

Berkshire Housing and Economic Land Availability Assessment (HELAA)

Reading Borough Council
Royal Borough of Windsor and Maidenhead
Slough Borough Council
West Berkshire Council
Wokingham Borough Council

Methodology

November 2016

This page is intentionally blank

CONTENTS

- 1 INTRODUCTION
 - Uses included in the HELAA
 - Geographical area of the HELAA
- 2 HELAA AND NATIONAL POLICY / GUIDANCE
- 3 METHODOLOGY
 - Stage 1 – Identification of sites and broad locations
 - Stage 2 – Site / broad locations assessment
 - Stage 3 – Windfall assessment
 - Stage 4 – Assessment review
 - Stage 5 – Final evidence base

Appendices

- A GLOSSARY
- B CONSULTATION STATEMENT
- C SUSTAINABILITY CONSIDERATIONS

This page is intentionally blank

INTRODUCTION

1.1 The Housing and Economic Land Availability Assessment (HELAA) is a technical study which forms a critical component of the evidence base for local plans. The purpose of the HELAA is to assist in identifying suitable land which is available for housing and economic development, the development potential and when development is likely to occur.

1.2 The inclusion of land within a HELAA report does not in itself determine that it is suitable for development, or that the land is necessary available for development. Assessments made through a HELAA are indicative only and do not prejudice assessments made through the Local Plan or planning application processes. Decisions on where development is directed and the allocation of land is made through the Local Plan process, and where produced a Neighbourhood Development Plan.

1.3 The methodology has been agreed between five of the Berkshire authorities:¹

- Reading Borough Council;
- Royal Borough of Windsor and Maidenhead;
- Slough Borough Council;
- West Berkshire Council;
- Wokingham Borough Council.

Uses to be included within the HELAA

1.4 HELAAs will consider the types of housing and economic developments set out in Table 1. Individual local authorities might choose to include additional uses.

Table 1 Uses included within the HELAA	
Housing	Housing developments including: • Dwellinghouses. • Housing provided for older people including residential institutions. • Housing provided for travellers. • Student housing.
Economic	Economic development including those within retail, leisure, cultural, office and public and community uses: • A1 Shops. • A2 Finance and professional services. • A3 Restaurants. • A4 Drinking establishments. • A5 Hot food takeaways. • B1 Business. • B2 General industrial. • B8 Storage and distribution. • C1 Hotels.

¹ Bracknell Forest Borough Council, which is also situated within Berkshire, have their own HELAA, see paragraph 1.8.

	• D1 Non-residential institutions. • D2 Assembly and leisure.
--	--

Geographical area of the HELAA

1.5 The Planning Practice Guidance² advises that a HELAA should be prepared to reflect housing market and economic market areas.

1.6 Studies commissioned by the Berkshire local authorities and Thames Valley Berkshire Local Enterprise Partnership have identified two housing market areas and three functional economic market areas relating to the Berkshire authorities and South Bucks District Council.³ Further details are provided in Table 2.

Table 2
Summary of functional housing and economic geography

Western Berkshire HMA	• Bracknell Forest Borough Council. • Reading Borough Council. • West Berkshire Council. • Wokingham Borough Council.
Eastern Berkshire HMA	• Slough Borough Council. • South Bucks District Council. • Royal Borough of Windsor and Maidenhead.
Western Berkshire FEMA	• West Berkshire Council.
Central Berkshire FEMA	• Bracknell Forest Borough Council. • Reading Borough Council. • Royal Borough of Windsor and Maidenhead. • Wokingham Borough Council.
Eastern Berkshire FEMA	• Slough Borough Council. • South Bucks District Council. • Royal Borough of Windsor and Maidenhead.

1.7 This methodology has been prepared to help achieve a common approach across five of the Berkshire local authorities. It is considered impractical to prepare a single HELAA across all relevant local authorities as each is at different stages in the preparation of local plans. Each local authority will follow this methodology to ensure comparable information is available. The methodology recognises that each local authority may need to vary from it in order to respond to local characteristics. Where this occurs each local authority will highlight this within their individual HELAA report.

² PPG Housing and economic land availability assessment, ID 3-007-20140306.

³ Berkshire (including South Bucks) Strategic Housing Market Assessment February 2016, GL Hearn; Berkshire Functional Economic Market Area Study February 2016, NLP.

1.8 Bracknell Forest Borough Council prepared and consulted on its own HELAA methodology in January and February 2016. As a consequence they have informed the other Berkshire authorities that they will continue to operate this approach.

1.9 South Bucks District Council has decided to prepare a joint local plan with Chiltern District Council. As a consequence they have informed the Berkshire local authorities that they consider themselves to form part of a Buckinghamshire housing market and economic market area based upon their interpretation of 'best fit.' This decision does not change the functional geography. This was recognised in the Chiltern and South Bucks Local Plan Initial Consultation (Regulation 18) Incorporating Issues and Options (January / March 2016) paragraph 2.4 which stated, "It should be noted that the 'best fit' approach to defining market areas does not change the functional relationship between part of South Bucks and the Berkshire market area (or with London) where there is an overlap or functional relationship and there will remain important Duty to Co-operate relationships with Slough, Royal Borough of Windsor and Maidenhead, London Borough of Hillingdon and Mayor of London." South Bucks District Council has informed the Berkshire authorities that they will be using the Central Buckinghamshire HELAA Methodology (May 2015).

1.10 Both Bracknell Forest Borough Council and South Bucks District Council were engaged in early discussions on preparing a joint methodology for this HELAA, with the former remaining engaged through their membership of the Berkshire Development Plans Group.

HELAA AND NATIONAL POLICY / GUIDANCE

2.1 The policy context for HELAAs is set out in the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG).⁴

2.2 Paragraph 158 of the NPPF states that local planning authorities should ensure that their assessments of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

2.3 Paragraph 159 identifies that local planning authorities should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.4 Paragraph 161 advises that local planning authorities should assess the existing and future supply of land available for economic development.

2.5 Detailed guidance on how local planning authorities should undertake housing and economic land availability assessments is set out in the PPG.⁵ This reaffirms the advantages of carrying out land assessments for housing and economic development as part of the same exercise and that such an assessment should:

- Identify sites and broad locations with potential for development;
- Assess their development potential;
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

