

## Schedule of Comments Received / Responses HELAA Final

**Q1) Do you agree with the sources of sites listed at paragraph 2.2 of the proposed HELAA methodology?**

**Support: (9):** Mr R Taylor(HELAA001), Mrs R Price(HELAA002),Mr R Porter(HELLA003), Mr M Chipperfield (HELAA004), Mrs J Addison(HELAA 005) Mrs D Galloway, **HIGHWAYS ENGLAND**(HELAA006), Mr R Hobbs. **Ipswich BC (HELAA 010)**, Mr G BloomField **Pigeon Investments LTD** (HELAA025), Miss R Maxwell **CBRE Ltd** (HELLA015)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the sources of sites listed at paragraph 2.2 of the proposed HELAA methodology	Supported noted	Consider Feedback support in the development of the methodology

**Support in Part (4)**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Mr N Gray (HELAA007)		
Include redundant local authority buildings, disused police stations, ex garage for courts (as used by hand car washes). Land acquired by supermarkets & not use or adjacent to existing supermarkets. Disused open car parks. Brown field sites.	It is important that all relevant sources of land are identified in order to obtain a true picture of the available capacity in each district.	Consider including specific reference to Brownfield land and or brownfield register ( future requirement)
Mr M Brook (HELAA008)		
Include sites for one dwelling upwards so as not to exclude appropriate sites in the	Question 2 details the approach to size threshold	No change recommended

countryside		
<b>Mr J Flamming Gladman HELAA016</b>		
Sites with Planning permission or those under construction should be considered outside the HELAA. Previously allocated sites require robust investigation to understand why they have not come forward.	The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a capacity assessment can be made of suitable land to inform Local Plan development. It is reasonable to include those proposals that have been granted permission and existing allocations where the principle that development can occur in such a calculation.	Consider Feedback in the development of the methodology - clarification/ context in para 2.2 around the aims of the HELAA
<b>Mr C Sperrin Persimmon Homes, Anglia (HELAA024)</b>		
Also include previous Strategic Housing Land Availability Assessments (SHLAA) that have been undertaken in each authority to use to identify available land.	It is important that all relevant sources of land are identified in order to obtain a true picture of the available capacity in each district. Inclusion of Historical records is an obvious starting point however there may well be duplication through the categories identified . Previously identified sources including those identified through previous SHLAA should be used to inform the HELAA	Consider Feedback in the development of the methodology - clarification include reference to previous studies as sources of potential sites , amend para 2.2 .

**Objections: (2),**

<b>SUMMARY OF COMMENTS/ISSUES RAISED</b>	<b>RESPONSE</b>	<b>Action / Recommendation</b>
<b>Dr S Randell Development Manager, Renewable Energy Systems Ltd (HELAA009)</b>		
Sites should also be specifically identified as suitable for onshore wind generation and renewable energy.	The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth. It is considered that the identification of sites suitable for on shore wind	Consider Feedback in identifying a suitable approach in the identification of sites suitable for onshore wind generation outside of the HELAA.

	will be through a separate technical process relevant to each local authority and emerging plans	
Mr A Milner(HELLA,011)		
The Broads Authority area should not be included in the HELAA	As a local planning authority in its own right and a member of the Norfolk Strategic Framework It is considered relevant that Broads Authority is included as part of this process	No change recommended

#### Other / General comments (1)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Mr K Walker <b>Hoveton Parish Council</b> (HELAA017)		
Could it be clarified what HELAA's definition of 'redundant public sector land' Could it be clarified how redundancy is measured?	Redundant public sector land is land that is not specifically being utilised for a specific economic use and owned by other authorities other than the local authorities	Consider Feedback in the development of the methodology - clarification - combine bullet 4 & 5 - land in local authority/Broads Authority ownership and other public sector land that can be identified

**Q2) Do you agree with the proposed site size thresholds as set out in paragraph 2.4 - 2.6 of the proposed HELAA methodology?**

**Support (7):** Mr R Taylor(HELAA001), Mrs R Price(HELAA002),Mr R Porter(HELAA003), Mrs J Addison(HELAA 005) Mrs D Galloway, **HIGHWAYS ENGLAND**(HELAA006), Miss R Maxwell CBRE Ltd, (HELAA015),Mr M Booth HELAA008

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the proposed site size thresholds as set out in paragraph 2.4 - 2.6 of the proposed HELAA methodology	Support Noted	Consider Feedback support in the development of the methodology.

**Objections: (6),**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Mr M Chipperfield (004)		
Any size should be considered if it complements the area. Bigger sites are starting to changer Norfolk too much.	National Planning Guidance states that the assessment should consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m <sup>2</sup> of floor space) and above. Where appropriate, plan makers may wish to consider alternative site size thresholds. It is not the purpose this document to assess small sites / single dwelling plots. Never the less It is recognised that in some authorities windfall allowances of small sites have historically contributed and will continue to contribute to the land supply. A windfall allowance is included in this methodology.	No change recommended
Mrs N Gray HELAA 007		

Depends on site & adjacent services.	Noted	No change recommended
<b>Mr R Hobbs HELAA 010 Ipswich BC</b> We feel 0.25 hectares is a large site size threshold for urban areas although we recognise the five dwelling threshold could catch smaller sites. It may be worth considering a threshold of 0.1 hectares in dense urban areas.	A windfall allowance approach is included in this methodology so that a reasonable assumption and proportion of smaller sites can be included in the assessment of land supply and capacity.	No change recommended
<b>Mr C Sperrin Persimmon Homes HELAA 024</b>		
The site size thresholds as per the NPPG of 5 or more dwellings or sites of 0.25ha should be applied across all the districts	It is considered that in setting the more locally specific criteria especially for the more rural areas the HELAA will best reflect local circumstances in each district. This locally specific approach is in line with the approach advocated in the national PPG. Should a LPA not be able to identify sufficient site to meet the identified requirements then a finer grain assessment may be required and the assumptions revisited as detailed in stage 4.	No change recommended
<b>Mr G Bloomfield Pigeon Investment Management HELAA 025</b>		
NPPG thresholds should apply	See response above	See response above
<b>Dr S Randall Development Manager, Renewable Energy Systems Limited</b>		
This relates to housing development and is not considering land suitable for onshore wind which would require much larger scales of available land.	The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth.	No change recommended

**Q3) Do you agree with the criteria being suggested to automatically excluded a site from the suitability testing as set out in paragraph 2.7 of the proposed HELAA methodology?**

**Support: ( 10):** Mr R Taylor(HELAA001), Mrs R Price(HELAA002),Mr R Porter(HELLA003), Mr M Chipperfield (HELAA004) Mrs D Galloway, **HIGHWAYS ENGLAND**(HELAA006),Mr N Gray, HELAA007, Mr M Booth HELAA008,Dr S Randall, Development Manager, Renewable Energy Systems Limited HELAA 009, Dr N Gates, **Historic England** HELAA 017, Mr C Sperrin **Persimmon Homes** HELAA024

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the criteria being suggested to automatically excluded a site from the suitability testing as set out in paragraph 2.7 of the proposed HELAA methodology	Supported noted	Consider Feedback support in the development of the methodology.
Dr N Gates, <b>Historic England</b> HELAA 017		
We welcome the exclusion from further assessment sites that fall within the scheduled area of a scheduled ancient monument	Support Noted	Consider Feedback support in the development of the methodology

