

To: The Chairman and Members of the Local Development Framework Sub-Committee

(Councillors Reilly, Chambers, T Clews, Hancocks, Osborne and Simpson)

For the information of the other Members of the Council

For general enquiries please contact Democratic Services on 01827 719226 or via e-mail: democraticservices@northwarks.gov.uk

For enquiries about specific reports please contact the officer named in the reports.

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LOCAL DEVELOPMENT FRAMEWORK SUB-COMMITTEE

17 OCTOBER 2022

The Local Development Framework Sub-Committee will meet on Monday, 17 October 2022 at 6.30pm in the Council Chamber at The Council House, South Street, Atherstone, Warwickshire.

The meeting can also be viewed on the Council's YouTube channel at [NorthWarks - YouTube](#).

AGENDA

- 1 Evacuation Procedure.**
- 2 Apologies for Absence/ Members away on official Council business.**
- 3 Disclosable Pecuniary and Non-Pecuniary Interests.**

- 4 **Minutes of the meeting of the Local Development Framework Sub-Committee held on 23 May 2022** - copy herewith, to be approved as a correct record and signed by the Chairman.

ITEMS FOR DISCUSSION AND DECISION (WHITE PAPERS)

- 5 **Housing and Employment Land Availability Assessment (HELAA) Methodology** – Report of the Chief Executive

Summary

The report seeks Members' approval of the final version of the Housing and Employment Land Availability Assessment (HELAA) Methodology which has previously been out for consultation.

The Contact Officer for this report is Dorothy Barratt (719250).

- 6 **Local Development Scheme (LDS) September 2022** – Report of the Chief Executive

Summary

This report brings to Members a revised up to date Local Development Scheme.

The Contact Officer for this report is Dorothy Barratt (719250).

STEVE MAXEY
Chief Executive

NORTH WARWICKSHIRE BOROUGH COUNCIL

MINUTES OF THE LOCAL DEVELOPMENT FRAMEWORK SUB-COMMITTEE

23 May 2022

Present: Councillor Simpson in the Chair.

Councillors Chambers, T Clews, Hancocks, Hayfield and Osborne.

Apologies for absence were received from Councillor Riley (Substitute Hayfield).

5 **Disclosable Pecuniary and Non-Pecuniary Interests**

There were none declared at the meeting.

6 **Minutes of the meeting of the Local Development Framework Sub-Committee held on 25 April 2022**

The minutes of the meeting of the Local Development Framework Sub-Committee held on 25 April 2022 copies having been previously circulated, were approved as a correct record and signed by the Chairman.

7 **Presentation of the Master Plan Framework for site H4 – Land east of Polesworth and Dordon**

A presentation was given to Members regarding the Master Plan Framework for site H4 – Land east of Polesworth and Dordon.

Speakers – on behalf of Dordon Parish Council - Helen Metclafe, Steve Ridley and John Winter, Polesworth Parish Council - Councillors Roy Skidmore, Emma Whapples and Paul Burns and Agents - Mark Sitch, Katherine Ventham and Michael Davies.

8 **Supplementary Planning Document “Planning Obligations for Open Space, Sport and Recreation” and Associated Calculator Documents Update for Public Consultation - Report of the Chief Executive**

Recommended to the Sub-Committee

- a **That the report and the May 2022 Consultation draft update of the “Planning Obligations for Open Space, Sport and Recreation” and associated Calculator Documents be noted; and**

- b That any comments which Members may have on the documents are reported to Planning and Development Board at the next convenient meeting.**

D Reilly
Chairman

Agenda Item No 5

Local Development Framework Sub-Committee

12 September 2022

Report of the Chief Executive

Housing and Employment Land Availability Assessment (HELAA) Methodology

1 Summary

- 1.1 The report seeks Members' approval of the final version of the Housing and Employment Land Availability Assessment (HELAA) Methodology which has previously been out for consultation.

Recommendation to the Board

- a That the Housing and Employment Land Availability Assessment (HELAA) Methodology be approved; and
- b Any future call for sites by the Borough Council be carried out in general compliance with the methodology.

2 Consultation

- 2.1 Consultation has taken place with the relevant Members and any comments received will be reported at the meeting.

3 Background

- 3.1 Members will recall a report was considered by the LDF Sub-committee on 28 October 2021. This set out the reasons for an agreed HELAA methodology across the Coventry and Warwickshire area, but it is essentially that when Local Authorities look at the detail of how they plan for growth, they do it in line with a common methodology to ensure consistency of approach and understanding. The methodology was prepared by Coventry and Warwickshire Local Planning Authorities to ensure that sites are being assessed within a common framework which accords with the most up to date National Planning Policy and guidance.

4 Consultation

- 4.1 Consultation took place between 10 November and 22 December 2021, running concurrently between the six Local Authorities within the Coventry and Warwickshire area. Representations are attached as Appendix 2.

...

4.2 Officers jointly considered the representations and amended the methodology accordingly. The final version was agreed at the CSWAPO (Duty to Co-operate) officers meeting on 9th February 2022. Each Local Authority to then take the final document through their own Councils for approval.

5 Observations

5.1 Officers recommend adopting the HELAA methodology in Appendix 1, having considered the representations made, in line with best practice and in conjunction with our neighbouring authorities in the HMA.

5.2 The Borough Council will be required to carry out call for sites. This could be, for example, for the forthcoming Employment or Gypsy and Traveller DPDs or for the review of the Local Plan itself. The agreed methodology will be used to ensure that the process is carried out in a similar way to those from local authorities in the Coventry and Warwickshire area. This will assist in being able to fulfil the statutory Duty to Co-operate that needs to be demonstrated to Planning Inspectors when Local Plans are examined.

6 Report Implications

6.1 Risk Management Implications

6.1.1 By working to an agreed methodology, it will help to avoid instances where Councils are objecting to other Local Plans on the grounds of how data has been collected and assessed.

6.2 Legal Implications

6.2.1 As indicated in the introduction to the appended HELAA Methodology document, the National Planning Policy Framework (NPPF) requires local planning authorities to undertake strategic assessments of land and formulate policies to identify areas and locations which can meet development needs. The NPPF is a material consideration in planning application decisions and, accordingly ensuring that any calls for land comply with the HELAA methodology prepared under it will be ensure that the Council has proper regard to the NPPF requirements.

The Contact Officer for this report is Dorothy Barratt (01827 719250).

Background Papers

Local Government Act 1972 Section 100D, as substituted by the Local Government Act, 2000 Section 97

Background Paper No	Author	Nature of Background Paper	Date

Coventry and Warwickshire Sub-Regional Joint Method Statement

Housing and Economic Land Availability Assessment - Methodology

February 2022

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APPENDICES

Appendix 1. Example Proforma

1. Introduction

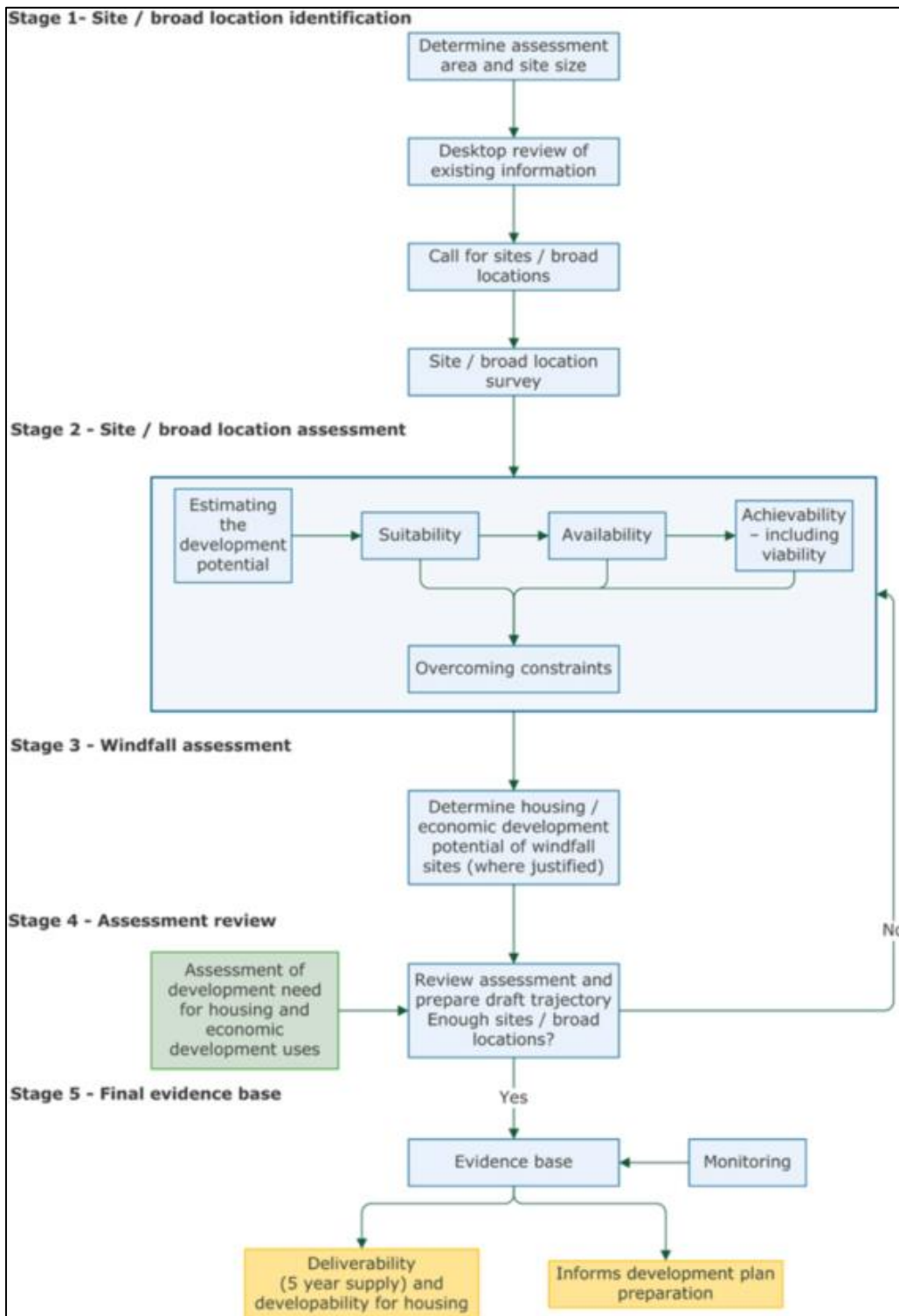
- 1.1 The National Planning Policy Framework (the “NPPF”) specifies that policy-making authorities should prepare strategic assessments of land availability for their areas. Arising from this assessment, strategic policies can be formulated to identify areas and locations for growth that can meet development need.
- 1.2 This joint statement has been prepared between the authorities that comprise the Coventry and Warwickshire sub-regional area and is an update from the Joint Statement published in May 2015 to ensure that it reflects the most up to date national guidance from Government.
- 1.3 In line with the recommendations of the Planning Practice Guidance (PPG)¹ the methodology is an agreed approach between the Local Planning Authorities (LPAs) that make up the Coventry and Warwickshire Housing Market Area (the HMA) and the Functional Economic Market Area (FEMA) where these two areas overlap. The LPAs are:
- Nuneaton and Bedworth Borough Council
 - Coventry City Council
 - Rugby Borough Council
 - Warwick District Council
 - Stratford on Avon District Council
 - North Warwickshire Borough Council
- 1.4 Forming part of this update is a joint movement away from the original sole focus on housing land assessment, which was referenced as a Strategic Housing Land Availability Assessment (SHLAA) to a **Housing and Economic Land Availability Assessment (HELAA)**, which considers both housing and employment sites . This has been agreed by the LPAs to more appropriately reflect the updates made by the PPG in 2019:
- “Plan-making authorities may carry out land availability assessments for housing and economic development as part of the same exercise, in order that sites may be identified for the use(s) that is most appropriate.”*
- 1.5 It is not the objective of this joint methodology to standardise the methods made to assess land availability in each Local Authority, but rather provide a broad framework to ensure a consistent approach, which each Local Authority can then use to inform more detailed assessment work.
- 1.6 The detailed HELAA produced by each Local Authority should:
- Identify sites and broad locations with development potential (housing, economic or other);
 - Assess their potential for development in terms of:
 - their availability for development and whether they can be brought

