

SHLAA Methodology Scoping Report Representations and Officer Response

Respondent	Summary of Representation	Requested Change	Officer Response	Recommendation
Cllr Sarah Lunnon	<p>I do not really feel able to comment on this document. It appears well thought out and seems to cover all the issues and more that I could think off.</p> <p>The only comment I would like to make is that you consider the likelihood of developing any car-parks as being very low. I know in Holland that some multi-story car-parks have a row of flats built into them where the car-park fronts the street. While we don't have many multi-story car-parks in Stroud District it does seem to me to indicate that there is housing potential around car-parks.</p>	No change requested.	<p>Welcome support.</p> <p>Will ensure car parks are given adequate consideration during the sites identification process.</p>	No change.
Rachel Small, SDC Regeneration Manager	<p>I must say that I have not been on the receiving end of any specific lobbying in relation opening up new areas for housing development. If you were going to run a strategic exercise for us to try and identify possible areas for inclusion, then I would be happy to attend, otherwise I am afraid that at this stage I have not got too much input.</p>	No change requested.	Will keep informed of progress for input at a later stage.	No change
Katie Larner, SDC Contaminated Land Officer	<p>Thank you for consulting me on this. I am happy to contribute and assess the chosen sites for you with regards to contamination issues. All I would ask is that you give me as long a period as possible in which to assess them, as I am the only officer and work loads are high at present.</p>	No change requested.	Will ensure involved at a later stage.	No change
Caroline White, Development Surveyor	<p>I do not have any comments on your proposed methodology etc.</p> <p>I do however have comments regarding Appendix B and your list of consultees. I would suggest broadening the surveyors to include Alder King and Donaldsons (DTZ) as well as Ash & Co and Bruton Knowles.</p> <p>Also, should the South West RDA be included as well as the Regional Assembly?</p>	Addition of consultees	Suggested developers and SWRDA had been consulted, as stated the list was indicative, not exhaustive.	No change.
Cllr John Stanton	<p>I have serious doubts about the length of the timetable and the time allocated for each of the individual processes and tasks. For example the time allocated for the methodology consultation process - 3 weeks is simply not adequate. The rest of the timetable looks tight and unrealistic, particularly if we bear in mind the time taken in the past to handle consultation processes and dealing with objections.</p>	Revise timetable	Due to other commitments on Officer time, the timetable requires revision.	Revise timetable

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Cllr John Stanton	<p>The good words about involving all stakeholders etc from the outset should provide a degree of comfort to most people but it is essential to follow this methodology rigorously and involve all the relevant local organisations to ensure that sound decisions are made.</p> <p>It is also important that the Council should get their basic facts and assumptions correct right from the outset in relation to matters concerning housing demand and infrastructure and resources. Clearly if these are flawed then so will be the recommendations.</p>	No change requested.	All stakeholders have been involved from the outset and the Council is working closely with the other authorities in the county to ensure information is correct.	No change.
Cllr John Stanton	One aspect that does seem to have been ignored in the site evaluations is the possible impact of developments on the wildlife and in particular protected species, it would appear to be sensible to check this at an early stage to minimise potential waste of resources on unsuitable sites.	No change requested.	It is a constraint to be investigated for each site, as listed on criteria of Appendix A.	No Change.
South West Regional Assembly	No comment	No change requested.	No comment.	No change
Bob Nigthingale, SDC Technical Officer Drainage	<p>Looking at the plan, there appears to be little reference to flood prevention. A major part of PPS25 are the exception tests, so it would make sense to exclude any land in flood zone 3 from the list of available land. (Individual sites will have to be assessed as they may extend over more than one flood zone).</p> <p>The other side of this is to ensure that the effect of the development on other land is known, (whilst the site itself may not flood, the run off from it may cause flooding to other land, both upstream as well as down stream).</p> <p>Regarding the check list on page 17, the question is asked, "Does the site fall within the Flood Plain? (Zone 1,2,3), the answer will always be yes, as Zone 1 is any area outside of Zone 2 or Zone 3.</p> <p>It is essential that thought is given to drainage, attenuation ponds, swales and other features as they have to be allowed for at the start of designing the layout for a site</p>	<p>Ensure flooding taken into account.</p> <p>Amend check list.</p>	<p>Flood risk will be noted as constraint for sites if applicable.</p> <p>Will consult with Planning Officers and Land Drainage Officer as sites are identified to highlight flooding and run off issues.</p> <p>Check list form will be amended.</p>	<p>Amend Checklist.</p> <p>Keep Land Drainage Officer informed.</p>

