

Strategic Assessment of Land Availability (SALA)

Methodology



February 2016



2002-2003
Crime Reduction in Rural Areas
2004-2005
Services for Older People

Chief Executive: David Hagg



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Introduction

- 1.1. Stroud District Council published its first Strategic Housing Land Availability Assessment (SHLAA) Report in March 2010 and an Update Report in December 2011. The SHLAA provided information on opportunities that exist to meet the housing needs within the District.
- 1.2. New guidance promotes a wider assessment of land available for housing, employment, retail and community uses, called the Strategic Assessment of Land Availability (SALA).
- 1.3. Public consultation took place between 7th December 2015 and 18th January 2016 on a proposed revised methodology for undertaking the SALA, to take into account changes to national policy and guidance and to reflect the adoption of the Stroud District Local Plan November 2015.
- 1.4. A total of five consultation responses were received, including statutory agency, town council and development industry representations. Appendix D provides a summary of each representation received together with an officer response and proposed amendments to the methodology.
- 1.5. This document sets out the amended methodology that will be used to undertake the Strategic Assessment of Land Availability 2016 and subsequent updates.

2. Purpose of the Assessment

- 2.1. The National Planning Policy Framework (NPPF) requires local planning authorities to “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.” (DCLG, 2012)
- 2.2. New national Planning Practice Guidance (PPG) promotes a **combined Strategic Assessment of Land Availability (SALA)** for housing and economic development uses over the plan period, in order that sites may be allocated for the use which is most appropriate.
- 2.3. The 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 (their availability and achievability).
- 2.4. The aim of the assessment is to identify which sites or broad locations are the most suitable and deliverable for a particular use.
- 2.5. The final assessment is an important component of the evidence base to underpin policies in the Local Plan, including supporting the delivery of land to meet identified need for these uses. It will be used to inform the review of the adopted Stroud District Local Plan November 2015.
- 2.6. The SALA will also be used as a proactive tool, to identify and regularly review a supply of available brownfield land suitable for housing.

3. The methodology

- 3.1. The PPG provides a Methodology flowchart (Appendix A) setting out the inputs and processes that will lead to a robust assessment of land availability. In following this methodology, Stroud District Council will meet the requirements of the PPG.
- 3.2. The guidance requires the assessment to be undertaken, and regularly reviewed, working with local planning authorities in the relevant housing market area or

functional economic market area, in line with the Duty to Co-operate. Stroud District Council officers have been working with officers of neighbouring authorities, to develop a shared approach to land availability assessments across the County of Gloucestershire.

3.3. The SALA has five main stages:-

- **STAGE 1: Identification of sites and broad locations**
- **STAGE 2: Site/ broad location assessment**
- **STAGE 3: Windfall assessment**
- **STAGE 4: Assessment review**
- **STAGE 5: Final evidence base**

4. **Stage 1: Identification of sites and broad locations** – Desktop review, call for sites, site/ broad location survey

4.1. The assessment area will normally comprise the whole of the District.

4.2. The assessment will consider **all sites and broad locations capable of delivering five or more dwellings, or economic development, other residential development, retail or community uses on sites of 0.25ha (or 500m² of floor space) and above.**

4.3. The Council will carry out a **desk top review** of sites and broad locations for development, in and around the District's settlements, having regard to the type of site and potential data sources set out in the PPG (Appendix B).

4.4. The Council will review the suitability of sites and broad locations for development within the Cotswold Area of Natural Beauty, identified conservation areas and on land outside existing settlement development limits. However, land identified as being subject to clear cut constraints, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), RAMSAR sites, Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) and Scheduled Ancient Monuments, will be excluded from the assessment.

4.5. The Council will issue an open **Call for Sites**, to be published on the Council's website and in the local press, requesting the submission of potential sites for development. Parish and town councils; landowners, developers and agents responsible for previous SHLAA submissions; together with landowners, developers, agents and relevant local interest groups on the Council's consultation database; will receive an invitation to submit sites for consideration.