¹ Paragraph 007 Reference 3-007-20190722

- forward as locations for housing, economic or other form of development.
 - their suitability to accommodate development, taking into consideration their context, constraints and policy designations.
 - their achievability in terms of market desirability and viability for development.
- 1.7 Sites that are identified through the HELAA are assessed as to whether they could be developed. The assessment does not make a judgement whether they should be developed. **Assessment does not allocate land for development, nor does it determine the acceptability of development on any site.**
- 1.8 The HELAA will form a part of the Local Plan evidence base for each Local Authority, and sites identified as being developable will need to be considered further in the light of additional evidence.
- 1.9 It will also assist in the preparation of Local Plans by quantifying the availability of land for housing, economic and other development
- 1.10 In preparing the update to the joint methodology, the LPAs consider it to be good practice to publish a draft (this document) and invite feedback for a six-week consultation period to be held in Autumn 2022.
- 1.11 In terms of the further work which each Local Authority will undertake relating to their detailed Call for Sites and assessment processes, it will be the decision of individual Authorities to develop the detail and separately consult on this in a way in which they feel most appropriate within their local context.

2. Methodology

- 2.1 The methodology will establish the basis of the approach to site assessment but will allow appropriate provisions for further detail to be made to reflect the individual contexts of each LPA area.
- 2.2 The Planning Practice Guidance provides the following flow chart which establishes the basis of the approach to site selection and assessment:



Stage 1: Identification of sites and broad locations

- 2.3 The PPG establishes that a geographical extent of site selection and assessment should be the plan-making area. This joint statement seeks to establish the basis of a consistent methodology between the parties involved to reflect the functionality of the HMA and FEMA and comply with the provisions of the Duty to Cooperate.
- 2.4 Guidance states that in the first instance, sites of a smaller size than 0.25ha, or with a capacity fewer than 5 dwellings, should not be considered as part of the HELAA process. The joint methodology will adopt this approach, but LPAs which comprise this joint method may individually opt to consider smaller sites where appropriate justification can be made.

Site Identification

- 2.5 National Guidance stipulates two primary sources in identifying sites:
- Desktop Review
 - Call for Sites Exercise
- 2.6 Active desktop review ensures that all suitable sites can be identified even in the case where they have not been submitted to an LPA for consideration.
- 2.7 A desktop review of sites may utilise, but not limited to, the following sources²:

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning application records Development briefs Local Economic partnerships, business groups etc
Planning Permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completion records Local Economic partnerships, business groups etc
Planning applications that have been refused or withdrawn	Planning application 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, parish councils, central government, NHS, police, fire services, utilities services, statutory undertakers
Sites with permission in principle, and identified brownfield land	Brownfield land registers (parts 1 and 2) National Land Use Database Valuation Office database

² Extracted from PPG Paragraph 011 ID: 3-011-20190722

**Housing and Economic Land
Availability Assessment – Methodology**

	Active engagement with sector
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 Housing Survey National Land Use Database Commercial property databases (eg estate agents and property agents) Valuation Office database Active engagement with sector Brownfield land registers Local Economic partnerships, business groups, retail forums etc
Additional opportunities for un-established uses (eg making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys County, district and parish council assets
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector Local Economic partnerships, business groups, retail forums etc
Sites in rural locations	Local and neighbourhood plans
Large scale redevelopment and redesign of existing residential or economic areas	Local Economic partnerships, business groups etc Planning applications
Sites in adjoining villages and rural exception sites	Ordnance Survey maps Aerial photography
Potential urban extensions and new free-standing settlements	Site surveys

- 2.8 In addition to a desktop review, a Call for Sites exercise can also enable third parties to promote sites to the LPAs for assessment. This ensures completeness in the HELAA process.
- 2.9 A Call for Sites conducted independently by each LPA (or LPAs where a joint plan is being prepared) will ensure that sites suitable for all land uses can be submitted for assessment. Submissions can be from any third party, with information stored to comply with data protection regulations.
- 2.10 A proforma, a copy of which can be seen at **Appendix 1**, will be provided to third parties to provide site submissions to the LPAs. This will provide as much information as possible, including the following details:
- Site location
 - Suggested potential type of development
 - Scale of development
 - Constraints to development
- 2.11 In respect of constraints, the proforma at Appendix 1 has been developed to allow submissions to establish any mitigations possible to overcome

identified constraints. This is to “front-load” site assessment as far as possible and assist in the overall assessment process. This will ensure a more comprehensive assessment of proposed broad locations and potential sites as established in the PPG. It could also help identify potential new broad locations where development may be suitable, such as clusters of individual sites for example where cumulatively they could provide suitable infrastructure to deliver growth in a sustainable way.

- 2.12 Significant constraints should be considered at this stage where they will affect the assessment of broad locations and sites. This is to ensure that they are appropriately assessed before the detailed assessment stage. The joint statement allows provisions for LPAs to decide on what designations / limitations / constraints might result in site omission at this stage, given the unique contexts of each administrative area.

Stage 2: Site/broad location assessment

- 2.13 The PPG outlines that at this stage site assessments should analyse sites for their capacity, developability, suitability and achievability.
- 2.14 *Capacity* should be determined by adopted and/or emerging policy determining appropriate densities, in the context of the National Planning Policy Framework in achieving efficient use of land. This should also take into consideration viability, given the quantum may affect viability and therefore, achievability and so inform developability within 5 years or beyond.
- 2.15 *Suitability* should be assessed against locational factors, identifiable constraints, their potential for mitigation as well as balancing on their potential impacts as a result of their development. Relevant information to inform this assessment may include:
- National and local policy designations
 - Appropriateness and likely market desirability of potential development
 - Contribution towards regeneration areas and priorities
 - Potential impacts on landscape, natural and heritage designations
- 2.16 Assessment should take into consideration existing Local Plans, but also emerging policy as well as the principle of development established by planning permissions or permissions in principle.
- 2.17 *Availability* can be assessed on the best information obtainable by the LPAs. This can be confirmed through submissions via Call for Sites by agents, landowners and/or promoters. Extant or expired planning permission can also inform availability and will establish 5-year timeframes, or beyond, of developability.
- 2.18 *Achievability* is assessed through best judgement on the economic viability of a site and its desirability to be delivered within particular market conditions. This can also be informed via submissions by third parties, where indication can be made of the potential type of development and how this will influence viability/desirability.

- 2.19 Assessment of overall developability should take into consideration any constraints and how they may influence the suitability of the site and its achievability. Desktop review will take this into account, but this will need to draw on various sources of information to make an appropriate best judgement. In the case of a submission via a Call for Sites, front-loading information will be vital in identifying constraints and establishing mitigation. This will provide evidence in presenting the overall developability of a site.
- 2.20 When taking all of the above into account, the LPAs will be able to identify a timescale and rate of development that could be realised on those sites determined as deliverable and developable (suitable, available and achievable). This will take into account size, scale and quantum of development, which in turn should take into consideration lead-in times and build-out rates.
- 2.21 Whilst best judgement by the LPAs can guide these timescales and development rates, advice will also be sought from developers and other third parties submitting sites for assessment.

Stage 3: Windfall assessment

- 2.22 Development sites that come forward outside of identification through the HELAA (or any other Planning Authority spatial assessment) are defined as windfall sites.
- 2.23 The PPG outlines that an allowance of windfall sites may be included within the land supply identified through the HELAA, but must be appropriately justified as established at Paragraph 71 of the National Planning Policy Framework (July 2021);

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

- 2.24 It is not the objective of this joint statement to establish windfall allowances for each LPA. The windfall allowance is specific to each Local Authority area and the local evidence base for each will be used to inform this work and decide the extent to which windfall development should be considered in the HELAA process. An explanation of this assessment, with justification of conclusions will be provided by each LPA individually.

Stage 4: Review of the assessment

- 2.25 Following assessment of sites and broad locations, an indicative trajectory will be produced. This will express the development quantum potentially available in terms of housing numbers and employment land and potentially

the amount of other land uses that have been identified.

- 2.26 The trajectory will outline the forecasted delivery of development in three increments: 1 to 5 years, 6 to 10 years and 11 years and beyond. A risk assessment will accompany any trajectory, explaining specific issues to delivery which may impact on the trajectory.
- 2.27 At this stage, an LPA may identify a shortfall in supply to meet the needs of the plan area. The PPG advises that a Local Authority should re-visit their assessment, including enhancing or changing site capacities and densities in line with the NPPF's promotion of efficient use of land.
- 2.28 If evidence shows that a shortfall in provision continues to exist, LPAs should consider continued cross-boundary provisions in accordance with the statutory Duty to Co-operate. This will enable the necessary Statements of Common Ground and other joint agreements to be formulated as Local Plan work progresses, helping to achieve sound Local Plans.

Stage 5: Final evidence base

- 2.29 The final HELAA report for each Local Authority (or Authorities where a joint plan is being prepared) will establish the approaches taken and identify the deliverable and developable sites and show a clear supply trajectory. All sites will be cross-referenced with location maps and their site assessments. The final report should also include sites that have been omitted from the supply, with reasons why.
- 2.30 The HELAA will be used by the Local Authorities to demonstrate a 5-year housing land supply position, as well as informing other strategic policies within the plan preparation process. Paragraphs 20-23 of the National Planning Policy Framework provide more detail on what is meant by 'strategic policy'
- 2.31 A final report with appendices where appropriate and relevant will be published on each Authority's website for public view.

