

# **Strategic Housing Land Availability Assessment (SHLAA)**

**Forest Heath District Council &  
St Edmundsbury Borough Council**

**Common Methodology  
(2015 Review)**

Forest Heath & St Edmundsbury councils



**West Suffolk**

working together

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## 1. Introduction

- 1.1 To boost significantly their supply of housing, the National Planning Policy Framework, (NPPF, para.47), tells local planning authorities, (LPAs), that they should.....

*Use their evidence base to ensure that their Local Plan, (LP), **meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework.....***

- 1.2 Further, the NPPF, (para. 159), tells LPAs that they should:

*Prepare a **Strategic Housing Land Availability Assessment, (SHLAA)**, to establish realistic assumptions about the availability, suitability and the likely economic viability of land **to meet the identified need for housing over the plan period.***

- 1.3 The Planning Practice Guidance, (PPG, 006), provides a 'good practice' flow-chart to assist LPAs when undertaking their housing, (and economic), land availability assessments and it will be demonstrated below that the West Suffolk approach to such 'assessment' accords with this guidance. The PPG itself is an accessible online resource accessible via the following link:

[www.planningguidance.planningportal.gov.uk/](http://www.planningguidance.planningportal.gov.uk/)

## 2. Working in Partnership

- 2.1 As Forest Heath and St Edmundsbury are within the same strategic housing market area, (Cambridge sub-region), and are 'sharing' services, (including planning), it was considered appropriate, moving forward, to 'adopt' a common approach to the SHLAA methodology and the assessment process itself. The SHLAA will report separately on the two areas but will be published as a single report.

## 3. Purpose of the assessment

- 3.1 The PPG, (001), identifies what a SHLAA should achieve. According to the guidance, they should:

- Identify sites and broad locations with the potential for development,
  - Assess their development potential,
  - Assess their suitability for development and the likelihood of development coming forward, (the availability and achievability).
- 3.2 The SHLAA will seek to identify suitable sites in identified settlements within the study area. A full list of all the settlements which will be considered can be found at Annex B of this document. Policy considerations, such as the relative sustainability of specific villages and town, have to be considered and this will form part of the site assessment process for each specific site.
- 3.3 The results of the SHLAA will inform the Local Plan preparation and monitoring for both authorities. The progress of emerging Local Plans is available to view within the joint Local Development Scheme, (LDS), accessed via the West Suffolk website:

[www.westsuffolk.gov.uk/supportinginformation](http://www.westsuffolk.gov.uk/supportinginformation)

#### **4. Methodology**

- 4.1 The SHLAA process will commence with a desk-top review of existing and potential 'new' sites by Officers. In accordance with the guidance, when carrying out a desk-top review Officers will be proactive in identifying as wide a range as possible of sites and broad locations for development, (including those existing sites that could be improved, intensified or changed).

**Table 1: Potential Housing, (& employment), site types & potential data sources, (PPG, 012)**

<b>Type of Site</b>	<b>Potential Data Source</b>
Existing housing and economic allocations and site development briefs not yet with planning permission	Local and neighbourhood plans. Planning applications records. Development briefs
Planning permissions for housing and economic development that are unimplemented or under	Planning application records. Development starts and completions records

construction	
Planning applications that have been refused or withdrawn	Planning application records
Land in the local authority's ownership	Local authority records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as County Councils, Central Government, National Health Service, Police, Fire Services, utilities providers, statutory undertakers
Vacant and derelict land and buildings, (including empty homes, redundant and disused agricultural buildings, potential permitted development changes e.g. offices to residential)	Local authority empty property register. English House Condition Survey. National Land Use Database. Commercial property databases, (e.g. estate agents and property agents). Valuation Office database. Active engagement with sector
Additional opportunities in established uses, (e.g. making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps. Aerial photography. Planning applications. Site surveys
Business requirements and aspirations	Enquiries received by LPA. Active engagement with sector
Sites in rural locations	Local and neighbourhood plans. Planning applications. Ordnance Survey maps. Aerial photography Site surveys
Large scale redevelopment and redesign of existing residential or economic areas	
Sites in and adjoining villages or rural settlements and rural exception sites	
Potential urban extensions and new free standing settlements	