**Support in Part (5)**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Mrs J Addison HELAA005		
Desktop does not provide sufficient information in some cases so site visits are a must.	The information required for the criteria is obtainable from a Desktop GIS search and is considered sufficient at this high level stage.	No change recommended
Mr R Hobbs <b>Ipswich BC</b> HELAA 010		

<p>In Ipswich, because of the nature and history of the urban area, scheduled ancient monuments are not necessarily a reason for excluding potential development sites.</p>	<p>Noted, These are irreplaceable historical assets and are protected by law. It is desirable that new development makes a positive contribution to local character and there are no adverse impacts that would significantly and demonstrably outweigh the benefits of development. The national PPG makes it clear that development should be restricted where there are national policies around designated heritage assets. (Para 3-044-20141006) and for the purpose of this capacity assessment such sites should therefore be excluded. Where the suitability of a site could be impacted the assessment criteria in appendix 1 allows for the significant of a heritage asset to be taken into account according to the available evidence. Should a LPA not be able to identify sufficient site to meet the identified requirements then a finer grain assessment may be required and the assumptions revisited as detailed in stage 4.</p>	<p>Consider Feedback support in the development of the methodology. – clarification</p> <p>Add additional clarifying text to Para 2.7. remove text <i>site as will be excluded from further assessment where they are ....</i>and replace with <i>sites will be removed from any further <u>capacity</u> assessment where they are:</i></p> <p><i>For clarity Amend para 2.21 sites identified as less suitable (red) at this stage will not be included in any <b>capacity</b> assessment as part of the HELAA <b>but may be included in any site allocation assessment in emerging Local Plans.</b></i></p>
<p>Ms A Fowler <b>Bidwells</b> HELAA013/014</p>		
<p>Whilst we agree with the criteria used, potential sites located within FRA 2 should be identified in the green category and not the amber category as proposed. As stated in the government guidance, although 'buildings used for dwelling houses' are classified as more vulnerable uses, it is considered that these more vulnerable</p>	<p>Support for the criteria noted. The issue of the specific classification is covered in Q8</p>	<p>Consider Feedback support in the development of the methodology</p>

<p>uses are considered appropriate in FRA 2....residential development can be located within FRA 2, the HELAA methodology should reflect this accordingly.</p>		
<p><b>Ms K Walker Hoveton PC HELAA18</b></p>		
<p>The 5<sup>th</sup> Bullet - detailing exclusion criteria of Locally designated Green Spaces, Designated Villages Greens and Common land is too narrow. Based on a review of the Aylesbury 's HELAA the following should be added as exclusions: High Quality Agricultural land, Scheduled Ancient Monuments and Listed Buildings and their settings. Historic Landscape and their settings.</p>	<p>Disagree – the national PPG para 3 – 044-20141006 indicates the exclusion criteria in line with the expectations of the NPPF when taken as a whole. Appendix 1 of the HELAA methodology outlines the Assessment Criteria, which demonstrates the approach to be taken in the assessment of landscape sensitivity and open space. The HELAA offers an initial sift of sites seeking to identify those most suitable and achievable. A full assessment including Sustainability Assessment will be undertaken through the site allocation process of a Local Plan where policy considerations such as agricultural land classification can be taken into account. Those sites with Scheduled ancient monuments are excluded as detailed in para 2.7 while the approach to the assessment around sensitivity of landscape and historic buildings is detailed in appendix 1.</p>	<p>No change recommended</p>
<p><b>MS R Maxwell CBRE LTD HELAA 015</b></p>		
<p>No additional criteria, but locally designated green spaces should be defined - would this need to be a designation shown on the relevant Local Planning</p>	<p>LGS's are defined in the national PPG and can be brought forward as part of the Local Plan and or any Neighbourhood Plan. Local Green Space designation should not be used in a way that undermines the aim of plan making as set</p>	<p>No clarification necessary</p>



Authorities proposals map?	out in paragraph 77 of the NPPF.	
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**Objections: (1),**

SUMMARY OF COMMENTS/ISSUES RAISED	Response	Action / Recommendation
<b>Mr G Bloomfield Pigeon Investment Management HELAA 025</b>		
<p>It is not considered that certain criteria should automatically exclude sites at the desk-top review stage but that sites should be considered on their individual merits.</p> <p>Eg SPAs and their respective buffers should not be used to exclude sites and there have been appeal decisions where development has been accepted.</p> <p>Great clarity also needs to be provided in terms of the methodology's approach to areas within an SPA - are these sites within the SPA only, or does this also include any accompanying SPA buffer?</p>	<p>The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a capacity assessment can be made of suitable land to inform Local Plan development. The assessment is an important evidence source to inform plan making, but does not in itself determine whether a site should be allocated for development.</p> <p>European legislation restricts development in SPAs and identified buffer zones. The national PPG makes it clear that development should be restricted where there are national policies that restrict development. (Para 3-044-20141006) and that such sites should be excluded from the HELAA process.</p> <p>It should be noted that the HELAA process is intended to provide an initial capacity assessment of sites only. It is recognised that in some cases local policy approaches may allow appropriate development subject to policy requirements and suitable agreed mitigation measures. Any such assessment should be</p>	<p>Consider Feedback in the development of the methodology.- add clarification as detailed above to para 2.7</p>

	carried out during a more detailed site assessment as part of a local Plan review.	
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**Q4) Do you agree with the proposed method to calculate development potential for housing schemes as set out in paragraphs 2.12 to 2.15?**

**Support: (13 ):** Mr R Taylor HELAA001, Mrs P Price HELAA002, Mr R Porter HELAA003, Mr M Chipperfield HELAA004, Mrs J Addison, HELAA005, Mrs D Galloway **Highways England** HELAA006, Mr N GRAY HELAA 007, Mr M BOOTH HELAA 008, DR S Randell, **Renewable Energy Systems LTd**, HELAA 009 Mr R Hobbs **Ipswich BC** HELAA010, Miss R Maxwell **CBRE ltd** HELAA015 Dr N Gates **Historic England** HELAA 017, Ms L Waters **NCC** HELAA 023

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the proposed method to calculate development potential for housing schemes as set out in paragraphs 2.12 to 2.15?	Support noted	Consider Feedback support in the development of the methodology
Dr N Gates Natural England HELAA 017		
Para 2.13 welcome the reference exclusion from assessment sites that fall within the scheduled area of a scheduled ancient monument.	Support noted re exclusion of capacity assessment for sites that fall within the scheduled area of a scheduled ancient monument as detailed in para 2.7 (para 2.13 and footnote 5 make reference to a variation in density calculations respecting the planning history of a site and objective evidence only).	Consider Feedback support in the development of the methodology
Para 2.14 – recommend wording is amended to include <i>..., and impact on the setting of heritage assets.</i>	In terms of a site assessment the significant of the heritage asset and or the setting should be taken into account according to the available evidence.	Consider Feedback support in the development of the methodology - clarification around para 2.14 1st sentence and adding <i>... into account including the surrounding residential density and character, including impact on the <u>setting of heritage assets</u></i>