3. Implementation

- 3.1 This statement establishes the joint methodology in implementing a HELAA across the Coventry and Warwickshire sub-region.
- 3.2 The Planning Practice Guidance determines how housing and economic land assessment should be conducted and this has been closely woven into the joint methodology.
- 3.3 How this is implemented in practical terms is dependent on the local context. As such, this joint methodology references the functional relationships of the HMA and FEMA, whilst also providing sufficient flexibility for assessing sites in a range of contexts.
- 3.4 For example, the LPAs have agreed the importance of “front loading” information as far as possible. Previous experience has identified issues with understanding constraints and how they can be mitigated. The model Call for Sites proforma (Appendix 1) has therefore been updated from the previous version, allowing for additional information to be submitted, and each LPA can adapt this as it sees fit. This will assist in the site assessment stage.
- 3.5 Understanding the broader context of promoted sites is helpful and this is also reflected in the model proforma, where promoters are encouraged to indicate land for assessment (red line), and other land under the same ownership (blue outline). This provides additional flexibility in site assessment, especially in the case where the ‘red-line’ areas may be particularly constrained, but the additional ‘blue-line’ land may be available for mitigation purposes.
- 3.6 Although a detailed approach to assessment is not specified in this joint statement, to allow for flexibility for each individual LPA, it is expected that final assessments will produce conclusive commentary as to how sites have been assessed in either narrative or pictorial form, or both.
- 3.7 To illustrate this point, an example is set out below. In this instance, a ‘red-amber/yellow -green’ approach (RAG) has been used. Sites would be scored using particular suitability, achievability and availability considerations. Those sites for which constraints are absolute and cannot be mitigated would be scored red. Amber sites would have the potential to be mitigated and could be ‘upgraded’ to yellow depending on the level of information supplied which could demonstrate this mitigation. Green sites would have no constraints and could readily form part of the short-term supply.

Housing and Economic Land Availability Assessment – Methodology

Figure 1: Example of a site assessment matrix (illustrative: each LPA would develop its own methodology for this level of detail)

		Availability & Achievability		
Suitability		Red	Orange	Green
		Red	Red	Red
		Orange	Orange	Yellow
		Green	Orange	Yellow
		Green	Orange	Green

3.8 To summarise: this document has been prepared jointly to ensure a consistent shared approach to identifying and assessing sites for housing and employment uses, which will be used by each Local Authority (or alliance of Local Authorities where shared plans are developed) as the framework within which they will develop their detailed assessment and selection processes.

Appendix 1

Example Call for Sites Proforma

Housing and Economic Land Availability Assessment (HELAA)

Call for Sites Proforma

- Please complete this form if you would like to suggest proposals for future land use and development within XX Council on sites capable of delivery 5 or more homes, sites larger than 0.25ha or sites which are to be considered for employment uses.
- The sites will be assessed as part of the HELAA and used as an evidence base document for the Local Plan preparation process.
- Please complete a separate form for each site. Complete each section clearly and legibly to the best of your knowledge. If you require more space, please use Section 9, or append additional pages.
- You must attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site and details of site ownership.

Data Protection Disclaimer

Details submitted to the Council as part of a Call for Sites will help inform the HELAA and assist in identifying land for development to contribute to a land supply to meet local need. The submitted information will not be confidential as it will be published as part of a comprehensive land assessment via published reports available for public consumption. This information will also be shared with other parties, including employees of the Council, other Council departments and third parties, such as the Planning Inspectorate and other Local Planning Authorities.

Details provided in Section 1 will be kept and stored confidentially by the Council. Details in Section 2, the names of which should match those provided in Section 1, will be made publicly available as established above. As such, only names of organisations/agents/applications will be made public where it has been clearly declared through this submission form. No other details, such as addresses or contact information, will be made available.

By submitting this form to the Council, you are providing consent for us to retain your details on our Planning Policy as part of the Call for Sites process, the HELAA and to enter your details to our consultation database so that we may contact you in future to advise on the Local Plan preparation process.

1. Your Confidentially Held Details			
Title		Name	
Organisation (if relevant)			Representing
Address			
Postcode		Telephone	
Email			
Signature			
Date			

2. Your Publicly Viewable Details	
Name/Organisation	
Status in relation to site	
Representing (if applicable)	

3. Site Location			
Site Name			
Site address (inc. postcode if known)			
OS Grid Easting		OS Grid Northing	
Total Site Area		Developable Area	
Please attach a 1:1250 scale Ordnance Survey map clearly showing the			

precise boundaries of the site. The area of the site you wish to be formally assessed should be enclosed by a red line. Any other relevant land under your ownership should be enclosed by a blue line

4. Site ownership (please mark as appropriate and/or provide details)				
Do you own the site?	Yes – sole owner	Yes – part owner	Yes – acting on behalf of the owner(s)	No
Is the site available?	Yes – immediately	Yes – In 5-10 years	Yes – 11+ years	No
Have you notified the landowner/other landowners that you have submitted the site?			Yes	No
Other relevant information eg is there a promotion / option agreement, is a developer on board etc				

5. Site Constraints (on site or at boundary – please mark as appropriate and/or provide details)					
Current/previous use					
Adjacent land uses					
Planning History					
Existing Infrastructure	Electricity	Gas	Mains Sewer	Mains Water	Telecoms
Access from Highway	Yes – Classified Road		Yes – Unclassified Road		No
Highway Works					
Ransom Strips /					

**Housing and Economic Land
Availability Assessment – Methodology**

third party land required etc			
Legal Issues			
Existing Occupiers			
Public Access/Rights of Way			
Topography			
Ecology /Wildlife Designations and other known issues	Yes – Details:	Reports/Mitigation Strategy:	No
Trees, hedgerows and woodlands (eg TPOs, other protections and designations)			No
Land Contamination / unexploded ordnance (in areas where this is relevant)	Yes – Details:	Reports/Mitigation Strategy:	No
Heritage Designations (eh listed buildings, conservation areas, local list, archaeology etc)	Yes – Details:	Reports/Mitigation Strategy:	No
Flooding	Yes - details	Reports/Mitigation Strategy:	No
Other Physical Constraints	Yes – Details:	Reports/Mitigation Strategy:	No

(eg water bodies, ditches etc)			
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc)	Yes – Details:	Reports/Mitigation Strategy:	No
Open space and recreation E.g. playing pitches, parks and gardens, allotments and orchards etc	Yes - details	Reports/Mitigation Strategy:	No
Other Knowns Issues/Constraints			

6. Site Accessibility (please provide distance as measured from the middle of the site “as the crow flies” and utilise journey planner to determine walking time)

Distance to closest bus stop (m/km)		Walking time to closest bus stop (mins)	
Distance to closest amenities (m/km)		Walking time to closest amenities (mins)	
Distance to		Walking time to	

**Housing and Economic Land
Availability Assessment – Methodology**

closest rail station (m/km)		closest rail station (mins)	
Any known issues with public transport – frequency of services etc		Any known issues with amenities e.g. limited capacity at schools, GPs etc	
Other accessibility issues relevant to the nature of the proposal			

7. Previous site promotional work (please cross reference with Section 5 where relevant)		
Has any work been undertaken to promote the site and/or to overcome constraints?	Yes	No
If yes, please provide more details and copies of reports where available:		
Have any viability appraisals been undertaken?	Yes	No
If yes, please provide more details and provide copies of reports where available:		
Are there any specific or immediate intentions to start development?	Yes	No
If yes, please provide more details (such as Pre-application discussions)		

**Housing and Economic Land
Availability Assessment – Methodology**

8. Proposal Details (please mark as appropriate and/or provide details)					
Description of Proposed Development					
Proposed Land Use	Residential	Employment	Retail	Mixed	Other
Site capacity/density (homes/floor space)			Details of mixed/other land uses		
Potential Development	For sale/marketed for development		Negotiations with developer	In control of developer	Ready for release by owner
Development time scales	Short term (within 5 years)		Medium term (6-10 years)	Long term (11-15 years)	Beyond (16+ years)
Development Timescale/Phasing (incl. build-out rates)					

9. Additional information e.g. relevant evidence, other constraints and challenges, market desirability, planned infrastructure, opportunities etc

HELAA Methodology Consultation – Summary of Representations

Prefix Codes for the representations:

ALL: same comments submitted to all Local Authorities involved in the consultation

CCC: Comments received by Coventry City Council

NWBC: Comments received by North Warwickshire Borough Council

NBBC: Comments received by Nuneaton and Bedworth Borough Council

RBC: Comments received by Rugby Borough Council

WDC & SDC: Comments received by Warwick and Stratford-on-Avon District Councils (joint consultation process)

Officer responses and changes to the methodology collectively agreed with CSWAPO.

Abbreviations used:

HELAA: Housing and Economic land Availability Assessment

NPPF: National Planning policy Framework

PPG: Planning Practice Guidance

LA / LPA: Local Authority / Local Planning Authority (used interchangeably)

Responses received by all / several Local Authorities					
Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change to Methodology
ALL1	Stoford (Commercial Developer)	Stage 1 of the (Methodology Identification of sites and broad locations)	<ul style="list-style-type: none"> Recommend that the locational requirements for employment land are recognised as being different to that of housing ensuring that sites for employment land are identified appropriately. Recommend that sites with good connections to the strategic road network are included within the desktop review for employment land and also those with rail connectivity (for movement of freight). Use the West Midlands Strategic Employment Sites study (WMSESS May 2021) to inform key locations Identify opportunities to extend existing employment allocations and sustainable urban extensions to cluster employment and provide opportunities for existing businesses to expand or relocate whilst maintaining labour supply. Covid-19 has created uncertainty over demand for office space so opportunities for other uses should be considered. 	<p>The existing proforma could capture all necessary detail including reference to key evidence which the promoter feels should be taken into account. Suggested details could be submitted during call for sites process and would form part of site assessment process.</p> <p>Any site can be submitted as part of HELAA process and desktop review. The subsequent analysis and assessment of constraints and policies, local, national and/or emerging will determine which are identified as having potential for development</p> <p>Each LPA's individual assessment framework will have regard to key evidence such as the Housing and Economic Development Needs</p>	<p>Amend the text at the start of the Call for Sites proforma to include reference to employment sites.</p> <p>Include prompt in additional information section 'eg opportunities, relevant evidence etc'.</p>

