity study was done in 2005 and this only looked at sites in Saffron Walden, Stansted Mountfitchet and Great Dunmow. Other sites which might have become available since then and sites in other settlements will be identified through stages 4 and 5 of the methodology.
	No information as to information sources for stage 7.	The information for stage 7 will be obtained from the returned Availability of Potential Sites forms and data available from the Adopted Local Plan or the Council's website. All sources will be listed in the final report.
	Information sources should be verified by appropriate authority or agency.	Information such as floodplains; accessibility maps have been obtained from the relevant agency or authority.



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	Legal and ownership issues of sites should be established to assess availability	These details are sought from the owner/agent in the Availability of Potential Sites Form.
	Stakeholders should be allowed to contribute to stage 7.	Stakeholders will be invited to be members of the Panel
	List of consultees should include key stakeholders – Essex County Council, Highways Agency, Environment Agency, Natural England etc.	These bodies will be invited to be members of the Panel.
Felsted Parish Council	ECC 10 year aerial survey should be included as a source of information.	The Council does not have access to this information. Similar information is now available on the internet.
	Surplus public sector land should include sites sourced from data on Essex County Council and central government land.	These sources will be investigated.
	Farmers and Landowners should be directly approached regarding Rural Exception Sites	Time and resources do not allow us to contact all landowners but Housing Associations are involved in the assessment to provide information on potential sites.
	Consultees should include EERA, EDA, LA21, Sustainable Homes Network, Uttlesford Futures and Co-operatively owned Land Associates	The scope of the SHLAA means that it does not fall within the remit of some of these consultees. However a representative of LA21 will be invited to be a member of the Panel.
Go-East	Note that you are following CLG, Planning Officers Society and Planning Advisory Service guidance.	
David Lock Associates	No comments on sources of sites and information.	
DLP Planning	Welcomes Core Strategy representations as a source of information. These should include all	All Core Strategy representations promoting residential development will be included in the



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	site based submissions and not simply those relating to urban extensions and freestanding new settlements.	assessment.
Swan Housing Group	Satisfied that the sources of sites and sources of information is comprehensive	
Stebbing Parish Council	Unable to suggest any sites under sources of sites heading.	
Takeley Parish Council	Satisfied that the sources of sites and sources of information are comprehensive. Unable to suggest any sites under sources of sites heading.	
Thaxted Parish Council	No comment	
Dundas & Wilson LLP	Suggest additional sources of sites:- - Sites subject to planning applications and those subject of appeal from Local Authority Records. - Extensions to new settlements from representations by owners or developers.	This was discussed by the Panel. The sites of undetermined applications continually changes and would be difficult to include in the assessment. For practical reasons the Assessment should look at the situation at April each year. This was not considered to exclude significant sites. Under the adopted Local Plan the majority of applications for residential development are small and within development limits, other sites would be identified from other sources or the site survey
Great Chesterford Parish Council	Two sites suggested	Included in Assessment
Barton Wilmore	Planning the assessment not clearly set out.	
	Satisfied with sources of sites.	
	A site size threshold of 0.2ha is inappropriate given the need to identify enough sites and could	This is not believed to be the case and if insufficient sites are found, smaller sites can be



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	place a reliance on windfalls sites.	looked at.
	Estimating the housing potential should be based on more recent adopted local plan and Preferred Option Core Strategy rather than older Urban Capacity Study.	The Urban Capacity Study looked at the density of recent housing developments of good design so similar densities could be applied to sites in similar locations. There is no more recent information.
	Net to gross density ratio for sites over 2ha does not take into account range of other uses which may be developed especially on large sites.	Following discussion with the Panel additional work was carried out on the density for new settlements which indicated that the density of new settlements should be amended to 30-67dph and a gross to net ratio of 75% was considered a reasonable standard to apply.
	In assessing achievability, the costs of infrastructure should be assessed in relation to the scale of development proposed.	This will be taken into account by the Panel. When discussed by the Panel, it was appreciated that it would be difficult to always know what facilities are being proposed or needed. It was appreciated that this was a difficulty to which there was no straightforward answer and each site would probably need to be treated on its merits and any assumptions made recorded.
	Do not consider that there is a reasonable case for windfall sites to be included within UDCs housing land supply calculations.	The methodology states that the Council is not intending to identify an allowance for windfalls sites as part of the housing supply.
Uttlesford District Council	As at March 2009, time and resources have been directed to assessing the sites identified by the desktop review which has meant that no surveys have been carried out to identify additional sites. The desktop survey has identified 246 sites and there are some settlements which are completely	Additional text to Stage 4 was approved by the Panel in March 2009. 'The survey will first identify any previously developed land within the town/village envelope or built up extent of the village and secondly any logical extension to the village which would have



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	surrounded by potential sites.	minimal environmental impact. For some villages the desktop survey will have identified all available land around the settlement and therefore the extent of the survey will be minimal. In other settlements the desktop study will have identified few or no sites and so the survey will pay particular attention to these settlements.'
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