

APPENDIX 2

HELAA Methodology Consultation – Summary of Representations

Prefix Codes for the representations:

ALL: same comments submitted to all Local Authorities involved in the consultation

CCC: Comments received by Coventry City Council

NWBC: Comments received by North Warwickshire Borough Council

NBBC: Comments received by Nuneaton and Bedworth Borough Council

RBC: Comments received by Rugby Borough Council

WDC & SDC: Comments received by Warwick and Stratford-on-Avon District Councils (joint consultation process)

Officer responses and changes to the methodology collectively agreed with CSWAPO.

Abbreviations used:

HELAA: Housing and Economic land Availability Assessment

NPPF: National Planning policy Framework

PPG: Planning Practice Guidance

LA / LPA: Local Authority / Local Planning Authority (used interchangeably)

Responses received by all / several Local Authorities					
Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change to Methodology
ALL1	Stoford (Commercial Developer)	Stage 1 of the (Methodology Identification of sites and broad locations)	<ul style="list-style-type: none"> Recommend that the locational requirements for employment land are recognised as being different to that of housing ensuring that sites for employment land are identified appropriately. Recommend that sites with good connections to the strategic road network are included within the desktop review for employment land and also those with rail connectivity (for movement of freight). Use the West Midlands Strategic Employment Sites study (WMSESS May 2021) to inform key locations Identify opportunities to extend existing employment allocations and sustainable urban extensions to cluster employment and provide opportunities for existing businesses to expand or relocate whilst maintaining labour supply. Covid-19 has created uncertainty over demand for office space so opportunities for other uses should be considered. 	<p>The existing proforma could capture all necessary detail including reference to key evidence which the promoter feels should be taken into account. Suggested details could be submitted during call for sites process and would form part of site assessment process.</p> <p>Any site can be submitted as part of HELAA process and desktop review. The subsequent analysis and assessment of constraints and policies, local, national and/or emerging will determine which are identified as having potential for development</p> <p>Each LPA's individual assessment framework will have regard to key evidence such as the Housing and Economic Development Needs</p>	<p>Amended the text at the start of the Call for Sites proforma to include reference to economic uses, and link to the PPG added in to para 1.5 for context.</p> <p>Prompt added to 'additional information' section.</p>

				<p>Assessment (HEDNA) and the WMSESS.</p> <p>However the introductory text at the start of the proforma should be amended to include employment. Further, the 'additional information' section could encourage links to key evidence and information such as that raised here.</p>	
ALL2	Stoford (Commercial Developer)	2.7	Clarification around how it is envisaged that engagement with the business sector will look. (As detailed by the 'Business requirements and aspirations' in the table of potential sources of information at para 2.7).	This is something each Local Authority needs to consider as part of its more detailed work on its individual HELAA as local context and issues will vary. However the table at 2.7 could be expanded to provide examples eg engagement with LEP, economic development team, Chamber of Commerce, local business forums and associations etc. Each individual's Statement of Community Involvement (SCI) will set out further detail on engagement.	Expanded examples in the table at 2.7
ALL3	Stoford (Commercial Developer)	2.14	More detail needed around how employment densities will be calculated and the net/gross ratios that will be applied against	This text is taken directly from the PPG. Information on densities and net / gross	No change

			employment sites that vary by size / number of units / infrastructure ratios.	factors will be a matter of each LPA to consider as part of its more detailed work on the HELAA as this will depend on local context. However in broad terms this work will be informed by the HEDNA.	
ALL4	Stoford (Commercial Developer)	2.15	<p>A lack of detail is observed here, more needed with regards to what locational factors will be judged, recommend:</p> <ul style="list-style-type: none"> ○ The 'Golden Triangle of Logistics' ○ Motorway / A -road junctions and proposed /planned improvements ○ The key locations identified in the West Midlands Strategic Employment Sites Study (May 2021) ○ Railway stations 	This text is taken directly from the PPG. The detail will be a matter of each LPA to consider as part of its more detailed work on the HELAA as this will depend on local context. Such matters could also be referenced in the proforma by those promoting particular projects.	No change
ALL5	Stoford (Commercial Developer)	2.15	'Likely market desirability' should be added to the proforma.	This is something which site promoters could include in the 'additional information' section of the proforma	No change
ALL6	Stoford (Commercial Developer)	Stage 2 of Methodology	<ul style="list-style-type: none"> ● Planned infrastructure to be fully considered within the assessment of sites. ● Also recommend that flood zones are also considered to inform assessment suitability – mitigation can be made against sites that are partly in a flood zone. This ensures such potential sites are not ruled out. 	Noted: Flood risk will inevitably be a constraint applied that will negatively impact development potential, to reflect national policy and guidance. Where sites are submitted that include parts of flood zones the potential of such areas will	No change

				be difficult to assess or prejudice as suggested, So such submission sites must/should include additional information showing how impact on flood risk areas will be addressed such as by avoidance of flood risk sensitive development or replacement and compensatory measures for lost flood storage capacity etc. In the absence of such additional information assessment potential may inevitably be constrained. This will be a matter for the detailed assessment by each LPA	
ALL7	Stoford (Commercial Developer)		Significant green belt within Coventry and Warwickshire should be acknowledged. It should be considered as part of a 'policy neutral' assessment. Support WMSESS recommendation for a Green Belt review.	Noted. The HELAA is a 'policy off' document.	No change.
ALL8	Stoford (Commercial Developer)	Para 2.20	Recommends consideration of timing and funding triggers for infrastructure.	Noted: This will of course vary significantly, dependant on site size, location, authority area and its infrastructure capacities and deficiencies. It is expected that each LA's engagement with statutory	No change

				and non-statutory consultees during detailed site discussion will address much of these concerns as well as reference future investment programmes and management plans by statutory service and infrastructure providers/agencies. This context will be included in the detailed assessment process undertaken by each LPA.	
ALL9	Stoford (Commercial Developer)	Stage 4 Para 2.26	Would welcome developer ability to input into trajectory risk assessment.	Developer engagement on this would come later in the process.	No change
ALL10	Stoford (Commercial Developer)	Stage 4 Para 2.28	Encourage Councils to establish need for strategic employment sites at the earliest opportunity e.g. cross boundary sites.	The Coventry and Warwickshire Councils work closely to fulfil their duty to cooperate requirements.	No change
ALL11	Stoford (Commercial Developer)	Stage 5 para 2.29	Seek clarity on whether consultation will be provided on those sites that are omitted. Aimed at ensuring that suitable sites are not wrongly disregarded.	The HELAA is technical evidence to support plan making and delivery. The opportunity to comment on omission sites will be provided through the various stages of consultation during local plan preparation.	No change
ALL12	Stoford (Commercial Developer)		In respect of reporting, we would ask that a District wide map is produced of all sites, and numbered, to help with identification. Appendices of separate site maps without an overarching map are difficult to interpret.	Agreed that LPAs should present their HELAAs in a clear, transparent and accessible manner.	Amended para 3.6 to address this point.