<b>Ms L Waters NCC HELAA 023</b>		
The county council welcomes paragraph 2.15 which identifies the need for infrastructure such primary school provision on larger sites.	Support noted	Consider Feedback support in the development of the methodology

### Support in Part (3)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<b>Ms A Fowler Bidwells HELAA 013/014</b>		
Although this method of calculation is considered acceptable overall, a more consistent approach needs to be adopted to define specific densities with regards to similar types of sites across similar categories of settlements and parts of settlements. Similar density levels should be set for similar settlement types/locations irrelevant of which district a site is located within.eg density assumption should be no different on the edge of a principle settlement in Breckland and that of North Norfolk.	Support noted  The national PPG states that the estimation of development potential should be guided by the existing or emerging plan policy including locally determined policies on density ( para 3-017-20140306). It is considered that in setting the more locally specific criteria this way the HELAA will best reflect local circumstances in each district. Flexibility is then built into the approach as detailed in para 2.13- 2.15	No change recommended
Housing density needs to reflect that different densities	The methodology builds in flexibility and allows for the individual characteristics of a site to be	No change recommended

<p>will be appropriate in different parts of settlements, for instance, a high density figure such as that which might be appropriate on a site in a town centre may not be appropriate for sites at the edge of towns. Suggest that edge of town developments should be at a slightly lower-density than town-centre developments to reflect local character. This would also reflect the need to ensure the type of houses provided are appropriate to the location and the local housing market need.</p>	<p>taken into account in setting the appropriate density.</p>	
<p>Should the densities in South Norfolk and Broadland be more refined to take account of those parts of the district that abut the Norwich City administration urban area</p>	<p>No 25dph is the default assumption that South Norfolk and Braodland DC use in plan making.</p>	<p>No change</p>
<p>Mr A Peate <b>Indigo Planning</b> Ltd HELAA 019</p>		
<p>We agree that the starting point for calculating housing numbers should be based on the existing policies set out in each authority's adopted local plan, <b>but only where plan policies are up to date and consistent with the NPPF.</b></p>	<p>Support noted</p> <p>Noted - the HELAA is a theoretical capacity assessment of land capacity only -they are intended to be indicative only.</p>	<p>No change recommended</p>

There are various approaches to calculating density and further clarification is required as to how densities would be calculated in practice against adopted policies. For example, what approach is proposed to defining net and gross developable areas?	The methodology builds in flexibility and allows for the individual characteristics of a site to be taken into account in setting the appropriate density	
<b>Ms J Moor Lawson Planning HELAA 020</b>		
Agree it is appropriate at this assessment stage to calculate development potential upon existing policy approach. HOWEVER it should be made clear they are indicative and only a guideline	Support noted	Consider Feedback support in the development of the methodology – clarification insert <i>indicative</i> into para 2.12

**Objections: (3),**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<b>Mr J Flemming, Gladman Development HELAA 016</b>		
Not all of the authorities in the HMA have a policy relating to housing density standards that have been confirmed as up to date. A standard density across the HMA should be applied using a figure of 30 dwellings per hectare. This	The Housing Market Area covers both rural and urban districts each with their distinct characterises. In calculating the potential capacity of sites it is considered important to reflect the local planning authorities approach for consistency. This best reflects the typical development that comes forward.  The methodology allows for flexibility to reflect	No change recommended

should however allow for a degree of flexibility that can be achieved through a slight adjustment to density standards to reflect the local character of a surrounding area.	surrounding density & character as well as reflect masterplans and the development potential of large sites to provide for open space and other infrastructure requirements.	
<b>Mr C Sperrin Persimmon Homes HELAA024</b>		
Broadland and South Norfolk District Council refer to 25 dph, this should state, minimum of 25 dph.	The figures quoted reflect the current policy approach for the purpose of a capacity assessment. For this purpose they are intended to be indicative and act as a starting point to respond to local characteristics.	No Change recommended
<b>Mr G Bloomfield Pigeon Investment Ltd HELAA025</b>		
The suggested approach does not appear to be linked to a particular policy approach or if they have been through examination . Suggest figures should be design led rather than a blanked figure and informed by landowner developer rather than LPA	The figures quoted reflect the current policy approach for the purpose of a capacity assessment. For this purpose they are intended to be indicative and act as a starting point to respond to local characteristics.	No Change recommended

**Q5) Do you agree with the proposed method to calculate development potential for employment land as set out in paragraph 2.16 - 2.17?**

**Support: ( 12):** Mr R Taylor HELAA001, Mrs P Price HELAA002, Mr R Porter HELAA003, Mr M Chipperfield HELAA004, Mrs J Addison, HELAA005, Mrs D Galloway **Highways England** HELAA006, Mr N GRAY HELAA 007, Mr M BOOTH HELAA 008, Mr R Hobbs Ipswich BC HELAA 010, Ms A Fowler **Bidwells** HELAA 014, Ms R Maxwell CPRE Ltd HELAA 015, Mr C Spirrin Persimmon Homes HELAA 024

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the proposed method to calculate development potential for employment land as set out in paragraph 2.16 - 2.17?	Supported noted	Consider Feedback support in the development of the methodology.

**Objections: (2),**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<b>Dr S Randall Renewable Energy Systems LTD</b>		
We are concerned that this assessment will not consider the need for allocating areas suitable for onshore wind.	The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth.	No Change recommended
<b>Mr G Bloomfield Pigeon Investment Ltd HELAA025</b>		
There is no particular objection but the response reflects that it is difficult to agree with the method to calculate development potential for employment land when the consultation document does	Noted - The requirements for employment land will be determined through the Local Plan Process and appropriate evidence base. The suitability for a site to accommodate employment will be informed by this assessment.	No Change recommended

not really set out a method at this stage. It only sets out a range of potential sources of information, acknowledging (para 2.16) that the approach is still being determined and will be refined.		
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**Other / General comments (2)**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<b>Ms A Fowler Bidwells HELAA 013</b>		
The methodology will need to take into account forthcoming changes to the NPPF, which will change the development potential of existing and allocated employment land, with a greater emphasis on their potential use for housing.	Sites will be assessed according to the potential uses put forward and or identified. The requirements will be determined through the Local Plan Process.	No Change recommended
<b>Mr J Flemming, Gladman Development HELAA 016</b>		
The Councils' are not intending to undertake a single HMA employment land needs assessment. The Councils' should ensure that a variety of employment projections are used to determine the economic and demographic trends for each authority. Economic needs evidence	Noted - The requirements for employment land will be determined through the Local Plan Process.	No Change recommended



should not be limited to the East of England Forecasting Model alone		
Ms K Walker Hoveton PC HELAA 018		
Section is loose and has the potential for shifting goal posts for employment land targets . Section is not in compliance with the NPPF para 160 which states that LPA should have a clear understanding of business needs	The site assessment methodology does not set employment targets. The requirements will be determined through the Local Plan Process. Sites will still undergo the relevant assessment by applying the criteria in Appendix 1.	No Change recommended

**Q6) Do you agree with the proposed method to calculate development potential for town centre uses as set out in paragraph 2.18?**