				<p>Assessment (HEDNA) and the WMSESS.</p> <p>However the introductory text at the start of the proforma should be amended to include employment. Further, the 'additional information' section could encourage links to key evidence and information such as that raised here.</p>	
ALL2	Stoford (Commercial Developer)	2.7	Clarification around how it is envisaged that engagement with the business sector will look. (As detailed by the 'Business requirements and aspirations' in the table of potential sources of information at para 2.7).	This is something each Local Authority needs to consider as part of its more detailed work on its individual HELAA as local context and issues will vary. However the table at 2.7 could be expanded to provide examples eg engagement with LEP, economic development team, Chamber of Commerce, local business forums and associations etc. Each individual's Statement of Community Involvement (SCI) will set out further detail on engagement.	Expand examples in the table at 2.7
ALL3	Stoford (Commercial Developer)	2.14	More detail needed around how employment densities will be calculated and the net/gross ratios that will be applied against employment sites that vary by size / number of units / infrastructure ratios.	This text is taken directly from the PPG. Information on densities and net / gross factors will be a matter of each LPA to consider as part of its more detailed work on the HELAA as this will depend on	No change

				local context. However in broad terms this work will be informed by the HEDNA.	
ALL4	Stoford (Commercial Developer)	2.15	<p>A lack of detail is observed here, more needed with regards to what locational factors will be judged, recommend:</p> <ul style="list-style-type: none"> ○ The ‘Golden Triangle of Logistics’ ○ Motorway / A -road junctions and proposed /planned improvements ○ The key locations identified in the West Midlands Strategic Employment Sites Study (May 2021) ○ Railway stations 	This text is taken directly from the PPG. The detail will be a matter of each LPA to consider as part of its more detailed work on the HELAA as this will depend on local context. Such matters could also be referenced in the proforma by those promoting particular projects.	No change
ALL5	Stoford (Commercial Developer)	2.15	‘Likely market desirability’ should be added to the proforma.	This is something which site promoters could include in the ‘additional information’ section of the proforma	No change
ALL6	Stoford (Commercial Developer)	Stage 2 of Methodology	<ul style="list-style-type: none"> ● Planned infrastructure to be fully considered within the assessment of sites. ● Also recommend that flood zones are also considered to inform assessment suitability – mitigation can be made against sites that are partly in a flood zone. This ensures such potential sites are not ruled out. 	Noted: Flood risk will inevitably be a constraint applied that will negatively impact development potential, to reflect national policy and guidance. Where sites are submitted that include parts of flood zones the potential of such areas will be difficult to assess or prejudge as suggested, So such submission sites must/should include additional information showing how impact on flood risk areas will be addressed such as by avoidance of flood risk sensitive development or	No change

				replacement and compensatory measures for lost flood storage capacity etc. In the absence of such additional information assessment potential may inevitably be constrained. This will be a matter for the detailed assessment by each LPA	
ALL7	Stoford (Commercial Developer)		Significant green belt within Coventry and Warwickshire should be acknowledged. It should be considered as part of a 'policy neutral' assessment. Support WMSESS recommendation for a Green Belt review.	Comment noted. A sub-regional Green Belt review was conducted previously so would be expected to be updated in due course. Green Belt will form a key part of site assessment.	No change
ALL8	Stoford (Commercial Developer)	Para 2.20	Recommends consideration of timing and funding triggers for infrastructure.	Noted: This will of course vary significantly, dependant on site size, location, authority area and its infrastructure capacities and deficiencies. It is expected that each LA's engagement with statutory and non-statutory consultees during detailed site discussion will address much of these concerns as well as reference future investment programmes and management plans by statutory service and infrastructure providers/agencies. This context will be included in the	No change

				detailed assessment process undertaken by each LPA.	
ALL9	Stoford (Commercial Developer)	Stage 4 Para 2.26	Would welcome developer ability to input into trajectory risk assessment.	Developer engagement on this would come later in the process.	No change
ALL10	Stoford (Commercial Developer)	Stage 4 Para 2.28	Encourage Councils to establish need for strategic employment sites at the earliest opportunity e.g. cross boundary sites.	The Coventry and Warwickshire Councils work closely to fulfil their duty to cooperate requirements.	No change
ALL11	Stoford (Commercial Developer)	Stage 5 para 2.29	Seek clarity on whether consultation will be provided on those sites that are omitted. Aimed at ensuring that suitable sites are not wrongly disregarded.	It is not expected that there would be further consultation on omitted sites. Unsure as to what the “lack of information” referred to relates to? If this relates to any supporting evidence and information (or lack of) for the desirability, availability and potential of a site it is surely up to its owners and/or promoters to ensure this is addressed and not the responsibility of individual authorities to act as advocates for sites through the HELAA process.	Amend Proforma
ALL12	Stoford (Commercial Developer)		In respect of reporting, we would ask that a District wide map is produced of all sites, and numbered, to help with identification. Appendices of separate site maps without an overarching map are difficult to interpret.	Noted, each LPA will consider this comment as they take forward their detailed HELAAs	No change
ALL13	Stoford (Commercial Developer)	3.7	In RAG assessments, ‘amber’ sites should be upgraded to green if evidence that mitigation can address constraints.	Not considered necessary to update assessment process. Interested parties will have a	No change - methodology makes it clear that the example is illustrative, and each

				fair opportunity to submit relevant details.	LA will take forward the detail
ALL14	Stoford (Commercial Developer)	Comments on the Pro-Forma – Appendix 1	<p>Suggest the following additions to the example site proforma:</p> <ul style="list-style-type: none"> ○ At section 4 seek to understand if there is a developer on board. ○ At section 6 include criterion relating to the accessibility of the site to a motorway or A Road. Excellent access to the strategic road network is needed for employment land. ○ Include a section on the appropriateness and likely market desirability of the potential development as set out in paragraph 2.15 of the methodology. ○ Include a section on planned infrastructure <p>Inclusion of ‘likely market desirability’ to be included in the call for sites pro forma in line with para 2.15.</p>	Agreed these would assist with the illustrative proforma. Amend at section 4, 6 and 9 to cover these suggestions.	Amend proforma
ALL15	Historic England		<p>Historic England advocates that, when using this methodology, a wide definition of the historic environment is used. This includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important. In addition, it includes the landscape and townscape components of the historic environment, as well as archaeology, the importance and extent of which is often unknown and may extend beyond designated areas.</p> <p>Information in the Historic Environment Record (HER) may indicate areas of known interest, or high potential where further assessment is required before decisions or allocations are made. The possible cumulative impact of a number of site</p>	<p>Noted. This will be down to the approach employed by each LPA when they undertake detailed assessment. Officers will use mapping to identify initial site constraints. Officers will engage HE during detailed site discussions which will include the definition and application of historic environment within the local context.</p> <p>No changes are proposed as it is considered that Officer</p>	No change

			allocations in one location could also cause considerable harm to the historic landscape/townscape.	assessment and engagement with HE will capture potential impacts and relevant issues.	
ALL16	Historic England	Pro Forma	Whilst Historic England is therefore pleased to see ‘Heritage Designations’ included in the site constraints listed in Section 5 of the “Example Call for Sites Proforma”, we suggest that the proforma be amended to also include non-designated heritage assets, noting that the NPPF refers to non-designated heritage assets of archaeological interest being as demonstrably of equivalent significance to scheduled monuments (Footnote 68). We strongly recommend that advice should be sought from your Conservation Officer and Archaeological advisor throughout the site selection process	Amendment to the proforma not considered necessary as the presence of non-designated assets will be captured by Officers and further consultation with HE. Officers will consider HE guidance on site selection when assessing sites. However it should also be noted that the proforma is illustrative and can be adapted to contain additional fields should the individual LPA consider it helpful to do so within the local context. No changes are proposed as it is considered that Officer assessment and engagement with HE will capture potential impacts and relevant issues.	No change
ALL17	Historic England	General	If a site which affects heritage assets is allocated, we would therefore expect to see reference in the ensuing policies and supporting text on the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting	Officers will use mapping to identify initial site constraints. Officers will engage HE during detailed site discussions. No changes are proposed as it is considered that Officer assessment and engagement with HE will capture potential impacts and relevant issues.	No change

ALL18	Historic England	General	Bearing in mind the overarching principle that harm to heritage assets should be avoided wherever possible, as a point of principle, we would expect sites that would have an unacceptable impact on the significance or special interest of heritage assets not to be taken forward.	Noted. Officers will consider HE guidance on site selection when assessing sites and will engage HE during detailed site discussions	No change
ALL19	Natural England	General	Natural England has no specific comments to make on the methodology consultation and instead offers generic advice on landscape, biodiversity, geological conservation, best and most versatile agricultural land, and public rights of way and access for use in producing or revising the HELAA.	Comments noted.	No change
ALL20	Natural England		<p>No specific comments. Generic advice available on key natural environment considerations for use in producing or revising HELAA's, which we hope is of use.</p> <p>1. Landscape Avoiding harm to the character of nationally protected landscapes - National Parks, the Broads and Areas of Outstanding Natural Beauty - and locally valued landscapes. Cumulative impacts may also occur as a result of the combined effects of more than one housing development. The assessment of potential housing sites should be informed by the landscape character approach. The National Character Area (NCA) profiles will provide useful information. Further information on LCAs is at Landscape Character Assessment.</p>	Noted. Officers will use mapping to identify initial site constraints. and engage with statutory and Non-statutory consultees during detailed site discussions.	No change
ALL21			<p>2. Biodiversity Avoiding harm to the international, national and locally designated sites of importance for biodiversity. The key to assessing these is to understand the potential impact pathways that may exist between the development and sensitive sites. Avoiding harm to priority habitats, ecological networks and priority and/or legally protected species populations Priority habitats and species listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and</p>	Noted. Officers will use mapping and/or GIS tools to identify initial site constraints. and engage with statutory and Non-statutory consultees during detailed site discussions.	No change

			<p>UK Biodiversity Action Plan (UK BAP). Protected species are those species protected under domestic or European law. A Phase 1 Habitat Survey is the commonly used standard for habitat audit and provides a starting point for determining the likely presence of important species.</p> <p>Seeking opportunities to contribute to the restoration and re-creation of habitats, the recovery of priority species populations and biodiversity enhancement</p> <p>Seeking opportunities to enhance and create Green Infrastructure</p> <p>The SHLAA should consider the availability of GI and opportunities to enhance GI networks when considering sites for development.</p>		
ALL22			<p>3. Geological conservation 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>Seeking opportunities to contribute to landscape restoration and enhancement.</p>	<p>Noted. Officers will use mapping to identify initial site constraints. and engage with statutory and Non-statutory consultees during detailed site discussions.</p>	No change
ALL23			<p>4. Best and Most Versatile Agricultural Land Avoiding Best and Most Versatile Agricultural Land</p> <p>Land quality varies from place to place. Information on Best and Most Versatile Agricultural land (grades 1,2 and 3 a) is available from the Agricultural Land Classification (ALC). Not all land has been surveyed in detail and more detailed field survey may be required to inform decisions about specific sites.</p>	<p>Noted. Officers will use mapping to identify initial site constraints. and engage with statutory and non-statutory consultees during detailed site discussions.</p>	No change
ALL24			<p>5. Public rights of way and access Seeking opportunities to enhance public rights of way and accessible natural green space.</p> <p>Housing allocations should avoid adverse impacts on National Trails and networks of public rights of way and opportunities should be considered to maintain and enhance networks and to add links to existing rights of way networks.</p>	<p>Noted. Officers will use mapping to identify initial site constraints. and engage with statutory and non-statutory consultees during detailed site discussions.</p>	No change

<p>ALL25 (sent to WDC & SDC / NWBC)</p>	<p>Warwickshire County Council</p>		<p>HELAA should look to include data specifically around older people's housing needs, accessible housing needs and supported housing needs.</p> <p>Where LAs use consultants to produce HELAA they should ensure that WCC People directorate and Health are consultee's within the spec for consultants to deliver on.</p>	<p>Noted : It is expected LA's engagement with statutory and non-statutory consultees during detailed site discussion will address much of these concerns as well as reference future investment programmes and management plans by statutory service and infrastructure providers/agencies etc... It is also expected that once agreed all Local Authorities will process their HELAA based on the agreed methodology and this methodology will apply to, and be applied by, any consultants contracted to and by those authorities for the purposes of producing their HELAA.</p>	<p>No change</p>
<p>ALL26 (sent to WDC & SDC / NWBC)</p>			<p>In terms of the Employment aspect, those sites which will impact People directorate are sites for residential care homes, and potentially community centres. Engagement with Planning Authorities is sought to ensure the need is fully understood based on the new census data when released .</p>	<p>Noted: It is expected LA's engagement with statutory and non-statutory consultees during detailed site discussion will address much of these concerns as well as reference future needs for statutory services based on most up to date data available.</p>	<p>No change</p>