- 4.2 Sites that are the subject of a specific policy/other constraint(s) will be included in the assessment for the sake of comprehensiveness but these constraints will be set out clearly, including where they severely restrict development.
- 4.3 Periodically, Officers will issue a call for potential sites and broad locations for development, aimed at as wide an audience as is practicable so that those not normally involved in property development have the opportunity to contribute also. It may be that a 'call for sites' is issued within the context of an emerging Local Plan.
- 4.4 The Authorities will set out key information sought from respondents when they issue a 'call for sites'. This could include:
- site location,
  - suggested potential type of development,
  - the scale of development,
  - constraints to development.
- 4.5 During any site surveys that will inform the preparation of the SHLAA, the following characteristics will be recorded, (or checked if they were identified within the context of a previous iteration of the SHLAA).
- site size, boundaries, and location,
  - current land use and character,
  - land uses and character of surrounding area,
  - physical constraints (e.g. access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure / utilities),
  - potential environmental constraints,
  - where relevant, development progress, (e.g. ground works completed, number of units started, number of units completed),
  - Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.
- 4.6 The assessment work will be undertaken by Policy Officers from the shared Planning Service. The boundary of the assessment area is illustrated on the map attached at Annex A.
- 4.7 A number of key stakeholders have been identified for involvement in the SHLAA, (i.e. the SHLAA 'Stakeholder

Group'), and it is intended that they will, on occasion, be invited to a 'workshop' to meet with the Officers undertaking the SHLAA and to help scrutinise and provide key inputs into the process. In all instances, the Authorities will seek engagement with the stakeholder group at the SHLAA consultation stage(s).

4.8 The PPG, (008), identifies that the following should be involved from the earliest stages of plan preparation, which includes the evidence base in relation to land availability:

- **developers; those with land interests,**
- **land promoters,**
- **local property agents,**
- local communities,
- partner organisations,
- Local Enterprise Partnerships,
- businesses and business representative organisations,
- parish and town councils,
- neighbourhood forums preparing neighbourhood plans.

4.9 Although all of the above have a crucial role to play in the development of each Authority's evidence base and their Local Plans themselves, it will usually be those stakeholders highlighted in bold whom will be invited to participate in the SHLAA stakeholder workshops themselves, (where these are deemed appropriate), and the SHLAA consultation exercises, as they have the specialist knowledge insofar as the suitability, availability and achievability, (including viability), of the specific sites is concerned.

4.10 All of those identified at 4.8 above will have the opportunity to make comments on specific sites at the formal consultation stages for emerging Local Plan documents and/or to submit sites for consideration as part of any 'call for sites' issued by either or both authorities as part their Local Plan preparation.

4.11 The comprehensive list of sites and broad locations derived from the various data sources and any call for sites will be assessed by Officers and the stakeholder group, (within the context of the workshop(s) and/or the minimum 3 week consultation on the draft SHLAA report), against national policies and designations and identified deliverability 'constraints', (including suitability, availability and achievability considerations), to establish which have reasonable potential for development.

- 4.12 Following appraisal of the consultation responses, the SHLAA report will be finalised and published on the shared website.
- 4.13 The SHLAA will be scrutinised by the various committees used by the authorities to oversee and approve planning policy or by the Officers themselves through delegated powers.
- 4.14 'Periodic' reviews of the SHLAA will generally follow the order as set out in the below:



**Table 2: SHLAA 'periodic' review process**

<b>Step</b>	<b>Activity</b>
1	<ul style="list-style-type: none"> <li>• Consult Stakeholder Group on, (revised), methodology, (if necessary).</li> </ul>
2	<ul style="list-style-type: none"> <li>• Revise methodology in light of consultation responses, (where appropriate).</li> </ul>
3	<ul style="list-style-type: none"> <li>• Issue invitation to 'stakeholders' to attend a workshop, (if deemed appropriate/necessary), to consider those issues as identified at step 6 below, (possibly to include a call for additional sites for potential assessment).</li> </ul>
4	<ul style="list-style-type: none"> <li>• Officers to undertake a desk-top review of all site information and site visits for all 'new' sites in addition to existing ones as required.</li> </ul>
5	<ul style="list-style-type: none"> <li>• Issue documentation to attendees for consideration ahead of Stakeholder workshop as and when required, (sites database, maps, constraints plans etc).</li> </ul>
6	<ul style="list-style-type: none"> <li>• When appropriate, Stakeholder workshop held with the purposes of seeking agreement/information on:               <ul style="list-style-type: none"> <li>○ The development potential of each site,</li> <li>○ Suitability, availability, achievability,</li> <li>○ Any constraints and how these might be overcome.</li> </ul> </li> </ul>
7	<ul style="list-style-type: none"> <li>• Officers to produce and then consult upon a draft SHLAA review report for a minimum 3 week period. Consideration/further appraisal of information identified at (6) above. Possibly to include a call for additional sites.</li> </ul>
8	<ul style="list-style-type: none"> <li>• Officers to review representations made on the draft SHLAA report and amend document as appropriate/necessary.</li> </ul>
9	<ul style="list-style-type: none"> <li>• Officers to publish 'final' West Suffolk SHLAA review report on shared website.</li> </ul>
10	<ul style="list-style-type: none"> <li>• Review of SHLAA when deemed appropriate, (always following steps 4, 7-9 and as deemed appropriate steps 1-3, 5/6).</li> </ul>

## **5. Site Assessment Considerations**

The following 'factors' will inform the assessment process and will be issues for consideration within the context of the Stakeholder workshop, (where applicable), when Officers are drafting the consultation draft SHLAA report and at the consultation stage itself,

(with the outputs being documented within the context of the 'final' 'joint' West Suffolk SHLAA report).

### Site size

5.1 The PPG, (010), identifies that the assessment should consider all sites and broad locations capable of delivering five or more dwellings or sites of 0.25ha and above.....Where appropriate, plan makers may wish to consider alternative site size thresholds. It would seem reasonable to continue with a minimum site area threshold of 0.2ha or above as applied in previous assessments undertaken by both authorities.

### Development potential

5.2 The estimation of the development potential of each identified site should be guided by the existing or emerging plan policy including locally determined policies on density, (PPG 017).

5.3 Forest Heath and St Edmundsbury will provide indicative site densities, (a multiplier based on the site area), at 20, 30, 40 and 50 dwellings per hectare, (dph), within the context of the SHLAA report. An 'anticipated' yield for each site will also be determined in accordance with the following, (and as agreed within the context of previous SHLAAs):

5.4 **Forest Heath** - Where a site is subject to an extant permission, or allocated within a Local Plan, or dwelling capacities have been identified in subsequent concept statements or master plans, then the identified 'yield' will be used in the assessment unless additional information has come to light to indicate an increase or decrease would be appropriate. For other sites, the adopted Core Strategy Spatial Strategy, (policy CS1), sets out the settlement hierarchy and this will be used as a basis of calculating the approximate dwelling numbers appropriate on sites in Towns, Key Service Centres, Primary villages, Secondary Villages and other identified settlements.

5.5 **St Edmundsbury** – For those sites identified through the Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031 Local Plan documents, or previous urban capacity studies, the dwelling capacities identified within these

documents or subsequent concept statements or master plans will be used, unless additional information has come to light to suggest an increase or decrease would be appropriate. For other sites, the adopted Core Strategy policy CS4 identifies the settlement hierarchy and scale of provision appropriate in those settlements and this will be used as a basis of calculating the approximate dwelling numbers on sites in proposed Key Service Centres, Local Service Centres and Infill Villages.