**Support: (12 ):** Mr R Taylor HELAA001, Mrs P Price HELAA002, Mr R Porter HELAA003, Mr M Chipperfield HELAA004, Mrs J Addison, HELAA005, Mrs D Galloway **Highways England** HELAA006, Mr N GRAY HELAA 007, Mr M BOOTH HELAA 008, Dr S Randall, **Renewable Energy Systems Limited** HELAA010, Mr R Hobbs, **Ipswich BC** HELAA 010. Ms A Fowler **Bidwells** HELAA014, Mr C Sperrin Persimmon Homes HELAA 024,

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the proposed method to calculate development potential for town centre uses as set out in paragraph 2.18	Supported noted	Consider Feedback support in the development of the methodology

**Support in Part (2)**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Ms A Fowler <b>Bidwells</b> HELAA013		
The methodology will need to take into account forthcoming changes to the NPPF, which will change the development potential of existing and allocated employment land, with a greater emphasis on their potential use for housing	Sites will be assessed according to the potential uses put forward and or identified. The requirements will be determined through the Local Plan Process.	No Change recommended
Dr N Gates <b>Historic England</b> HELAA 017		
Refer to the 2010 research on The impact of Historic Regeneration incl Aylsham. Rpt concluded that by investing in	Noted. The development potential of sites will be assessed on a site by site basis and in line with specific uses identified / potential uses through emerging Local Plans, evidence and	No Change recommended

the historic environment places can increase their economic resilience by attracting visitors, shoppers and businesses all attracted by the historic environment	town centre strategies. It will be important to reflect on the benefits of Heritage assets in any emerging Local Plan Town Centre strategies.	
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**Objections: (1),**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Mr G Bloomfield <b>Pigeon Investment Ltd</b> HELAA025		
Like the employment activities (Q5), it is acknowledged at para 2.18 that the local approach to evidence gathering is still to be determined, and sets out a range of potential sources of information. Therefore the approach cannot be supported at this stage when a full understanding has not been provided.	Noted - The requirements for town centres will be determined through the Local Plan Process and will be informed by appropriate evidence and emerging town centre strategies. Sites will still undergo the relevant assessment criteria in Appendix 1.	No Change recommended

**Other / General comments (1)**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Ms K Walker Hoveton PC HELAA 018		
Section is loose and has the potential for shifting goal posts	The site assessment methodology does not set employment targets or town centre strategies.	No Change recommended

for employment land targets. Section is not in compliance with the NPPF para 160 which states that LPA should have a clear understanding of business needs	The requirements and strategic approaches will be will be determined through the Local Plan Process.	
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**Q7) Do you agree with the list of ‘constraints’ and ‘impacts’ at paragraph 2.19 of the proposed HELAA methodology?**

**Support: (12 ):** Mr R Taylor HELAA001, Mrs P Price HELAA002, Mr R Porter HELAA003, Mr M Chipperfield HELAA004, Mrs J Addison, HELAA005, Mrs D Galloway **Highways England** HELAA006, Mr N GRAY HELAA 007, Mr M BOOTH HELAA 008, Mr R Hobbs **Ipswich BC** HELAA 010, Ms R Maxwell **CBRE** Ltd HELAA 015 Dr N Gates **Historic England** HELAA 017, Mr C Sperrin **Persimmon Homes** HELAA 024

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the list of ‘constraints’ and ‘impacts’ at paragraph 2.19 of the proposed HELAA methodology	Supported noted	Consider Feedback support in the development of the methodology.
Dr N Gates <b>Historic England</b> HELAA 017		
We welcome the identification of landscape, townscape and historic environment as considerations as to a site’s suitability	Supported noted	Consider Feedback support in the development of the methodology.

**Support in Part (4)**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Ms S Bull <b>Anglian Water</b> HELAA 012		
Anglian Water are supportive of the inclusion of Utilities capacity and <b>Utilities Infrastructure</b> . For clarity we would suggest under the Utilities Infrastructure section reference is made to water / drainage infrastructure: <i>‘Some sites may have strategic utilities infrastructure passing across it (either under or over ground), for example, power lines or gas pipelines, water supply pipes , sewers or pumping stations’</i>	Support welcomed. This is referenced in Appendix 1 Utilities Infrastructure	Consider Feedback support in the development of the methodology - Clarification Add text in the Utilities Infrastructure section Appendix 1 - including proximity to over ground and underground infrastructure.
<b>Compatibility with Neighbouring</b> /adjoining uses, however,	Noted. The proximity of a potential	Consider Feedback support in the development

<p>there is no specific reference in the document to proximity to Water Recycling Centres (formally referred to as Sewage or Wastewater Treatment Works). In order to give our water recycling centres room to grow and enable us to operate efficiently in future, we need to maintain a suitable distance between them and the communities they serve. We use a risk assessment process to consider any proposed development within 400 metres of a water recycling centre or within 15 metres of a used water pumping station. Our policy and methodology for assessing a suitable distance can be viewed at:  <a href="http://www.anglianwater.co.uk/developers/encroachment.aspx">http://www.anglianwater.co.uk/developers/encroachment.aspx</a>.</p>	<p>site to Water Recycling Centres could have an impact on amenity.</p>	<p>of the methodology - Clarification - add further clarifying text in Appendix 1- Compatibility with Neighbouring / adjoining uses</p>
<p>Recommend reference to the need for early consultation with Anglian Water to determine the suitability of the location of the site in respect of odour risk is included in the document.</p>	<p>Noted. The approach around consultation with utility providers is included in Appendix A detailing the Suitability criteria around Utilities.</p>	<p>Consider Feedback support in the development of the methodology - Clarification Add text re early consultation with Anglian Water in para 2.25 and utility providers.</p>
<p>Ms A Fowler <b>Bidwells</b> HELAA 013/014</p>		
<p>We have reviewed the lists and have some concerns. For instance, how will the Councils determine whether an impact or constraint is unsurmountable? The parameters for assessing this need to be clear. Who will determine market attractiveness? Will expert advice be sought</p>	<p>The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The criterion around market attractiveness is detailed in Appendix 1. In terms of constraints the assessment should consider what action would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Landowners and developers have the opportunity to input through the call</p>	<p>No Change recommended</p>

	for sites, continued dialogue and Local Plan process.	
<b>Mr A Peate Indigo Planning HELAA 019</b>		
Broadly agree with the identified list of constraints/impacts. The bar for achieving 'amber' should be lower on some of the more subjective constraints/impacts, to avoid the early discounting of certain sites.	The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used.	No Change recommended
<b>Ms J Moor Lawson Planning HELAA 020</b>		
Within <b>Impacts Transport and roads</b> should also refer to sustainable transport methods ( public transport/ walking/ cycling)	It is important that all means of transport and accessibility are considered, however this is considered as part of a more detailed site specific assessment that should be part of any local plan assessment	No Change recommended

**Objections: (2),**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<b>Dr S Randall Renewable Energy Systems Limited HELAA 009</b>		
Not all of these constraints are relevant for onshore wind and additional constraints such as wind speed are more important. It is essential that planning officers are able to undertake an assessment with sufficient information relevant for the potential development they are assessing e.g The	The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth. The consideration of a separate evidence base for the identification of on shore wind sites is for the individual planning authorities to pursue through the local plan process and or the Norfolk Strategic Framework.	No change recommended.

walking distance to local services is not relevant for onshore wind development.		
Compatibility with neighbouring uses is very vague and should be removed or clarified further.	Noted - see response above HELAA 012	Consider Feedback support in the development of the methodology Clarification - add further clarifying text in Appendix 1- Compatibility with Neighbouring / adjoining uses
<b>Mr G Bloomfield Pigeon Investment Ltd HELAA025</b>		
It is recognised that consideration of 'market attractiveness' will be applied as one of many measures of deliverability. However, LPAs will need to ensure that they have access to sufficient expertise, finances and resources to make appropriate judgments on market attractiveness. In particular this can be quite fluid and change quickly subject to a range of factors and, therefore, it needs to be ensured that there is the ability for LPAs to monitor and respond to such changes and the mechanism for the HELAA to be updated accordingly.	The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The criteria around market attractiveness is detailed in Appendix 1 .	No change recommended.