ALL13	Stoford (Commercial Developer)	3.7	In RAG assessments, 'amber' sites should be upgraded to green if evidence that mitigation can address constraints.	The methodology makes it clear that the example is illustrative and each LA will take forward the detail	No change
ALL14	Stoford (Commercial Developer)	Comments on the Pro-Forma – Appendix 1	<p>Suggest the following additions to the example site proforma:</p> <ul style="list-style-type: none"> ○ At section 4 seek to understand if there is a developer on board. ○ At section 6 include criterion relating to the accessibility of the site to a motorway or A Road. Excellent access to the strategic road network is needed for employment land. ○ Include a section on the appropriateness and likely market desirability of the potential development as set out in paragraph 2.15 of the methodology. ○ Include a section on planned infrastructure <p>Inclusion of 'likely market desirability' to be included in the call for sites pro forma in line with para 2.15.</p>	Agreed these would assist with the illustrative proforma. Amend at section 4, 6 and 9 to cover these suggestions.	Amended proforma in line with officer comments
ALL15	Historic England		Historic England advocates that, when using this methodology, a wide definition of the historic environment is used. This includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important. In addition, it includes the landscape and townscape components of the historic environment, as well as archaeology, the importance and extent of which is often unknown and may extend beyond designated areas.	Noted. This will be down to the approach employed by each LPA when they undertake detailed assessment. Officers will use mapping to identify initial site constraints. Officers will engage HE during detailed site discussions which will include the definition and application	No change

			Information in the Historic Environment Record (HER) may indicate areas of known interest, or high potential where further assessment is required before decisions or allocations are made. The possible cumulative impact of a number of site allocations in one location could also cause considerable harm to the historic landscape/townscape.	of historic environment within the local context. No changes are proposed as it is considered that Officer assessment and engagement with HE will capture potential impacts and relevant issues.	
ALL16	Historic England	Pro Forma	Whilst Historic England is therefore pleased to see 'Heritage Designations' included in the site constraints listed in Section 5 of the "Example Call for Sites Proforma", we suggest that the proforma be amended to also include non-designated heritage assets, noting that the NPPF refers to non-designated heritage assets of archaeological interest being as demonstrably of equivalent significance to scheduled monuments (Footnote 68). We strongly recommend that advice should be sought from your Conservation Officer and Archaeological advisor throughout the site selection process	Amendment to the proforma not considered necessary as the presence of non-designated assets will be captured by Officers and further consultation with HE. Officers will consider HE guidance on site selection when assessing sites. However it should also be noted that the proforma is illustrative and can be adapted to contain additional fields should the individual LPA consider it helpful to do so within the local context. No changes are proposed as it is considered that Officer assessment and engagement with HE will capture potential impacts and relevant issues.	No change

ALL17	Historic England	General	If a site which affects heritage assets is allocated, we would therefore expect to see reference in the ensuing policies and supporting text on the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting	Officers will use mapping to identify initial site constraints. Officers will engage HE during detailed site discussions. No changes are proposed as it is considered that Officer assessment and engagement with HE will capture potential impacts and relevant issues.	No change
ALL18	Historic England	General	Bearing in mind the overarching principle that harm to heritage assets should be avoided wherever possible, as a point of principle, we would expect sites that would have an unacceptable impact on the significance or special interest of heritage assets not to be taken forward.	Noted. Officers will consider HE guidance on site selection when assessing sites and will engage HE during detailed site discussions	No change
ALL19	Natural England	General	Natural England has no specific comments to make on the methodology consultation and instead offers generic advice on landscape, biodiversity, geological conservation, best and most versatile agricultural land, and public rights of way and access for use in producing or revising the HELAA.	Comments noted.	No change
ALL20	Natural England		No specific comments. Generic advice available on key natural environment considerations for use in producing or revising HELAA's, which we hope is of use. 1. Landscape Avoiding harm to the character of nationally protected landscapes - National Parks, the Broads and Areas of Outstanding Natural Beauty - and locally valued landscapes. Cumulative impacts may also occur as a result of the combined effects of more than one housing development. The	Noted. Officers will use mapping to identify initial site constraints. and engage with statutory and Non-statutory consultees during detailed site discussions.	No change

			assessment of potential housing sites should be informed by the landscape character approach. The National Character Area (NCA) profiles will provide useful information. Further information on LCAs is at Landscape Character Assessment .		
ALL21			<p>2. Biodiversity Avoiding harm to the international, national and locally designated sites of importance for biodiversity. The key to assessing these is to understand the potential impact pathways that may exist between the development and sensitive sites.</p> <p>Avoiding harm to priority habitats, ecological networks and priority and/or legally protected species populations Priority habitats and species listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Protected species are those species protected under domestic or European law. A Phase 1 Habitat Survey is the commonly used standard for habitat audit and provides a starting point for determining the likely presence of important species.</p> <p>Seeking opportunities to contribute to the restoration and re-creation of habitats, the recovery of priority species populations and biodiversity enhancement</p> <p>.</p> <p>Seeking opportunities to enhance and create Green Infrastructure The SHLAA should consider the availability of GI and opportunities to enhance GI networks when considering sites for development.</p>	Noted. Officers will use mapping and/or GIS tools to identify initial site constraints. and engage with statutory and Non-statutory consultees during detailed site discussions.	No change
ALL22			<p>3. Geological conservation Avoid harm to nationally and locally designated sites of importance for geological conservation - geological SSSIs and Local Geological Sites (also known as RIGS - Regionally Important Geological Sites).</p>	Noted. Officers will use mapping to identify initial site constraints. and engage with statutory and	No change

			Seeking opportunities to contribute to landscape restoration and enhancement.	Non-statutory consultees during detailed site discussions.	
ALL23			4. Best and Most Versatile Agricultural Land Avoiding Best and Most Versatile Agricultural Land Land quality varies from place to place. Information on Best and Most Versatile Agricultural land (grades 1,2 and 3 a) is available from the Agricultural Land Classification (ALC). Not all land has been surveyed in detail and more detailed field survey may be required to inform decisions about specific sites.	Noted. Officers will use mapping to identify initial site constraints. and engage with statutory and Non-statutory consultees during detailed site discussions.	No change
ALL24			5. Public rights of way and access Seeking opportunities to enhance public rights of way and accessible natural green space. Housing allocations should avoid adverse impacts on National Trails and networks of public rights of way and opportunities should be considered to maintain and enhance networks and to add links to existing rights of way networks.	Noted. Officers will use mapping to identify initial site constraints. and engage with statutory and Non-statutory consultees during detailed site discussions.	No change
ALL25 (sent to WDC & SDC / NWBC)	Warwickshire County Council		HELAA should look to include data specifically around older people's housing needs, accessible housing needs and supported housing needs. Where LAs use consultants to produce HELAA they should ensure that WCC People directorate and Health are consultee's within the spec for consultants to deliver on.	Noted : It is expected LA's engagement with statutory and Non-statutory consultees during detailed site discussion will address much of these concerns as well as reference future investment programmes and management plans by statutory service and infrastructure providers/agencies etc...	No change

				It is also expected that once agreed all Local Authorities will process their HELAA based on the agreed methodology and this methodology will apply to, and be applied by, any consultants contracted to and by those authorities for the purposes of producing their HELAA.	
ALL26 (sent to WDC & SDC / NWBC)			In terms of the Employment aspect, those sites which will impact People directorate are sites for residential care homes, and potentially community centres. Engagement with Planning Authorities is sought to ensure the need is fully understood based on the new census data when released .	Noted: It is expected LA's engagement with statutory and Non-statutory consultees during detailed site discussion will address much of these concerns as well as reference future needs for statutory services based on most up to date data available.	No change