4.6. All submissions will require the completion of a **Site Submission Form**, setting out the key information required, available as a downloadable proforma (Appendix C) on the Council's Consultation Hub during the Call for Sites period. An individual submission is required for each site submitted and will need to be accompanied by a site location plan, on an Ordnance Survey base, clearly identifying the site boundaries and access to the site.

4.7. Sites identified through the desktop review and the call for sites, considered against national and local policies and designations as having reasonable potential for future development, will be included in a **site and broad location survey**.

4.8. As part of the **site survey**, each site will be photographed and the following details will be recorded and checked:-

- site size, boundaries, and location;
- current land use and character;
- land uses and character of surrounding area;
- physical constraints (e.g. access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure / utilities);

- potential environmental impacts;
- where relevant, development progress (e.g. ground works completed, number of units started, number of units completed);
- initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.

Stage 2: Site/ broad location assessment

- 4.9. Whether a site is considered deliverable over the plan period will be informed by an assessment of the **suitability, availability and achievability of sites**, including whether the site is economically viable.
- 4.10. In parallel with this, the Council will consider the development potential of each site/ broad location. The PPG states that, “estimation of the development potential of each identified site should be guided by the existing or emerging plan policy, including locally determined policies on density”.
- 4.11. The SALA will consider the development potential of sites based on Local Plan policies, alongside an assessment of the achievability of sites for development.
- 4.12. **Assessing the suitability of sites/ broad locations:**
- 4.12.1. An assessment of **suitability** will be guided by:
- the adopted Stroud District Local Plan November 2015 and national policy, including existing land use allocations and policy area boundaries,
 - market and industry requirements in the housing market or functional economic market area.
- 4.12.2. Sites in the adopted Local Plan, or with planning permission, will generally be considered suitable for development.
- 5.4.3. In addition, the following factors will be considered to assess a site’s suitability for development now or in the future:
- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
 - potential impacts including the effect upon landscape features, nature and heritage conservation, and impact on the existing transport network (including rail);
 - appropriateness and likely market attractiveness for the type of development proposed;
 - contribution to regeneration priority areas;
 - environmental/ amenity impacts experienced by would be occupiers and neighbours.
- 5.4.4. The Council will consider commissioning landscape impact assessments for sensitive sites/ broad locations on the edge of settlements within the Cotswold AONB, where appropriate, to provide additional detail on the most suitable locations for development.
- 5.4.5. The latest published SHLAA 2011 adopted a ‘policy off’ approach to the consideration of the ‘suitability’ of sites for development, to provide an extensive audit of available land across the District that may be suitable for housing development.
- 5.4.6. In the new combined SALA, it is proposed to adopt a ‘policy on’ approach to the consideration of suitability, to provide a more realistic assessment of sites and broad locations with potential for development. Sites/ broad locations not in

accordance with adopted local plan policy will be assessed as being 'not currently developable', as they are contrary to policy for strategic growth, but may be identified as having future potential for development, to be considered through the review of the Local Plan.

5.5. Assessing the availability of sites:

- 5.5.1. A site will be considered **available** for development when, on the best information available (confirmed by the call for sites and information from land owners 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.
- 5.5.2. Where land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell, consideration will be given to the delivery record of the developer or land owner putting forward the site, and to the planning background, in assessing whether it is available for development.
- 5.5.3. Where potential problems have been identified, an assessment will need to be made as to how and when they can reasonably be overcome.

5.6. Assessing the achievability of sites:

- 5.6.1. **A site will be considered achievable for development where there is a reasonable prospect that the particular type of development will come forward on the site at a particular point in time, and relates to the economic viability of a site.**
- 5.6.2. A broad assessment of economic viability will be made using the latest available evidence from the local property market.
- 5.6.3. In addition, the Council will seek the views of landowners, developers and local agents, through a convened SALA Panel (see 8.3 below), in assessing lead in times, build out rates by year and the economic viability of sites.

5. Stage 3: Windfall assessment:

- 6.1. The Council will examine historic windfall trends on sites and broad locations, excluding residential gardens, to determine whether there is compelling evidence that they will continue into the future as a valid contribution to the five year housing supply and beyond, in accordance with paragraph 48 of the NPPF.
- 6.2. In addition, the Council will examine historic windfall rates for economic development to determine their potential contribution to employment land supply.