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Geraldyn Macfadyen	<p>Concerned that Woodchester may again be at risk of having its village development boundary extended and adjacent green fields within the AONB may once more be blighted by the threat of housing sprawl.</p> <p>In particular in SDC Local Plan 2007, section 5.3.1 of Housing, the selection of housing sites seems like the start up of a familiar battle Woodchester AONB Group has fought all too recently. We are very concerned that we may be affected by -</p> <p>5.3 Sequential Search for Housing Development Opportunities includes Land adjacent to the Small Towns and Larger Villages</p> <p>We are already aware of one developer who says he is just awaiting an opportunity to cash in on an extension of our village settlement boundary to build on green fields adjacent to Woodchester! Does he know something we should know?</p> <p>We are deeply concerned that POLICY HN6 may be open to abuse by unscrupulous developers manipulating statistics -</p> <p>We do not interpret PPG3 as intending to condone building adjacent to settlement boundaries in the AONB, other than in a grave national emergency and hope that SDC will adhere to its POLICY HN10 - Outside the defined settlement boundaries.</p> <p>We were pleased to see the inclusion of - 5.4.2</p> <p>We hope you will be able to assure us our village development boundary will not be compromised and keep us informed of any new developments.</p>	No changes requested	<p>The methodology has been prepared in accordance with government guidance. In order to meet RSS housing requirements land must be identified for future housing needs.</p> <p>It is not appropriate for HLAA to address settlement boundaries. The HLAA forms part of the evidence base for developing policy in the LDF. Settlement boundaries may be reviewed through that policy formulation process if necessary. If sufficient land is not identified from brownfield sources broad locations will be identified.</p>	No change.

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Andy O'Brien, SDC Housing Strategy Manager	<p>Currently there is no mention of Affordable Housing in the SHLAA.</p> <p>The difference between Housing Demand and Housing Need is mentioned within 1.9 (Purpose) but the Intro (1.3) only mentions housing need and I think the context of this sentence is meant to read housing demand.</p> <p>For overall clarity of context, perhaps you could consider expanding the Introduction by including the bullet points from Annex C of PPS3? This makes reference to the Strategic Housing Market Assessment (SHMA) and how this helps to inform the SHLAA.</p> <p>Also, since PPS3 makes regular mention of communities balanced with market and affordable housing, I think that the SHLAA could benefit from a few more (edited) contextual paragraph references taken from PPS3 e.g.</p> <p>(9) Market & Affordable housing, Decent homes, Quality and Choice (10) Mix of Market & Affordable, Tenure & Price, Supporting a range of households, Urban & Rural (15) Sustainable & Eco friendly affordable housing, & ref Code for Sustainable Homes that RSLs must achieve from 2008 (22) How the findings of the SHMA will inform the SHLAA and LDDs in respect of the proportions of Market and Affordable Housing to be achieved to match household profiles (29) How the SHLAA will accommodate plan-wide LDD targets for the amount and different tenures of affordable housing to be provided, reflecting economic land viability assessments, etc (30) Positive and proactive approach for delivering affordable rural housing, including the potential for allocating and releasing rural sites solely for affordable housing</p>	<p>Address context of 1.3</p> <p>Addition to Introduction of PPS3, Appendix C bullet points.</p>	<p>HLAA is a process to identify land that is available for housing, not to examine the types of housing, proportions of housing or their construction methods.</p> <p>SHMA does not inform HLAA but they should be prepared collaboratively.</p>	<p>Revise wording of paragraph 1.3</p>
Cam Parish Council	<p>The Parish Council's Planning & Highways Committee has discussed the Methodology Scoping Report and would comment that there is a role for parish and town councils in providing information to identify potential sites and their potential. Parish Plans could also help in this process.</p>	<p>No change requested.</p>	<p>Town and Parish Councils will continue to be involved through the process. Parish Plans have been used as a source of information through the desktop study.</p>	<p>No change.</p>
Whiteshill & Ruscombe Parish Council	<p>The reports states Developers will be included as part of people to be consulted, the Parish Council would prefer that the developers included should have proven track record within the District.</p>	<p>No change requested.</p>	<p>As an all-inclusive, non-discriminating consultation process it is not possible to pick-and-choose developers.</p>	<p>No change</p>