Responses received by Coventry City Council					
Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change to Methodology
CCC1	Claremont (Planning Consultancy)	Stage 1 of Methodology	<p>Observed omissions of parts of the PPG which are considered to be relevant to the document:</p> <p>Paragraph 008 – Reference ID:3 – 008 -20190722 is advised to be considered.</p> <p><i>‘The assessment needs to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land. The process of the assessment will, however, provide the information to enable an identification of sites and locations that are most suitable for the level of development required.’</i></p> <p>This advice is detailed further in paragraph 010 Reference ID:3-010-20190722 of PPG, that recognises that when carrying out a desktop review, plan-makers need to be proactive in identifying as wide range of sites and broad locations for development as possible (including those existing sites that could be improved, intensified or changed). Identified sites, which have particular constraints, need to be included in the assessment for the sake of comprehensiveness. PPG identifies that an important part of the desktop review is to identify sites and their constraints, rather than simply rule out sites outright which are known to have constraints.</p> <p>It is important to note that the identification of all sites and broad locations is a ‘policy-off’ approach before assessment is made of the suitability of the site. This will ensure as wide range of sites and broad</p>	<p>Noted. This is covered by paras 2.4 – 2.7. Detailed interpretation of the guidance (beyond the scope of this broad HELAA framework) will be taken forward by each individual LPA to reflect the local context and circumstances.</p>	No change

			locations is identified as possible, and sites are not dismissed too early that could otherwise come forward for development.		
CCC2	Claremont (Planning Consultancy)	2.4	Paragraph 2.4 of the draft document identifies those sites of a size of less than 0.25 hectares or fewer than 5 dwellings that should not be considered as part of the HELAA process. What is omitted from this paragraph, however, is the advice contained in PPG <i>that ‘a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements should be considered where appropriate.’</i> It is recommended that an additional sentence is included in this paragraph to recognise this advice.	Noted. This is covered by paras 2.4 – 2.7. Detailed interpretation of the guidance (beyond the scope of this broad HELAA framework) will be taken forward by each individual LPA to reflect the local context and circumstances.	No change
CCC3	Claremont (Planning Consultancy)	2.15	Stage 2: It is considered that Paragraph 2.15 should recognise in terms of a site’s suitability for development the advice contained in paragraph 018 Reference ID: 3-018-20190722. This identifies that sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability.	This is addressed in para 2.16	No change
CCC4	Resident	1.5	I am a resident in the CCC area. I have no commercial or professional interests that are relevant to my response regarding Planning strategy or decisions. The initiative to seek a common assessment and data gathering methodology across contiguous councils is a good one. At last there appears to be a common-sense and pragmatic effort to recognize the critical inter-dependability of HMA and FEMA issues in the same assessment methodology.	The Framework will be agreed and adopted by the LPAs involved. However this paragraph will be amended to make it clear that the	Amended para 1.5 to provide more clarity.

			<p>If the approach framework will allow respective councils to "adapt" to suit, this risks unravelling the methodology and key principles. The "adaptations" scope needs to be more specific in its definition and limitations.</p>	<p>framework itself will not be changed but that detailed assessment work will be taken forward by each LPA using the framework as the starting point for more detailed appraisal work which takes account of the local context.</p>	
CCC5	Resident	2.11	<p>"new broad locations.....where cumulatively they could provide suitable infrastructure to deliver growth in a sustainable way":- Does this open the way for compulsory purchase orders to merge suitable development 'pockets' into broader schemes? See also s.2.15 - "Suitability". This also touches on my greatest criticism of Planning's current assessment of major housing development applications: viz. applications in the same area/region are considered on their individual merits with no apparent assessment of the CUMULATIVE effects of the combined developments' scale on local community services, highways, etc. As an example - Eastern Green, Banner Lane, Cromwell Lane, Westwood Heath, Southern Relief Road combined development impacts on the merged area and resulting local pinch-points. In particular, S.106 contributions levied in a piecemeal way will fail to provide a meaningful solution to health, education, highways, retail and cultural/leisure needs.</p>	<p>The methodology has been written to reflect national guidance but detailed matters would need to be considered on a case by case basis by each LPA to reflect the local context and circumstances. This would include consideration of whether clusters of sites might provide benefits as part of a more co-ordinated approach to infrastructure delivery as stated in 2.11, and the</p>	<p>No change.</p>

				method for that delivery.	
CCC6	Resident	2.20	"Lead times and build-out rates" - this is a critical component of the assessment process. If these are not specified in Reserved Matters, with penalties for non-observance, there is a clear risk of long-term speculative land-banking and sporadic build periods leading to nuisance and adverse effects on adjacent housing valuations. A "pecking" approach by a major site developer(s) also significantly interferes with community services planning, and the meaningful application of s.106 community levies.	Noted, however legislation determines the scope of what can be achieved here regarding planning applications. The HELAA process however is concerned with informing site assessment for strategic planning purposes.	No change
CCC7	Resident	2.27	There MUST be a timescale and frequency for formally revisiting the methodology of approach and Local Authority's assessment criteria. I suggest the current Applications' validity of 3 years.	The assessment of sites is concerned with strategic planning and the allocation of sites, the majority of which will not yet have reached the planning application stage.	No change.
CCC8	Resident	2.28	'The Statutory Duty for co-operation between councils regarding cross-boundary land allocations MUST embrace the ability for those new residents to be accepted by the 'requesting' Authority for THEIR health and education services if so desired (by postcode definition). Likewise, s.106 levies MUST be allocated to the 'donor' authority.'	The planning process only requires that sufficient infrastructure is delivered to support development based upon appropriate	No change

				evidence (eg education and health as mentioned here) and this evidence would be provided by the relevant bodies. In terms of where those residents live who will access those services, this is beyond the scope of the planning process as the relevant providers (GPs, schools etc) have their own processes for determining who they accept.	
CCC9	Resident	2.30	“ other spatially strategic policies” - this is a loose definition that needs clarification and examples.’	Noted, the text will be amended for clarity to explain that paragraphs 20-23 of the NPPF provide the definition.	Amended text for clarity
CCC10	Resident	3.5	Red Line / Blue Line area and "mitigation", and "overcoming constraints by mitigation". In my experience "mitigation" invariably leads to a net local LOSS. This section provides an excess of 'wiggle-room' for predetermined decisions to be 'qualified' by ill-defined mitigation that is ultimately un-policed at the (post)-development stage.	These are matters that would be considered in detail by the case officer at the planning application stage.	No change

CCC11	Resident	Joint approach	<p>It is welcome to see that there will be an agreed approach between the Local Planning Authorities (LPAs). However, this approach should be extended further to identify potential cross boundary effects at the earliest possible stage i.e., during strategic assessment of land availability. For example, the methodologies and modelling used to produce other strategic assessments should also be consistent across the LPAs especially where cumulative impact is a consideration and, ideally, they should be produced to provide data at the Coventry and Warwickshire sub-regional area level but enable drilling down to the level of individual LPAs or specific geographical areas. This should include the following aspects:</p> <ul style="list-style-type: none"> - traffic levels (local and strategic road networks) - air quality - flood risk and flood storage - sewage and surface water systems - climate change – mitigation and adaptation - nature recovery - access to green space and sports/play facilities - access to services e.g., GP, dentist, schools - community facilities <p>Not only would this assist in the early identification of constraints, infrastructure requirements and locations where cumulative impacts could be an issue but would also help inform the evidence base for Local Plans. In addition, it has potential to streamline the process for developers especially for those who may be considering submitting an application for a site close to an administrative boundary.</p> <p>There have been significant and ongoing issues with several sites allocated within the Nuneaton and Bedworth Borough Council's (NBBC) Borough Plan where cumulative impacts on the wards of Longford, Foleshill and Holbrook were not sufficiently considered. In</p>	<p>Noted, and the authorities are working together on a shared strategic evidence base to inform future local plan work and a co-ordinated approach to this. In terms of para 1.5, the Framework will be agreed and adopted by the LPAs involved. However this paragraph will be amended to make it clear that the framework itself will not be changed but that detailed assessment work will be taken forward by each LPA using the framework as the starting point for more detailed appraisal work which takes account of the local context.</p>	<p>Amended para 1.5 for clarity</p>
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			<p>particular, impacts on Coventry’s AQMA; traffic levels – local and strategic road networks (M6 J3 and A444); local economy – Coventry Building Society Arena and shopping park; flood risk in areas such as Rowley’s Green(River Sowe), access to green space and sports/play facilities and access to services, including schools and GP practices.</p> <p>Currently, communities appear to be ‘falling through the cracks’ created by administrative boundaries. However, residents living at these locations should be afforded the same protections as others; inequalities in public health or access to services should not be exacerbated by sites which have been identified within neighbouring LPAs; through their planning policies e.g., Local Plan and SPDs, or planning decisions made about them at a later stage.</p> <p>The clause ‘It is not the objective of this joint methodology to standardise the methods...’ in 1.5 is of concern. How will a ‘consistent approach’ be achieved when a Local Authority can make adaptations? Would a proposal for an adaptation need approval by the other LPAs? Would local people be consulted on any changes made?</p>		
CCC12	Resident	2.19	<p>Understanding constraints</p> <p>It is welcome to see that Appendix 1 has been developed to ‘...establish any mitigations possible to overcome identified constraints’ and the concept of “front-loading” site assessment. How much support will a landowner be given when they are filling in a proforma particularly with identifying constraints? Will consultees be involved in this stage of the process e.g., National Grid, National Highways, Natural England, etc? Will the landowner be required to provide supporting evidence such as assessments produced by qualified professionals/consultancies e.g., an Ecological</p>	Noted. The further detail including any support will be down to the approach employed by each LPA when they undertake detailed assessment. Officers will use mapping to identify initial site constraints. The	No change