### Suitability

- 5.6 When assessing the sites against the adopted local plan, plan makers need to take account of how up to date the plan policies are and consider the appropriateness of identified constraints on sites/broad location and whether such constraints may be overcome.
- 5.7 Sites in adopted and emerging local plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability.
- 5.8 In addition to the above considerations, the following factors should be considered to assess a site's suitability for development now or in the future, (PPG 019):
- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination,
  - potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.

### Availability

- 5.9 A site is considered available for development, when, on the best information available, (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by

a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell.

- 5.10 Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome.

#### Achievability, (including viability)

- 5.11 A site is considered achievable for development where there is a reasonable prospect that the particular type of development, (in this case housing), will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.

#### Constraints

- 5.12 Where constraints have been identified, the assessment will 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). Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy, which is currently constraining development.
- 5.13 A process of 'site sieving' will be applied as part of the assessment, (undertaken in collaboration with stakeholders), with a number of sites being 'discounted' as a consequence of 'significant' and agreed 'constraints' on their deliverability, (which may include suitability, availability and/or achievability considerations).
- 5.14 The 'discounted' sites will appear within the context of the SHLAA report, (alongside their site specific constraint(s)), but they will not be considered within the context of the 'calculations' and/or housing trajectory and will not be considered in as much detail as those that are 'included', (see 'outputs' section below).
- 5.15 It is important to note that for those sites 'discounted' for the purposes of the SHLAA, they can still come forward through the planning process should their constraints be overcome.