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Strategic Land Partnerships	We would suggest the amendment of the table within Appendix A - Checklist of Site Details - to include 2 additional comments under Current policy/Physical Constraints:- 1. Are there opportunities to mitigate any constraints? 2. Are there opportunities to improve accessibility?	Revise Appendix A	This additional information would be useful to further inform the site selection process.	Revise Appendix A
Strategic Land Partnerships	Paragraph 2.4 makes mention of the housing trajectory and the five year supply - this figure should be 15 years to be compliant with PPS3. Additionally the information recorded regarding sites indicated by the bulleted points should contain an assessment of the phased contribution of larger sites, over time and a clear statement as to how the Council will manage any overspill or shortfall.	No change requested.	The wording is in accordance with the Guidance. It refers to 5 year supply addressed in the AMR, which will monitor delivery overspill or shortfall.	No change.
Strategic Land Partnerships	We would congratulate you in the statement within paragraph 3.3. A consistent approach with neighbouring authorities and GOSW is essential.	No change.	Support welcomed.	No change.
Strategic Land Partnership	Paragraph 3.11 states that the scope of the Assessment should not be narrowed down by existing policies designed to constrain development. We feel that this is essential, often the best locations for new housing are protected by other policies; it is important that such constraints are not given overdue weight.	No change requested.	Support welcome.	No change.
Strategic Land Partnership	The table within paragraph 3.12 causes us concern. To rely on assessment of past yield and assumptions will not make the final assessment compliant with PPS3. PPS3 states that Local Planning Authorities should identify sufficient specific deliverable sites. To be considered deliverable, sites should be at the point of adoption of the relevant Local Development Document and should be available, suitable and achievable PPS3 places no weight or importance on past trends.	No change requested.	Previous guidance required consideration of past trends to determine likely supply from sources such as flats over shops and residential sub-division. In order to comply with latest guidance, the table will be removed.	Remove table after paragraph 3.12

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Strategic Land Partnerships	Paragraph 3.39 deals with establishing a set of criteria to include the avoidance of coalescence of settlements. Why should coalescence be included as a blanket comment when there is no justification for its inclusion? Indeed in some cases coalescence of settlements may be the best thing to do to ensure the sustainability of communities and each suggested site should be viewed on its own merits.	No change requested.	Wording in accordance with Government Guidance and is used as an example. All sites and settlements will be assessed on their own merits.	No change.
Strategic Land Partnerships	Paragraph 3.42 discussed the scenario of genuine local circumstances where a windfall allowance is justified; windfalls can only be considered where land cannot be identified we would not expect Stroud District to have such a problem as there is clearly sustainable scope for small, medium and large urban extensions.	No change requested.	The Methodology states that a windfall allowance is only allowed where need can not be met and is written in accordance with PPS3 and Government Guidance.	No change
Strategic Land Partnerships	It would appear that paragraphs 1.7 and 1.9 are in conflict with each other. Paragraph 1.7 states that the SHLAA should aim to identify sufficient specific sites for at least the first 10 years of a plan, and ideally for longer than the whole 15 year plan period, this surely will have to make some assessment of suitability; paragraph 1.9 states that the assessment rightly should not determine whether a site should be allocated for housing development and makes no mention of suitability.	No change requested.	Paragraph 1.7 refers to identifying sites and 1.9 confirms that this process does not make sites housing allocations. The wording is in accordance with guidance. The overall aim of the assessment is to identify sites and their suitability.	No change.
Strategic Land Partnerships	Paragraph 3.38 discusses the broad locations of housing sites. You describe small extensions to settlements and major extensions, however no mention is made of medium sites, how will these be assessed for potential?	No change requested.	Sizes are used as examples only. It is not yet known what size any settlement or urban extensions may be.	No change.
Hallam Land Management	We believe that an additional paragraph should be inserted after para 3.27 on page 13 along the lines of DCLG Guidance Para 36, i.e. "the assessment of deliverability / developability of specific sites should be made irrespective of the level of housing provision that is actually needed over the plan period".	Addition of "the assessment of deliverability / developability of specific sites should be made irrespective of the level of housing provision that is actually needed over the plan period"	The addition of this sentence would be in keeping with government guidance.	Add "the assessment of deliverability / developability of specific sites should be made irrespective of the level of housing provision that is actually needed over the plan period"