			Impact Assessment (EClA) produced by an ecologist registered with CIEEM. How will identification of constraints be robust at this stage without having an illustrative masterplan? How is the accuracy and availability of data checked? For example, in areas with a history of under recording, desktop based biological searches and maps may not be reliable and surveys may be required for protected species, birds, etc. Is there a process for reviewing RAG rates to ensure they remain up to date and accurate?	evidence needed will be proportionate to the stage at which the plan- making process has reached and issues identified including the reliability of the evidence used.	
CCC13	Resident	Section 5 of Appendix 1	<p>Additional Constraints:</p> <p>Could the following be added to the list of constraints in Section 5 of Appendix 1:</p> <ul style="list-style-type: none"> - Tree Preservation Order(s) – - Mature, veteran and/or ancient trees - Hedgerows - Grassland, pasture and/or meadow - Woodland - Main river and/or ordinary watercourse - Lakes, ponds and/or ditches - Sports fields - Allotments and/or orchards - Parkland and/or gardens - Protected species <p>Site features which are located within an ecological network; could contribute towards nature recovery and/or flood storage; where loss would have a negative impact on mitigation and adaptation to climate change e.g., carbon sequestration, the heat island effect, etc, or have</p>	The form at Appendix 1 is illustrative and can be tailored by each LPA to reflect the local context. However the suggestions will be included in the illustrative example as these are useful prompts	Amendments made to the proforma

			the potential to improve access to green space or sports/play facilities should be identified early on.		
CCC14	Resident	General	<p>Proposed Land Use:</p> <p>The section on proposed land use should be more detailed. In particular, it requires specifics on Use Classes i.e., B, C, E, F and Sui Generis.</p> <p>For example, on p31 of the NPPF it says the following,</p> <p style="padding-left: 40px;">'109. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.'</p> <p>A proposal for use for 'B8 Storage or distribution' would require provision for overnight lorry parking and sufficient parking to cater for 'anticipated use.' Furthermore, an increase in HGV movements could introduce other issues such as impacts on air quality. If located within a residential area, landscape buffers may also be required to mitigate against noise pollution, light pollution, storage of hazardous materials, etc. This shows that constraints and site suitability are dependent on the Use Classes involved. Therefore, this information should also form part of the site assessment matrix and RAG ratings as it may be necessary to outline which Use Classes have been excluded or provide specific RAG ratings for each land use proposal if there is more than one option.</p>	Noted – however the categories have been prepared in line with national guidance and the matters raised are issues which would be addressed by each LPA at the site assessment stage. Parking for B8 (including overnight provision) would still be classed as B8 for example as it would be ancillary to the main proposed use. It is for the site promoters to provide the further detail and evidence to demonstrate why they consider their scheme to be a good proposal so it can be properly assessed.	No change

CCC15	Resident	General	<p>Widening the scope of the assessment</p> <p>When we are facing impacts from climate change, the biodiversity crisis and poor air quality, it is essential that land availability for green infrastructure is considered alongside that for housing and economic purposes. Green infrastructure should be seen as an integral part of sustainable growth and not an afterthought at the level of individual sites. In wards where there is a deficit e.g., Foleshill, opportunities for nature recovery and improving access to open space should be prioritised. Furthermore, local planning authorities should work with landowners to explore funding opportunities (e.g., Environmental Land Management schemes, carbon offsetting schemes, Severn Trent Community Fund, Highways England Designated Fund) and encourage collaboration with other organisations which have environmental, health and social goals.</p> <p>A sub-regional infrastructure strategy already exists and is underpinned by the Habitat Biodiversity Audit, the longest continuously running survey of its kind in the UK. In addition, there is a Warwickshire, Coventry and Solihull Green Infrastructure map which could be used to identify locations that could contribute towards Nature Recovery Networks, ‘joined-up, nature-rich spaces of all sizes, across all areas.’ Currently, these do not appear to be integrated within the HELAA process allowing potential sites to be lost and ecological networks to become further fragmented.</p> <p>Land use to provide access to services should also form part of the assessment as it is essential that the future needs of a community are considered especially in areas where there is ‘growth’. This should look at aspects such as access to education (early years, primary, secondary and colleges); GP practices and healthcare facilities; dentists; libraries; community meeting spaces; sports facilities; play areas; neighbourhood shopping centres and corner</p>	<p>All points noted and these are all matters which will be considered through the detailed assessment and plan-making processes undertaken by each LPA. However the HELAA itself has clear parameters (Housing and Employment) which are set out in the National Planning Practice Guidance and these have been followed for the purpose of this specific methodology. This is not to say that sites for other uses could not be put forward though as this is helpful to inform the local plan process.</p>	No change
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			<p>shops; places of worship; sheltered housing, assisted living facilities and nursing homes; etc. Without these aspects 'growth' cannot be sustainable; health, social and cultural well-being should be at the heart of the entire planning.</p> <p>process. If sites are not identified early on for these purposes, opportunities to build in social infrastructure will be lost and this can have long-term impacts especially in deprived areas.</p> <p>According to the NPPF,</p> <p style="padding-left: 40px;">'Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways...an economic objective...a social objective...an environmental objective.'</p> <p>Previously, the process appeared to be focused on meeting certain aspects of the economic and social objectives such as delivering national housing targets. Even though a Green Infrastructure sub-group of CSWAP0 existed, which was responsible for producing the Warwickshire, Coventry and Solihull Green Infrastructure Strategy, this did not seem to be translated into land availability assessments which called for and identified sites to address the NPPF's environmental objective and health and well-being aspects of its social objective such as nature recovery; mitigating flood risk and providing flood storage areas; improving access to open space and services; improving air quality and mitigating and adapting to climate change.</p> <p>'b) a social objective...by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and</p>		
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			<p>c) an environmental objective—to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'</p> <p>Hopefully, the new statement and methodology will be able to rectify this. Could the HELAA even be renamed to become the HECGILAA (Housing, Employment, Community and Green Infrastructure Land Availability Assessment)?</p>		
CCC15	Chair of Residents Group (Allesley and Coundon Wedge Society)	General	<p>Your document would seem to be better referred to as a 'Developers Charter' where they are invited to recommend sites for potential future development, it is ingenuous to suggest that they would seek to use Brownfield sites as these inevitably require further expense to develop, so they will naturally opt for existing greenfield sites.</p> <p>Furthermore, the Coventry Planning Depts record on actioning responses from such consultations is abysmal, being little more than lip service to meet regulatory requirements.</p>	Local Authorities are unable to plan for their identified development needs without an understanding of what sites are available, suitable and deliverable. The HELAA provides essential evidence to enable sites to be assessed in a thorough and considered manner. The National Planning Policy Framework prioritises brownfield sites.	No change