## Timescale for development

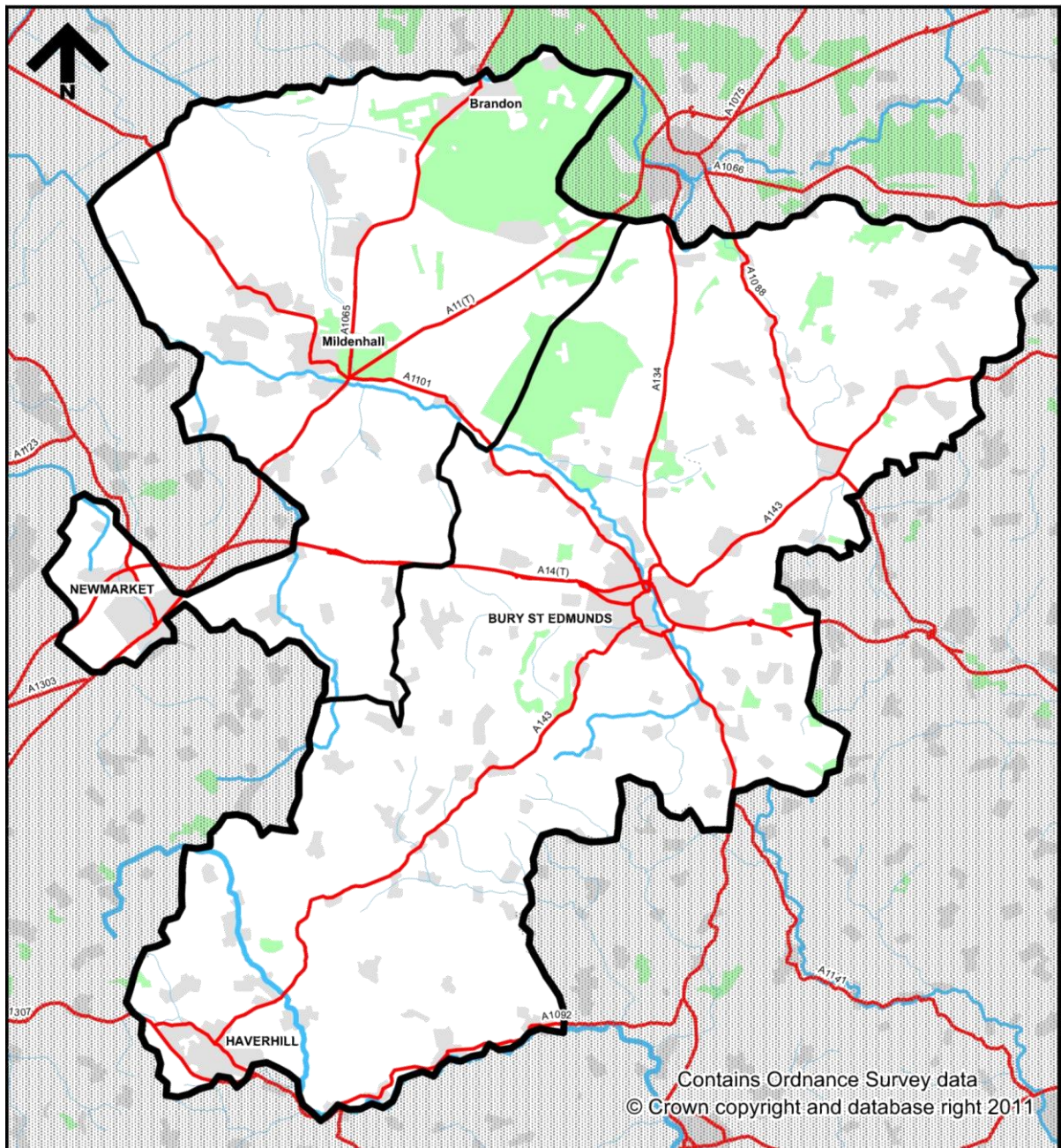
- 5.16 The time-frame for consideration by the SHLAA is 15 years as with previous iterations of the assessment.
- 5.17 The local planning authority will use the information on suitability, availability, achievability and constraints to assess the timescale within which each site is capable of development, (years 1-5, 6-10 and 11-15). This may include indicative lead-in times and build-out rates for the development of different size of sites. The advice of developers and local agents will be important in assessing lead-in times and build-out rates on a year by year basis.
- 5.18 As a general rule and where no evidence to the contrary has been provided, brownfield sites with few constraints will be identified as deliverable within 0-5 years and those with some constraints as 6-11 years.
- 5.19 It should be recognised that all of the timeframes for delivery of sites as they appear within the context of the SHLAA report, are estimates only, and will be subject to a number of factors beyond the scope of the SHLAA itself.

## **6. SHLAA Outputs**

- 6.1 The following set of standard outputs will be produced from the assessment, (and will be referenced within the SHLAA report itself), to ensure consistency, accessibility and transparency:
- A list of all sites or broad locations considered, cross-referenced to their locations on maps,
  - An assessment of each site or broad location, (in terms of its suitability for development, availability and achievability including whether the site/broad location is viable), to determine whether a site is realistically expected to be developed and when,
  - Contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons,
  - the potential quantity of development that could be delivered on each site/broad location, including a

- reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when,
- an indicative trajectory of anticipated development and consideration of associated risks,
  - The assessment, (final SHLAA review report), will also be made available on the councils website.

## Annex A SHLAA Assessment Area Map



## Annex B List of settlements considered by the SHLAA

<b>St Edmundsbury Borough Council</b>	<b>Forest Heath District Council</b>
<b>Towns</b>	<b>Market Towns</b>
Bury St Edmunds	Newmarket
Haverhill	Mildenhall
	Brandon
<b>Key Service Centres</b>	<b>Key Service Centres</b>
Barrow	Red Lodge
Clare	Lakenheath
Ixworth	<b>Primary Villages</b>
Kedington	Beck Row
Stanton	Exning
<b>Local Service Centres</b>	Kentford
Bardwell	West Row
Barningham	<b>Secondary Villages</b>
Cavendish	Barton Mills
Chedburgh	Elveden
Great Barton	Eriswell
Great & Little Thurlow	Freckenham
Great & Little Whelnetham	Gazeley
Hopton	Holywell Row
Hundon	Icklingham
Ingham	Moulton
Risby	Tuddenham
Rougham	Worlington
Wickhambrook	
<b>Infill Villages</b>	<b>Small Settlements</b>
Barnham	Cavenham
Bradfield St George	Dalham
Chevington	Herringswell
Coney Weston	Higham
Cowlinge	Santon Downham
Fornham All Saints	
Fornham St Martin	
Great Bradley	
Hawkedon	
Hepworth	
Honington & Sapiston	
RAF Honington	
Horringer	
Lidgate	
Market Weston	
Ousden	
Pakenham	