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Hallam Land Management	Further clarification is required on page 12, para 3.20 as to whether the Council are handling enquiries from its Council Members or Members of the Public.	Add clarity to para 3.20	Agree clarity needed.	Add "Council" to para 3.20
Hallam Land Management	As Stroud District is considerably constrained due to its geography we feel that more emphasis should be given in the methodology scoping report for joint working with neighbouring authorities where sustainable urban extensions could be created, for example south Gloucester.	More emphasis for joint working.	The methodology states that the Council is working with the other authorities.	No change.
Hallam Land Management	We believe that 'urban extensions' should be included in the table on page 10 para 3.12. Urban extensions are different from "Sites outside existing settlements" which are more akin to the creation of new communities.	Add urban extensions to table on page 10.	To aide clarity and coverage of all eventualities, urban extensions could be included.	Table to be removed.
Dursley Town Council	The above [HLAA] was considered by the Planning Committee on 16/10/2007 and it was agreed to support the methodology providing that town and parish councils were consulted at every stage of the process.	No change requested.	Support welcome. Town & Parish Councils will be involved throughout the entire process.	No change.

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Highways Agency	<p>The Agency supports the objectives of this study and would welcome the opportunity to be consulted on the suitability of development sites within the District at the appropriate time. The Agency needs to be satisfied that any proposed development on the Strategic Road Network (SRN) namely the M5, which runs through the centre of the District.</p> <p>The agency also supports the promotion of sustainable development and actively seeks to ensure that land use planning policy fully takes into account sustainable transport objectives and the need to reduce movement by the private car.</p> <p>The comments do not prejudice any future responses on site specific matters and would request that the Agency is consulted at an early state on any development sites that come forward. The HA is committed to the principles behind the new development plan system and is keen to be involved further in the production of the Stroud LDF and its evidence base. On this basis the Agency welcomes its inclusion within the list of consultees within Appendix B of the document.</p>	No change requested.	Support welcome.	No change.
Highways Agency	<p>With regards to the sources of housing supply contained within Stage 2, the Agency particularly welcomes the promotion of the reuse of existing land and premises, provided that they are located within sustainable locations.</p> <p>The Agency encourages the inclusion of a reference to the need for future development sites to be reflective of sustainable transport objectives as this should be a key consideration in the allocation of sites within the District.</p>	Include reference for future development sites to be reflective of sustainable transport objectives.	Support welcomed. The assessment does not allocate sites, that is the role of Core Strategy and Site Allocations DPDs. The Agency will be consulted as sites are identified.	No change.
Highways Agency	<p>The Agency agrees with the general list of criteria included as part of Stage 7a: Assessing Suitability for Housing. However, the Agency would wish to see further reference to access by sustainable modes of transport and accessibility to jobs and services. Whilst infrastructure is included as criteria to consider, this does not specify transport infrastructure. Accessible locations that reduce reliance on the private car should be prioritised for development over more isolated sites.</p>	Reference to access by sustainable modes of transport and accessibility to jobs and services.	The Assessment can not address transport issues, but consideration is given to access and sustainability of location. Accessible locations will be given priority over more isolated sites.	No change.
Highways Agency	<p>The Agency has some concerns over identifying and assessing the potential of broad locations for growth as proposed in Stage 9 without site-specific assessment taking place. The Highways Agency is keen to be involved at the earliest opportunity in discussing these potential 'broad locations' in order to establish their sustainability in transport terms and any likely impacts on the Strategic Road Network. In considering broad locations, if major settlement extensions are proposed then these should be truly integrated with existing facilities, services and jobs to ensure that they do not provide dormitory roles to other urban areas.</p>	No change requested.	The identification of broad locations is in keeping with government guidance. The Highways Agency will be fully involved in the consideration of any locations identified.	No change.

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Highways Agency	The Agency notes the proposed 'Checklist of Site Details' within Appendix 1. The Agency supports the items included within the list, particularly the reference to public transport accessibility. However, the Agency requests that reference is also made to the consideration of potential impacts of development on the highways network, in particular the Strategic Road Network (M5).	Add "consideration to potential impacts on highway network" to checklist.	The transport network is not a consideration of the assessment, only site accessibility. The highways Agency will be involved through the process, as well as with the allocation process.	No change.
Gloucester City Council	Paragraph 3.20 - does it refer to members of public or Council Members.	Add wording to clarify which members.	Agree that clarity is required.	Amend para 3.20 to refer to Council Members.
Gloucester City Council	Welcomes mention of County co-operative working group. Requests that SSCT density of 50 dwellings per hectare is used for areas around Gloucester.	Use SSCT density of 50 dwellings per hectare around Gloucester City.	Agree that clarity should be added that we will consider the RSS' density for SSCTs around Gloucester SSCT.	Clarify density within Gloucester SSCT within stage 6..
Painswick Parish Council	The Parish Council has no comments regarding the subject report other than to stress the importance of Town and Parish Councils being fully consulted on areas being considered within its boundaries.	No change requested.	Town and Parish Councils will be fully involved through the process.	No change.
Mr A Watton	Reference is made to ransom strips as being a problem to deliverability. Many sites have been allocated in the past with ransom strips and these have been delivered. Moreover, the footnote under III is incorrect, insofar as the definition indicates a total block on development whereas a ransom is something, which is negotiated between the parties. It is very unusual for a ransom to be a total bar to development, e.g. Kings Stanley 2007.	No change requested.	The methodology refers to a strip of land comprising numerous back gardens, where one resident can hold development to ransom. This would prevent the land being available for development, which is a criteria within this assessment.	No change