Responses received by Rugby Borough Council					
Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change to Methodology
RBC1	Fenny Compton Parish Council (Stratford District)	General	Framework consistent with Stratford District Council Site Allocation Plan process. No mention of HELAA consultation process itself. Request additional step that District Councils consult Parish Councils	Comments noted. Parish Councils will be consulted	No change
RBC2	Agent/house builder- Goldfinch OBO Lockley Homes	General	The representation concerns a site within Stratford District. The representation states that the site in question should be considered alongside two earlier Local Plan representations made to the South Warwickshire Local Plan Scoping and call for sites	The site relates to the South Warwickshire Local Plan and does not adjoin Rugby's boundary. It is therefore not appropriate for Rugby Borough Council to offer detailed comments	No change
RBC3	Other- Wolston Parish Council (within Rugby Borough)	Title page	The formal RBC consultation statement uses the word Employment, not Economic	The correct terminology for the HELAA is the Housing and Economic Land Availability Assessment however the Planning Practice	Amended para 1.5 for clarity

				Guidance provides more context so this has been added in to para 1.5 for clarity.	
RBC4	Other-Wolston Parish Council (within Rugby Borough)	Title page	To what extent is the HELAA applicable to an NDP?	The HELAA informs all housing and employment requirements. NDPs will be considered when assessing submitted sites	No change
RBC5	Other-Wolston Parish Council (within Rugby Borough)	Para 1.6, sub-point 3	Criteria identified (market desirability) is considered subjective	This is taken from national guidance.	No change
RBC6	Other-Wolston Parish Council (within Rugby Borough)	Para 2.11	Para 2.11 conflicts with Para 1.7. Greater clarity on 'acceptability' required. Does it include social, sustainability and environmental?	Yes, 'acceptability' includes all factors identified in the NPPF	No change
RBC7	Other-Wolston Parish Council (within	Para 2.6	Suggests the replacement of 'suitable' with 'prospective' as 'suitable' suggests a site is Green on the RAG assessment	Suitable is considered acceptable on the basis that 'suitable' is frequently used in	No change

	Rugby Borough)			the NPPF and guidance.	
RBC8	Other-Wolston Parish Council (within Rugby Borough)	Para 2.7 - table: Section 4 Section 7 Section 9	Suggest adding Parish Councils due to knowledge PCs have	Parish Councils will be engaged further	Text on Parish Councils added to list
RBC9	Other-Wolston Parish Council (within Rugby Borough)	Para 2.11	First sentence appears to conflict with earlier statements in the document	This is considered consistent because interested parties are able to suggest suitable mitigation measures to make land suitable for development	No change
RBC10	Other-Wolston Parish Council (within Rugby Borough)	Para 2.12	The use of 'may' instead of 'will' as this avoids predetermination	The text is considered to refer to serious constraints so change not considered necessary	No change
RBC11	Other-Wolston Parish Council (within Rugby Borough)	Para 2.21	Replace 'sort' with 'sought'	Commented noted	Corrected the typo

RBC12	Other-Wolston Parish Council (within Rugby Borough)	Para 2.25	Suggests that text should read: "...the amount of land for which other uses have been identified"	Phase 'land uses' considered pertinent in this sentence	No change
RBC13	Other-Wolston Parish Council (within Rugby Borough)	Para 2.26	'will' should read 'should'	Risk assessment considered important so will need to be included	No change
RBC14	Other-Wolston Parish Council (within Rugby Borough)	Para 2.27	Suggest adding that another 'Call for Sites' may assist	Noted. Each LPA will have its own approach to the call for sites.	No change
RBC15	Other-Wolston Parish Council (within Rugby Borough)	Para 2.29	"will" should read 'should'	Change not considered necessary as the identified text is considered important to ensure a robust process	No change

Responses received by Nuneaton and Bedworth Borough Council					
Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change to Methodology
NBBC1	Sport England	General	Sport England wishes to make no comment but where playing field sites (existing or disused) have been submitted for assessment Sport England would be happy to assist with any assessment of the sites.	Noted.	No change
NBBC2	Oxalis Planning (Commercial Developer)	General	Will the Environment Act 2021 shape the HELAA process in any way and will it have an effect on the way in which sites submitted through the 'Call for Sites' exercise will be assessed?	The ecological merits/constraints/mitigation of a site will be assessed and be considered by each LPA.	No change
NBBC3	Oxalis Planning (Commercial Developer)	General	With regard to employment development, will the HELAA process begin taking regard to the sectoral priorities and strategies of the relevant Local Enterprise Partnerships?	Yes, part of the 'Suitability' assessment of a site which will be considered by each LPA.	No change
NBBC4	Oxalis Planning (Commercial Developer)	Para 2.13	Accessibility, including sustainable access and travel to potential development sites, is a key indicator for the identification for broad locations where development may be most suitable.	Would be assessed as part of the 'Suitability' of a site. Part 6 of the illustrative proforma includes this.	No change
NBBC5	Oxalis Planning	General	Suitability for distribution or industrial employment development will require the HELAA to consider the need for sites capable of delivering	Noted.	No change

	(Commercial Developer)		large-scale buildings as part of the mix and range of land and buildings needed to respond to market needs.		
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Responses received by Warwick and Stratford-on-Avon District Councils					
Comment reference	Respondent	Page / para reference	Consultation response (summary)	Officer response	Proposed change to methodology
WDC & SDC 1	Resident	General	<p>Suggest a clear statement be included about where development will <u>not</u> be allowed.</p> <p>As well as housing and business, there should be concurrent consideration of land for all other purposes including transport networks, education, recreation, exercise, health and social care, local and central government premises</p>	The HELAA is a database of sites which are to be considered for assessment, it is for each LPA to determine what is to be omitted or taken forward as part of its own detailed site assessment process.	No change
WDC & SDC 2	Resident	General	<p>The draft methodology proposed only makes passing reference to Neighbourhood plans as a source of potential development sites. The methodology makes no reference to democratic decision making or another Referendum on future development.</p> <p>All sites obtained via a call for sites process should be put to the rigour of a neighbourhood referendum.</p>	This approach would not be in line with national planning practice guidance. Neighbourhood plans can allocate sites and these are subject to referendum once they have been deemed suitable to proceed to	No change

				referendum by an independent examiner.	
WDC & SDC 3	Oxalis Planning (Commercial Developer)	General	When assessing potential sites for strategic employment, infrastructure provision and accessibility should be a key component of the assessment, which will be crucial to the eventual success of any site.	Noted, and site promoters would be expected to illustrate this within the context of their proposals.	No change
WDC & SDC 4	Other - Pillerton Priors Parish Council (within Stratford District)	General	The drive to reduce impact on carbon emissions through the use of the car must feature in decision making. Developers want to build out in the green fields which simply ensures more cars. Response to climate change must feature in your assessments. Good use of existing brownfield sites should feature in your assessment.	Noted, national planning policy prioritises brownfield land and sustainable planning and these are matters which would be assessed in detail in relation to the sites put forward. Section 5 of the proforma asks for current / previous use of the land which enables LPAs to determine whether the site is brownfield or not.	No change.
WDC & SDC 5	Resident	General	There must be a moratorium on all greenfield development. Given the changes in retail and office activity, accelerated since the pandemic, the increased availability of redundant urban accommodation should make this possible.	Detailed evidence has to be developed which sets out how much development each local authority needs to deliver.	No change.