6. Stage 4: Assessment review

- 6.1. The initial survey and assessment of sites will enable the production of an indicative trajectory that sets out how much housing, and the amount of economic development, that can be provided, and at what point in the future.
- 6.2. The identified supply of suitable, available and achievable development land will be compared against the development requirements for the whole plan period, up to 2031, and against the five year land supply requirements for housing, to determine whether sufficient land has been identified.
- 6.3. If it is concluded that insufficient sites/ broad locations have been identified, further sites may need to be sought or assumptions that were applied may need to be altered, for example reviewing the development potential, or constraints, on particular sites.

7. Stage 5: Final evidence base

8.1. The Strategic Assessment of Land Availability will provide the following set of standard outputs:-

- 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;
- 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.

8.2. The SALA will also identify those brownfield sites suitable for housing included in the assessment.

8.3. In order to produce a robust land availability assessment, the Council will convene a SALA Panel, involving neighbouring planning authorities, developers and local property agents, to review whether sites can be considered deliverable, developable or not developable. Details of when the SALA Panel meeting is to be held will be published on the Council's website.

8.4. To be considered deliverable for housing, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing 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.(NPPF Footnote 11)

8.5. To be considered **developable for housing**, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.(NPPF Footnote 12)

8.6. The final joint housing and economic **Strategic Assessment of Land Availability Report** will be published and made available by the Council.

9. Keeping up to date

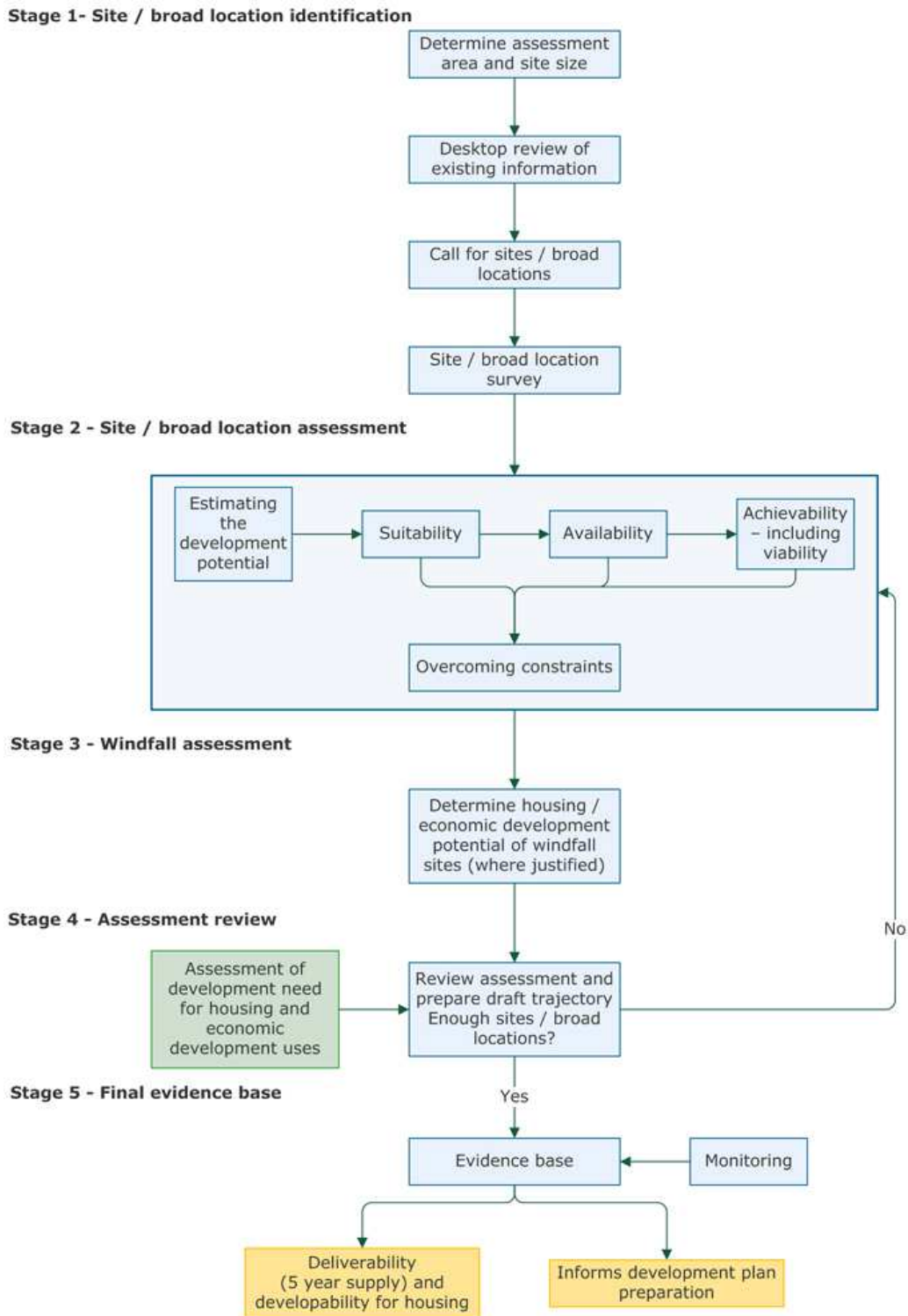
9.1. The Council will review the assessment process following completion of the SALA and reflect on improvements to be incorporated in future assessments.