Rede	
Stanningfield	
Stansfield	
Stoke by Clare	
Stradishall	
Thelnetham	
Troston	
Whepsted	
Withersfield	

**Annex C Methodology consultation representations and an explanation of how these have been considered in the formulation of final draft of the SHLAA Methodology document**

Consultee	Comment	Officer Response
Cambridgeshire County Council, (Historic Environment Team).	Any SHLAA review should include an assessment of known archaeological evidence for the area, or, where none is known, statements that indicate how such evidence should be acquired, (as part of a scheme of evaluative work to be carried out prior to the determination of planning applications, or through a suitable condition imposed on planning consent). Such characteristics should be recorded as part of the site assessment work, (4.5 of methodology document), to include an indication of the significance of the local area as gained from an appraisal of designations, (e.g, scheduled monuments, listed buildings), or non-designated archaeological sites. Where no evidence is known the appraisal should set out how this might be obtained and when, (as a pre-determination requirement or in accordance with an appropriate condition placed on a planning consent). Stakeholders should include the Authorities own archaeological advisors for impartial advice.	Noted. The list of site details to be surveyed/recorded at para. 4.5 are not intended to be exhaustive. Where appropriate, known archaeological data can/will be recorded at the 'desk-top' analysis stage and where this is likely to be a significant factor in terms of the suitability/availability/achievability of specific sites, details will be recorded/identified within the context of the SHLAA review report itself. Specialist archaeological advisors employed by Suffolk County Council administer appropriate advice to the authorities at the planning application/pre-application stage(s) and this is reflected in the decisions made on those applications and within the context of any conditions imposed. Suffolk County Council is also a key SHLAA stakeholder and is consulted at appropriate stages in the SHLAA review process.
Unex Group	No comments to make on the consultation	Noted.

	document	
Smiths Gore	Although very sensibly clause 5.1 sets out a minimum site size, it would be best to include some wording, (in brackets), along the lines of...'but this shall not preclude submissions being made for smaller sites still capable of making a worthwhile contribution to increasing housing stock'.	Noted. The proposed amendment is not deemed necessary as it is considered reasonably clear that the site size threshold applies only for the purposes of the SHLAA. It is generally accepted that smaller sites are still capable of making a 'worthwhile' contribution to increasing overall housing stock.
Anglian Water	Anglian Water are keen to support St Edmundsbury and Forest Heath in the whole Local Plan process and will provide high level comments on ease of serving potential sites and constraints faced from a water supply and drainage perspective in the form of a RAG, (Red/Amber/Green), assessment. The methodology document appears to comprehensively cover all of the requirements for the SHLAA.	Noted.
Economic Development & Strategy, Norfolk County Council	At this stage Norfolk CC would expect to be consulted/involved in any new housing allocations particularly in any neighbouring settlements such as Brandon where there is likely to be strategic cross-boundary issues. Obviously you could consult Norfolk CC when you review your Local Plan. I assume, under your statutory duty to co-operate, (Localism Act 2011), that if you feel there are any strategic cross boundary issues arising, or likely to arise, from any of the emerging SHLAA/Local Plan	Noted. There will be ongoing 'dialogue' with 'our' counterparts within Norfolk CC and Breckland DC throughout the Local Plan preparation processes as is required by the Localism Act, (to ensure that any cross-border/strategic 'issues' likely to arise are identified in a timely manner and appropriately mitigated where appropriate). Both Norfolk CC and Breckland DC are SHLAA stakeholders and will be consulted at the appropriate stages in the review process for this important evidence base.