**Other / General comments (2)**

<b>SUMMARY OF COMMENTS/ISSUES RAISED</b>	<b>RESPONSE</b>	<b>Action / Recommendation</b>
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<b>Mr J Flemming Gladman Developments</b>		
<p>It is noted that any impacts and constraints which result in a red classification will be discounted from the HELAA as these issues are considered to be insurmountable. The Councils' should ensure that they fully consider all issues and whether any potential impacts can be successfully mitigated. This should be achieved in collaboration with a developer and/or landowner prior to making any formal decision to discount a site from the assessment. The Councils' should ensure that these sites are revisited on an annual basis to determine whether the issues that have been previously identified are still applicable or whether new evidence is available that demonstrates any constraints can be successfully mitigated</p>	<p>Noted - The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used.</p> <p>The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a) a capacity assessment can be made of suitable land to inform Local Plan development and b) inform more detailed site assessment in any Local Plan process.</p> <p>The approach put forward is one that is recommended through the national PPG and one that ensures that all land is assessed together as part of plan preparation to identify which sites or broad locations are the most suitable and deliverable for a particular use.</p>	<p>No change recommended.</p>
<b>Ms L Waters NCC HELAA 023</b>		
<p>If a site is deemed broadly sustainable but does not meet one of the sustainability criteria then it shouldn't be ruled out. Mitigation could be identified through further analysis of</p>	<p>The approach put forward is one of flexibility and is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. The identification of Amber and green sites allows a degree of flexibility and planning</p>	<p>Consider Feedback support in the development of the methodology - Clarifications Add clarity in text around the approach in section 2.19 – 2.34. Add para 2.21 “red “impacts and constraints rule out the suitability of a site <i>at this stage in any calculation of suitable land capacity.</i> Add para 2.33 in order to be</p>

<p>technical constraints such as flood risk.</p>	<p>judgement to be used around potential impacts and potential for mitigation. More detailed assessment of sites will be undertaken through the local Plan process.</p>	<p>included in the <i>HELAA and in any calculation of suitable land capacity. .... of stage 2.</i></p>
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**Q8) Referring to Appendix A of the proposed HELAA methodology, please add below any comments you may have on the ‘red’, ‘amber’ and ‘green’ criteria relating to each of the identified constraints/impacts?**

**General Comments (17)**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p><b>Mr R Taylor HELAA 001</b> Please build more bungalows for people with disabilities and downsizing opportunities.</p>	<p>The type and tenure of dwellings will be addressed through any emerging policies of the Local Plans and based on national policy requirements and evidence.</p>	<p>No change recommended.</p>
<p><b>Ms J Addison HELAA 005</b> Give proper consideration to how some obstacles can be overcome.</p>	<p>The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used.</p>	<p>No change recommended.</p>
<p><b>Mrs D Galloway Highways England HELAA 006</b> I am content with the proposals on the basis that Highways England will be consulted for their views and concerns and to input into all development.</p>	<p>Noted</p>	<p>No change recommended.</p>
<p><b>Dr S Randall Renewable Energy Systems Limited HELAA 009</b> Not all of these constraints are relevant for onshore wind and additional constraints such as wind speed are more important. It is essential that planning officers are able to undertake an assessment with sufficient information relevant for the potential development they are assessing e.g it would be difficult for an officer to assess market opportunities for many industries such onshore wind</p>	<p>The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth. The consideration of a separate evidence base for the identification of on shore wind sites is for the individual planning authorities to pursue through the local plan process and or the Norfolk Strategic Framework.</p>	<p>No change recommended</p>
<p>Utilities assessment should be undertaken by a developer who will have greater insight of possible mitigation rather than a</p>	<p>The approach put forward is intended to be a broad high level assessment to</p>	<p>No change recommended</p>

<p>planning officer</p>	<p>inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The methodology also identifies the requirement to liaise with appropriate infrastructure providers.</p>	
<p><b>Ms L Waters NCC HELAA 023</b> If a site is deemed broadly sustainable but does not meet one of the sustainability criteria then it shouldn't be ruled out. Mitigation could be identified through further analysis of technical constraints such as flood risk.</p>	<p>The approach put forward is one of flexibility and is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. The identification of Amber sites allows a degree of flexibility and planning judgement to be used around potential impacts and mitigation. More detailed assessment of sites will be undertaken through the local Plan process and site assessments which the HELAA site categories will inform.</p>	<p>No change recommended</p>
<p><b>Mr G BloomField Pigeon Investment Management HELAA 025</b> the R/A/G ratings should be guidance only and not prescriptive for a site's inclusion.</p>	<p>The approach put forward is one of flexibility and is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a) a capacity assessment can be made of suitable land to inform Local Plan development and b) inform more detailed site assessment in any Local Plan process.</p>	<p>Consider Feedback support in the development of the methodology - Clarifications as detailed above in question 7.</p>

Suitable provision should be made for landowners/developers to review and respond to the LPA on the site assessment made, and demonstrate the suitability and sustainability of their site.	As detailed in para 3.2 - All sites in each LPA area will be consulted on as part of the consultation on the respective emerging Local Plans	No change recommended
Concern raised around whether the HELAA stage is too premature to make proper judgements and whether the LPA have access to sufficient expertise and resources to make such judgements. This includes judgements on market conditions, viability for infrastructure and contamination	The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a) a capacity assessment can be made of suitable land to inform Local Plan development and b) inform more detailed site assessment in any Local Plan process. The approach put forward is one that is recommended through the national PPG. All sites in each LPA area will be consulted on as part of the consultation on the respective emerging Local Plans	No change recommended

## Criteria comments

### Access

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<b>Mr R Hobbs Ipswich BC HELAA010</b> Access Whilst accessibility is important it is difficult to rule out the suitability of a site due to poor access – otherwise in rural areas you will end up ruling out most sites. You could also end up ruling out large sites which have the potential to provide new services.	The criteria is one around can a suitable access be provided. The opinion of Highways will be sought as well as planning judgement with regard constraints	No change recommended
<b>Ms A Fowler Bidwells HELAA 013 (014)</b> Access to Site - We believe that the Amber category should say -	Planning judgement call based on local knowledge and evidence of third party	No change recommended

"...these can be overcome through development or the purchase of third party land from a willing landowner".	availability will need to be applied	
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### Accessibility to local services and facilities