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Mr A Watton	Paras 3.37 and 3.38 Is sensible and should be encouraged on the basis that this provides a platform for towns and parishes to come forward with preferred sites, where by example, a quota of dwellings could be put forward with an indication as to acreage required and, through democracy, a preferred location is chosen rather than imposed upon the local populous.	No change requested.	Support welcomed.	No change
Mr A Watton	Para 3.29 The various bullet points seem to exclude reference to sustainability of development, with regard to existing settlements and the ability for development to underpin or help in the regeneration of towns and villages.	No change requested.	Methodology written in accordance with government guidance. As sites are identified they will be fully assessed for sustainability and all stakeholders will have an opportunity to comment on sites, raising issues as necessary.	No change.
Mr A Watton	Para 3.27 The lack of information should not be a debar of development. Rather, further research will be required.	No change requested.	As much research as possible will be carried out, the paragraph merely refers to sites where this information can still not be identified.	No change.
Mr A Watton	Reference is made to the Stroud District Local Plan as being adopted in November 2005. Bearing in mind that the GOSW has now called in the Local Plan, with particular regard to the allocation of Hunts Grove, this paragraph is inaccurate. Moreover, the difficulty in delivering those dwellings is going to have a profound effect upon the Core Strategy.	No change requested.	The Local Plan has not been called-in, only the Outline application for Hunt's Grove development.	No change
Mr A Watton	Para 3.14 You list the various sources and information. Towards the end of the table, you show commercial property databases e.g. estate agents and property agents. I would have assumed that this would be further up the table on the basis that this is a prolific source.	Move estate agents further up the table.	The table puts no weight or hierarchy to any source of information.	No change

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Mr A Watton	The table below shows a proper analytical approach to the various sources of housing supply. Unfortunately, under the title "Redevelopment of Car Parks", it would appear that a conclusion has been reached prior to consultation. This may be a grammatical error.	No change requested.	Table states that few are expected, but they will still be duly considered, it merely expresses existing understanding.	No change.
Mr A Watton	<p>It is noted that the Assessment is shown as September with methodology consultation being shown as the last week of September and the first two weeks of October. Therefore, the programme would appear to be in order with the obvious comment of slippage being for one week. At the same time as the methodology consultation (this process), it is also noted that initial site identification will be taking place. However, it is not clear as to whether that initial site identification is coming purely from the Local Authority, based upon historic records or through submissions made by land owners, agents, developers etc. With this in mind, I draw to your attention Paragraph 1.10 in which you confirm key stakeholders should be involved from the outset to help shape the approach. I therefore presume that, in carrying out the initial site identification that this is subject to public invitation? Bearing in mind that the invitation is to comment upon the methodology, it would seem that the initial site identification should in fact follow that period, i.e. towards the end of October (22 October 2007?) I must therefore query how 3.8 actually works as at October/November 2007.</p> <p>This is particularly relevant to the later sections of Table 3.1, in which you show work in hand as follows:</p> <p>(a) Determining areas and sites to be surveyed. (b) Carry out survey. (c) Estimated housing potential for each site.</p> <p>Thereafter, assessing when and where the sites likely to be developed takes place towards the end of November i.e. three or four weeks from now.</p> <p>In the circumstances, I am unhappy as to the amount of progress, which has seemingly been made in private, without access to the stakeholders referred to in 1.10 (and elsewhere in your Scoping Report).</p>	Address para 3.8 and timetable.	<p>The process of site identification at that early stage refers to officer desktop investigations of databases and records.</p> <p>The timetable requires revision due to monitoring, AMR and consultation activity commitments.</p>	Address para 3.8 and revise timetable.
Nailsworth Town Council	The inclusion in the proposed partnership of builders and estate agents will indeed give the assessments 'a joined up and robust' approach. We have some concern as to the balance in the partnership in that both builders and estate agents have a clear commercial interest in building and selling houses, which business interests will favour higher value property development. The importance of affordable housing in the development needs to be stressed. There is, we feel, a real risk that this is squeezed out under pressure to meet quantitative housing targets.	Stress the importance of affordable housing.	Support welcomed. The inclusion of builders and estate agents is in line with government guidance. Their input will inform the areas of growth / need and available land through their professional knowledge. The purpose of the HLAA is not to supply affordable housing, it refers to the availability of land.	No change