9.2. Progress on the delivery of individual sites will be updated following publication of the Council's annual Housing Land Availability and Employment Land Availability reports.

9.3. A full review of the Strategic Assessment of Land Availability will be undertaken when further land for development is required or if the Council is no longer able to demonstrate a five year supply of specific deliverable sites for housing.

APPENDIX A

Methodology flow chart



APPENDIX B

Types of sites and sources of data

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning applications records Development briefs
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 sector land Engagement with strategic plans of other public sector bodies such as County Councils, Central Government, National Health Service, Policy, Fire Services, utilities providers, statutory undertakers
Vacant and derelict land and buildings (including 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 under-utilised 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
Large scale redevelopment and redesign of existing residential or economic areas	Planning applications Ordnance Survey maps Aerial photography
Sites in and adjoining villages or rural settlements and rural exception sites	Site surveys
Potential urban extensions and new free standing settlements	

APPENDIX C
Stroud District Council
Strategic Assessment of Land Availability
Site Submission Form



Stroud District Council is inviting the submission of potential development sites, in and around the District's settlements, for consideration in a new **Strategic Assessment of Land Availability (SALA)**.

Please use this form to provide information on sites within Stroud District that you would like to suggest as suitable for:

- **new housing development of five dwellings or more,**
- **sites of 0.25 hectares/ 500 square metres of floorspace and above that could be suitable for economic development, other residential development, retail or community uses.**

An **individual site submission form** is required for each site you wish to be considered in the Assessment, accompanied by a **site location plan** on an Ordnance Survey base clearly identifying the site boundaries and access to the site.

Please submit your sites by **Monday 18th January** for inclusion in the SALA 2016.

Please email your completed electronic responses to localplan@stroud.gov.uk or post paper copies to **The Planning Strategy Team, Stroud District Council, Ebley Mill, Westward Road, Stroud, GL5 4UB**.

Should you have any queries, the Planning Strategy Team can be contacted on 01453 754143.

Site Submission form PART A

All sites submitted under the Call for Sites will be assessed for their suitability, availability and achievability and cannot be treated confidentially.

Your details:

Please fill out this section with your personal information.