Responses received by Coventry City Council					
Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change to Methodology
CCC1	Claremont (Planning Consultancy)	Stage 1 of Methodology	<p>Observed omissions of parts of the PPG which are considered to be relevant to the document:</p> <p>Paragraph 008 – Reference ID:3 – 008 -20190722 is advised to be considered.</p> <p><i>‘The assessment needs to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land. The process of the assessment will, however, provide the information to enable an identification of sites and locations that are most suitable for the level of development required.’</i></p> <p>This advice is detailed further in paragraph 010 Reference ID:3-010-20190722 of PPG, that recognises that when carrying out a desktop review, plan-makers need to be proactive in identifying as wide range of sites and broad locations for development as possible (including those existing sites that could be improved, intensified or changed). Identified sites, which have particular constraints, need to be included in the assessment for the sake of comprehensiveness. PPG identifies that an important part of the desktop review is to identify sites and their constraints, rather than simply rule out sites outright which are known to have constraints.</p> <p>It is important to note that the identification of all sites and broad locations is a ‘policy-off’ approach before assessment is made of the suitability of the site. This will ensure as wide</p>	<p>Noted. This is covered by paras 2.4 – 2.7. Detailed interpretation of the guidance (beyond the scope of this broad HELAA framework) will be taken forward by each individual LPA to reflect the local context and circumstances.</p>	No change

			range of sites and broad locations is identified as possible, and sites are not dismissed too early that could otherwise come forward for development.		
CCC2	Claremont (Planning Consultancy)	2.4	Paragraph 2.4 of the draft document identifies those sites of a size of less than 0.25 hectares or fewer than 5 dwellings that should not be considered as part of the HELAA process. What is omitted from this paragraph, however, is the advice contained in PPG that <i>'a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements should be considered where appropriate.'</i> It is recommended that an additional sentence is included in this paragraph to recognise this advice.	Noted. This is covered by paras 2.4 – 2.7. Detailed interpretation of the guidance (beyond the scope of this broad HELAA framework) will be taken forward by each individual LPA to reflect the local context and circumstances.	No change
CCC3	Claremont (Planning Consultancy)	2.15	Stage 2: It is considered that Paragraph 2.15 should recognise in terms of a site's suitability for development the advice contained in paragraph 018 Reference ID: 3-018-20190722. This identifies that sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability.	This is addressed in para 2.16	No change
CCC4	Resident	1.5	I am a resident in the CCC area. I have no commercial or professional interests that are relevant to my response regarding Planning strategy or decisions. The initiative to seek a common assessment and data gathering methodology across contiguous councils is a good one. At last there appears to be a common-sense and pragmatic effort to recognize the critical inter-dependability of HMA and FEMA issues in the same assessment methodology. If the approach framework will allow respective councils to "adapt" to suit, this risks unravelling the methodology and key	The Framework will be agreed and adopted by the LPAs involved. However this paragraph will be amended to make it clear that the framework itself will not be changed but that detailed assessment work will be taken forward by each LPA using the framework as the starting point for more detailed appraisal work	Amend 1.5 to provide more clarity.

			principles. The "adaptations" scope needs to be more specific in its definition and limitations.	which takes account of the local context.	
CCC5	Resident	2.11	"new broad locations.....where cumulatively they could provide suitable infrastructure to deliver growth in a sustainable way":- Does this open the way for compulsory purchase orders to merge suitable development 'pockets' into broader schemes? See also s.2.15 - "Suitability". This also touches on my greatest criticism of Planning's current assessment of major housing development applications: viz. applications in the same area/region are considered on their individual merits with no apparent assessment of the CUMULATIVE effects of the combined developments' scale on local community services, highways, etc. As an example - Eastern Green, Banner Lane, Cromwell Lane, Westwood Heath, Southern Relief Road combined development impacts on the merged area and resulting local pinch-points. In particular, S.106 contributions levied in a piecemeal way will fail to provide a meaningful solution to health, education, highways, retail and cultural/leisure needs.	The methodology has been written to reflect national guidance but detailed matters would need to be considered on a case by case basis by each LPA to reflect the local context and circumstances. This would include consideration of whether clusters of sites might provide benefits as part of a more co-ordinated approach to infrastructure delivery as stated in 2.11, and the method for that delivery.	No change.
CCC6	Resident	2.20	"Lead times and build-out rates" - this is a critical component of the assessment process. If these are not specified in Reserved Matters, with penalties for non-observance, there is a clear risk of long-term speculative land-banking and sporadic build periods leading to nuisance and adverse effects on adjacent housing valuations. A "pecking" approach by a major site developer(s) also significantly interferes with community services planning, and the meaningful application of s.106 community levies.	Noted, however legislation determines the scope of what can be achieved here regarding planning applications. The HELAA process however is concerned with informing site assessment for strategic planning purposes.	No change
CCC7	Resident	2.27	There MUST be a timescale and frequency for formally revisiting the methodology of approach and Local Authority's assessment criteria. I suggest the current Applications' validity of 3 years.	The assessment of sites is concerned with strategic planning and the allocation of sites, the majority of which will not yet have reached the planning application stage.	No change.

CCC8	Resident	2.28	‘The Statutory Duty for co-operation between councils regarding cross-boundary land allocations MUST embrace the ability for those new residents to be accepted by the 'requesting' Authority for THEIR health and education services if so desired (by postcode definition). Likewise, s.106 levies MUST be allocated to the 'donor' authority.’	The planning process only requires that sufficient infrastructure is delivered to support development based upon appropriate evidence (eg education and health as mentioned here) and this evidence would be provided by the relevant bodies. In terms of where those residents live who will access those services, this is beyond the scope of the planning process as the relevant providers (GPs, schools etc) have their own processes for determining who they accept.	No change
CCC9	Resident	2.30	“ other spatially strategic policies" - this is a loose definition that needs clarification and examples.’	Noted, the text will be amended for clarity to explain that paragraphs 20-23 of the NPPF provide the definition.	Amend text for clarity
CCC10	Resident	3.5	Red Line / Blue Line area and "mitigation", and "overcoming constraints by mitigation". In my experience "mitigation" invariably leads to a net local LOSS. This section provides an excess of 'wriggle-room' for predetermined decisions to be 'qualified' by ill-defined mitigation that is ultimately un-policed at the (post)-development stage.	These are matters that would be considered in detail by the case officer at the planning application stage.	No change

<p>CCC11</p>	<p>Resident</p>	<p>Joint approach</p>	<p>It is welcome to see that there will be an agreed approach between the Local Planning Authorities (LPAs). However, this approach should be extended further to identify potential cross boundary effects at the earliest possible stage i.e., during strategic assessment of land availability. For example, the methodologies and modelling used to produce other strategic assessments should also be consistent across the LPAs especially where cumulative impact is a consideration and, ideally, they should be produced to provide data at the Coventry and Warwickshire sub-regional area level but enable drilling down to the level of individual LPAs or specific geographical areas. This should include the following aspects:</p> <ul style="list-style-type: none"> - traffic levels (local and strategic road networks) - air quality - flood risk and flood storage - sewage and surface water systems - climate change – mitigation and adaptation - nature recovery - access to green space and sports/play facilities - access to services e.g., GP, dentist, schools - community facilities <p>Not only would this assist in the early identification of constraints, infrastructure requirements and locations where cumulative impacts could be an issue but would also help inform the evidence base for Local Plans. In addition, it has potential to streamline the process for developers especially for those who may be considering submitting an application for a site close to an administrative boundary.</p> <p>There have been significant and ongoing issues with several sites allocated within the Nuneaton and Bedworth Borough Council's (NBBC) Borough Plan where cumulative impacts on the wards of Longford, Foleshill and Holbrook were not</p>	<p>Noted, and the authorities are working together on a shared strategic evidence base to inform future local plan work and a co-ordinated approach to this. In terms of para 1.5, the Framework will be agreed and adopted by the LPAs involved. However this paragraph will be amended to make it clear that the framework itself will not be changed but that detailed assessment work will be taken forward by each LPA using the framework as the starting point for more detailed appraisal work which takes account of the local context.</p>	<p>Amend para 1.5 for clarity</p>
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			<p>sufficiently considered. In particular, impacts on Coventry’s AQMA; traffic levels – local and strategic road networks (M6 J3 and A444); local economy – Coventry Building Society Arena and shopping park; flood risk in areas such as Rowley’s Green(River Sowe), access to green space and sports/play facilities and access to services, including schools and GP practices.</p> <p>Currently, communities appear to be ‘falling through the cracks’ created by administrative boundaries. However, residents living at these locations should be afforded the same protections as others; inequalities in public health or access to services should not be exacerbated by sites which have been identified within neighbouring LPAs; through their planning policies e.g., Local Plan and SPDs, or planning decisions made about them at a later stage.</p> <p>The clause ‘It is not the objective of this joint methodology to standardise the methods...’ in 1.5 is of concern. How will a ‘consistent approach’ be achieved when a Local Authority can make adaptations? Would a proposal for an adaptation need approval by the other LPAs? Would local people be consulted on any changes made?</p>		
CCC12	Resident	2.19	<p>Understanding constraints</p> <p>It is welcome to see that Appendix 1 has been developed to ‘...establish any mitigations possible to overcome identified constraints’ and the concept of “front-loading” site assessment. How much support will a landowner be given when they are filling in a proforma particularly with identifying constraints? Will consultees be involved in this stage of the process e.g., National Grid, National Highways, Natural England, etc? Will the landowner be required to provide supporting evidence such as assessments produced by qualified professionals/consultancies e.g., an Ecological Impact Assessment (EclA) produced by an ecologist</p>	Noted. The further detail including any support will be down to the approach employed by each LPA when they undertake detailed assessment. Officers will use mapping to identify initial site constraints. The evidence needed will be proportionate to the stage at which the plan- making process has reached and	No change

			<p>registered with CIEEM. How will identification of constraints be robust at this stage without having an illustrative masterplan? How is the accuracy and availability of data checked? For example, in areas with a history of under recording, desktop based biological searches and maps may not be reliable and surveys may be required for protected species, birds, etc. Is there a process for reviewing RAG rates to ensure they remain up to date and accurate?</p>	<p>issues identified including the reliability of the evidence used.</p>	
CCC13	Resident	Section 5 of Appendix 1	<p>Additional Constraints:</p> <p>Could the following be added to the list of constraints in Section 5 of Appendix 1:</p> <ul style="list-style-type: none"> - Tree Preservation Order(s) – - Mature, veteran and/or ancient trees - Hedgerows - Grassland, pasture and/or meadow - Woodland - Main river and/or ordinary watercourse - Lakes, ponds and/or ditches - Sports fields - Allotments and/or orchards - Parkland and/or gardens - Protected species <p>Site features which are located within an ecological network; could contribute towards nature recovery and/or flood storage; where loss would have a negative impact on mitigation and adaptation to climate change e.g., carbon sequestration, the heat island effect, etc, or have the potential to improve access to green space or sports/play facilities should be identified early on.</p>	<p>The form at Appendix 1 is illustrative and can be tailored by each LPA to reflect the local context. However the suggestions will be included in the illustrative example as these are useful prompts</p>	<p>Amendments made to the proforma</p>
CCC14	Resident	General	<p>Proposed Land Use:</p> <p>The section on proposed land use should be more detailed. In particular, it requires specifics on Use Classes i.e., B, C, E, F and Sui Generis.</p> <p>For example, on p31 of the NPPF it says the following,</p>	<p>Noted – however the categories have been prepared in line with national guidance and the matters raised are issues which would be addressed</p>	<p>No change</p>