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Nailsworth Town Council	We appreciate the inclusion of Town and Parish Councils amongst those to be consulted on the Scoping Report. It is, however, unclear the extent to which Town and Parish Councils will be able to comment on the actual HLAA when it emerges, particularly insofar as it involves development proposals within the ward or parish for which the Council is statutory representational authority. We would like to see this consultation stage, which we believe is vital if Town and Parish Councils are to be properly answerable to their electorates, specified explicitly in Stage 8.	Add clarity to Stage 8 referring to involvement of Town and Parish Councils.	Support welcomed. The Town and Parish Councils will be a useful source of local knowledge. Stage 8 refers to a calculation after all sites have been surveyed and processed, in order to establish whether enough land has been identified. If not, broad locations will be identified. Town and Parish Councils will be consulted at this stage.	Add wording to Stage 8 to emphasise the input from Town and Parish Councils.
Nailsworth Town Council	While we welcome the inclusion in the check list of the Accessibility and Infrastructure points relating to availability of facilities such as transport, employment opportunities, health care and schooling provision we would have liked to see these given more prominence in the text as important assessment criteria and to have seen greater recognition of the impact of new housing on traffic volumes and patterns. Neither the County Council nor the Highways Agency are included in the partnership but only included as amongst parties which we assume are to be consulted on the emerging HLAA.	Emphasise Accessibility and Infrastructure in the text of the document.	Support welcomed. All assessment criteria have been treated equally, with no one aspect having greater representation in the text than another. Government guidance state that LAs within an HMA should work together. County Council and Highways Agency have been consulted. HA have responded and are satisfied with their level of involvement. Both parties will continue to be involved.	No change.
Woodchester Parish Council	We are reassured that the Stroud District Local Plan will remain the basis for determining the housing potential of any identified site. However, the inclusion of Woodchester in the Stroud Urban Area gives us continuing concern that demand for housing (particularly affordable housing) could result in sprawling development along the A46 corridor and on greenfield sites within the village settlement boundary itself, particularly as we note (Para 3.25) that "housing potential is a significant factor that affects economic viability".	No change requested.	The wording of Stage 6 refers to the Local Plan with reference to guiding density. The assessment states that policy should not be a constraint to development. HLAA does not refer to Affordable Housing, it merely identifies land that could be available for housing.	No change.
Woodchester Parish Council	We note that in assessing suitability for housing, specific policy planning constraints (in our area these include the AONB, South Woodchester Conservation Area, the Industrial heritage Conservation Area and historical status of parts of the parish) as well as physical limitations, potential impacts and environmental considerations locally will be used when assessing housing for "suitable mixed communities". The majority of these issues have already been addressed by our Parish Plan and this should assist in determining the suitability or otherwise of a site for development. We note with some concern in Stage 7c that a site will be considered achievable for development "when there is a reasonable prospect that housing will be developed in the site at a particular point in time and this is essentially a judgement about the economic viability of the site and the capacity of the developer to complete and sell houses". With local (not to say national) demand for housing continuing to rise, this could mean that any site with reasonable access could be seen as potentially suitable for development and could result in housing sprawl and total destruction of the rural character and historical aspects of villages such as Woodchester.	No change requested.	Parish plans have been included in the desktop study process. The methodology is worded in accordance with government guidance. Sites have to meet several criteria through the process. The Council are aware of retaining character, safe guarding the environment and preventing sprawl and the need to balance the issues.	No change.

