

Strategic Housing Land Availability Assessment

Summary Report on the Methodology and Call for Sites Consultation

December 2010



Introduction

The Draft South Gloucestershire Strategic Housing Land Availability Assessment (Draft SHLAA) was published alongside the Pre-Submission Publication Draft Core Strategy for consultation from June to August 2010.

The Draft SHLAA set out the methodology used in preparing the SHLAA together with a schedule of sites with potential for housing with a summary of the Council's assessment of each site. The sites included those identified by the Council as having potential for housing as well as around 60 sites put forward by developers and landowners. This consultation provided an opportunity to comment on the methodology, the site assessments and to submit new sites.

This report sets out the key issues raised by those commenting on the Draft SHLAA and the Council's response to these issues.

Summary of Responses

In total there were 56 comments received in relation to the Draft SHLAA. In addition there were 49 comments on the Pre-Submission Publication Draft Core Strategy which related to the SHLAA or were proposed new sites for housing. Some of these duplicated comments made on the SHLAA itself but all have been considered in the same way to ensure a consistent approach.

The vast majority of comments were from developers or landowners. Objections were also received from Avon Wildlife Trust and the Shortwood Green Belt Campaign. A petition was received supporting the Core Strategy and the SHLAA conclusion that sites off Morton Way in Thornbury are unsuitable for housing development.

Objections to Methodology and Assessment of Sites within the Draft SHLAA

Various developers objected to the SHLAA methodology and site assessments raising the following issues:

- Object to the approach to the geographical coverage of the SHLAA and the exclusion from assessment of sites not included in the Core Strategy – Strategy for Development or covered by local and national policy restrictions. It was considered that the approach undermines the robustness of the evidence base.
- There should be a peer review of viability through a panel.
- A number of developers provided factual updates on individual site assessments.

Avon Wildlife Trust identified the need to address the ecological issues relating to sites identified as suitable for housing in the SHLAA, in line with South Gloucestershire Local Plan policies.

The Shortwood Green Belt Campaign objected to the SHLAA approach to Shortwood.

Council Response

It is important to appreciate at the outset that the SHLAA is not intended to do the job of the Development Plan Documents (DPDs) in identifying housing land. The Core Strategy has identified locations which are suitable for new housing development, and policies to protect land used for green space or economic development uses, through a process of evidence gathering, sustainability appraisal and consultation. The role of the South Gloucestershire SHLAA is to assess on a consistent basis those sites which are suitable for housing in national and local policy terms to identify their housing potential and whether they are likely to be developed.

Factual amendments have been made to the SHLAA to reflect comments received on individual sites where appropriate.

In relation to Avon Wildlife Trust objections, the Council's ecologist is satisfied that the ecological issues raised on individual sites have already been identified and addressed in line with national and local policies.

In response to objections from the Shortwood Green Belt Campaign, it is not the case that the SHLAA is proposing to reopen the debate on the Shortwood Green Belt in 5 years time with plans for potentially 1,500 houses. As set out in para 1.3 it is not the role of the SHLAA to act as an alternative Core Strategy. It is for the Core Strategy itself to identify land for housing and Shortwood is clearly not identified in the Core Strategy for future development.

A number of sites were put forward by developers in this area as a result of the urban extension proposed in the various versions of the South West Regional Spatial Strategy. However, the Core Strategy does not support this RSS location for development and so the Core Strategy clearly identifies Shortwood as being outside the settlement boundary of the urban area and within the Green Belt and the SHLAA states that these 7 or so sites are not suitable locations for development.

The Core Strategy approach to rural areas is that the Council will work with rural communities over the next five years to identify whether there is a need for a limited amount of additional housing to meet local needs. The approach to rural areas is clearly set out in policy CS34 of the Core Strategy. Thus Shortwood is treated in exactly the same way as all other rural communities in South Gloucestershire. This could involve looking at a rural exceptions site for affordable housing or allocating a site for housing (market and affordable housing) through the Local Development Framework system/ community right to build, subject to new legislation, either way, there would need to be evidence that there is a need, local support and that it was commensurate and sustainable in relation to the existing character of the village.

Minor wording changes have been made to the text of the SHLAA at para 5.19 to further clarify this approach. The version of the SHLAA which will be published with the Submission Core Strategy in December 2010 will only include those sites which contribute to the Core Strategy provision for 21,500 dwellings and so sites outside existing settlement boundaries at Shortwood will not appear. The SHLAA database will continue to hold records for all sites received as a result of continuing consultation but the individual assessment sheets for all sites on the boundaries of villages will be amended to clarify that the approach to rural areas is as set out in Policy CS 34.

New Sites Proposed for Housing

A total of 37 individual sites were proposed as suitable for housing development. Most sites were in the rural areas both within and outside the Green Belt including sites adjoining the boundaries of the urban areas. Sites currently in use as open space or for employment uses were also submitted.

Council Response

The new sites put forward for consideration have been individually assessed. However, only two of these were within the areas identified as in the Core Strategy – Strategy for Development as being suitable for housing and free of other policy restrictions relating to the protection of employment land or green spaces.

Updating the SHLAA

As a result of consultation and the need for factual updates the SHLAA has been updated as follows:

- Various amendments have been made to update the SHLAA to reflect the stage in its development and changes in national policy.
- The text has been clarified in response to objections relating to the coverage of the SHLAA and the approach to rural areas.
- Two sites at Newnham Place Patchway and Whittucks Road/Abbots Road Hanham have been added to the SHLAA as suitable and deliverable for housing.