			There must be active resistance to pressure from property developers for greenfield sites where profit margins are greater.	National planning policy prioritises brownfield land and sustainable planning and these are matters which would be assessed in detail in relation to the sites put forward and whether this can be accommodated without having to resort to greenfield. However national policy does not allow for a moratorium to be placed on greenfield sites.	
WDC & SDC 6	Resident	Section 2.15 (Suitability)	The first sub bullet point states "National (and local) policy designations". Is this intended to suggest that the site designation policies already identified at a District (Local Plan) and local (Neighbourhood Plan) level are in some way of secondary consideration compared to National directives?	This is not the intention, the wording has been adapted from national guidance, the brackets will be removed for clarity.	Amended – removed the bracket
WDC & SDC 7	Resident	General	Provide confirmation that when sites are listed for consideration for housing and employment in the future, there will not be amongst them any sites whatsoever that have already been the subject of planning applications that were refused unless the reasons for refusal no longer substantially apply.	This information would be considered in detail at the site assessment stage.	No change
WDC & SDC 8	Other - Harbury Parish	Appendix 1. Proforma, section 6	In relation to Q6 regarding site accessibility and distance and walking time to the nearest bus stop, that while we have several bus stops in and around Harbury, the bus service is so infrequent that the	Noted – agreed that this information would be helpful.	Amended pro forma to include this

	Council (Stratford District)		proximity of the bus stops is immaterial. Surely a more pertinent question would be how frequently and at what times does the bus service run?		
WDC & SDC 9	Other – Southam Town Council (Stratford District)	General	Advised that emerging Neighbourhood Plans that have gone past Reg 16 should be taken into account.	Noted and these would be considered during the detailed assessment stage although the weight given would be proportionate to the stage at which the plan had reached (eg in examination / modification / referendum)	No change
WDC & SDC 10	Other – Warwick Town Council (Warwick District)	General	The Town Council wish to make a return of no comment.	Noted	No change
WDC & SDC 11	House builder – Savills on behalf of Barratt David Wilson Homes (Mercia)	Section 2. Methodology	Sites should not only be assessed for their development potential on what is principally a constraint-based assessment, as currently drafted. It is important that the benefits and opportunities provided by the development proposals on the assessed sites, as well as the benefits and opportunities provided by the wider context, should be reviewed and recorded through the HELAA process and taken into consideration in deciding which sites to allocate.	Section 9 ‘additional information’ of the proforma provides this opportunity.	No change
		Appendix 1. Proforma, section 4	Sites being promoted by parties may be subject to an Option or Promotion agreement that gives the party control to promote the site for development. The party may therefore have a recognisable interest in the site but is not however the freehold or leasehold owner	Section 4 provides the opportunity to elaborate on the circumstances	Amended section 4 of the proforma to prompt further detail

			of the site. The 'Do you own the site?' part of Section 4 should be amended to reflect this.	however a note will be added.	
WDC & SDC 12	Other – Wellesbourne & Walton Parish Council (Stratford District)	General	The only reference to parishes and local councils were that the Parish's Neighbourhood Plan would be looked at but Cllrs felt Parish Councils should be contacted and consulted directly as changes may have occurred in the parish that needed to be taken into consideration and that Made Neighbourhood Plans should be followed not just considered.	Noted – Parish Councils would be consulted as per the consultation mechanisms employed by each LPA.	No change
WDC & SDC 13	Other – National Highways	General	Support the emphasis placed on the assessment of potential development sites at the earliest stage with respect of their capacity, developability, suitability and achievability. On this matter, we wish to stress the importance of identifying the transport implications at the earliest possible stage, as the need for transport mitigation, may delay the local authority in realising their five-year land supply.	Noted	No change
WDC & SDC 14	House builder – Harris Lamb on behalf of Barratt David Wilson Homes (Mercia)	Section 2. Methodology	The benefits of proposed allocations should be set out within the HELAA in order to assist in the identification of development sites. Sites should not be assessed for their development potential on what is, by and large, a constraint-based only assessment as currently drafted.	Section 9 'additional information' of the proforma provides this opportunity.	No change
		Appendix 1. Proforma, section 4	Sites being promoted by parties may be subject to an Option or Promotion agreement that gives the party control to promote the site for development. The party may therefore have a recognisable interest in the site but is not however the freehold or leasehold owner of the site. The 'Do you own the site?' part of Section 4 should be amended to reflect this.	Section 4 provides the opportunity to elaborate on the circumstances however a note will be added.	Amended section 4 of the proforma to prompt further detail
WDC & SDC 15	Other – Radford Semele Parish Council (Warwick District)	Paragraph 2.31	The call for sites gives a major role to prospective developers. They have the opportunity to advocate for their prospective sites including mitigation measures. There appears to be no opportunity for town and parish councils or local communities to have an input to the assessment of prospective sites. Paragraph 2.3.1 says that the final assessment will be published on each authority's website for public view. This suggests that town and parish councils and local	Parish Councils and communities will have a say when the Local Authority undertakes consultation on the different stages of	No change

			communities will see the outcome of the process but will have no role in it. The parish council has noted that the analysis identifies sites which could be developed not sites which should be developed. Nevertheless, this process is a fundamental sift of prospective sites and will affect the subsequent stages.	the Local Plan, or which this evidence will form part.	
		General	Concerned about the weight which will be given to existing policies in the assessment of prospective sites. In particular, the Green Belt currently covers a large part of South Warwickshire and impacts on the allocation of development. If the current Green Belt policy and extent is taken as it stands decisions on prospective sites will be taken in advance of the substantive local plan decisions on the future policies and extent of the Green Belt.	These are matters for the detailed site assessment process by each LPA to consider in the context of how much development it needs to provide and how much urban capacity / suitable brownfield land it has to accommodate this as first priority in line with national planning policy.	No change
WDC & SDC 16	Other – Environment Agency	Paragraph 2.15, Appendix 1 – Proforma. Section 5	<p>The impact of flood risk affects the ‘capacity’ and ‘suitability’ of a site and therefore, we advise this is clearly considered as relevant information to inform the assessment under paragraph 2.15.</p> <p>In terms of suitability of the flood risk and sites for Housing and Employment, the following principles should be adhered to:</p> <ul style="list-style-type: none"> • SUITABLE - Flood Zone 1 • MAY BE SUITABLE - Flood Zone 2 and 3a • NOT SUITABLE - Flood Zone 3b (<i>functional floodplain</i>) 	Noted, it is considered that 2.15 covers this and flood risk is highlighted in the proforma. Detailed assessment would apply the principles highlighted.	No change
		General	Advise that any new development is not at risk of flooding both now and in the future due to climate change. SFRAs may show developments are at increased flood risk in the future where they may be currently located in Flood Zone 1. We strongly advise this is	Noted and this will be taken account of in detailed assessment work.	No change

			considered as part of the assessment and informed by your Strategic Flood Risk Assessment (SFRA).		
WDC & SDC 17	Star Planning on behalf of Richborough Estates Limited	Paragraphs 1.5 and 3.6	There is reference to the joint methodology not having the objective of standardising the methods to assess land availability within each local planning authority. Although a framework is proposed to be created to ensure a consistent approach is adopted, there is a lost opportunity to introduce higher degree of standardisation across the Sub-Region. Such standardisation gives greater certainty to all stakeholders about the inputs required and the veracity of the outcomes.	The context for each Local Authority area is very different (City / towns / villages /rural) so a broad framework allowing for local flexibility is considered a robust approach.	No change
		Paragraph 2.14, Paragraph 2.15, Paragraph 2.18.	As recognised at paragraph 2.14, the quantum of development can impact upon viability and paragraph 2.18 then refers to the best judgement on economic viability of a site being applied. Although mention is made of viability in the call for sites pro forma, the Statement is unclear what specialist inputs will be sought by the local planning authorities to address the critical viability and deliverability elements. Will the onus be placed upon the landowners/promoters of broad locations or sites to demonstrate viability or will the authorities seek advice from an Agent? Is the fact that a land promoter or housebuilder being actively involved with a parcel of land sufficient to demonstrate its market desirability? Clarification about how viability and market desirability will be assessed is required.	The onus is placed on those promoting the sites. Viability in terms of the Local Plan process comes at a later stage and each LPA would arrange for this themselves.	No change
		Section 3 - Implementation	Ensure that constancy is applied to the RAG approach, and provide further guidance to the local authorities of the boundaries between the red, amber and green scores.	The context for each Local Authority area is very different (City / towns / villages /rural) so a broad framework allowing	No change