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Woodchester Parish Council	In conclusion we give our qualified approval to this scoping exercise but remain concerned that the SHLAA could result in compromising our village development boundary and pressure to increase housing in such a way as to destroy the character, appearance and historical value of North and South Woodchester.	No change requested.	Support welcomed.	No change.
Woodchester Parish Council	The same comments apply to Stage 8 Review of Assessment, where it is stated in Para 3.36 that "if there are insufficient sites then it will be necessary to identify broad locations for future housing growth (Stage 9) and this would include (Para 3.38) land within and adjoining settlements. Again this provision could have a serious adverse effect on a village such as Woodchester, where there are already difficulties with access including narrow, winding roads and pressure on school places, which any extension of housing could worsen to a substantial degree.	No change requested.	The methodology has been prepared in accordance with government guidance, requiring broad locations to be identified if necessary. Each site will be assessed for suitability of access.	No change.
Woodchester Parish Council	PPS3 expects the supply of housing to be based on specific sites but there may be local circumstances in which a windfall allowance is permitted (based on an estimate of housing that could be delivered in the area on land not identified in the list of sites). We have serious concerns that this could be used to "slot in" additional housing developments in our village, where most useable buildings sites have already been identified in local plans and could have an adverse effect on those sites that are already subject to planning permission.	No change requested.	Stage 10 regarding windfall is written in compliance with government guidance and PPS3. Windfall sites can not be identified and, therefore, can not be used by the council to slot in development.	No change.
Woodchester Parish Council	We note the commitment to work closely with other councils and agencies as well as developers, landowners and agents on the HLAA. We trust you will take into account the considerable amount of work parishes such as Woodchester have already carried out in connection with their parish plans. The Woodchester Parish Plan in 2006 reflected the views of local residents on a wide variety of planning issues. In particular we identified suitable brownfield and derelict sites for housing (including affordable housing) within our boundaries and the constraints affecting any such development. We are currently in the process of producing a detailed design statement for our parish, which could well be affected by proposals in the HLAA.	Include Parish Plans in the Assessment.	Parish Plans have already been included as a source of information. Town and Parish councils will continue to be included through the process. HLAA does not produce proposals.	No change
Woodchester Parish Council	In para 7d "overcoming restraints" we would comment that many of the infrastructure, land ownership, environmental and planning policy constraints mentioned are outside Stroud District Council's competence and will be influenced by decisions at county, regional and national level.	No change requested.	It is acknowledged that some matters will be beyond the scope of the District Council. The assessment aims to highlight measures that may be necessary to overcome some issues.	No change.

Respondent	Summary of Representation	Requested Change	Officer Response	Recommendation
Woodchester Parish Council	Having reviewed the whole document in detail, Woodchester Parish Council gives its qualified support to the approach SDC is using in devising its HLAA. The methodology would seem to be fairly robust and we are in general agreement with the staging process though concerned with the timescale for the production of both the Scoping Report and the subsequent HLAA, which seems to be unduly short given the need for a wide level of consultation on such as important issue. Indeed, unless SDC has already carried out some preliminary work, to complete the HLAA agreement by December, as indicated in Para 3.8, will be almost impossible.	Revise timetable	Support for the methodology is welcomed. Agree timetable requires adjustment. The process will not be able to start due to monitoring and AMR commitments.	Adjust timetable.
Woodchester Parish Council	Following the desk top review it is proposed to hold site surveys to identify those sites with potential for further development. At this stage involvement of the planning sub-committee of Woodchester Parish Council will be essential. Local knowledge as to the nature of the area and land supply as well as any resources available will be key to the success of any intended change in housing density for the area.	No change requested.	The Town and Parish Councils will be fully involved through the process, especially as sites are identified.	No change.
Woodchester Parish Council	With regard to the requirement to identify sites not yet the subject of planning permission, we trust that the work done locally in the Woodchester Parish Plan to identify brownfield and redundant sites within our Parish available for potential housing or employment gain be taken into account. Most such sites have already been identified in the plan and it is likely that there will be few opportunities to develop further land without adverse consequences on the character and setting of our village.	No change requested.	The Parish Plans have been taken into account during the desktop study stage.	No change.
Woodchester Parish Council	<p>We support the way in which the assessment of sites to be included in the planning process is to be carried out. However, we do have concerns with the statement in Para 3.11 that "The scope of the assessment should not be narrowed down by existing policies designed to constrain development". Sites outside existing settlements are referred to, and in particular the need to consider yield through density assumptions applied to the size of any such site. We recognise that the Council will be under pressure to free land for housing to respond to local and national need. However this should not be seen as an "open season" to large-scale housing development alongside existing residential sites in villages such as Woodchester. Not only must any proposals for increased density of housing be transparent but the effects of such housing on traffic flow, education, energy use and the environment should be brought into the equation.</p> <p>We note that particular types of land or areas may be excluded from the assessment provided that reasons for doing so are justified. In Woodchester we would argue that this should include those areas within the AONB, the South Woodchester Conservation Area, the Industrial Conservation Area and the historic sites of the Roman Orpheus Mosaic and Woodchester Mansion.</p>	No change requested.	<p>Support welcomed.</p> <p>The six Districts of Gloucestershire have been advised by GOSW that we are not to exclude the AONB. Therefore, all sites have to be included in the assessment with constraints noted.</p> <p>The inclusions of sites outside the settlement boundary is in accordance with the Government Guidance.</p>	No change