			<p>'109. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.'</p> <p>A proposal for use for 'B8 Storage or distribution' would require provision for overnight lorry parking and sufficient parking to cater for 'anticipated use.' Furthermore, an increase in HGV movements could introduce other issues such as impacts on air quality. If located within a residential area, landscape buffers may also be required to mitigate against noise pollution, light pollution, storage of hazardous materials, etc. This shows that constraints and site suitability are dependent on the Use Classes involved. Therefore, this information should also form part of the site assessment matrix and RAG ratings as it may be necessary to outline which Use Classes have been excluded or provide specific RAG ratings for each land use proposal if there is more than one option.</p>	<p>by each LPA at the site assessment stage. Parking for B8 (including overnight provision) would still be classed as B8 for example as it would be ancillary to the main proposed use. It is for the site promoters to provide the further detail and evidence to demonstrate why they consider their scheme to be a good proposal so it can be properly assessed.</p>	
CCC15	Resident	General	<p>Widening the scope of the assessment</p> <p>When we are facing impacts from climate change, the biodiversity crisis and poor air quality, it is essential that land availability for green infrastructure is considered alongside that for housing and economic purposes. Green infrastructure should be seen as an integral part of sustainable growth and not an afterthought at the level of individual sites. In wards where there is a deficit e.g., Foleshill, opportunities for nature recovery and improving access to open space should be prioritised. Furthermore, local planning authorities should work with landowners to explore funding opportunities (e.g., Environmental Land Management schemes, carbon offsetting schemes, Severn Trent Community Fund, Highways England Designated</p>	<p>All points noted and these are all matters which will be considered through the detailed assessment and plan-making processes undertaken by each LPA. However the HELAA itself has clear parameters (Housing and Employment) which are set out in the National Planning Practice Guidance and these have been followed for the purpose of this specific methodology. This is not to</p>	<p>No change</p>

		<p>Fund) and encourage collaboration with other organisations which have environmental, health and social goals. A sub-regional infrastructure strategy already exists and is underpinned by the Habitat Biodiversity Audit, the longest continuously running survey of its kind in the UK. In addition, there is a Warwickshire, Coventry and Solihull Green Infrastructure map which could be used to identify locations that could contribute towards Nature Recovery Networks, ‘joined-up, nature-rich spaces of all sizes, across all areas.’ Currently, these do not appear to be integrated within the HELAA process allowing potential sites to be lost and ecological networks to become further fragmented. Land use to provide access to services should also form part of the assessment as it is essential that the future needs of a community are considered especially in areas where there is ‘growth’. This should look at aspects such as access to education (early years, primary, secondary and colleges); GP practices and healthcare facilities; dentists; libraries; community meeting spaces; sports facilities; play areas; neighbourhood shopping centres and corner shops; places of worship; sheltered housing, assisted living facilities and nursing homes; etc. Without these aspects ‘growth’ cannot be sustainable; health, social and cultural well-being should be at the heart of the entire planning process. If sites are not identified early on for these purposes, opportunities to build in social infrastructure will be lost and this can have long-term impacts especially in deprived areas. According to the NPPF,</p> <p style="padding-left: 40px;">‘Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways...an economic objective...a social objective...an environmental objective.’</p>	<p>say that sites for other uses could not be put forward though as this is helpful to inform the local plan process.</p>	
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			<p>Previously, the process appeared to be focused on meeting certain aspects of the economic and social objectives such as delivering national housing targets. Even though a Green Infrastructure sub-group of CSWAPO existed, which was responsible for producing the Warwickshire, Coventry and Solihull Green Infrastructure Strategy, this did not seem to be translated into land availability assessments which called for and identified sites to address the NPPF's environmental objective and health and well-being aspects of its social objective such as nature recovery; mitigating flood risk and providing flood storage areas; improving access to open space and services; improving air quality and mitigating and adapting to climate change.</p> <p>'b) a social objective...by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and</p> <p>c) an environmental objective—to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'</p> <p>Hopefully, the new statement and methodology will be able to rectify this. Could the HELAA even be renamed to become the HECGILAA (Housing, Employment, Community and Green Infrastructure Land Availability Assessment)?</p>		
CCC15	Chair of Residents Group (Allesley and Coundon Wedge Society)	General	<p>Your document would seem to be better referred to as a 'Developers Charter' where they are invited to recommend sites for potential future development, it is ingenuous to suggest that they would seek to use Brownfield sites as these inevitably require further expense to develop, so they will naturally opt for existing greenfield sites.</p>	Local Authorities are unable to plan for their identified development needs without an understanding of what sites are available, suitable and deliverable. The HELAA provides essential evidence to enable sites to be	No change

			Furthermore, the Coventry Planning Depts record on actioning responses from such consultations is abysmal, being little more than lip service to meet regulatory requirements.	assessed in a thorough and considered manner. The National Planning Policy Framework prioritises brownfield sites.	
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Responses received by Rugby Borough Council

Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change to Methodology
RBC1	Fenny Compton Parish Council (Stratford District)	General	Framework consistent with Stratford District Council Site Allocation Plan process. No mention of HELAA consultation process itself. Request additional step that District Councils consult Parish Councils	Comments noted. Parish Councils will be consulted	No change
RBC2	Agent/house builder- Goldfinch OBO Lockley Homes	General	The representation concerns a site within Stratford District. The representation states that the site in question should be considered alongside two earlier Local Plan representations made to the South Warwickshire Local Plan Scoping and call for sites	The site relates to the South Warwickshire Local Plan and does not adjoin Rugby's boundary. It is therefore not appropriate for Rugby Borough Council to offer detailed comments	No change
RBC3	Other- Wolston Parish Council (within Rugby Borough)	Title page	The formal RBC consultation statement uses the word Employment, not Economic	The correct terminology is the Housing and Economic Land Availability Assessment	No change
RBC4	Other- Wolston Parish Council	Title page	To what extent is the HELAA applicable to an NDP?	The HELAA informs all housing and employment requirements. NDPs will be	No change

	(within Rugby Borough)			considered when assessing submitted sites	
RBC5	Other-Wolston Parish Council (within Rugby Borough)	Para 1.6, sub-point 3	Criteria identified (market desirability) is considered subjective	This is taken from national guidance.	No change
RBC6	Other-Wolston Parish Council (within Rugby Borough)	Para 2.11	Para 2.11 conflicts with Para 1.7. Greater clarity on 'acceptability' required. Does it include social, sustainability and environmental?	Yes, 'acceptability' includes all factors identified in the NPPF	No change
RBC7	Other-Wolston Parish Council (within Rugby Borough)	Para 2.6	Suggests the replacement of 'suitable' with 'prospective' as 'suitable' suggests a site is Green on the RAG assessment	Suitable is considered acceptable on the basis that 'suitable' is frequently used in the NPPF and guidance.	No change
RBC8	Other-Wolston Parish Council (within Rugby Borough)	Para 2.7 - table: Section 4 Section 7 Section 9	Suggest adding Parish Councils due to knowledge PCs have	Parish Councils will be engaged further	Text on Parish Councils to be added to list
RBC9	Other-Wolston Parish Council	Para 2.11	First sentence appears to conflict with earlier statements in the document	This is considered consistent because interested parties are able to suggest suitable mitigation measures to make	No change

Appendix 2

	(within Rugby Borough)			land suitable for development	
RBC10	Other-Wolston Parish Council (within Rugby Borough)	Para 2.12	The use of 'may' instead of 'will' as this avoids predetermination	The text is considered to refer to serious constraints so change not considered necessary	No change
RBC11	Other-Wolston Parish Council (within Rugby Borough)	Para 2.21	Replace 'sort' with 'sought'	Commented noted	Correct the typo
RBC12	Other-Wolston Parish Council (within Rugby Borough)	Para 2.25	Suggests that text should read: "...the amount of land for which other uses have been identified"	Phase 'land uses' considered pertinent in this sentence	No change
RBC13	Other-Wolston Parish Council (within Rugby Borough)	Para 2.26	'will' should read 'should'	Risk assessment considered important so will need to be included	No change

RBC14	Other-Wolston Parish Council (within Rugby Borough)	Para 2.27	Suggest adding that another 'Call for Sites' may assist	PPG guidance would be followed but then a further call for sites may be necessary	No change
RBC15	Other-Wolston Parish Council (within Rugby Borough)	Para 2.29	"will" should read 'should'	Change not considered necessary as the identified text is considered important to ensure a robust process	No change

Responses received by Nuneaton and Bedworth Borough Council					
Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change to Methodology
NBBC1	Sport England	General	Sport England wishes to make no comment but where playing field sites (existing or disused) have been submitted for assessment Sport England would be happy to assist with any assessment of the sites.	Noted.	No change
NBBC2	Oxalis Planning (Commercial Developer)	General	Will the Environment Act 2021 shape the HELAA process in any way and will it have an effect on the way in which sites submitted through the 'Call for Sites' exercise will be assessed?	The ecological merits/constraints/mitigation of a site will be assessed and be considered by each LPA.	No change
NBBC3	Oxalis Planning (Commercial Developer)	General	With regard to employment development, will the HELAA process begin taking regard to the sectoral priorities and strategies of the relevant Local Enterprise Partnerships?	Yes, part of the 'Suitability' assessment of a site which will be considered by each LPA.	No change
NBBC4	Oxalis Planning	Para 2.13	Accessibility, including sustainable access and travel to potential development sites, is a key indicator for the	Would be assessed as part of the 'Suitability' of a site. Part	No change

	(Commercial Developer)		identification for broad locations where development may be most suitable.	6 of the illustrative proforma includes this.	
NBBC5	Oxalis Planning (Commercial Developer)	General	Suitability for distribution or industrial employment development will require the HELAA to consider the need for sites capable of delivering large-scale buildings as part of the mix and range of land and buildings needed to respond to market needs.	Noted.	No change

Responses received by Warwick and Stratford-on-Avon District Councils

Comment reference	Respondent	Page / para reference	Consultation response (summary)	Officer response	Proposed change to methodology
WDC & SDC 1	Resident	General	<p>Suggest a clear statement be included about where development will <u>not</u> be allowed.</p> <p>As well as housing and business, there should be concurrent consideration of land for all other purposes including transport networks, education, recreation, exercise, health and social care, local and central government premises</p>	The HELAA is a database of sites which are to be considered for assessment, it is for each LPA to determine what is to be omitted or taken forward as part of its own detailed site assessment process.	No change
WDC & SDC 2	Resident	General	<p>The draft methodology proposed only makes passing reference to Neighbourhood plans as a source of potential development sites. The methodology makes no reference to democratic decision making or another Referendum on future development.</p> <p>All sites obtained via a call for sites process should be put to the rigour of a neighbourhood referendum.</p>	This approach would not be in line with national planning practice guidance. Neighbourhood plans can allocate sites, and these are subject to referendum once they have been deemed suitable to proceed to referendum by an independent examiner.	No change
WDC & SDC 3	Oxalis Planning (Commercial Developer)	General	When assessing potential sites for strategic employment, infrastructure provision and accessibility should be a key component of the assessment, which will be crucial to the eventual success of any site.	Noted, and site promoters would be expected to illustrate this within the context of their proposals.	No change