This part of the response form (Part A) will *not* be made public and will not be used for any purpose other than the Strategic Assessment of Land Availability. **Please note we will not process any anonymous responses.**

Your name

(title):	first name:	last name:
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Site name and address

	Postcode

Your company name or organisation *(if applicable)*

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Your address

Your email address

--

Your phone number

--

If you are acting on behalf of a client, please supply the following details:

Your client's name

(title):	name:
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Your client's company or organisation *(if applicable)*

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Site Submission form PART B

Your name

Site name and address

<input type="text"/>	
<input type="text"/>	Postcode

Your organisation or company

Your client's name/organisation

(If applicable)

1: Your interest in the site

Please tick box to indicate

Owner of the site	<input type="checkbox"/>	Planning consultant	<input type="checkbox"/>
Parish Council	<input type="checkbox"/>	Land agent	<input type="checkbox"/>
Local resident	<input type="checkbox"/>	Developer	<input type="checkbox"/>
Amenity/ community group	<input type="checkbox"/>	Registered social landlord	<input type="checkbox"/>
Other (please specify)			

2: Site information

Please provide as much detail as possible

OS Grid reference (EENN)	<input type="text"/>	Total site area (hectares)	<input type="text"/>
Is the site in single ownership? <i>Please tick box to indicate</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Developable area (hectares) <input type="text"/>
Current use(s) of the site (e.g. vacant, agricultural, employment etc.) Please include Use Class if known: <input type="text"/>			
Past uses: <input type="text"/>			
Planning history <i>(Please include reference numbers, planning application/ SHLAA site, if known):</i> <input type="text"/>			
Access to the site (vehicle and pedestrian): <input type="text"/>			
Can the site be seen from a public road, public footpath, bridleway or other public land? <i>Please tick box to indicate</i>			
Yes <input type="checkbox"/> No <input type="checkbox"/>			



3a: Is the site proposed for RESIDENTIAL development?			Yes <input type="checkbox"/>	No <input type="checkbox"/>
<i>Please tick to indicate</i>				
If Yes:	Number of houses			
	Number of flats			
	TOTAL number of units			
<i>Where possible, please tick to indicate which of the following apply:</i>			Number of units	
Market housing		Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Affordable housing	Affordable rent	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
	Shared ownership	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Is the site proposed to meet a particular need? (e.g. older people housing, self build)				Yes <input type="checkbox"/> No <input type="checkbox"/>
If Yes, please specify:				
3b: Is the site proposed for institutional residential development?			Yes <input type="checkbox"/>	No <input type="checkbox"/>
(e.g. care home, hospital or residential care home)				
<i>Please tick to indicate</i>				
If Yes, please indicate number of bed spaces and specify use :		Number of bed spaces		
Use:				
3c: Is the site proposed for NON RESIDENTIAL development?			Yes <input type="checkbox"/>	No <input type="checkbox"/>
<i>Please tick to indicate</i>				
If Yes:	TOTAL floorspace		m²	
<i>Where possible, please tick to indicate which of the following apply:</i>			Floor space	
Offices, research and development, light industrial (B1)		Yes <input type="checkbox"/>	No <input type="checkbox"/>	m ²
General industrial (B2)		Yes <input type="checkbox"/>	No <input type="checkbox"/>	m ²
Warehousing (B8)		Yes <input type="checkbox"/>	No <input type="checkbox"/>	m ²
Retail		Yes <input type="checkbox"/>	No <input type="checkbox"/>	m ²
Community facilities		Yes <input type="checkbox"/>	No <input type="checkbox"/>	m ²
Sports/ leisure		Yes <input type="checkbox"/>	No <input type="checkbox"/>	m ²
Other: (If Yes, please specify)		Yes <input type="checkbox"/>	No <input type="checkbox"/>	m ²



4: Possible constraints

Please provide as much information as possible

4a: To the best of your knowledge is there anything restricting the development potential of the site?