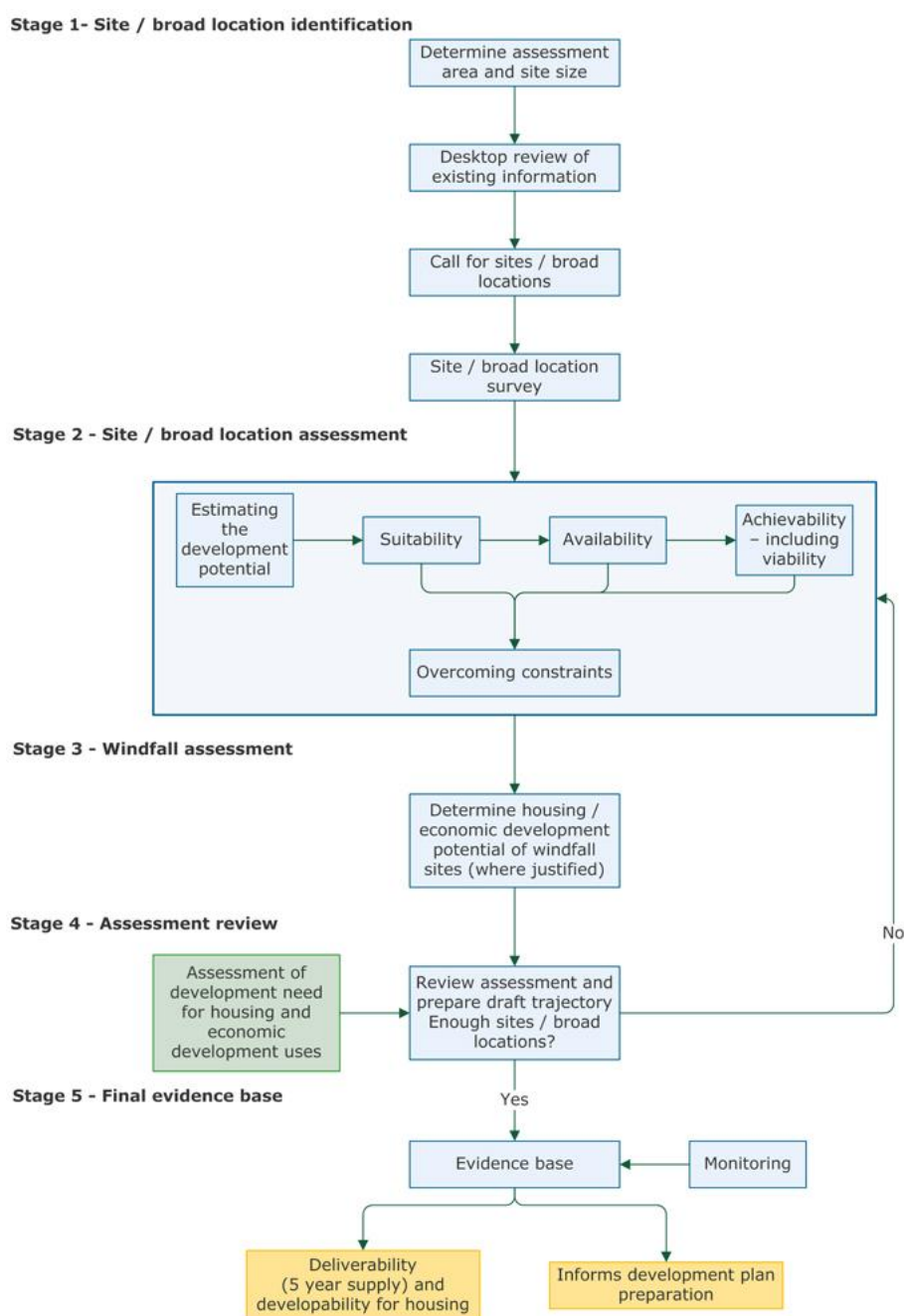
⁴ PPG, Housing and economic land availability assessment.

⁵ PPG, Housing and economic land availability assessment.

METHODOLOGY

3.1 The HELAA methodology is based on the standard methodology set out in the PPG as reproduced below.⁶ The following sections expand upon the standard methodology providing additional clarification of the approach. Unless otherwise stated each stage relates to the assessment of both housing and economic uses.

3.2 In preparing the methodology the Berkshire authorities published a draft methodology between 9th May and 6th June 2016. Responses were received from seventeen organisations. A summary of the key issues raised and how the methodology has responded is provided in Appendix B.



⁶ PPG, Housing and economic land availability assessment, Methodology – flow chart ID 3-006-20140306.

Stage 1 – Identification of sites and broad locations

3.3 Stage 1 is to identify sites for further assessment for housing and economic development. This section outlines the decisions and actions that will be completed by each local authority to ensure they have a robust understanding of the amount of land with potential for housing and economic development within their area.

Determining site size

3.4 The PPG includes advisory thresholds for sites and broad areas. For housing development the advice is to assess sites capable of accommodating five or more dwellings. For economic uses the advice is to assess sites of 0.25ha or 500m² of floorspace and above. Where appropriate alternative site size thresholds can be used.

3.5 Given the diverse built character of places across Berkshire, individual local authorities will set out locally suitable site size thresholds, including the related justification, within their individual HELAA report. In setting thresholds individual local authorities should consider whether flexibility should be applied to sites being promoted for development as traveller sites.

Desk top review of existing information

3.6 A desktop review of existing information will be carried out by each local authority to identify potential sites for assessment. Table 3 sets out the sources of potential sites listed within the PPG.⁷ This list should not be viewed as exhaustive, e.g. the more recent proposal of a brownfield register.

Table 3 Sources of site data	
Existing housing and economic development allocations and site development briefs not yet with planning permission	• Local and neighbourhood plans. • Planning application records. • Development brief.
Planning permissions for housing and economic development that are unimplemented or under construction	• Planning application records. • Development starts and completions records.
Planning applications that have been refused or withdrawn	• Planning application records.
Land in the local authority's ownership	• Local authority records.
Surplus and likely to become surplus public sector land	• National register of public land. • Engagement with strategic plans of other public sector bodies such as County Councils, Central Government, National Health Service, Police, Fire Services, utility providers, statutory undertakers.

⁷ PPG, Housing and economic land availability assessment, ID 3-012-20140306.

Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes e.g. offices to residential)	• Local authority empty property register. • English House Condition Survey. • National Land Use database. • Commercial property databases (e.g. estate agents and property agents). • Valuation Office database. • Active engagement with sector.
Additional opportunities in established uses (e.g. making productive use of underutilised facilities such as garage blocks)	• Ordnance Survey maps. • Aerial photography. • Planning applications. • Site surveys.
Business requirements and aspirations	• Enquiries received by local planning authority. • Active engagement with sector.
Sites in rural locations	• Local and neighbourhood plans. • Planning applications. • Ordnance Survey maps. • Aerial photography. • Site surveys.
Large scale redevelopment and redesign of existing residential or economic areas	
Sites in and adjoining villages or rural settlements and rural exception sites	
Potential urban extensions and new free standing settlements	

Call for sites / broad locations

3.7 An initial call for sites will be undertaken by each local authority to inform their HELAA process. As a minimum, each local authority will write to parish and town councils, neighbourhood development plan groups / forums (where applicable) and other relevant interest groups, landowners and developers, planning agents, and undertake local publicity. Each local authority will keep their stakeholder database under review.

Site / broad location survey

3.8 The PPG advises that all sites (subject to site size thresholds) derived from data sources and the call for sites should be assessed against national policies and designations to establish which have reasonable potential for development and should be included in the site survey.⁸

3.9 An initial desktop review of sites and broad locations will be carried out to sift out those which can be excluded from further detailed assessment. Where exclusion constraints exist on part of a site or broad area, it will not be excluded from the assessment. In such circumstances the constraint will be considered within the more detailed Stage 2 assessment.

⁸ PPG, Housing and economic land availability assessment, ID 3-014-20140306.

3.10 Sites subject to those constraints set out in Table 4 may be excluded from further assessment.

Table 4 Exclusion categories	
Category	Reason for exclusion
Sites within the functional flood plain	The PPG advises that only water compatible development should be permitted within the functional flood plain. ⁹ Most forms of residential and economic development do not meet this requirement.
Sites within a Special Area of Conservation	Legislation and the NPPF advises that planning permission should not normally be granted for development that is likely to have an adverse effect on the integrity of a European site. ¹⁰
Sites within a Special Protection Area	Legislation and the NPPF advises that planning permission should not normally be granted for development that is likely to have an adverse effect on the integrity of a European site. ¹¹
Sites within 400m of the Thames Basin Heaths SPA	Natural England advises that the recreational impacts which result from residential development cannot be mitigated within 400m of the designation. Impacts arising from economic development will be assessed on their merits.
Sites within a Ramsar site	The NPPF advises that planning permission should not normally be granted for development that is likely to have an adverse effect on a Ramsar site. ¹²
Sites within Site of Special Scientific Interest	Legislation and the NPPF advises that planning permission should not normally be granted for development that is likely to have an adverse effect on a SSSI. ¹³
Sites within Suitable Alternative Natural Greenspace	The NPPF advises that sites identified as compensatory measures for adverse impacts on European sites should be given the same protection as the European sites themselves. ¹⁴

⁹ PPG, Flood risk and coastal change, ID 7-067-20140306.

¹⁰ The Conservation of Habitat and Species Regulations 2010; NPPF, paragraph 118.

¹¹ The Conservation of Habitat and Species Regulations 2010; NPPF, paragraph 118.

¹² NPPF, paragraph 118.

¹³ The Wildlife and Countryside Act 2081; NPPF, paragraph 118.

¹⁴ NPPF, paragraph 118.