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p><b>Ms A Fowler Bidwells HELAA 013 (014)</b> We believe that the Red category should say - "No core services (or no ability to provide/fund new core services) within 800m/10-minute walking distance of the site". This should also be reflected in the Amber and Green categories.</p>	Noted - it is considered that large sites have the potential to deliver on site facilities	Consider Feedback in the development of the methodology - Clarification - amend red category to reflect suggested change.
<p><b>MS R Maxwell CBRE Ltd HELAA 015</b> We consider that the 800m zone should be extended to 1,000m - there are areas of land suitable for allocation on the edge of sustainable settlements which might only be within 800m of 1-3 core services. However, they are within 1,000m of many more core services.</p> <p>We consider that this distance should be increased for land adjacent to settlements which are identified as focused areas for growth. In addition, we consider it should be made clear that planned facilities (e.g. in Site Allocations) can be taken into consideration.</p>	Noted - In assessing sites against this measure, accessibility to a range of services is expected and planning judgement is called for depending on local circumstances.	Consider Feedback in the development of the methodology - Clarification - amend text to clarify approach 1 or more services in line with CIHT advice below .
<p><b>MR J Flaming Gladman Developments LTD HELAA 016</b> Research indicates that acceptable walking distances will depend on a number of factors such as the surrounding area, local facilities, the type of amenity offered etc. The Chartered Institution of Highways and Transportation (CIHT) document entitled 'Providing for Journeys on Foot (2000)' suggests that accessibility to services can be extended to a preferred maximum distance of 1,200m. The methodology should instead refer to the preferred maximum walking distances contained in</p>	Noted - The Institute of Highways and Transportation report recommends a distance of 800m in town centres and 1,200 elsewhere. Within the HMA and across the districts there are many different townscapes and streetscapes across urban and rural areas. The report also recommends that 2,000m is an acceptable walking distance for	Consider Feedback in the development of the methodology - Clarification add 800m in urban areas and up to 1,200m elsewhere. 2,000 for employment and school as advised by the CIHT.

national guidance.	school access and employment	
<p><b>Ms J Moor Lawson Planning Partnership HELAA 020</b>  Accessibility to local services . 800m Criteria is overly restrictive and does not take account of Government guidance towards accessibility and transport in rural areas. Recommend that account should be taken to include accessibility by public transport and cycling infrastructure in addition to walking distances – this modification will accord with the NPPF para 29 to recognise variations in rural and urban areas .  There is a requirement to distinguish between the characteristics and assessment criteria for both urban and rural areas to enable suitable housing development to be provided in each location. Overly restrictive criteria could prevent suitable sustainable sites within rural areas from being positively considered for development by NNDC. NPPF Para 47, 159, 54,55 and PPG Ref ID 50-001-20140306 put forward as supportive.  Sites in rural areas <i>should be considered where it will enhance or maintain the viability of rural communities</i> NPPF para 54</p>	Noted Please see response above	Noted Please see response above
<p><b>Ms L Waters NCC HELAA 023</b>  <b>Access</b> to local services and particularly health services ‘by means other than car’. This is in keeping with theme 2 (vibrant neighbourhoods) and theme 3 (active lifestyles) of the draft health impact assessment checklist.</p>	Support noted	Consider Feedback in the development of the methodology
<p><b>Mr C Spirrin Persimmon Homes HELAA 024</b>  Accessibility Concern re the discounting of sites more than 800 m from core services. Whilst it is acknowledged that this is a guide for assessment purposes, it should allow for /encourage the assessor to apply a certain degree of Judgement.  Suggest approach red - If there are 2 or more core services within a 1,000m/ 10-15 minute walking distance or 3 or more core services within 1,200m/ 15 minute walking distance of the site, it can be categorised as Amber)</p>	Noted Please see response above	Noted - Please see response above

Suggested approach Amber - (If there are 5 or more core services within a 1,200m/ 15 minute walking distance of the site, it can be categorised as Green)		
<b>Mr G BloomField Pigeon Investment Management HELAA 025</b> - it should be note that larger site have the ability to provide such services.	Noted - it is considered that large sites have the potential to deliver on site facilities. Please see response above	Noted - Please see response above

### Utilities Capacity

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<b>Ms S Bull Anglian Water HELAA 012</b> We would recommend reference to the need for early consultation with Anglian Water to determine the suitability of the location of the site in respect of odour risk is included in the	Noted. Consultation with Utility providers is included in Appendix A detailing the Suitability criteria around Utilities.	Add text re early consultation with Anglian Water in para 2.25 and utility providers.
<b>Ms A Fowler Bidwells HELAA 013 (014)</b> The lack of utility capacity should not automatically rule out the development of an entire site. We accept it may limit potential numbers on a site,	The criterion is not seeking to rule out a site if no infrastructure is present but identify if there are limiting factors which would prevent delivery	No change recommended

### Utilities Infrastructure

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<b>Ms A Fowler Bidwells HELAA 013 (014)</b> If utilities infrastructure on a site is limited, a potential site for development should not be ruled out in its entirety because of this. Additionally, it is accepted that it may restrict potential number of units (or uses) that could be located on a site	The criterion is not seeking to rule out a site if no infrastructure is present but identify if there is any limiting factors around strategic infrastructure such as pipelines under a site. In assessing sites against this measure, planning judgement is called for depending on local circumstances	No change recommended



<p><b>Ms L Waters NCC HELAA 023</b>  Utilities Infrastructure Some of the categories need some stronger direction. For example, in the section 'utilities infrastructure', there is the statement: Whilst this does not provide an absolute constraint to development, it may limit the development potential of the site or involve additional costs which may affect the viability of the site.' This wording could be included in the subsequent statement relating to 'Flood Risk'.</p>	<p>Noted</p>	<p>Clarification .Add suggested clarification to Flood Risk section</p>
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### Flood Risk

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p><b>Ms A Fowler Bidwells HELAA 013 (014)</b>  Potential sites located within FRA 2 should be identified in the Green category and not the Amber category as proposed. As stated in the government guidance, although 'buildings used for dwelling houses' are classified as more vulnerable uses, it is considered that these more vulnerable uses are considered appropriate in FRA 2. The relevant parts of this guidance are highlighted and enclosed within this letter accordingly. Therefore, on this basis, residential development can be located within FRA 2, the HELAA methodology should reflect this accordingly.</p>	<p>Noted - all development in Zone 2 should be accompanied by a flood risk assessment. At this high level stage it is considered appropriate to remain cautious and mark the site as amber.</p>	<p>No change recommended</p>

### Coastal Change

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p><b>Ms A Fowler Bidwells (HELAA014 only)</b> - We do not agree that</p>	<p>The NNDC Core Strategy EN11 refers</p>	<p>Consider feedback in the development of the</p>

<p>the Coastal Change Management Area/Coastal Flood Hazard Zones require a 30m buffer zone. Development up to the edge of the zones should be considered suitable. If there is a danger that development within 30 metres of the zone may be affected, then the zones are incorrectly drawn.</p>	<p>to Coastal Erosion Constraint Area where no development will be permitted. There is no requirement for further assessment should a site fall into this area. It is appropriate that sites that fall into a Coastal Erosion Constraint area should be screened out at an early stage.</p>	<p>methodology - Clarification recommended that the Coastal Change criterion is amended to show adjacent and removed from any management area in the amber and green categories. Sites that are subject to coastal erosion and within the Coastal management Area should be excluded from further assessment.</p> <p>Sites that are identified as at risk from coastal erosion should be added to the list of exclusions as detailed in para 2.7.</p>
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#### Market Attractiveness