Please tick to indicate *If Yes, please provide brief details*

Contamination/ pollution	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Land stability	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Ground levels	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Mains water/ sewerage	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Electricity/ gas/ telecommunications	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Highway access and servicing	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Ownership/ leases/ tenancies/ occupiers	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Easements/ covenants	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Drainage/ flood risk	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Heritage/ landscape/ wildlife assets	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Other abnormal development costs	Yes <input type="checkbox"/> No <input type="checkbox"/>	



4b: Do you believe constraints on the site can be overcome? Tick box

Yes

No

If Yes, please provide details below of how they will be overcome and the likely time frame

(Please continue on additional sheets and attach as required)

5: Please provide an estimate of the number of dwellings/ floor space m² to be built on site per annum (1st April to 31st March)

2016/17		2023/24		2030/31	
2017/18		2024/25		2031/32	
2018/19		2025/26		2032/33	
2019/20		2026/27		2033/34	
2020/21		2027/28		2034/35	
2021/22		2028/29		2035/36	
2022/23		2029/30		2036/37	

6: Please indicate the current market status of the site

<i>Please tick all relevant boxes</i>	<i>Please provide brief details where possible</i>
Site is owned by a developer <input type="checkbox"/>	
Site is under option to a developer <input type="checkbox"/>	
Enquiries received from a developer <input type="checkbox"/>	
Site is being marketed <input type="checkbox"/>	
No interest currently <input type="checkbox"/>	

7: Site location plan

Each Site Submission Form must be accompanied by a site location plan on an Ordnance Survey base and clearly showing the site boundaries and access to the site.

Please tick box to confirm you have included the required site location plan

Yes

APPENDIX D
SALA Methodology
Consultation November 2015
Summary of Consultation Responses