Sites within ancient woodland	The NPPF advises that planning permission should not normally be granted for development which results in the loss or deterioration of ancient woodland. ¹⁵
Sites within notified safety zones	Development within certain safety zones may be considered unsuitable due to safety concerns, e.g. airport safety zones or emergency planning zones. Impact will be assessed on their merits taking account of the type of development proposed and the nature of the hazard.

3.11 All sites will be mapped and recorded on a database. Details of sites excluded from further assessment will be provided within each local authority's individual HELAA report.

3.12 Site surveys will be carried out as necessary with appropriate site characteristics being recorded to assist the subsequent, more detailed assessment.

Stage 2 – Site / broad location assessment

3.13 Stage 2 is to assess the development potential for each site / broad location identified in Stage 1. This will be carried out by a combination of desktop assessment, site visits and contacting landowners, agents and developers.

3.14 The assessment of suitability, availability and achievability will inform the decision as to whether a site or broad location can be considered deliverable, developable or not currently developable.¹⁶

3.15 The PPG methodology flow chart shows the assessment of development potential, suitability, availability and achievability occurring in sequence.¹⁷ Advice elsewhere within the PPG recognises that such assessments may occur in parallel.¹⁸

Estimating development potential

3.16 The PPG advises that development potential of sites should be guided by the existing or emerging planning policy, including locally determined policies on density.¹⁹

3.17 Given the diverse built character of places across Berkshire, individual local authorities will set out locally suitable approaches within their individual HELAA report. Factors to be taken into account for sites will include:

- NPPF and PPG;

¹⁵ NPPF, paragraph 118.

¹⁶ PPG, Housing and economic land availability assessment, ID 3-029-20140306.

¹⁷ PPG, Housing and economic land availability assessment, ID 3-006-20140306.

¹⁸ PPG, Housing and economic land availability assessment, ID 3-017-20140306.

¹⁹ PPG, Housing and economic land availability assessment, How should development potential be calculated? ID 3-017-20140306.

- Adopted planning policy (including Local Plans, Neighbourhood Development Plans and guidance);
- Emerging planning policy;
- Recent planning history including pre-application advice where applicable;
- Location and accessibility;
- Nearby character and density;
- Infrastructure requirements.

3.18 The estimating of development potential within a HELAA report does not in itself determine that it is suitable for development or that it should be allocated for development. The potential is indicative only and does not prejudice assessments made through the Local Plan or planning application processes.

Assessing suitability

3.19 The PPG indicates that the suitability of sites or broad locations should be guided by: the development plan (including Local Plans and Neighbourhood Development Plans), emerging plan policy and national policy; and market and industry requirements in that housing market or functional economic market area.²⁰

3.20 Each local authority will take into account both constraints and opportunities appropriate to their area when assessing suitability. These could include both those that are existing or proposed, and that are as a result of a policy approach or are intrinsic to the site.

- Constraints are factors which limit or restrict the ability to develop a site. In some instances constraints may prevent development at a particular point in time, whilst in others they might limit or influence the type, form or capacity of a site;
- Opportunities are beneficial factors. These might be the result of existing factors such as accessibility of a site to facilities, or they might be created through development itself such as contributing to regeneration or a community aspiration.

3.21 To assist with the assessment of suitability the following general approach to key issues has been agreed between the local authorities.

Location

3.22 Sites will generally be deemed suitable with regard to this factor where they are located within areas that already have appropriate infrastructure and a suitable range of services, community and other facilities, and where the site is in conformity with the spatial strategy of the adopted development plan. Sites will generally be deemed potentially suitable where appropriate infrastructure and a range of services, community and other facilities could be provided to support the development, and where the site is in conformity with the spatial strategy in the emerging development plan. Exceptions might occur for sites which are previously developed or where there are specific industrial requirements.

Area of Outstanding Natural Beauty

3.23 Sites where development is likely to result in harm to the natural beauty and special qualities of the AONB will be deemed unsuitable. Site where development would conserve and

²⁰ PPG, Housing and economic land availability assessment, ID 3-019-20140306.

enhance the natural beauty and special qualities of the AONB will generally be considered suitable. Major development will only be considered suitable in exceptional circumstances and where it is in the public interest.

Green Belt

3.24 Sites where a Green Belt purpose analysis suggests land makes a lower contribution to the purposes of Green Belt will generally be deemed potentially suitable with regards to this factor. Sites where analysis suggests the land makes an important contribution to the purposes of Green Belt will generally be deemed unsuitable. Exceptions might occur for sites which are previously developed, where there are specific industrial requirements, where development would support community aspirations or where there are specific sustainability benefits.

Employment

3.25 Sites in economic use but not designated for such uses will generally be deemed suitable for redevelopment to provide improved economic premises or to provide alternative uses such as housing. Sites which are currently designated for economic uses but emerging evidence and policy suggest the site is no longer required for employment use will generally be deemed potentially suitable for alternative uses. Sites which are designated or in economic use and are proposed to be retained for such use will generally be deemed unsuitable for alternative uses.

Public Open Space

3.26 Sites which are designated or recognised public open spaces will generally be deemed unsuitable for development. Exceptions might occur for sites where arrangements are in place to make alternative public open space provision, where development would fund improvements to the quality of the public open space, where the development is linked to the use of the area as public open space. Sites which are currently designated or recognised public open spaces but emerging evidence and policy suggest the site is no longer required will generally be deemed potentially suitable for alternative uses.

Local Green Space

3.27 Sites which are designated Local Green Space will generally be deemed unsuitable for development. Exceptions might occur for sites where development would fund improvements to the quality of the space, or where the development is linked to the use of the space.

Scheduled Monuments

3.28 Sites which are designated Scheduled Monuments will be deemed unsuitable for development. Exceptions might occur for sites where development is linked to the benefit of the historic site.

Historic Parks and Gardens

3.29 Sites which are within registered historic parks and gardens will generally be deemed unsuitable for development. Exceptions might occur for sites which are previously developed or where development is linked to the use of the area.

Agricultural land

3.30 Sites which do not comprise best and most versatile agricultural land will generally be deemed suitable with regards to this factor. Sites which comprise best and most versatile agricultural land will generally be deemed unsuitable. Exceptions might occur for sites where there are specific industrial requirements, where development would support community aspirations or where there are specific sustainability benefits.

Other considerations

3.31 Further suitability considerations are set out in Appendix B. This list of considerations is not exhaustive.

3.32 The assessment of each site will be classified into the categories set out in Table 5. The assessment of suitability is indicative only and does not prejudice assessments made through the Local Plan or planning application processes.

Table 5 Suitability classification	
Suitable	The site offers a suitable location for development and there are no known constraints which significantly inhibit development for the defined use.
Potentially suitable	The site offers a potentially suitable location for development but is subject to a policy designation which inhibits development for the defined use. The development plan process will determine the future suitability for the defined use.
Suitability unknown	The site requires further assessment before a robust decision can be made on its suitability for being developed for the defined use.
Unsuitable	The site does not offer a suitable location for being developed for the defined use or there are known constraints which significantly inhibit development. The site is unlikely to be found suitable for the defined use within the next 15 years.

Assessing availability

3.33 The PPG advises that a site is considered available for development when, on best information available (e.g. confirmed by the call for sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or a landowner who has expressed an intention to sell. Where potential problems are identified, an assessment is needed as to how and when they can realistically be overcome.²¹

²¹ PPG, Housing and economic land availability assessment, ID 3-020-20140306.

3.34 The assessment of each site will be classified into the categories set out in Table 6.

Table 6 Availability classification	
Available	• Confirmation of availability within the next 15 years has been received from the landowner and there are no known legal issues or ownership problems.
Potentially available	• The landowner or a third party with an interest has promoted the land but confirmation has not been received from the landowner that the land will be available within the next 15 years. • The land is in multiple ownerships and may have site assembly issues. • The land accommodates an existing use which would require relocation but arrangements are not in place to achieve this.
Availability unknown	• The landowner has not expressed an interest in promoting the site. Landownership remains unknown following investigations. • The landowner has expressed an interest in promoting the site in the past but has not responded to subsequent enquires for a period no shorter than three years. • The land is subject to legal issues upon which further information is required before a robust decision can be made on availability.
Not available	• The landowner has confirmed that the land is not available for development in the next 15 years. • The land is subject to known legal issues which are unlikely to be overcome within the next 15 years.