				for local flexibility in the assessment process is considered a robust approach.	
		Appendix 1 – Proforma	<p>The example pro forma is not a user friendly document.</p> <p>Alongside a location plan, it would be beneficial to ask for any masterplan or vision document for a site to be provided.</p> <p>In Section 4 for the question “Do you own the site?” it is impossible for someone to say “Yes – acting on behalf of the owner(s)”. The body answering the question would not own the site but there will be a legal agreement in place to act. Accordingly, the response should be “No – but acting/promoting on behalf of the owner(s)”. In addition, if this amended answer is ticked then there should be a further question to clarify of the relationship to the owner(s).</p> <p>It would be beneficial to have after Section 4 a separate section asking about whether a broad location or the site has planning consent (in whole or part).</p> <p>Section 5 needs further consideration because:</p> <ul style="list-style-type: none"> • The implication is that current/previous uses and adjacent land uses are constraints. Instead, these queries should be directed at asking if current/previous uses or adjacent land uses are a constraint to development and, if so, why and what forms of development are constrained? • The third question should be whether there are legal issues which limit the development potential of the land. • The fourth question should, rather than just being about ransom strips, ask whether any third party land is required outside the site (other than public highway land). 	<p>The proforma asks for information which enables each LPA to establish the facts about a site in a proportionate manner which is fair to those promoting sites of all sizes given that this is the first stage of a ‘sifting process’.</p> <p>Should site promoters wish to submit more information they are welcome to do so should they wish to resource this.</p> <p>Changes to the form have been made in terms of ownership, agreements, ransom strips, wildlife and ecology, flooding and topography. The reference to unexploded</p>	Changes to the proforma made in line with officer comments

			<ul style="list-style-type: none"> • To a lay person, what is the difference between Wildlife Designations and Ecology Designations? These should be a single question regarding Biodiversity Designations. • For the lay person where would they find information about Unexploded Ordnance? This criterion ought to be deleted. • Other Physical Constraints should be broken down into specific subjects such a floodplain and topography rather than being grouped together. Suggest in Section 6 - to confirm which journey planner should be used to determine walking time (as consistency point). Further, the list of amenities ought to be broken down into, for example, primary school, convenience food shop, public house and community hall. 	<p>ordnance has been retained as this is relevant to some of the participant authorities (as an illustrative proforma which LPAs can adapt to suit their local context).</p> <p>There is already a section on legal matters.</p> <p>In terms of other matters this is an illustrative profoma but individual LPAs may wish to expand depending on their local context.</p>	
WDC & SDC 18	Resident	Introduction – Paragraph 1.3, Paragraphs 1.5	<p>Paragraph 1.5 contradicts the statement contained in 1.3 “the methodology is an agreed approach between local Authorities”.</p> <p>The use of descriptors such as “broad framework to ensure a consistent approach, which each Local Authority can then adapt to reflect their own local circumstance” is simply contradictory and ambiguous.</p>	<p>Noted. The text will be amended to make clear that the framework will not be changed once adopted, it is the detail following on from this which each Local Authority will develop and adapt.</p>	Amended para. 1.5 for clarity

WDC & SDC 19	Goldfinch on behalf of Lockley Homes	General	The representation concerns a site within Stratford District. The representation states that the site in question should be considered alongside two earlier Local Plan representations made to the South Warwickshire Local Plan Scoping and call for sites.	This would be a matter for detailed assessment by the individual LPA.	No change
WDC & SDC 20	Development Consultant – Dobson Grey	General	<p>There is a need to include references to different types of housing when considering land availability assessments and subsequent land allocations. The current assessment model does not adequately distinguish between standard market housing - which will maximise potential land values - and more specialist forms of accommodation with associated higher build costs and a reduced ability to pay a premium for land.</p> <p>It is necessary to consider the requirement for land for other types of development which are neither residential nor a standard form of employment use. There is an increasing demand nationally for pupil places within specialist educational facilities, including private Special Educational Needs schools. There is a lack of specific land allocations to meet this need.</p> <p>It is also necessary for there to be clarification as to what types of uses will be considered under the category of ‘other’ development as referred to in the draft Methodology document.</p>	These are all matters which will be considered through the detailed assessment and plan-making processes undertaken by each LPA. However the HELAA itself has clear parameters (Housing and Employment land) which are set out in the National Planning Practice Guidance and these have been followed for the purpose of this specific methodology. This is not to say that sites for other uses could not be put forward though as this is helpful to inform the local plan process.	No change

WDC & SDC 21	Turley on behalf of Taylor Wimpey	Methodology, Figure 1	It is difficult to determine how the methodology will be applied consistently across all authorities - for example, will each authority be mandated to implement the site assessment matrix at Figure 1?	The matrix is illustrative, it is for each individual LPA to determine how it wishes to undertake its detailed site assessment.	No change
		Strategic / large scale housing sites	<p>The draft methodology will only assess sites that have the capacity of 5 dwellings or more.</p> <p>However, the PPG does offer the opportunity for plan-makers to consider alternative site size thresholds, which in this instance, Taylor Wimpey encourage the HELAA to do.</p> <p>The identification of large scale sites at a sub-regional scale will allow local authorities headroom to identify smaller sites so a variation of site sizes is met through the plan-making process.</p>	Each Local Authority can opt to assess smaller sites in addition if it so wishes to and considers it proportionate to the local context however this is a decision to be taken locally.	No change
		Assessment of Suitability – Paragraph 2.15 to 2.16	There is no confirmation on what ‘relevant information’ will be used to assess the suitability of each site or broad area. It is therefore unclear how the potential impacts for constraints such as Green Belt and landscape will be measured and reported.	Examples of ‘relevant information’ are included in para 2.15, detail will depend upon the local context and will be determined by each individual LPA.	No change
		Achievability	The assessment of whether or not a developer has the capacity to complete and sell a development over a certain period can be enhanced with the inclusion of criteria to distinguish whether or not a site has a development partner on board.	Noted. The form provides opportunity to add this in however it will be amended to include	Amended form to prompt this information if relevant to the promoter’s situation.

				a 'prompt' for further information.	
WDC & SDC 22	Turley on behalf of IM Land	General	<p>Whilst it is recognised that the proposed methodology for the (HELAA) is to be a broad framework which in turn will be built upon by authority-specific methodologies, it is difficult to determine how the principles will be applied consistently across all authorities. This concern is further echoed in the fact that it is not the objective for the methodology to standardise the methods made to assess land availability in each Local Authority. If the approach is not standardised as a broad approach, it is not clear how consistency can be achieved.</p> <p>At present there is no confirmation on what 'relevant information' will be used to assess the suitability of each site or broad area. It is therefore unclear how the potential impacts for constraints such as Green Belt and landscape will be measured and reported.</p>	Examples of 'relevant information' are included in para 2.15, detail will depend upon the local context and will be determined by each individual LPA.	No change
WDC & SDC 23	Knight Frank on behalf of A & M Turney and Mr and Mrs G N Wright	Methodology – Paragraph 1.5	<p>-There needs to be a consistent approach to the assessment of sites.</p> <p>-There is no commitment within the methodology that Local Authorities will commit to review their respective Strategic Housing and Economic Land Availability Assessment in the event that they cannot demonstrate a five-year housing land supply and we suggest that this should feature within the methodology as a requirement.</p> <p>-Engagement in accordance with the NPPG should feature as a requirement within the methodology to ensure that this is a standard method featuring within all independent methodologies.</p>	The methodology already reflects national planning policy and guidance and is aimed at achieving consistency at a sub regional scale. The approach to undertaking a detailed HELAA and the assessment process is down to each LPA to undertake individually.	No change