ORGANISATION	SUMMARY OF COMMENTS	OFFICER RESPONSE	PROPOSED ACTION
Marine Management Organisation	1. Advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river.	The SALA methodology provides for physical limitations, ground conditions, flood risk and potential impact on the natural environment to be taken into account in the assessment of a site's suitability for development now or in the future (Section 5.4).	No action proposed
Natural England	<p>The following key environmental issues/opportunities should be considered as an integral part of the SALA assessment process.</p> <p>1. Avoiding harm to the character of nationally protected landscapes and locally valued landscapes - The assessment of potential sites should be informed by the landscape character approach, in accordance with Government guidance on National Character Areas (NCAs) and Landscape Character Assessments (LCAs).</p> <p>2. Potential development sites within or near protected landscapes may require a more detailed assessment of landscape and visual impact.</p> <p>3. Avoiding harm to the international, national and locally designated sites of importance for biodiversity - The assessment of potential sites should include consideration of the cumulative impact of development in an area and the indirect impact on identified sites of importance for biodiversity several kilometres away from new development e.g. from water pollution.</p> <p>4. Potential impact pathways between development and sensitive sites together with Impact Risk Zones (IRZs) around Sites of Special Scientific Interest (SSSIs) should be part of any assessment of direct or indirect environmental impact.</p> <p>5. Local Environmental Records Centres may have information on Local Wildlife Sites.</p> <p>6. Avoiding harm to priority habitats, ecological networks and priority/legally protected species populations - In addition to identifying statutory protected features, the assessment of potential sites should include an awareness of possible habitats for protected species; such as watercourses, old buildings, significant hedgerows, substantial trees, and the key principle of connectivity within ecological networks to allow free movement and dispersal of wildlife e.g. badger routes.</p> <p>7. It may also be necessary to undertake a basic ecological survey in order to appraise the biodiversity value of any potential development site.</p> <p>8. Seeking opportunities to contribute to the restoration and re-creation of habitats, the recovery of priority species populations and biodiversity enhancement - The assessment process should consider the potential of development to contribute to biodiversity and habitat enhancement, particularly within identified Nature Improvement Areas (NIAs).</p> <p>9. Seeking opportunities to enhance and create Green Infrastructure - The SALA should consider the availability of green infrastructure (GI) and opportunities to enhance GI networks when considering sites for development.</p> <p>10. 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) - The assessment process should also consider opportunities for the enhancement of geological sites, e.g. exposure sites in road cuttings.</p> <p>11. Seeking opportunities to contribute to landscape restoration and enhancement.</p> <p>12. Avoiding Best and Most Versatile Agricultural Land.</p> <p>13. Seeking opportunities to enhance public rights of way and accessible natural green space - Sites identified as suitable for development should avoid adverse impacts on public rights of way and opportunities should be considered to maintain/ enhance networks and to add links to existing rights of way networks including National Trails.</p> <p>14. Existing open space of public value should not be built on unless the tests of NPPF para 74 have been met.</p> <p>15. Natural England's work on Accessible Natural Greenspace Standard (ANGSt) may be of use in assessing current level of accessible natural greenspace and planning improved provision.</p>	<p>The SALA methodology provides for the exclusion of land identified as being subject to clear constraints, including identified sites of international and national wildlife importance (para 4.4).</p> <p>The suitability for development of the remainder of sites, including sites within the Cotswold Area of Outstanding Natural Beauty (AONB), will be guided by national and adopted local plan policies, including the potential impacts on landscape features and nature conservation (para 4.7).</p> <p>All sites identified as having reasonable potential for future development will be surveyed, to record factors including existing landuse, landscape sensitivity, natural features of significance, public rights of way and potential environmental impacts (para 4.8), before assessing the suitability of sites/ broad locations for development.</p> <p>It is proposed to liaise with Gloucestershire Centre for Environmental Records (GCER), under the existing Service Level Agreement, to identify sites where development may have a potential impact on recorded protected species present, that may influence the suitability of a site for development (para 5.4.3).</p> <p>Any sites/ broad locations not in accordance with adopted local plan policy will be assessed as being 'not currently developable' as they are contrary to policy for strategic growth (para 5.4.5).</p> <p>In addition, where sites/ broad locations for development come forward in sensitive locations on the edge of settlements within the AONB, the Council may consider commissioning a landscape impact assessment to provide additional detail to support an assessment of the most suitable locations for development.</p>	<p>New paragraph 5.4.4:</p> <p>5.4.4 The Council will consider commissioning landscape impact assessments for sensitive sites/ broad locations on the edge of settlements within the Cotswold AONB, where appropriate, to provide additional detail on the most suitable locations for development.</p>
Network Rail	<p>Level/ pedestrian crossing safety</p> <p>1. Emerging planning policy/ allocations should consider the impact of development on the safety of level/ pedestrian crossings.</p> <p>2. Where a site allocation/ development may increase the level of pedestrian and/or vehicular usage at a level crossing it should be supported by a full Transport Assessment quantifying in detail the likely impact on the rail network.</p> <p>Funding of rail improvement</p> <p>3. Network Rail would like to be consulted on sites where development may impact on the rail network and may require rail infrastructure improvements.</p> <p>4. Network Rail will seek developer contributions where transport assessments identify local level improvements to make a development acceptable.</p>	<p>The SALA methodology sets out the factors to be considered in the assessment of the suitability of sites/ broad locations for development now or in the future, including potential impacts (Section 5.4).</p> <p>To add clarity, It is suggested that paragraph 5.4.3 should be amended to refer to the potential impact of development on the existing transport network as well as the impact on landscape features, nature and heritage features already specified.</p>	<p>Amend paragraph 5.4.3 to read:</p> <p>5.4.3. In addition, the following factors will be considered to assess a site's suitability for development now or in the future:</p> <ul style="list-style-type: none"> • physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; • potential impacts including the effect upon landscape features, nature and heritage conservation, and impact on the existing transport network (including rail). • appropriateness and likely market attractiveness for the type of development proposed; • contribution to regeneration priority areas; • environmental/ amenity impacts experienced by would be occupiers and neighbours.