Assessing achievability

3.35 The PPG advises that a site is considered achievable where there is a reasonable prospect that it will be developed at a particular point in time. This is essentially a judgement about the economic and viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.²²

3.36 Given the importance of a sites suitability and availability to the assessment of achievability, the local authorities will ordinarily only undertake an assessment of sites which have been assessed as suitable or potentially suitable, or available or potentially available.

3.37 It is impractical to undertake detailed viability assessments of all sites and broad locations. As such the local authorities will draw on generic viability information, such as that which has been used to inform the Community Infrastructure Levy, and giving consideration to a range of factors including the following:

Site factors:

- Availability of access;

²² PPG, Housing and economic land availability assessment, ID 3-021-20140306.

- Agreements regarding necessary third party land or property.

Market factors:

- Adjacent uses;
- Economic viability of existing, proposed and alternative uses in terms of land values;
- Attractiveness of the locality;
- Level of potential market demand.

Cost factors:

- Site preparation costs relating to any physical constraints;
- Exceptional works costs;
- Strategic infrastructure costs;
- Prospect of funding or investment to address identified constraints or assist development.

Delivery factors:

- Phasing / realistic build out rates;
- Single developer or several developers offering different housing product;
- Size and capacity of the developer.

3.38 The assessment of each site will be classified into the categories set out in Table 7.

Table 7 Achievability classification	
Achievable	There is a reasonable prospect that the site will be developed for the defined use within the next 15 years.
Potentially achievable	The achievability of the site is inhibited by an external factor where the timing of resolution is unknown. The delivery of the resolution will determine the future achievability of the site.
Achievability unknown	The site is subject to issues upon which further information is required before a robust decision can be made on achievability.
Unachievable	There is no reasonable prospect that the site will be developed for the defined use within the next 15 years.

Overcoming constraints and assessing of deliverable and developable

3.39 The assessment of suitability, availability and achievability of sites and broad areas will provide information on which the judgement can be made in the plan making context as to whether a site can be considered deliverable over the plan period.²³ The definitions of deliverable and developable are set out within the NPPF.²⁴

²³ PPG, Housing and economic land availability assessment, ID 3-018-20140306.

²⁴ NPPF, footnotes 11 and 12.

3.40 The assessment of each site will be classified into the categories set out in Table 8.

- Sites classified as “deliverable” or “developable” may be expected to be developed within the next 15 years.
- Sites classified as “potentially developable” comprise a basket of sites from which some might be deemed developable following further consideration through the local plan process.
- Sites classified as “not developable within the next 15 years” cannot realistically be expected to be developed in the foreseeable future.

Table 8 Deliverable and developable classification	
Deliverable (years 1-5)	• The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years.
Developable (years 6-10, 11-15)	• The site is a suitable location for defined use and there is a reasonable prospect that the site is available and could be viably developed in years 6-10 or 11-15.
Potentially developable	• The site has been identified as potentially suitable and/or potentially available. Whether the site becomes developable will depend on further assessment through the plan making process, e.g. whether circumstances support the amendment or removal of existing designations, and further investigations into its availability.
Not developable within the next 15 years	• Those sites assessed as having significant policy and/or environmental constraints that means that the site is unlikely to be become suitable in the next 15 years. • Those sites assessed as being unlikely to become available in the next 15 years. • Those sites assessed as having no reasonable prospect of becoming achievable in the next 15 years.

Stage 3 – Windfall assessment

3.41 The term “windfall” is defined as sites which have not been specifically identified as available in the local plan process. They normally comprise previously developed sites that have unexpectedly become available.²⁵

3.42 The NPPF and PPG advise that, where justified, windfall sites can contribute towards housing supply.

- The NPPF confirms that an allowance for windfall sites can be made within the five-year supply.²⁶

²⁵ NPPF, Annex 2: Glossary.

²⁶ NPPF, paragraph 48.

- The PPG confirms that broad locations in years 6-15 could include a windfall allowance based on geographical area.²⁷

3.43 Windfall might reasonably apply to different land uses. The appropriateness of any allowance must be justified by evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.

3.44 Each local authority will set out a locally suitable allowance for windfall sites within their own individual HELAA report. This allowance may include consideration of supply from sites smaller than the site size threshold and where evidence allows, an allowance for larger sites which have not been specifically identified.

Stage 4 – Assessment review

3.45 Based on assessment of sites and broad locations through Stages 1 to 3, an indicative trajectory will be prepared setting out how much housing and the amount of economic floorspace that can be provided, and at what point in the future.²⁸

3.46 The trajectory will be considered against the targets for housing and economic development set out in the up-to-date local plan or, where necessary, evidence of the objectively assessed need.

3.47 Where the trajectory shows there to be insufficient sites to meet objectively assessed needs, or the related targets, the assessments within Stages 1 to 3 will be revisited to establish whether anything can be done to alter the outcome of the assessment. This may include discussions with landowners/agents, reviewing density assumptions, and further research on identifying sites and overcoming constraints.

3.48 If following the review process, there is still insufficient capacity the PPG advises that it will be necessary to investigate how this shortfall should be best planned for. Each local authority will need to consider how many cycles of review are appropriate, or when to re-run the process.

3.49 If there is clear evidence that the target, or where necessary need, cannot be met locally, it will be necessary to consider how needs might be met in other parts of the functional area, and if necessary in areas beyond this, in accordance with the duty to cooperate.²⁹ In these circumstances the local authority's individual HELAA report will progress to Stage 5 with the potential shortfall.

Stage 5 - Final evidence base

3.50 Each local authority will publish an individual HELAA report containing the core outputs defined in the PPG, namely:

- A list of all sites or broad locations considered, cross-referenced to their locations on maps;
- An assessment of each site or broad location, in terms of its suitability for development, availability and achievability (including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when;

²⁷ PPG, Housing and economic land availability assessment, How should a windfall allowance be determined in relation to housing? ID 3-24-20140306.

²⁸ PPG, Housing and economic land availability assessment, ID 3-025-20140306.

²⁹ PPG, Housing and economic land availability assessment, ID 3-026-20140306.

- Contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
- The potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
- An indicative trajectory of anticipated development and consideration of associated risks.³⁰

3.51 Each local authority will clearly set out in their individual HELAA report where the approach taken varies from this base methodology, including the approach taken to windfall sites.

Monitoring

3.52 The assessment of sites should be kept up-to-date. Updates to the HELAA report will account for changes which have taken place during the reporting period. Changes may include:

- Changes in the status of existing planning permissions, e.g. whether development has commenced or been completed;
- The inclusion of new sites with planning permissions;
- The inclusion of newly identified sites;
- Changes in the suitability of a site, e.g. as a result of new information or changes in the extent of severity of constraints;
- Changes in the availability of a site, e.g. as a result of changes in ownership or the landowner's intentions;
- Changes in the achievability of a site.

3.53 Each local authority will continue to accept new sites for consideration through the HELAA process. New sites identified following the commencement of a report will be taken into account in the next review.

³⁰ PPG, Housing and economic land availability assessment, ID 3-028-20140306.