	allocations that you would seek further discussion with Norfolk CC.	
Pegasus Group on behalf of the Newmarket Horsemen's Group	It is suggested that both LPAs make a commitment to review the SHLAA in the event that the relevant LPA cannot demonstrate a five year housing land supply.	Noted. It would not be practicable/prudent for either LPA to commit to a review of the SHLAA on every occasion that the statement of 5 year housing land supply is updated and reveals a 'deficit'. The SHLAA will be updated periodically and will be informed by the 5-year housing land supply statement and vice versa.
Pegasus Group on behalf of the Newmarket Horsemen's Group	It is requested that representatives from the Horse Racing Industry (HRI), such as Newmarket's Horsemen's Group, should also be included within the list of stakeholders to be invited to workshops to discuss the potential impact specific sites will have upon the industry.	As identified at para. 4.9 above, it will <u>usually</u> be those stakeholders highlighted in <b>bold</b> at 4.8 above whom will be invited to participate in the SHLAA stakeholder workshops themselves, as they are considered to have the specialist knowledge insofar as the suitability, availability and achievability, (including viability), of the specific sites is concerned. The list is not exhaustive and, (on the occasions that a workshop is held), should a representative(s) of the Horsemen's Group wish to be involved then the LPAs would welcome their involvement.
Pegasus Group on behalf of the Newmarket Horsemen's Group	The LPA should produce a standardised criteria assessment methodology to ensure all sites are assessed in a common fashion. For example this could include distance to local facilities, (bus stops, primary school, local shops), within walking distance. Given the importance of the HRI to the district it is requested that the site	The 'initial' site survey stage that informs the preparation of the SHLAA is considered suitably comprehensive, (see para. 4.5 above for examples of the site characteristics that are recorded, or checked if they were identified within the context of a previous iteration of the SHLAA).

	assessment should include distance from horse racing facilities as a criteria along with proximity to ecological features. It would be ideal for these assessment criteria to be consulted upon to give site promoters the opportunity to highlight potential issues prior to the assessment of all sites.	Key information/characteristics/constraints pertaining to specific sites will be distributed to stakeholders ahead of any workshop for consideration, (see table 2, stage 5 above), and/or will be recorded within the context of the consultation draft SHLAA report, (see table 2, stage 7 above). Equine policy is a constraint, (for consideration), previously 'agreed' within the context of the SHLAA stakeholder group.
Pegasus Group on behalf of the Newmarket Horsemen's Group	Support is given to the statement at table 2 that all sites submitted as part of the call for sites process should be formally assessed within the SHLAA. There is a commitment to both a desk top review and a site visit by Officers.	Support noted.
Five Villages Preservation Trust	The draft SHLAA document should emphasise that the SHLAA assessment will identify whether any actions are required, including provision of infrastructure, to ensure sites become deliverable in the timescales recommended for sites coming forward.	The draft/final SHLAA report will consider mitigation/timescales for bringing specific sites forward and it is considered that this is appropriate.
Five Villages Preservation Trust	At the site assessment stage it will also be necessary to engage with statutory undertakers/consultees and infrastructure providers in order to determine issues such as the provision of utility services, highway infrastructure, flooding, drainage and the capacity of educational and health services. We	Statutory consultees are encouraged to engage in the SHLAA, (& Local Plan), preparation processes. All comments submitted in respect of the SHLAA are considered by Officers prior to publication within the context of the final SHLAA report. The SHLAA is a key evidence base for Local Plan document preparation and ultimately