ORGANISATION	SUMMARY OF COMMENTS	OFFICER RESPONSE	PROPOSED ACTION
<p>Persimmon Homes Severn Valley</p>	<p>Stage 1: Identification of sites and broad locations</p> <ol style="list-style-type: none"> 1. Agree that the methodology should include all sites and broad locations capable of delivering 5 or more dwellings or other developments (para 4.2). 2. Support the consideration of sites in the Cotswold AONB and/ land outside settlement development limits (para 4.4). <p>Stage 2: Assessing suitability</p> <ol style="list-style-type: none"> 3. Disagree with a 'policy on' approach to assessing the suitability of sites (para 5.4.5) - automatically rejecting all sites outside settlement development limits as 'not currently developable' conflicts with the points made above. 4. Sites in sustainable locations which are in accordance with the settlement hierarchy but outside settlement development limits should be considered suitable to meet any shortfall. 5. The adopted Core Strategy did not review previous settlement boundaries which are now considerably out of date. 6. Suitability should not differentiate between currently developable and sites with future potential. This should be part of assessing achievability (para 5.6) and result in a continuous trajectory of sites. <p>Assessing achievability</p> <ol style="list-style-type: none"> 7. Reliance on 'evidence from the local property market' (para 5.6.2) is not a robust & comprehensive assessment of viability. 8. The methodology should set out a robust and transparent viability methodology which takes account of site specific characteristics. 9. Where appropriate existing local plan allocations, e.g. Sharpness, and sites with planning permission should be reassessed to identify any changes in circumstances. 10. The appointment of the SALA Panel should be transparent and subject to consultation. 	<p>The SALA methodology has adopted a 'policy on' approach to the consideration of suitability to facilitate the bringing forward of the most sustainable sites for development, in accordance with the overall strategy of the Local Plan and the specified aim of the SALA, to identify sites/ broad locations which are "most suitable and deliverable" for development (para 2.4) .</p> <p>The Council currently has more than a five year housing land supply to meet identified housing need (Housing Land Supply Update at 30 September 2015) and an up to date local plan. In these circumstances it is considered reasonable to assess sites/broad locations not in accordance with local plan policy as 'not currently developable' but recognise future potential for development should circumstances change (para 5.4.5).</p> <p>Settlement boundaries (Adopted Local Plan 2005) were reviewed, in accordance with a published methodology, and amendments proposed to (and renamed, settlement development limits, as part of the emerging Stroud District Local Plan 2015.</p> <p>The principle of the local plan strategy, to effectively manage patterns of growth and focus development within settlement development limits in accordance with a settlement hierarchy, was fully endorsed in the Local Plan Inspector's Report: November 2015 as "effective, fully justified, soundly based and consistent with national policy."</p> <p>Regarding viability, the Council will use up to date property and build cost information in conjunction with updated, independently prepared viability typologies for a range of development types within Stroud District, to generate a broad assessment of the economic viability of sites. The methodology also provides for the open discussion of the economic viability of sites at a SALA panel to include representatives from the development industry (para 5.6.3).</p> <p>The delivery trajectory on allocated sites and sites with planning permission is updated twice annually, as part of the Council's annual Five Year Housing Land Supply Report and six month update, based on information provided by developers, and reflects a realistic picture of likely delivery.</p> <p>In accordance with Government guidance to seek the advice of developers and local agents in assessing the timescale and rate of development, the Council will invite representatives from the local development and property agent sectors, together with neighbouring planning authorities, to form a SALA Panel. Details of when the panel meeting is to be held will be published on the Council's website.</p>	<p>Amend paragraph 8.3 to read:</p> <p>8.3. In order to produce a robust land availability assessment, the Council will convene a SALA Panel, involving neighbouring planning authorities, developers and local property agents, to review whether sites can be considered deliverable, developable or not developable. Details of when the SALA Panel meeting is to be held will be published on the Council's website.</p>
<p>Stroud Town Council</p>	<ol style="list-style-type: none"> 1. The methodology should provide an opportunity for Parish/ Town Councils to be consulted on individual sites before the Assessment is finalised. 	<p>The SALA methodology has been prepared in accordance with national Planning Policy Guidance and represents this Authority's assessment of the sites/ broad locations that are suitable, available and deliverable for a particular use (paras 3.1 - 3.3). All parish councils have been given the opportunity to submit sites to the SALA process and a schedule of sites will be publicised on the Council's website and publicly available once the database of sites has been completed. The final assessment, including individual site assessments together with the potential type/ quantity of development and indicative delivery timescale, will also be published and made available by the Council (Methodology Section 8- Stage 5 Final evidence base). Consultation will take place on sites as part of the review of the Local Plan.</p>	<p>No action proposed</p>