APPENDIX A: GLOSSARY

Best and most versatile agricultural land	Land in grades 1, 2 and 3a of the Agricultural Land Classification.
Constraints	Factors which limit or restrict the ability to develop a site. In some instances constraints will prevent development, whilst in others they might limit or influence the type, form or capacity of a site.
Deliverable	To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.
Developable	To be considered developable, sites should be in a suitable location for development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.
Economic development	Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).
Functional Economic Market Area (FEMA)	A geographical area defined by commercial property markets including location of premises and the spatial factors used in analysing demand and supply.
Housing and Economic Land Availability Assessment (HELAA)	An assessment of land availability which identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.
Housing Market Area (HMA)	A geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.
Local Plan	The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Neighbourhood Plan	A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and

	Compulsory Purchase Act 2004).
Opportunities	Beneficial factors. These might be the result of existing factors such as accessibility of a site to facilities, or they might be created through development itself such as contributing to regeneration or a community aspiration.
Previously Developed Land (PDL)	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Strategic Housing Land Availability Assessment (SHLAA)	An assessment of land availability which looks specifically at land for housing. This is now incorporated within the Housing and Economic Land Availability Assessment (HELAA).
Strategic Housing Market Assessment (SHMA)	An assessment which identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which: – meets household and population projections, taking account of migration and demographic change; – addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and – caters for housing demand and the scale of housing supply necessary to meet this demand.
Windfall sites	Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.

APPENDIX B: CONSULTATION STATEMENT

Respondent (agent):

1. Bray Parish Council
2. Buckinghamshire County Council
3. Cala Group
4. Chiltern District Council
5. Environment Agency
6. Gladman Developments
7. Highways England
8. Historic England
9. Natural England
10. Runnymede Borough Council
11. Stratfield Mortimer Parish Council
12. Spelthorne Borough Council
13. Surrey County Council
14. Transport for London
15. Turley
16. Waltham St Lawrence Parish Council
17. Woodley Town Council

Comments have been grouped in order they relate to the consultation document. General comments are summarised at the beginning.

Please note that references by respondents to pages, paragraph numbers and tables relate to the consultation draft methodology and may not correspond to those in this report. References within the Response column are correct to this report.

Summary of Comment	Respondent	Response
No comments.	• Bray Parish Council • Natural England • Surrey County Council • Transport for London • Woodley Town Council	Comment noted.
Notes that the methodology is intended to cover travellers (Table 1) but comments that the methodology does not seem to fully reflect this, e.g. in the use of the threshold at paragraph 3.3. The list of consultees at paragraph 3.6 needs expanding if traveller consultees are to be considered.	• Chiltern District Council	Paragraph 3.4 of the consultation document referred to the advisory thresholds outlined in the PPG. Notwithstanding this, it is accepted that these advisory thresholds might not be suitable with regard to land promoted for development as traveller sites and that flexibility should be considered when setting locally suitable

		thresholds. Paragraph 3.5 has been amended accordingly.
The document appears thorough, well written and closely follows national policy and guidance.	Runnymede Borough Council	Comment noted.
To provide a better context and highlight important considerations promoters should be aware of the document should highlight development pressures including HS ² , WRATH, Heathrow Expansion, M4 smart motorway, Crossrail 2 etc.	Buckinghamshire County Council	Disagree. Information on development needs and other influences will be set out in consultation material relating to Local Plans. It is not necessary to include such information within the HELAA.
The HELAA should be seen as an audit of available land and should not in itself determine whether a piece of land should be allocated for development. The allocation of land for development is beyond the scope of the HELAA.	Gladman Developments	Comment noted. Paragraph 1.4 of the consultation document already stated that the inclusion of land in the HELAA report does not in itself determine whether it is suitable for development or that it should be allocated for development. In response to other comments the content of the paragraph has been promoted and expanded to form paragraph 1.2.
The adequacy of the HELAA will be strongly influenced by the assessment of site suitability. The local authorities will need to ensure their approach makes realistic delivery and density assumptions.	Gladman Developments	Comment noted.
It will be important to ensure as much consistency as possible is maintained between the five author local authorities and Bracknell Forest Borough Council.	Gladman Developments	Comment noted.
The methodology would benefit from an explanation of	Stratfield and Mortimer Parish Council	Agree. Clarification has been added into the Introduction.

how the document fits into the overall planning context, including that suitability does not imply allocation. Suggested that paragraphs 3.16-3.17 might be used as a basis.		See paragraph 1.2.
Paragraph 1.1 should be expanded to reference that such land should be in conformity with the local strategic approach to development.	Stratfield and Mortimer Parish Council	Disagree. It is not considered appropriate for the Introductory text to reference the development strategy, however it is agreed that the methodology should make reference to this issue. Paragraph 3.22 which relates to location has been amended to refer to the adopted or emerging spatial strategy when assessing suitability.
Within Table 1 “Normal housing” should be added as the first bullet point.	Stratfield and Mortimer Parish Council	Agree in part. “Dwellinghouses” has been added to Table 5.
Paragraph 1.4 should be amended to make it clear by land included within the HELAA might not be suitable.	Stratfield and Mortimer Parish Council	Comment noted. Paragraph 1.4 of the consultation document already stated that the inclusion of land in the HELAA report does not in itself determine whether it is suitable for development or that it should be allocated for development. In response to other comments the content of the paragraph has been promoted and expanded to form paragraph 1.2.
Comments that the Policy Context section as written simply lists the documents that established the HELAA process. Suggest the title is amended to reflect this.	Stratfield and Mortimer Parish Council	Agree. The title of the section has been amended to “HELAA and national policy / guidance.”
The methodology appears to be broadly in line with government guidance set out in the PPG note Housing & Economic Land	- Gladman Developments - Spelthorne Borough Council	Comment noted.

Availability Assessment.		
Comments that the Flow Chart should include reference to Neighbourhood Development Plans within Stages 2 and 3.	Stratfield and Mortimer Parish Council	Comment noted. The Flow Chart is a reproduction of that included within the PPG and is referenced as such. It would not be appropriate to make amendments. It is for each individual local authority to consider the involvement of Neighbourhood Development Plan groups and other stakeholders thorough the HELAA process.
Comments that clear reasons would need to be provided where a local authority did not follow the thresholds set out in the PPG note Housing & Economic Land Availability Assessment.	Chiltern District Council	Comment noted. Paragraph 3.5 already states that individual local authorities will set out locally suitable thresholds within their individual HELAA reports. The text has been amended to refer to this being supported by justification.
Considers that a standard approach to site size thresholds can be adopted for all of the local authorities in spite of their diverse character.	Gladman Developments	Comment noted. The methodology allows an individual local authority to consider local characteristics in setting the site size threshold. Where this varies from the PPG, individual local authorities will provide justification within their individual HELAA report.
The word “initial” in paragraph 3.6 implies that the call for sites exercise is a one off exercise and that there will be no further opportunity to submit further sites. The call for sites exercise should be a continuous process.	Chiltern District Council	Disagree. The use of the word “initial” clearly implies that further opportunities exist to promote land. This is supplemented by paragraph 3.53 which already states that each local authority will continue to accept new sites for consideration through the HELAA process.
Paragraph 3.6 omits key bodies such as the Local Enterprise Partnership, developers/providers of older persons accommodation,	Chiltern District Council	Comment noted. The description of groups already provided in paragraph 3.7 is considered to cover the organisations/groups referred

business and their representatives as set out in the PPG note Housing & Economic Land Availability Assessment.		to by the respondent.
Support the exclusion of sites in the functional flood plain.	- Environment Agency - Spelthorne Borough Council	Support noted.
Pleased to see that designated sites and SANGs are mentioned in the areas of land where development would not be encouraged.	Natural England	Support noted.
Excluding sites at Stage 1 appears to be contrary to guidance set out in the PPG note Housing & Economic Land Availability Assessment which suggests that sites that are subject to policy constraints should be included in the assessment for the sake of completeness.	Historic England	Disagree. In referring to all sites being included in the assessment, the PPG does not indicate that all sites should be subject to the same level of assessment. Indeed the PPG subsequently refers to establishing which sites have reasonable potential for development and should be included in the site survey (ID 3-014-20140306). The methodology identified a limited number of categories where development is severely prohibited by national policy and designations. These sites are being assessed through the HELAA process with the reason for their exclusion from the more detailed site assessment noted. As confirmed in paragraph 3.10 all sites subject to these categories will be reported and mapped in individual local authorities HELAA report. Paragraph 3.9 has been amended to improve clarity.
Comments that if exclusion categories are retained that designated heritage sets of the highest significance should also	Historic England	Comment noted. Paragraph 3.28 and 3.29 relate to scheduled monuments and historic parks and gardens and