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Chalford Parish Council	<p>Our greatest concern is that the need to meet Government criteria/policy will far outweigh other important issues, ignoring local needs.</p> <p>There is mention on page 10 about 'Yield through density'. Full consideration must be given to the resultant issues - there is more to it than just design e.g. living in close proximity to others.</p>	No change requested.	<p>The Local Planning Authority has to work within government policy.</p> <p>Assessing the likely yield of each site is stipulated in the government guidance and a necessary part of the assessment in order to understand if enough land has been identified.</p>	No change
Chalford Parish Council	On page 12, 3.19 refers to the nature of the area - we would emphasise the need that note must be taken of Areas of Outstanding Natural Beauty and Conservation Areas but small development could take place with very careful design criteria.	No change requested.	AONB and wildlife designations are to be noted, as stipulated in the site checklist. GOSW have instructed the six districts within Gloucestershire not to omit AONB from the assessment. A size threshold is not to be applied, therefore it is not possible to stipulate areas for small development only.	No change
Chalford Parish Council	Parishes, such as ours, priority should be given to the need for affordable housing and housing for the elderly. Not all these needs will refer to employment accessibility etc.	No change requested.	<p>The assessment must be conducted in line with government guidance and sustainable development, which includes the need for local employment.</p> <p>The HLAA is simply concerned with the availability of land, it does not address affordable housing or for whom the housing is to be prioritised.</p>	No change.
Mr Mike Stevens	Would like to be kept involved through consultation.	No change requested.	Support welcomed, will keep involved through assessment process.	No change.
Mr J. Nicholson	<p>The comments from the Parish Councils :</p> <ul style="list-style-type: none"> - the methodology looks a bit light in its suggested consultation with PCs. - it is unclear how this will take place - it is unclear how much weight will be given to PCs comments. 	Clarity on Town and Parish Councils involvement.	<p>Town and Parish Councils will be consulted at each stage of the documents preparation. They will be consulted regarding specific sites that have been identified within their parish.</p> <p>Comments will be considered carefully, but must be considered within the District development as a whole.</p>	No change.

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Newbridge Construction	I have read the report and write on behalf of my client in support of the methodology to be adopted and the criteria to be incorporated within the assessment.	No change requested.	Support welcomed.	No change.
Newbridge Construction	My only concern relates to the weighting to be given to individual criteria that will be used to build up suitability profiles of individual sites. The weighting to be adopted is clearly of great importance and should be the subject of further consultation to ensure that the whole process of site identification and selection remains open and transparent.	Incorporate further consultation regarding weighting of criteria.	Government guidance does not apply weighting to the criteria to assess the suitability of sites. All parties will be fully involved in appraising sites to ensure transparency of the process.	No change.
English Courtyard	Refer to specific site, Look forward to receiving updates as to progress on the various housing assessments and to the LDF.	No change requested.	Will be kept informed.	No change.
Carter Jonas	We generally support the methodology. In particular, we support the consideration of greenfield urban extensions.	No change requested.	Support welcomed.	No change.
Charles Planning Associates Ltd	Informal submission regarding a site for residential development in Whitminster for consideration as part of your Housing Land Availability Assessment.	No change requested.	Will be taken into consideration in due course.	No change.

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Moore Allen & Innocent LLP	We note the report with interest and would be grateful for further updates on the process and when sites for potential housing can be put forward.	No change requested	Will be kept informed of the Assessment progress.	No change.
Tim King, Court Consulting	Please inform when it is possible to submit sites to the SHLAA process.		Will keep informed.	No change, keep informed.
Leonard Chittenden, Painswick Conservation Soc	<p>The Painswick & District Conservation Society understands that SDC, along with other local authorities was requested by central government to undertake a study, in the latter part of 2007, to identify land availability.</p> <p>It would be appreciated if we could be informed of the arrangements for publication of the study findings for our local area and the anticipated date of publication.</p>	No change requested.	Will keep informed.	No change.