WDC & SDC 4	Other - Pillerton Priors Parish Council (within Stratford District)	General	<p>The drive to reduce impact on carbon emissions through the use of the car must feature in decision making. Developers want to build out in the green fields which simply ensures more cars. Response to climate change must feature in your assessments.</p> <p>Good use of existing brownfield sites should feature in your assessment.</p>	<p>Noted, national planning policy prioritises brownfield land and sustainable planning and these are matters which would be assessed in detail in relation to the sites put forward. Section 5 of the proforma asks for current / previous use of the land which enables LPAs to determine whether the site is brownfield or not.</p>	No change.
WDC & SDC 5	Resident	General	<p>There must be a moratorium on all greenfield development.</p> <p>Given the changes in retail and office activity, accelerated since the pandemic, the increased availability of redundant urban accommodation should make this possible.</p> <p>There must be active resistance to pressure from property developers for greenfield sites where profit margins are greater.</p>	<p>Detailed evidence has to be developed which sets out how much development each local authority needs to deliver. National planning policy prioritises brownfield land and sustainable planning and these are matters which would be assessed in detail in relation to the sites put forward and whether this can be accommodated without having to resort to greenfield. However national policy does not allow for a moratorium to be placed on greenfield sites.</p>	No change.
WDC & SDC 6	Resident	Section 2.15 (Suitability)	<p>The first sub bullet point states "National (and local) policy designations". Is this intended to suggest that the site designation policies already identified at a District (Local Plan)</p>	<p>This is not the intention, the wording has been adapted from national guidance, the</p>	Amend – remove the bracket

			and local (Neighbourhood Plan) level are in some way of secondary consideration compared to National directives?	brackets will be removed for clarity.	
WDC & SDC 7	Resident	General	Provide confirmation that when sites are listed for consideration for housing and employment in the future, there will not be amongst them any sites whatsoever that have already been the subject of planning applications that were refused unless the reasons for refusal no longer substantially apply.	This information would be considered in detail at the site assessment stage.	No change
WDC & SDC 8	Other - Harbury Parish Council (Stratford District)	Appendix 1. Proforma, section 6	In relation to Q6 regarding site accessibility and distance and walking time to the nearest bus stop, that while we have several bus stops in and around Harbury, the bus service is so infrequent that the proximity of the bus stops is immaterial. Surely a more pertinent question would be how frequently and at what times does the bus service run?	Noted – agreed that this information would be helpful.	Amend pro forma to include this
WDC & SDC 9	Other – Southam Town Council (Stratford District)	General	Advised that emerging Neighbourhood Plans that have gone past Reg 16 should be taken into account.	Noted and these would be considered during the detailed assessment stage although the weight given would be proportionate to the stage at which the plan had reached (eg in examination / modification / referendum)	No change
WDC & SDC 10	Other – Warwick Town Council (Warwick District)	General	The Town Council wish to make a return of no comment.	Noted	No change
WDC & SDC 11	House builder – Savills on behalf of Barratt David Wilson	Section 2. Methodology	Sites should not only be assessed for their development potential on what is principally a constraint-based assessment, as currently drafted. It is important that the benefits and opportunities provided by the development proposals on the assessed sites, as well as the benefits and opportunities provided by the wider context, should be reviewed and recorded through the HELAA process	Section 9 ‘additional information’ of the proforma provides this opportunity.	No change

	Homes (Mercia)		and taken into consideration in deciding which sites to allocate.		
		Appendix 1. Proforma, section 4	Sites being promoted by parties may be subject to an Option or Promotion agreement that gives the party control to promote the site for development. The party may therefore have a recognisable interest in the site but is not however the freehold or leasehold owner of the site. The 'Do you own the site?' part of Section 4 should be amended to reflect this.	Section 4 provides the opportunity to elaborate on the circumstances however a note will be added.	Amend section 4 of the proforma to prompt further detail
WDC & SDC 12	Other – Wellesbourne & Walton Parish Council (Stratford District)	General	The only reference to parishes and local councils were that the Parish's Neighbourhood Plan would be looked at but Cllrs felt Parish Councils should be contacted and consulted directly as changes may have occurred in the parish that needed to be taken into consideration and that Made Neighbourhood Plans should be followed not just considered.	Noted – Parish Councils would be consulted as per the consultation mechanisms employed by each LPA.	No change
WDC & SDC 13	Other – National Highways	General	Support the emphasis placed on the assessment of potential development sites at the earliest stage with respect of their capacity, developability, suitability and achievability. On this matter, we wish to stress the importance of identifying the transport implications at the earliest possible stage, as the need for transport mitigation, may delay the local authority in realising their five-year land supply.	Noted	No change
WDC & SDC 14	House builder – Harris Lamb on behalf of Barratt David Wilson Homes (Mercia)	Section 2. Methodology	The benefits of proposed allocations should be set out within the HELAA in order to assist in the identification of development sites. Sites should not be assessed for their development potential on what is, by and large, a constraint-based only assessment as currently drafted.	Section 9 'additional information' of the proforma provides this opportunity.	No change
		Appendix 1. Proforma, section 4	Sites being promoted by parties may be subject to an Option or Promotion agreement that gives the party control to promote the site for development. The party may therefore have a recognisable interest in the site but is not however the freehold or leasehold owner of the site. The 'Do you own the site?' part of Section 4 should be amended to reflect this.	Section 4 provides the opportunity to elaborate on the circumstances however a note will be added.	Amend section 4 of the proforma to prompt further detail
WDC & SDC 15	Other – Radford	Paragraph 2.31	The call for sites gives a major role to prospective developers. They have the opportunity to advocate for their prospective	Parish Councils and communities will have a say	No change

	Semele Parish Council (Warwick District)		sites including mitigation measures. There appears to be no opportunity for town and parish councils or local communities to have an input to the assessment of prospective sites. Paragraph 2.3.1 says that the final assessment will be published on each authority’s website for public view. This suggests that town and parish councils and local communities will see the outcome of the process but will have no role in it. The parish council has noted that the analysis identifies sites which could be developed not sites which should be developed. Nevertheless, this process is a fundamental sift of prospective sites and will affect the subsequent stages.	when the Local Authority undertakes consultation on the different stages of the Local Plan, or which this evidence will form part.	
		General	Concerned about the weight which will be given to existing policies in the assessment of prospective sites. In particular, the Green Belt currently covers a large part of South Warwickshire and impacts on the allocation of development. If the current Green Belt policy and extent is taken as it stands decisions on prospective sites will be taken in advance of the substantive local plan decisions on the future policies and extent of the Green Belt.	These are matters for the detailed site assessment process by each LPA to consider in the context of how much development it needs to provide and how much urban capacity / suitable brownfield land it has to accommodate this as first priority in line with national planning policy.	No change
WDC & SDC 16	Other – Environment Agency	Paragraph 2.15, Appendix 1 – Proforma. Section 5	<p>The impact of flood risk affects the ‘capacity’ and ‘suitability’ of a site and therefore, we advise this is clearly considered as relevant information to inform the assessment under paragraph 2.15.</p> <p>In terms of suitability of the flood risk and sites for Housing and Employment, the following principles should be adhered to:</p> <ul style="list-style-type: none"> ● SUITABLE - Flood Zone 1 ● MAY BE SUITABLE - Flood Zone 2 and 3a ● NOT SUITABLE - Flood Zone 3b (<i>functional floodplain</i>) 	Noted, it is considered that 2.15 covers this and flood risk is highlighted in the proforma. Detailed assessment would apply the principles highlighted.	No change

		General	Advise that any new development is not at risk of flooding both now and in the future due to climate change. SFRA's may show developments are at increased flood risk in the future where they may be currently located in Flood Zone 1. We strongly advise this is considered as part of the assessment and informed by your Strategic Flood Risk Assessment (SFRA).	Noted and this will be taken account of in detailed assessment work.	No change
WDC & SDC 17	Star Planning on behalf of Richborough Estates Limited	Paragraphs 1.5 and 3.6	There is reference to the joint methodology not having the objective of standardising the methods to assess land availability within each local planning authority. Although a framework is proposed to be created to ensure a consistent approach is adopted, there is a lost opportunity to introduce higher degree of standardisation across the Sub-Region. Such standardisation gives greater certainty to all stakeholders about the inputs required and the veracity of the outcomes.	The context for each Local Authority area is very different (City / towns / villages /rural) so a broad framework allowing for local flexibility is considered a robust approach.	No change
		Paragraph 2.14, Paragraph 2.15, Paragraph 2.18.	As recognised at paragraph 2.14, the quantum of development can impact upon viability and paragraph 2.18 then refers to the best judgement on economic viability of a site being applied. Although mention is made of viability in the call for sites pro forma, the Statement is unclear what specialist inputs will be sought by the local planning authorities to address the critical viability and deliverability elements. Will the onus be placed upon the landowners/promoters of broad locations or sites to demonstrate viability or will the authorities seek advice from an Agent? Is the fact that a land promoter or housebuilder being actively involved with a parcel of land sufficient to demonstrate its market desirability? Clarification about how viability and market desirability will be assessed is required.	The onus is placed on those promoting the sites. Viability in terms of the Local Plan process comes at a later stage and each LPA would arrange for this themselves.	No change
		Section 3 - Implementation	Ensure that constancy is applied to the RAG approach, and provide further guidance to the local authorities of the boundaries between the red, amber and green scores.	The context for each Local Authority area is very different (City / towns / villages /rural) so a broad	No change

				<p>framework allowing for local flexibility in the assessment process is considered a robust approach.</p>	
		<p>Appendix 1 – Proforma</p>	<p>The example pro forma is not a user friendly document.</p> <p>Alongside a location plan, it would be beneficial to ask for any masterplan or vision document for a site to be provided.</p> <p>In Section 4 for the question “Do you own the site?” it is impossible for someone to say “Yes – acting on behalf of the owner(s)”. The body answering the question would not own the site but there will be a legal agreement in place to act. Accordingly, the response should be “No – but acting/promoting on behalf of the owner(s)”. In addition, if this amended answer is ticked then there should be a further question to clarify of the relationship to the owner(s). It would be beneficial to have after Section 4 a separate section asking about whether a broad location or the site has planning consent (in whole or part).</p> <p>Section 5 needs further consideration because:</p> <ul style="list-style-type: none"> • The implication is that current/previous uses and adjacent land uses are constraints. Instead, these queries should be directed at asking if current/previous uses or adjacent land uses are a constraint to development and, if so, why and what forms of development are constrained? • The third question should be whether there are legal issues which limit the development potential of the land. • The fourth question should, rather than just being about ransom strips, ask whether any third party land is required outside the site (other than public highway land). 	<p>The proforma asks for information which enables each LPA to establish the facts about a site in a proportionate manner which is fair to those promoting sites of all sizes given that this is the first stage of a ‘sifting process’. Should site promoters wish to submit more information they are welcome to do so should they wish to resource this.</p> <p>Changes to the form have been made in terms of ownership, agreements, ransom strips, wildlife and ecology, flooding and topography. The reference to unexploded ordnance has been retained as this is relevant to some of the participant authorities (as an illustrative proforma which LPAs can adapt to suit their local context)</p> <p>In terms of other matters this is an illustrative profoma but individual LPAs may wish</p>	<p>Changes to the proforma made in line with officer comments</p>