be excluded (schedules monuments, battlefields, grade 1 and ii* listed buildings and grade 1 and ii* registered parks and gardens and non-designated assets of archaeological interest that are demonstrably of equal significance to scheduled monuments).		state that sites within these designations will normally be deemed unsuitable. The importance of other designated heritage assets is full recognised and will be assessed as confirmed in Appendix 3: Suitability considerations. This will have regard to the form of development being proposed, e.g. the conversion of a listed building.
Comments that sponsors of Neighbourhood Development Plans should take part in Stage 2 of the methodology. Reference is made to paragraph 3.12.	Stratfield Mortimer Parish Council	Comment noted. It is for each individual local authority to consider the involvement of Neighbourhood Development Plan groups and other stakeholders thorough the HELAA process. No amendments have been made to the methodology.
Comments that whilst paragraph 3.15 notes that policy should guide density, it might be beneficial to provide more detail on the level of densities that may be used in the local authorities and whether higher densities are likely to be used in town centres.	Spelthorne Borough Council	Comment noted. It is considered impractical to provide further guidance within the methodology given the diverse built character of places across Berkshire and the fact that each local authority is at a different stage of plan preparation. Paragraph 3.17 already states that each local authority will set out a suitable approach within their individual HELAA report.
Comments that the content of paragraph 3.17 should be emphasised elsewhere including in Stages 4 and 5.	Stratfield Mortimer Parish Council	Agree in part. A statement regarding the indicative nature of the HELAA process has been inserted into the Introduction at paragraph 1.2. Further statements in Stages 4 and 5 are considered unnecessary.
Paragraph 3.18 should be amended to refer to Neighbourhood Development Plans.	Stratfield Mortimer Parish Council	Agree. The text has been amended to directly reference Neighbourhood Development Plans.

Comments that whilst accepting that adopted and emerging planning policy need to be considered when assessing suitability many of these policies are able to be overcome and mitigated. Criteria should not artificially remove sites from consideration, e.g. greenfield, development limits, accessibility. These factors should be weighed in a balance exercise. A decision on sites should be taken at the Local Plan preparation stage rather than through the HELAA.	Gladman Developments	Comment noted.
Comments that the proper consideration of a sites/areas historic environment and contextual features, where character and physical constraints are assessed, will give greater certainty of housing supply and more realistic capacity assumptions.	Historic England	Comment noted.
Comments that the following factors should be take into account in assessing a site's potential: -All heritage assets; buildings, monuments, sites, places, areas or landscapes. Includes designated heritage assets and assets identified by the local planning authority (including local listing). -Implications of development (both positive and negative) for the setting of a heritage asset and its significance. -Potential archaeological interest of the site. -Implications for landscape and townscape character. -Settlement character where	Historic England	Comment noted. Appendix C: Suitability considerations already identifies the historic environment as being a suitability consideration. Paragraph 3.20 already refers to the consideration of both constraints and opportunities.

development would significantly alter the historic settlement pattern.		
Support paragraph 3.21 Location, but suggest that within the reasons for a site to be deemed potentially suitable reference is made to being located in the lowest probability of flooding from all sources.	Environment Agency	Comment noted. Paragraph 3.22 sets out a general approach to location which seeks to reflect a site's position with regard to infrastructure and services. It is not intended to consider wider factors. Appendix C: Suitability considerations already identify fluvial flood risk and non-fluvial flood risk as being a suitability consideration.
There is a lack of emphasis on suitability is linked to the local strategic approach to development.	Stratfield Mortiner Parish Council	Comment noted. It is agreed that the methodology should make reference to this issue. Paragraph 3.22 relating to location has been amended to refer to the adopted or emerging spatial strategy when assessing suitability.
Paragraphs 3.23 to 3.29 should give recognition to the impacts of boundary disputes, fly-tipping of garden waste, vandalism and graffiti, increased noise and other nuisances from football etc.	Buckinghamshire County Council	Disagree. Paragraphs 3.22 to 3.30 set out the general approach to key issues when assessing suitability. Further considerations set out in Appendix C. The pollution and built environment considerations would include amenity issues such as noise.
Paragraph 3.22 on AONB should read "Sites where development is unlikely to result in harm to the natural beauty and special qualities of the AONB will be deemed unsuitable."	- Cala Group - Chiltern District Council - Gladman Developments	Agree. Text corrected.
Supportive of the general approach to Green Belt as a consideration when assessing suitability, and notes the potential suitability of sites which make a lower contribution to the purposes of	Spelthorne Borough Council	Support noted.

the Green Belt and other exceptions, such as previously developed land.		
Paragraph 3.23 on Green Belt, it may be useful to include reference to paragraphs 89 and 90 of the NPPF in text.	Spelthorne Borough Council	Comment noted. Appendix C: Suitability considerations already cross refers to relevant sections of the NPPF including paragraphs 89 and 90 which are situated within section 9: Protecting Green Belt Land.
Concerned by the lack of information regarding the assessment of sites in the Green Belt, for instance how will sites be scored and assigned, what score would warrant a site being included as developable?	Chiltern District Council	The assessment of how land currently designated Green Belt performs against the purposes of Green Belt will be informed by dedicated studies. The Royal Borough of Windsor and Maidenhead consulted on the Edge of Settlement: Green Belt Purpose Assessment methodology to be applied in 2015 with the study published in July 2016. A joint Green Belt Review between Bracknell Forest Borough Council and Wokingham Borough Council methodology was consulted on and 2016 with the report published in June the same year. It is noted that a similar approach has been taken by the Buckinghamshire local authorities in the assessment of land designated Green Belt. It is further noted that the level of guidance provided by the Berkshire HELAA is consistent with that within the Buckinghamshire HELAA methodology. Notwithstanding this, it is noted that that Berkshire base methodology provides for exceptions to be made where justified by specific circumstances. The Buckinghamshire methodology included no such provision.

Object to the approach to Green Belt set out in paragraph 3.23. The approach could lead to unsustainable patterns of growth with land outside the Green Belt or those within the Green Belt but making a lower contribution being considered more suitable than others. As Green Belt is not an environmental or landscape based designation, any assessment should apply a neutral score in relation to the presence of a site within the Green Belt.	Turley	The assessment of how land currently designated Green Belt performs against the purposes of Green Belt will be informed by dedicated studies. Disagree. In stating that land which makes a lower contribution to the purposes of Green Belt will be deemed potentially suitable with regard to this factor, the text continues to provide an exception that sites of higher value might be considered where there are specific sustainability benefits.
Comments that whilst there may be a case for relaxing Green Belt restriction on the periphery of conurbations (e.g. Cox Green bordering Maidenhead), this should strengthen 'deep' Green Belt for the benefit not just of residents but visitors as well.	Waltham St Lawrence Parish Council	Comment noted.
Comments that opportunities exist for change of use within the Green Belt where this does not defeat the main objective of preserving 'openness'. Other 'windfall' sites may become available over time.	Waltham St Lawrence Parish Council	Comment noted.
Paragraph 3.24 isn't clear in what is meant by "with regard to this factor." Does this mean employment sites can only be used for alternative economic uses or for alternative uses per se?	Chiltern District Council	Comment noted. Paragraph 3.25 seeks to confirm that the redevelopment of non-designated sites in economic use will be deemed suitable. This may involve redevelopment to provide another economic use or an alternative such as housing. Amendments have been made to paragraph 3.25 to improve the clarity.

