

Appendix 6 Comments on Draft Methodology

Consultation Responses on SHLAA Draft Methodology

April 2008

Closed 2nd May 2008

Name	Organisation	Received by	Summary of Comments	Response
Phil Megson	Lancashire CC	E mail	No Comments	
Rurh Gilbert	Rochdale	E mail	No Comments	
Gina Bourne	HBF	E mail + Letter Attached	Firstly we welcome the fact that the approach is broadly in accordance with the requirements set out in the Annex to PPS3 and the accompanying Practice Guidance. We also welcome the commitment given to on-going engagement with stakeholders throughout the process of preparation of the SHLAA and note that both the Home Builders Federation and individual house builders are included in the list of stakeholders in Appendix 1. Turning to the thorny issue of windfalls, in accordance with PPS3 these should not normally be included in assessments of supply. As the Practice Guidance notes, just because a district has a history of windfall development is not a justification on its own for continuing with such an allowance. So, where the methodology refers to historic annual windfall completions suggesting it is appropriate to include a windfall allowance, this is the wrong test. Past trends is not the "exceptional circumstance" which allows the inclusion of a windfall allowance. The exceptional circumstance, as identified in the practice guidance and PPS3, is robust evidence of genuine local circumstances that prevent sites being identified. The council must provide this evidence through the SHLAA process if it is to justify maintaining any windfall allowance to make up five (and ten) years supply. In other words, councils must explain why they	

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Alison Munday	GOYH	2 E mails 2 nd correcting ref to small rather than large urban exts in Tables 2 and 3	cannot identify what would otherwise, if it remained unidentified, have come forward as windfalls (paragraph 59 of PPS3). This is still not adequately addressed in the methodology. Thank you again for giving the HBF the opportunity to comment. We trust you will take our comments on board and look forward to receiving further information regarding the progress of the assessment. The draft methodology seems to be broadly in line with the guidance issued by CLG in July 2007. However, it is Calderdale's responsibility to ensure that the completed SHLAA is fit for purpose, and meets all the R regulatory requirements. Comments: Stage 1 (Planning the Assessment): In planning the SHLAA you will need to be clear about management and scrutiny arrangements, including who is responsible for what, and who will make the decisions. You will also need to consider how the quality of the project work will be assured (CLG guidance para 19). Tables 2 and 3: Exclusion of large urban extensions and new free standing settlements - you will need to provide justification for exclusion of these areas from the SHLAA (CLG guidance para 21). Stage 3, Sites with the potential for housing: You will need to ensure that you have looked wide enough, e.g. if there is a shortfall in the potential supply from identifiable sites, Calderdale could consider whether there is a need to review Green Belt boundaries. There should not be a reliance on windfall. If you have not already done so, you may wish to look at the PAS guidance "strategic housing land availability assessment and development plan document preparation" (www.pas.gov.uk), which provides some useful guidance.	
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Judith Schofield	CPRE	To Come – notified by email 6/5	I list below the main points we wish to raise bearing in mind that the main methodology proposed seems to be very reasonable: -there is a need for sustainable transport to be included in the survey, any new housing must have access to a sustainable transport system -any new development must have consideration to the adequate provision of, and access for all to, main services such as local schools, shops, medical and community facilities -the impact of congestion on road systems must also be a factor to consider -parking, on and off street is an important consideration -whilst it appreciated that Calderdale is considered to be a rural area, it is essential that there is access to open spaces for recreation for all parts of the community including those with restricted mobility either physical or financial. Development must not fill every small open space and new developments should include open spaces with adequate planting -there is a great deal of unused space on upper floors, often in poor condition and in substantial buildings, much of which is in town centres, the utilisation of this accommodation must be an important part of the survey -present green belts must be conserved but the lack of such designation must not automatically signify availability for development -density, layout and character of housing must respect the inherent heritage and culture of the settlements and surrounding landscape
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