		Suitability	<p>Climate change and sustainable transport should be included within the methodology to ensure that the assessments identifying suitable locations for new residential development.</p> <p>A site submission form should enable landowners and promoters to supplement their submissions with technical reports and vision documents to enable a fair assessment of sites, especially if Call for Sites become interactive submissions. The ability to supplement submissions will also enable Local Authorities to accurately appraise site suitability and their potential, allowing for mitigation.</p>	<p>It is considered that these issues are already covered in terms of the evidence which is requested, including matters pertinent to climate change and sustainable transport.</p> <p>The LPA needs to establish the facts about a site in a proportionate manner which is fair to those promoting sites of all sizes given that this is the first stage of a 'sifting process'. Should site promoters wish to submit more information they are welcome to do so should they wish to resource this.</p> <p>There are sections of the form which enable the suggested</p>	No change

				information to be submitted should the promoter wish to elaborate.	
		Availability	The Council should ensure that it has a robust evidence base on site availability for every site it includes within its trajectory. If the availability cannot be determined by fact, then the site is not available for the purposes of housing delivery. If availability is unknown, then further work is required and should be undertaken to ascertain availability to inform subsequent annual reviews and sites omitted until availability becomes known and is substantiated with evidence.	Noted, however the HELAA assesses a range of short, medium and long term options which will be explored and scrutinised through the local plan process	No change
		Achievability	Market viability needs to be properly factored in to the SHELAA site assessment work.	Noted. This forms part of the proforma.	No change
		Stage 3 – Windfall Assessment	The general approach proposed is accepted on the proviso that each respective Local Authority adopts a consistent approach to assessing windfall allowances. It is suggested that windfall assessments are carried out within each Local Authority across all housing completions within the last 10 years to determine how many could be classed as windfalls within each year.	Noted however the method for assessing this is to be determined by each LPA in a manner which reflects the local context.	No change
WDC & SDC 24	Knight Frank on behalf of A.M Jervis and Son	Same as above	Same as above (identical representations but on behalf of a different client)	See above	No change
WDC & SDC 25	Turley on behalf of IM Properties Plc	General	The methodology is not sufficiently balanced to consider whether a site is deliverable / developable for economic use as the assessment criteria currently lacks robust accessibility assessment section. The methodology should consider and reflect upon the key locational drivers for storage and distribution operators, including access to the	The methodology provides a broad framework at a sub regional level. It is for each LPA to develop its own detailed methods of	No change

			strategic transport network, access to labour, sustainable movement and proximity to market.	assessment in line with this, but which reflects the local context.	
WDC & SDC 26	RPS on behalf of a Consortium of developers	General, Paragraph 1.5 and 1.11	<p>Whilst it is understood that each authority area will have its own issues and challenges, it is not clear where the 'broad' HELAA approach stops and where the individual assessments begin.</p> <p>Concerns there could be a risk of significant difference and inconsistency across the C&W area.</p>	The methodology provides a broad framework at a sub regional level. It is for each LPA to develop its own detailed methods of assessment in line with this, but which reflects the local context.	No change
WDC & SDC 27	Resident	General	<p>Methodology seems sound within its limited context. However, it appears to lack any recognition that future development must help to mitigate climate change and provide net wildlife and ecological gains for the benefit of our health and well-being.</p> <p>Call for Sites should require some details of how developers propose to meet these obligations.</p>	Noted – the call for sites will be run by each Local Authority to reflect the local context. The information requested is relevant to inform assessment work on matters such as climate change and biodiversity.	No change
WDC & SDC 28	Framptons on behalf of Bryer Estates	General	The Methodology should properly make reference to the requirements of the PPG (Ref: Paragraph 31 Reference ID: 2a-031-20190722). How can Authorities assess need and allocate space for logistics?	The evidence base is being updated and logistics will be considered as part of this including the matter of locational	Changes made to para 1.5 to reflect the PPG including its reference to economic development uses

			<p>The PPG makes clear that the logistics sector has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).</p> <p>Presently as drafted, the Methodology would appear intent on making an assessment, of land generally for 'economic' development. The distinct locational requirements for logistics would not be accounted for.</p>	<p>requirements. There is nothing in the methodology to stop site promoters from submitting the detail to support their case in this regard as this will be considered through the local plan process and through the Duty-to Cooperate in terms of cross boundary matters.</p>	
WDC & SDC 29	Other – Wellesbourne Allotment & Garden Holders Association (WAA) - (in Stratford District)	General	<p>Land east of Kineton Road, Wellesbourne is in the SDC Site Allocations Plan 2020 as a Reserve Site from 2030/31.</p> <p>WAA recommend that instead of being a reserve site, it should be removed from this listing and be retained in perpetuity as a vital green space for the long-term enjoyment of the community.</p>	<p>The methodology makes no recommendations in terms of specific sites, this is a matter for the relevant local Authority to appraise through its own detailed site assessment mechanisms.</p>	No change
WDC & SDC 30	Other – Lapworth Parish Council (in Warwick District)	Section 6 of Appendix 1 - Proforma	<p>Concerned that although proximity to nearest bus stop and station are requested, it does not appear that further information is asked e.g. what bus routes (if any) serve the nearest bus stop, how frequently does a bus stop there? What train line is the station on? Do trains actually stop at that station?</p>	<p>In terms of transport an amendment will be made to the illustrative proforma to provide this information.</p>	Changes made to proforma in line with officer comments

			<p>Similar questions should be asked about the closest amenities – what are they? If a surgery or dentist, does it have the capacity to take on any additional residents?</p> <p>It was felt that the questions are not searching enough and it would be easy for a potential site to get a tick because it's near a station, but in reality trains don't stop there so it's not of any benefit to the locality.</p>	<p>In terms of amenities a prompt will be added in to request information on any known capacity issues</p> <p>Each local Authority will be able to adapt the illustrative proforma to better reflect the local context.</p>	
WDC & SDC 31	Other - District Councillor for the northern ward of Campden and Vale at Cotswold District Council	General	Concerned about the amount of new housing being built on the Warwickshire/Gloucestershire border which will increase significantly the amount of traffic passing through both villages on the B4632.	Noted. This is a matter for the detailed Local Plan process to consider, and will need to be addressed by the Local Authorities concerned.	No change

Responses received solely by North Warwickshire Borough Council					
Comment reference	Respondent	Page / para reference	Consultation response (summary)	Officer response	Proposed change to methodology
NWBC1	Water Orton Parish Council		<p>WOPC concerns;</p> <ol style="list-style-type: none"> 1. Essentially ANY site could be developed, comment in section 1.7 is too wide. Any assessment whether sites could be developed <u>have</u> to include such aspects as: <ol style="list-style-type: none"> a. Can the local infrastructure support the development? (traffic impact, sufficient health facilities? school places etc?) b. A flood assessment should be carried out at the initial stage. c. Any reduction in open space should be sympathetic with national recommendations e.g. If assessments provide negative feedback, any site that "could" be developed must be accompanied by a plan to mitigate the identified problems. 	<p>Comments noted. Para 1.7 reflects the process. Parish Councils will be consulted.</p> <p>Points a, b and c will be integral parts of any site assessment process prior to any potential allocation.</p> <p>Officers will use mapping to identify initial site constraints. and engage with statutory and Non-statutory consultees during detailed site discussions.</p>	No change
NWBC2	Water Orton Parish Council		<ol style="list-style-type: none"> 2. Local Parish and Town councils should be consulted at the initial stage to provide local knowledge and expertise. <p>As a general point, this proposed policy is for Warwickshire and should not allow 'trading' housing stock numbers with other areas . Water Orton is particularly vulnerable on this point as it is neighbouring not only Birmingham council but also Solihull council</p>	<p>Comments re- "trading" noted but will only arise where Duty to Co-operate issues of adjoining authorities lack of capacity and shortfalls</p>	No change

				arise. Aware of concerns but this is a more strategic issue above the individual authorities HELAA.	
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