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p><b>Ms A Fowler Bidwells HELAA 013 (014) Market Attractiveness –</b> We are concerned about how Councils will judge Market attractiveness. We suggest expert advice should be sought, especially as the market is often fickle and subject to change</p>	<p>The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The criterion around market attractiveness is detailed in Appendix 1.</p>	<p>No change recommended</p>

#### Landscape, Strategic gaps and Agricultural Land

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p><b>Ms A Fowler Bidwells HELAA 013 (014)</b> The protection of local designations appears to place greater emphasis than what is expected by National Planning Policy</p>	<p>Noted. The potential impacts on landscape are an important consideration. Assessment should be</p>	<p>Consider Feedback in the development of the methodology.</p>

<p>(NPPF). The definition of 'other landscape' needs to be better explained and defined. Currently, it is too open ended and is ambiguous. (HELAA 013 only) - Consideration of a development scheme should be balanced between the deliverability of housing supply within a District and the protection of landscape features.</p>	<p>in line with the requirements of the NPPF.</p>	<p>Clarification – update text removing <i>other landscapes</i> in the red criteria and update amber criteria accordingly. Remove reference to review of agricultural classifications</p>
<p><b>MR J Flaming Gladman Developments LTD HELAA 016</b> Reference to NPPF para 116 has been taken out of context as this is made in context to those designations identified in para 115 only. It is not appropriate to discount sites purely because they are in a locally designated policy area such as strategic Gap or Landscape character area. Such site is seen as relevant to the supply of housing ref Suffolk coastal DC v Richborough &amp; Hopkins homes V Cheshire East. As such sites should not be discounted from the HELAA simply because they are located within any local designation.</p>	<p>The region has a number of nationally and locally specific landscapes. If a local planning authority cannot identify sufficient capacity to meet its own OAN through this methodology, then in the first instance consideration should be given to the need to revisit the assessment undertaking a finer grained assessment based on a review of the assumptions and relevant guidance. If, following this there is still insufficient sites then it will be necessary to investigate how this shortfall can be planned for. This process is specified in para 2.43.</p>	<p>Consider Feedback in the development of the methodology – Clarification, recommend that additional text is inserted para 2.44 around the requirement to review appropriate assumptions if after the assessment sufficient capacity is not identified in order to meet OAN.</p>
<p><b>Dr N Gates Historic England HELAA 017</b> We would recommend that Registered Parks and Gardens, and the setting of heritage assets, are included as sensitive landscapes.</p>	<p>Noted . For the purpose of this capacity assessment it is considered appropriate to reflect the national PPG and NPPF as above.</p>	<p>Consider Feedback in the development of the methodology - Clarification reflects the comments above</p>
<p><b>Ms L Oliver Natural England HELAA022</b> Amend text to include sensitive landscapes include – areas within and in the setting of the Norfolk Coast AONB</p>	<p>Noted</p>	<p>Clarification include suggested text in definition</p>

## Townscape

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p><b>Mr A Peate Indigo Planning HELAA 019</b></p> <p>Townscape Impact is highly subjective and whilst being a useful assessment criterion, the bar should be set low in the initial round of site assessment ie townscape impacts should be given more weight at a later stage of the assessment process. In any event, townscape impact can be addressed through detailed design work.</p>	<p>Noted Planning judgement and experience will be used.</p>	<p>No change recommended</p>
<p><b>Mr G BloomField Pigeon Investment Management HELAA 025</b></p> <p>Townscape - The presence of protected trees in terms of landscape etc.... impacts would also not necessarily preclude development, and again it would seem too early to make such judgments at the HELAA stage. It is not considered that a presumption should be applied that development will be harmful as this will be subject to detail.</p>	<p>Noted . Planning judgement and experience will be used. However the text could benefit from additional comments around the amount of weight to be applied and in what areas as defined in NPPF para 116.</p>	<p>Consider Feedback in the development of the methodology. Align the assessment to the areas covered in the landscape assessment criteria above and detailed in the NPPF.</p>
<p><b>Dr N Gates Historic England HELAA 017</b></p> <p><b>Townscapes</b> we welcome the identification of townscape as part of the methodology.</p>	<p>Support noted</p>	<p>Consider Feedback support in the development of the methodology</p>

## Biodiversity and Geodiversity

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p><b>Ms A Fowler Bidwells HELAA 013 (014)</b></p> <p>Similar to above, the protection of local designations appears to place greater emphasis than what is expected by National Planning Policy (NPPF). These should not be given the same status and protection as internationally designated sites.</p> <p>(HELAA 013 only) - With appropriate ecological investigation,</p>	<p>Noted . The potential impacts on Biodiversity and geodiversity are an important consideration. The NPPF seeks to minimise impacts and prevent harm. It is considered the approach is consistent with the NPPF</p>	<p>No change recommended</p>

survey and recording such constraints can be overcome.		
<p><b>Ms L Oliver Natural England HELAA 022</b></p> <p>Following features should be listed:</p> <ul style="list-style-type: none"> <li>• priority habitats</li> <li>• veteran trees, ecological networks; and</li> <li>• priority and/or legally protected species populations.</li> </ul> <p>Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP).</p> <p>Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds).</p>	Noted	Consider Feedback in the development of the methodology - Add recommended text
<p><b>Mr G BloomField Pigeon Investment Management HELAA 025</b></p> <p>There needs to be far greater clarity on the potential impact on SPAs. For example with regard to ground-nesting birds, buffers have been applied around the SPA that are seen as a constraint to site selection. However, development can take place in such locations as demonstrated with planning permissions granted subsequent to this policy. Further detail is required in terms of the application of the biodiversity and geodiversity criteria</p>	The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The local Plan process offers the opportunity for a more detailed assessment	No change recommended

## Historic Environment

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p><b>Ms A Fowler Bidwells HELAA 013 (014)</b> Guidance on how impacts on the Historic Environment need to be made clearer, including details on how these will be quantified. The methodology refers to the importance of assessing heritage assets such as archaeological potential. Although we agree this should be a consideration, it should not be an absolute constraint and should not hinder development. With appropriate archaeological investigation, survey and recording such constraints can be overcome.</p>	<p>Agreed . The level of impacts depend on the proposed use. The approach put forward is intended to be a broad high level assessment to inform local planning authorities of the suitable land capacity in each district. Planning judgement and experience will be used. The local Plan process offers the opportunity for a more detailed assessment.</p>	<p>No change recommended</p>
<p><b>Dr N Gates Historic England HELAA 017</b> We would recommend that these words are added, “Heritage assets are buildings, monuments, sites, landscapes, and places identified...” We also would suggest that these words are added, “Non-designated Heritage Assets can include locally listed buildings, non-registered parks or gardens, sites with archaeological potential...”</p>	<p>Noted</p>	<p>Consider Feedback in the development of the methodology - Add recommended text</p>

### Open Space

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<p><b>Ms A Fowler Bidwells HELAA 013 (014)</b></p> <p><b>Open Space</b> – Open Space should only be considered a constraint if it is designated as such in an adopted plan. Also, designations should only be given weight where they are supported by up-to-date Open Space Assessment or Strategy needs to be formed and implemented.</p> <p>(HELAA 013 only) - Consideration of new housing development</p>	<p>Noted - the provision and protection of appropriate open space is seen as an important consideration and is outlined in the NPPF para 74 and national PPG</p>	<p>Consider Feedback in the development of the methodology - Clarification add Local Green Space designation in line with guidance</p>

schemes which provide additional access to Open Space should be decided favourable and overall benefits to the local community seen as a positive contribution.		
<b>Ms L Oliver Natural England HELAA022</b> Open Space it would be helpful to include references to green infrastructure (GI) under this heading. HELAAs should consider the availability and the need to maintain of GI, and opportunities to enhance GI networks when considering sites for development. Potential sites should be considered against each planning authority's GI strategy (where one exists) to ensure a strategic overview and maintain coherence of ecological networks.	Noted	Consider Feedback in the development of the methodology - Clarification add GI into heading.