Objects to the approach to best and most versatile (BMV) agricultural land set out at paragraph 3.29. The approach potentially elevates the presence of BMV to a restraint or bar on development which is contrary to the approach taken within the NPPF. The approach could lead to unsustainable patterns of growth in favour of sites of lower agricultural land quality.	- Gladman Developments - Turley	Agree in part. Both the NPPF³¹ and PPG³² require the consideration of the economic and other benefits of best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be used in preference to that of higher quality. The principle of guiding development away from areas of best and most versatile agricultural land is consistent with national policy and guidance. Notwithstanding this, it is accepted that exceptions might be justified in specific circumstances. Amendments have been made to clarify that exceptions might be made in specific circumstances.
Welcomes the identification of Scheduled Monuments and Historic Parks and Gardens as sites deemed unsuitable for development.	Historic England	Support noted.
Comments that there is a conflict between the meanings of suitable, e.g. sometime referenced as indicative, sometimes not. Suggest the reference in Table 5 is amended to ensure it is interpreted as indicative and does not set a precedent.	Stratfield Mortimer Parish Council	Agreed in part. Paragraph 3.32 preceding Table 5 has been amended to clarify that the assessment of suitability is indicative only and does not prejudice assessments made through the Local Plan or planning application processes.
Comments that whilst the PPG confirms that residential development is acceptable in flood zone 2, subject to the sequential test being passed, and acceptable in flood zone 3a	Spelthorne Borough Council	Comment noted.

³¹ NPPF, paragraph 112.

³² PPG Natural Environments, ID: 8-026-20140306.

subject to the sequential test and exception test being passed, that Policy SP1 of the Spelthorne Core Strategy and Policies DPD 2009 states that 'new residential development will only be allowed in Flood Zones 1 and 2 unless it can be demonstrated that flood risks can be overcome'. Suggest that this approach should be a consideration for policy and land use.		
With regard to paragraph 3.36, attention is drawn to the established a Development Market Panel (DMP) by Runnymede Borough Council to help with the viability assessments of its Strategic Land Availability Assessment (SLAA sites). The Berkshire Authorities may find such the use of such a panel beneficial.	Runnymede Borough Council	Comment noted.
Comments that no detail is provided on how achievability will be assessed. These factors relate to matters such as site factors, market factors, cost factors and delivery factors). For example, the delivery factors include the size and capacity of the developer. Confirmation could be provided as to whether consultation upon these more detailed aspects will be undertaken prior to reaching judgements on sites.	Turley	Comment noted. Paragraph 3.37 sets out a range of factors to which consideration will be given when assessing achievability. The list of not exhaustive. Consultation is not anticipated on a draft assessment. Respondents may draw on the details of technical studies in responding to Local Plan consultations.
Comments that it is essential for a local authority's windfall allowance to be robust and justified.	Gladman Developments	Comment noted. Paragraph 3.43 already states that any windfall allowance must be justified by evidence.
Queries whether large windfall sites will have already been	Chiltern District Council	Comments noted. Paragraph 3.43 already states that any

picked up in the HELAA / brownfield register process? Comments that Inspectors have considered it unwise to rely on large windfall sites.		windfall allowance must be justified by evidence. This is reinforced with regards to larger sites in paragraph 3.44.
Questions whether windfall sites relate to housing only as suggested in paragraph 3.41.	Stratfield Mortimer Parish Council	Windfall might reasonably apply to different land uses. The appropriateness of any allowance will be based on evidence within an individual local authority's HELAA report. Paragraph 3.43 has been amended to refer to windfall applying to different uses, when justified by evidence.
Comments that the sponsors of Neighbourhood Development Plans should take part in Stage 3 of the methodology.	Stratfield Mortimer Parish Council	Comment noted. It is for each individual local authority to consider the involvement of Neighbourhood Development Plan groups and other stakeholders thorough the HELAA process. No amendments have been made to the methodology.
Comments that paragraph 3.42 or elsewhere should state that the windfall allowance should be borough-wide or at a lower level. Support indicated for the former.	Stratfield Mortimer Parish Council	Comment noted. Each local authority will need to consider the appropriateness of any windfall allowance based on evidence. It is beyond the scope of this methodology to prejudge the outcome of this consideration.
Notes the intention to provide an indicative housing trajectory to allow comparison against Objectively Assessed Need.	Gladman Developments	Comment noted.
Comments that a key part of the HELAA process involves the setting up of a well-designed GIS and database. Mention of this should be included within the methodology.	Chiltern District Council	Comment noted.
Appropriateness of a site should be added to the requirements of paragraph	Stratfield Mortimer Parish Council	Disagree. Paragraph 3.50 outlines the key outputs of a HELAA as informed by the PPG.

3.49. It would provide a link to the context of the vision set out in Neighbourhood Development Plans.		'Appropriateness' is not a term used in the NPPF or PPG guidance in the context of site assessment. Neighbourhood Development Plans on being made become part of the development plan. Paragraphs 3.17 and 3.19 of the consultation document already refer to estimates of development potential and suitability being guided amongst other matters by the development plan. For clarity the text has been amended to make direct reference to Local Plans and Neighbourhood Development Plans.
Comments that some references are made to housing when it seems appropriate to use the word development, e.g. when referring to deliverable and developable.	Stratfield Mortimer Parish Council	Comment noted. The definitions of deliverable and developable are taken from the NPPF, footnotes 11 and 12. The NPPF does not contain such definitions for economic development. Notwithstanding this the principles are considered to be transferrable. The text has been amended to clarify this.
Comments that there is no definition of suitable. Suggest drawing on paragraph 3.17 of the methodology.	Stratfield Mortimer Parish Council	Comment noted. It is not considered appropriate to define suitability. Section 3 and Appendix C of the methodology outline factors that will be considered when considering suitability.
Welcome the identification of this historic environment as a suitability consideration.	Historic England	Support noted.
Please to see that fluvial flooding and non-fluvial flood risk, pollution, natural environment and infrastructure have been included within the considerations taken into account to assess suitability.	Environment Agency	Support noted.

Comments that the setting of a historic asset can contribute to its significance, and such, potential implications for setting will need to be considered as an integral part of the site identification / appraisal process.	Historic England	Comment noted.
Comments that development might give rise to opportunities to enhance or better reveal a historic assets significance.	Historic England	Comment noted. Paragraph 3.20 already refers to the consideration of both constraints and opportunities.
Note that the current and potential availability of infrastructure will be a consideration throughout the assessment of the suitability of potential sites. Any assessment should also consider the cumulative as well as the individual impact to the Strategic Road Network from sites identified.	Highways England	Comment noted.
Footnote 40 (Infrastructure) should be amended to include environmental capacity in addition to utility capacity. This is to avoid unacceptable risks of water quality in line with the Water Framework Directive.	Environment Agency	Agree in part. The Footnote 43 has been amended to refer to water supply and waste water. Water quality is already referenced under the sustainability consideration pollution. Footnote 38 has been expanded to refer to surface water contamination.
The HELAA process should have regard to traffic and transport considerations including cross boundary routes and other strategic routes within or near the area.	Buckinghamshire County Council	Comment noted.
The HELAA process needs to be mindful of the highly sensitive boundary to the north of Slough and on the associated A4012 (through Iwer to M40 J1) and A355 (through Stoke Poges and Farnham Common/Royal to	Buckinghamshire County Council	Comment noted.