	Would ask officers to search out the legitimacy of these claims from infrastructure providers which are in conflict with local opinion.	any 'claims' will be tested at the examination stage(s) for these particular documents.
Five Villages Preservation Trust	Paragraph 1.4 states; 'the Planning Practice Guidance, (PPG, 006), provides a 'good practice' flow-chart to assist LPAs when undertaking their housing, (and economic), land availability assessments'...We believe it would be useful to include this flow chart.	The online suite of Planning Practice Guidance, (PPG), is intended to be highly accessible and we would encourage stakeholders and other groups to 'visit' this resource for further information on SHLAAs and other guidance as it pertains to the planning process. The online resource is also updated on a regular basis, (and more often than this methodology document). It is not considered prudent and/or necessary to reproduce the flow-chart within the context of the methodology document itself. The PPG has been signposted, (by means of a web address/link), within the context of this 'final' versions of the methodology document, (see para. 1.3 above).
Five Villages Preservation Trust	During the plan period, our district will undergo some of the biggest changes it has had to deal with for many years as we face the withdrawal and closure of RAF Mildenhall. We do not consider this methodology addresses the impact the closure of RAF Mildenhall will have on the district in terms of planning. It fails to identify a way of monitoring the impact of the withdrawal of USAF personnel and the need for prompt reviews of the SHLAA.	It is acknowledged that the withdrawal of USAFE personnel from the Mildenhall airbase will have an impact on the district as a whole and not only in planning terms. The SHLAA is a key evidence base for the emerging Single Issues Review, (SIR), and Site Allocations Local Plan documents and the implications of the withdrawal/potential closure of the air-base will be further considered within the context of these documents as and when further detail/evidence emerges.
Five Villages	The document contains no reference to windfall	It is not considered necessary to make reference

Preservation Trust	sites.	to windfall sites within the context of the methodology document itself.
Five Villages Preservation Trust	'....it will usually be those stakeholders highlighted in bold whom will be invited to participate in the SHLAA stakeholder workshops themselves...', 'and the SHLAA consultation exercises, as they have the specialist knowledge insofar as the suitability, availability and achievability , (including viability), of the specific sites is concerned'. We would strongly oppose any changes to those stakeholders who currently engage and attend the stakeholder workshops. We believe residents groups and interested Parish councils are extremely well placed to offer 'specialist knowledge' regarding suitability, availability and achievability.	It is not anticipated that the constitution of the SHLAA stakeholder group will alter significantly. The list of stakeholders at para. 4.7 above is not intended to be definitive and 'we' would not be looking, (necessarily), to preclude groups with specialist knowledge of specific sites. It is inevitable that the 'membership' of the forum will change to some extent over time, for example, as and when new sites are submitted and 'representatives' of such sites wish to become involved in the SHLAA process.
Natural England	Natural England does not have the staff resources to provide bespoke advice on SHLAAs or attend meetings in connection with them. In line with the NPPF, we offer the following generic advice on key natural environment considerations for use in producing or revising SHLAAs, which we hope is of use.... Key themes: 1. <u>Landscape</u> - Avoiding harm to the character of nationally protected landscapes and locally valued landscapes, 2. <u>Biodiversity</u> - Avoiding harm to international,	Noted. Themes are considered within the context of the SHLAA and/or existing/emerging Local Plan documents including their requisite SA/SEAs in addition to HRA.

	<p>national and locally designated sites of importance for biodiversity. Avoiding harm to priority habitats, ecological networks and priority and/or legally protected species populations. Seeking opportunities to contribute to the restoration and re-creation of habitats, the recovery of priority species populations and biodiversity enhancement. Seeking opportunities to enhance and create green infrastructure.</p> <p>3. <u>Geological Conservation</u> – Avoid harm to nationally and locally designated sites of importance for geological conservation – geological SSSIs and Local Geological Sites, (also known as RIGS – Regionally Important Geological Sites).</p> <p>4. <u>Best and Most Versatile Agricultural Land</u> – Avoiding best and most versatile agricultural land.</p> <p>5. <u>Public rights of way and access</u> – Seeking opportunities to enhance public rights of way and accessible natural green space.</p>	
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