#### Compatibility with neighbouring/adjoining areas

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<b>Ms S Bull Anglian Water HELAA 012</b> Noted the section on Compatibility with Neighbouring /adjoining uses, however, there is no specific reference in the document to proximity to Water Recycling Centres (formally referred to as Sewage or Wastewater Treatment Works). In order to give our water recycling centres room to grow and enable us to operate efficiently in future, we need to maintain a suitable distance between them and the communities they serve. We use a risk assessment process to consider any proposed development within 400 metres of a water recycling centre or within 15 metres of a used water pumping station. Our policy and methodology for assessing a suitable distance can be viewed at: <a href="http://www.anglianwater.co.uk/developers/encroachment.aspx">http://www.anglianwater.co.uk/developers/encroachment.aspx</a> .	Noted. The proximity of a potential site to Water Recycling Centres could have an impact on amenity. In assessing the suitability of sites, account will be taken of standing advice from statutory undertakers and infrastructure providers with regard to maintaining appropriate separation between new development and existing infrastructure installations.	Consider Feedback in the development of the methodology - Clarification - add further clarifying text in Appendix 1- Compatibility with Neighbouring / adjoining uses as detailed.
<b>Ms L Waters NCC HELAA 023</b>	Noted see response above.	No change recommended

<p>The ability for a site to protect and enhance/promote green space, sports facilities could be a useful addition Greater prominence could be given to factors such as noise, air pollution light pollution in the compatibility <b>with Neighbouring uses</b> section</p>	<p>The level of impacts depend on the proposed use. The approach put forward is intended to be a broad high level assessment.</p>	
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**Q9) Do you agree with the assumptions that will be made when assessing the potential for development from windfall sources?**

**Support: (10 ):** Mr R Taylor HELAA001, Mrs P Price HELAA002, Mr R Porter HELAA003, Mr M Chipperfield HELAA004, Mrs J Addison, HELAA005, Mrs D Galloway **Highways England** HELAA006, Mr N GRAY HELAA 007, Mr M BOOTH HELAA 008, Ms R Maxwell CBRE HELAA015, Mr G Bloomfield Pigeon Management LTD HELAA 025

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Agree with the assumptions that will be made when assessing the potential for development from windfall sources	Supported noted	Consider Feedback support in the development of the methodology
Mr G Bloomfield <b>Pigeon Management LTD</b> HELAA 025		
No particular comments on the assumptions made with regard to windfall sites, which by their nature are difficult to predict.	Noted	Consider Feedback support in the development of the methodology

**Support in part s: (1),**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
Mr C Sperrin <b>Persimmon Homes</b> HELAA 024		
NPPG states that Starter Homes on exception sites should not contribute towards 5 year housing land supply.	Noted	Consider Feedback support in the development of the methodology

### Objection (3)

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
<b>Dr S Randall Renewable Energy Systems Limited HELAA 009</b>		
Again this is more focused on housing and small businesses. An onshore wind farm could encourage windfall sites of over a 100 hectares so using "only average delivery rates for sites under 0.25 hectares will be considered." is not appropriate.	The HELAA approach is specifically aimed at the identification of sites suitable for residential and economic growth.	No Change recommended
The Local Plan and HELAA document does not identify any areas suitable for onshore wind or a methodology. This approach is not a proactive or positive. The omission of sites for renewable energy in a local plan and HELAA is considered a soundness issue by RES. Rotherham BC draft sites & policy Plan identifies suitable wind sites by criteria and RES support this approach as an effective method	It is considered that the identification of sites suitable for on shore wind will be through a separate technical process relevant to each local authority and emerging plans	No Change recommended
<b>Mr R Hobbs Ipswich BC HELAA 010</b>		
It is suggested to use historic rates for windfall from each local authority on sites irrespective of size over a reasonable time period and	Noted . it is considered that limiting site size to 0.25 is robust and avoid the potential for double counting	No Change recommended

<p>then take the average, rather than restricting it to sites of less than 0.25 hectares for an average to be taken</p>		
<p>Mr A PEATE <b>Indigo Planning</b> HELLA 019</p>		
<p>Assumptions about windfalls must be based on locally-relevant evidence. There are likely to be more windfall sites in Norwich for example, as a result of the office to residential permitted development (PD) rights. Such PD rights will be lesser relevance in terms of windfall contribution in the more rural districts. In such rural districts, PD rights enabling the conversion of agricultural buildings to residential use will clearly be of more relevance, but the numbers involved will be modest (in the context of office to residential PD).</p> <p>Para 2.36 suggests that environmental constraints will prevent some LPAs from being able to allocate enough land to meet their need and therefore they'll need to rely on windfalls. This is inconsistent with the NPPF's requirement</p>	<p>Noted the proposed approach is flexible across each LPA and allows for local assumptions around PD rights.</p> <p>The aim of the HELAA is to identify the amount of land available for housing and economic development in order that a capacity assessment can be made of suitable land to inform Local Plan development. The national PPG states that any windfall allowance included should be justified. The approach is detailed in para 2.35- 2.42 of the HELAA methodology.</p> <p>Starter homes will provide an element of affordable homes in line with relevant local and national policies.</p>	<p>Consider Feedback in the development of the methodology – clarification remove reference to starter homes in para 2.41.</p>

<p>that LPAs plan to meet the full objectively assessed need of an area.</p> <p>Para 2.41 states that the emergence of the Starter Homes initiative may increase the amount of windfall development. In relation to Starter Homes, the NPPG (Ref. ID 55-010-20150318) however advises that "... local planning authorities should not make an allowance for them in their five-year housing land supply until such time as they have compelling evidence that they will consistently become available in the local area."</p>		
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**Further Comments (1)**

SUMMARY OF COMMENTS/ISSUES RAISED	RESPONSE	Action / Recommendation
MR J Flaming Gladman Developments LTD HELAA 016		
In light of the issues identified above, it is recommended that the Councils establish a joint panel with members from both the public and private sectors to discuss individual sites and to act as a critical friend in	As detailed in para 3.2 - All sites in each LPA area will be consulted on as part of the consultation on the respective emerging Local Plans. As part of the process input will be sought from appropriate bodies as required.	No Change recommended

<p>relation to the Council's reasoning behind any assumptions on market attractiveness, lead in times, build out rates and site specific viability issues. This will help ensure that the HELAA is based on appropriate evidence and is robust enough to help inform the preparation of Local Plans across the HMA</p>		
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