M40 J2). Both have history of issues associated with increasing traffic volumes. Development along the A4 near Taplow may increase traffic off the A4.		
Comments that the suitability considerations make no reference to planning policy in Local Plans or Neighbourhood Development Plans.	Stratfield and Mortimer Parish Council	Neighbourhood Development Plans on being made become part of the development plan. Paragraphs 3.17 and 3.19 of the consultation document already refer to estimates of development potential and suitability being guided amongst other matters by the development plan. For clarity the text has been amended to make direct reference to Local Plans and Neighbourhood Development Plans.
Comments that sites near the boundary between Berkshire and Buckinghamshire would be asked to include an assessment of impact on Buckinghamshire's highway network. It may be appropriate to undertake traffic and transport modelling.	Buckinghamshire County Council	Comment noted.
Comments that Buckinghamshire County Council would be happy to comment on a more site by site basis for development near the boundary between Berkshire and Buckinghamshire.	Buckinghamshire County Council	Comment noted.
Details provided regarding the capacity of schools in Buckinghamshire. The increase in housing on the border with Slough is unlikely to cause capacity issues for Buckinghamshire Schools. Increased housing where children from Burnham and Iver take up places in Slough may	Buckinghamshire County Council	Comment noted.

create additional pressure on schools in Buckinghamshire.		
More consideration should be given to the impact of development on nearby green and other open spaces, including those in Buckinghamshire.	Buckinghamshire County Council	Comment noted. Appendix C: Sustainability considerations already refer to the consideration of public open space.
Comments that a number of parks in Buckinghamshire are approaching capacity at peak periods. Consideration needs to be given to what additional green space and open space provision will be needed to meet needs.	Buckinghamshire County Council	Comment noted.
It is unclear whether draft HELAA reports will be subject of consultation. This would be supported so that interested parties can review and provide comments.	Gladman Developments	Comment noted. The draft methodology does not require an individual local authority to consult in their HELAA report. It will be for each local authority to consider how to take their HELAA report forward.
Comments that Planning Practice Guidance states that, 'Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement'. Officers at Runnymede have had a number of discussions about how to do this practically when C2 accommodation typically delivers bed spaces and not units in the same way that C3 units do. Therefore, should evidence be compiled to justify a mathematical conversion from bed spaces to unit numbers for the purpose of the housing trajectory (so that C2 and C3 uses can be considered together) or should C2 and C3 accommodation be dealt with	Runnymede Borough Council	Comment noted.

entirely separately in any trajectory, with different types of housing requirement being considered individually? The Berkshire authorities can see how Runnymede is proposing to approach this issue in its draft interim SLAA which is currently available for consultation but would be interested in any conclusions that the Berkshire Authorities draw in this area.		
Section 8 of the HELAA pro-forma should request information on impact on: • Education, • Highways • Rail and other public transport • Chilterns AONB The impact on open spaces should be widened to include reference on public open spaces and country parks (including those in neighbouring counties).	• Buckinghamshire County Council	The respondent is referring to the RBWM HELAA pro-forma. This does not form part of the HELAA methodology.
Comments that there is a lack of comment regarding Neighbourhood Development Plans.	• Stratfield Mortimer Parish Council	Comment noted. Additional text referencing Neighbourhood Development Plans has been added at paragraph 1.2, 3.17 and 3.19.
Comments that while the document is used for many land uses there are a number of occasions where only housing is mentioned.	Stratfield and Mortimer Parish Council	Comment noted. The text has been reviewed to ensure appropriate reference is made throughout the methodology to both housing and economic development.
Paragraphs 1.4 and 3.17 should be amended to read ..."determine that it is suitable..."	• Stratfield and Mortimer Parish Council	Agree. Text amended accordingly at related sections (please note that the original paragraph 1.4 has been moved forward within the document to paragraph 2).

APPENDIX C: SUITABILITY CONSIDERATIONS

The following table lists a number of considerations that will be taken into account when assessing the suitability of sites or broad locations. This list and justification should not be viewed as exhaustive.

The impact of some considerations may limit or influence the type, form or capacity of a site. In some instances, where the impact is significant and cannot be mitigated some considerations might prevent a site being suitable for development unless circumstances change. Conversely, the impact of development may positively influence the suitability of a site by way of creating specific opportunities.

Consideration	Justification
Location	- NPPF, paragraph 17, chapter 4, paragraph 55. - PPG, Ensuring the vitality of town centres. - PPG, Rural housing.
Previously Developed Land	- NPPF, paragraph 17, 89, 111. - PPG, Natural environment.
Area of Outstanding Natural Beauty	- Countryside and Rights of Way Act 2000. - NPPF, paragraph 115-116. - PPG, Natural Environment.
Green Belt	- NPPF, paragraph 17, chapter 9, paragraph 156-157.
Economic Use	- NPPF, paragraph 17, Chapter 1, Chapter 2, paragraph 156-157.
Housing Use	- NPPF, paragraph 17, Chapter 6.
Minerals	- NPPF, Chapter 13. - PPG, Minerals.
Waste	- The National Planning Policy for Waste 2014. - PPG, Waste.
Safeguarded Land ³³	- NPPF, paragraph 162.
Public Open Space	- NPPF, paragraph 69-70 and 74-74. - PPG, Design. - PPG, Open space, sports and recreation facilities, public rights of way and local green space.
Local Green Space	- NPPF, paragraph 76-78. - PPG, Open space, sports and recreation facilities, public

³³ Includes consideration of land safeguarded for transport and flooding project, e.g. Crossrail, the Lower Thames Strategy.

	rights of way and local green space.
Nature Designations ³⁴	- NPPF, Chapter 11. - PPG, Natural environment.
Protected and Important Species	- NPPF, Chapter 11. - PPG, Natural environment.
Priority Habitats	- NPPF, Chapter 11. - PPG, Natural environment.
Agricultural Land Quality	- NPPF, Chapter 11. - PPG, Natural environment.
Highway Access	- NPPF, Chapter 4.
Highway Network	- NPPF, Chapter 4.
Notified Safety Zones ³⁵	- NPPF, paragraph 172, 194. - PPG, Hazardous substances.
Fluvial Flood Risk ³⁶	- NPPF, Chapter 10. - PPG, Flood risk and coastal change.
Non-Fluvial Flood Risk ³⁷	- NPPF, Chapter 10. - PPG, Flood risk and coastal change.
Pollution ³⁸	- NPPF, paragraph 17. - PPG, Air quality. - PPG, Heath and wellbeing. - PPG, Land affected by contamination. - PPG, Light pollution. - PPG, Noise.
Land Stability	- PPG, Land stability
Historic Environment ³⁹	- NPPF, paragraph 17, Chapter 12. - PPG, Conserving and enhancing the historic environment. - PPG, Tree Preservation Orders and trees in conservation areas.

³⁴ Includes consideration of Special Areas of Conservation, Special Protection Areas, Sites of Special Scientific Interest, Ramsar, Thames Basin Heaths SPA buffer, Sustainable Alternative Natural Greenspace capacity, Local Wildlife Sites, National and Local Nature Reserves, Ancient Woodland, Biodiversity Opportunity Areas.

³⁵ Includes consideration of major hazards such as high pressure gas pipes, nuclear establishments and the Atomic Weapons Establishment.

³⁶ Includes consideration of the probability of flooding, flood storage, and safety.

³⁷ Includes consideration of the probability of flooding, flood storage, and safety.

³⁸ Includes consideration of land contamination, groundwater contamination, surface water contamination, air quality, noise, dust, odour.

³⁹ Includes consideration of conservation areas, listed buildings, scheduled monuments, registered parks and gardens, battlefields, archaeology, local listed buildings, local listed parks and gardens.

Natural Environment ⁴⁰	- NPPF, paragraph 17, chapter 7. - PPG, Design. - PPG, Natural environment. - PPG, Tree Preservation Orders and trees in conservation areas.
Built Environment ⁴¹	- NPPF, paragraph 17, chapter 7 . - PPG, Design.
Public Rights of Way	- NPPF, paragraph 75 . - PPG, Design.
Common Land	- The Commons Act 2006.
Accessibility ⁴²	- NPPF, paragraph 17, chapter 4, chapter 8 . - PPG, Design.
Infrastructure ⁴³	- NPPF, paragraph 17, 162. - PPG, Water supply, wastewater and water quality.
Community Aspirations ⁴⁴	- NPPF, paragraph 17. - PPG, Neighbourhood planning.

⁴⁰ Includes consideration of landscape character and features, trees, hedgerows, geological features.

⁴¹ Includes consideration of townscape character, public car parking, amenity impacts for the occupiers of existing properties and the occupier of the proposed development.

⁴² Includes consideration of shops, primary schools, secondary schools, employment areas, train stations, bus routes.

⁴³ Includes consideration of utility capacity (including water supply and waste water), education capacity, land safeguarded for strategic projects, e.g. strategic road, rail and flood defence.

⁴⁴ Includes consideration of initiatives set out in neighbourhood development plans.