			<ul style="list-style-type: none"> • To a lay person, what is the difference between Wildlife Designations and Ecology Designations? These should be a single question regarding Biodiversity Designations. • For the lay person where would they find information about Unexploded Ordnance? This criterion ought to be deleted. • Other Physical Constraints should be broken down into specific subjects such a floodplain and topography rather than being grouped together. Suggest in Section 6 - to confirm which journey planner should be used to determine walking time (as consistency point). Further, the list of amenities ought to be broken down into, for example, primary school, convenience food shop, public house and community hall. 	to expand depending on their local context.	
WDC & SDC 18	Resident	Introduction – Paragraph 1.3, Paragraphs 1.5	<p>Paragraph 1.5 contradicts the statement contained in 1.3 “the methodology is an agreed approach between local Authorities”.</p> <p>The use of descriptors such as “broad framework to ensure a consistent approach, which each Local Authority can then adapt to reflect their own local circumstance” is simply contradictory and ambiguous.</p>	Noted. The text will be amended to make clear that the framework will not be changed once adopted, it is the detail following on from this which each Local Authority will develop and adapt.	Amend para. 1.5 for clarity
WDC & SDC 19	Goldfinch on behalf of Lockley Homes	General	The representation concerns a site within Stratford District. The representation states that the site in question should be considered alongside two earlier Local Plan representations made to the South Warwickshire Local Plan Scoping and call for sites.	This would be a matter for detailed assessment by the individual LPA.	No change
WDC & SDC 20	Development Consultant – Dobson Grey	General	There is a need to include references to different types of housing when considering land availability assessments and subsequent land allocations. The current assessment model does not adequately distinguish between standard market housing - which will maximise potential land values - and more specialist forms of accommodation with associated	These are all matters which will be considered through the detailed assessment and plan-making processes undertaken by each LPA. However the HELAA itself has clear parameters	No change

			<p>higher build costs and a reduced ability to pay a premium for land.</p> <p>It is necessary to consider the requirement for land for other types of development which are neither residential nor a standard form of employment use. There is an increasing demand nationally for pupil places within specialist educational facilities, including private Special Educational Needs schools. There is a lack of specific land allocations to meet this need.</p> <p>It is also necessary for there to be clarification as to what types of uses will be considered under the category of ‘other’ development as referred to in the draft Methodology document.</p>	<p>(Housing and Employment land) which are set out in the National Planning Practice Guidance and these have been followed for the purpose of this specific methodology. This is not to say that sites for other uses could not be put forward though as this is helpful to inform the local plan process.</p>	
WDC & SDC 21	Turley on behalf of Taylor Wimpey	Methodology, Figure 1	<p>It is difficult to determine how the methodology will be applied consistently across all authorities - for example, will each authority be mandated to implement the site assessment matrix at Figure 1?</p>	<p>The matrix is illustrative, it is for each individual LPA to determine how it wishes to undertake its detailed site assessment.</p>	No change
		Strategic / large scale housing sites	<p>The draft methodology will only assess sites that have the capacity of 5 dwellings or more.</p> <p>However, the PPG does offer the opportunity for plan-makers to consider alternative site size thresholds, which in this instance, Taylor Wimpey encourage the HELAA to do.</p> <p>The identification of large scale sites at a sub-regional scale will allow local authorities headroom to identify smaller sites so a variation of site sizes is met through the plan-making process.</p>	<p>Each Local Authority can opt to assess smaller sites in addition if it so wishes to and considers it proportionate to the local context however this is a decision to be taken locally.</p>	No change
		Assessment of Suitability –	<p>There is no confirmation on what ‘relevant information’ will be used to assess the suitability of each site or broad area. It is therefore unclear how the potential impacts for constraints</p>	<p>Examples of ‘relevant information’ are included in para 2.15, detail will depend</p>	No change

		Paragraph 2.15 to 2.16	such as Green Belt and landscape will be measured and reported.	upon the local context and will be determined by each individual LPA.	
		Achievability	The assessment of whether or not a developer has the capacity to complete and sell a development over a certain period can be enhanced with the inclusion of criteria to distinguish whether or not a site has a development partner on board.	Noted. The form provides opportunity to add this in however it will be amended to include a 'prompt' for further information.	Amend form to prompt this information if relevant to the promoter's situation.
WDC & SDC 22	Turley on behalf of IM Land	General	<p>Whilst it is recognised that the proposed methodology for the (HELAA) is to be a broad framework which in turn will be built upon by authority-specific methodologies, it is difficult to determine how the principles will be applied consistently across all authorities. This concern is further echoed in the fact that it is not the objective for the methodology to standardise the methods made to assess land availability in each Local Authority. If the approach is not standardised as a broad approach, it is not clear how consistency can be achieved.</p> <p>At present there is no confirmation on what 'relevant information' will be used to assess the suitability of each site or broad area. It is therefore unclear how the potential impacts for constraints such as Green Belt and landscape will be measured and reported.</p>	Examples of 'relevant information' are included in para 2.15, detail will depend upon the local context and will be determined by each individual LPA.	No change
WDC & SDC 23	Knight Frank on behalf of A & M Turney and Mr and Mrs G N Wright	Methodology – Paragraph 1.5	<p>-There needs to be a consistent approach to the assessment of sites.</p> <p>-There is no commitment within the methodology that Local Authorities will commit to review their respective Strategic Housing and Economic Land Availability Assessment in the event that they cannot demonstrate a five-year housing land supply and we suggest that this should feature within the methodology as a requirement.</p>	The methodology already reflects national planning policy and guidance and is aimed at achieving consistency at a sub regional scale. The approach to undertaking a detailed HELAA and the assessment process is down to each LPA to undertake individually.	No change

			-Engagement in accordance with the NPPG should feature as a requirement within the methodology to ensure that this is a standard method featuring within all independent methodologies.		
	Suitability	<p>Climate change and sustainable transport should be included within the methodology to ensure that the assessments identifying suitable locations for new residential development.</p> <p>A site submission form should enable landowners and promoters to supplement their submissions with technical reports and vision documents to enable a fair assessment of sites, especially if Call for Sites become interactive submissions. The ability to supplement submissions will also enable Local Authorities to accurately appraise site suitability and their potential, allowing for mitigation.</p>	<p>It is considered that these issues are already covered in terms of the evidence which is requested.</p> <p>LPA to establish the facts about a site in a proportionate manner which is fair to those promoting sites of all sizes given that this is the first stage of a 'sifting process'. Should site promoters wish to submit more information they are welcome to do so should they wish to resource this.</p> <p>There are sections of the form which enable the suggested information to be submitted should the promoter wish to elaborate.</p>		No change
	Availability	<p>The Council should ensure that it has a robust evidence base on site availability for every site it includes within its trajectory. If the availability cannot be determined by fact, then the site is not available for the purposes of housing delivery.</p> <p>If availability is unknown, then further work is required and should be undertaken to ascertain availability to inform subsequent annual reviews and sites omitted until availability becomes known and is substantiated with evidence.</p>	<p>Noted, however the HELAA assesses a range of short, medium and long term options which will be explored and scrutinised through the local plan process</p>		No change

		Achievability	Market viability needs to be properly factored in to the SHELAA site assessment work.	Noted. This forms part of the proforma.	No change
		Stage 3 – Windfall Assessment	The general approach proposed is accepted on the proviso that each respective Local Authority adopts a consistent approach to assessing windfall allowances. It is suggested that windfall assessments are carried out within each Local Authority across all housing completions within the last 10 years to determine how many could be classed as windfalls within each year.	Noted however the method for assessing this is to be determined by each LPA in a manner which reflects the local context.	No change
WDC & SDC 24	Knight Frank on behalf of A.M Jervis and Son	Same as above	Same as above (identical representations but on behalf of a different client)	See above	See above
WDC & SDC 25	Turley on behalf of IM Properties Plc	General	The methodology is not sufficiently balanced to consider whether a site is deliverable / developable for economic use as the assessment criteria currently lacks robust accessibility assessment section. The methodology should consider and reflect upon the key locational drivers for storage and distribution operators, including access to the strategic transport network, access to labour, sustainable movement and proximity to market.	The methodology provides a broad framework at a sub-regional level. It is for each LPA to develop its own detailed methods of assessment in line with this, but which reflects the local context.	No change
WDC & SDC 26	RPS on behalf of a Consortium of developers	General, Paragraph 1.5 and 1.11	Whilst it is understood that each authority area will have its own issues and challenges, it is not clear where the ‘broad’ HELAA approach stops and where the individual assessments begin. Concerns there could be a risk of significant difference and inconsistency across the C&W area.	The methodology provides a broad framework at a sub-regional level. It is for each LPA to develop its own detailed methods of assessment in line with this, but which reflects the local context.	No change
WDC & SDC 27	Resident	General	Methodology seems sound within its limited context. However, it appears to lack any recognition that future development must help to mitigate climate change and provide net wildlife and ecological gains for the benefit of our health and well-being.	Noted – the call for sites will be run by each Local Authority to reflect the local context.	No change

			Call for Sites should require some details of how developers propose to meet these obligations.		
WDC & SDC 28	Framptons on behalf of Bryer Estates	General	<p>The Methodology should properly make reference to the requirements of the PPG (Ref: Paragraph 31 Reference ID: 2a-031-20190722). How can Authorities assess need and allocate space for logistics?</p> <p>The PPG makes clear that the logistics sector has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).</p> <p>Presently as drafted, the Methodology would appear intent on making an assessment, of land generally for 'economic' development. The distinct locational requirements for logistics would not be accounted for.</p>	The evidence base is being updated and logistics will be considered as part of this including the matter of locational requirements. There is nothing in the methodology to stop site promoters from submitting the detail to support their case in this regard as this will be considered through the local plan process and through the Duty-to Cooperate in terms of cross boundary matters.	No change
WDC & SDC 29	Other – Wellesbourne Allotment & Garden Holders Association (WAA) - (in Stratford District)	General	<p>Land east of Kineton Road, Wellesbourne is in the SDC Site Allocations Plan 2020 as a Reserve Site from 2030/31.</p> <p>WAA recommend that instead of being a reserve site, it should be removed from this listing and be retained in perpetuity as a vital green space for the long-term enjoyment of the community.</p>	The methodology makes no recommendations in terms of specific sites, this is a matter for the relevant local Authority to appraise through its own detailed site assessment mechanisms.	No change
WDC & SDC 30	Other – Lapworth Parish Council (in Warwick District)	Section 6 of Appendix 1 - Proforma	Concerned that although proximity to nearest bus stop and station are requested, it does not appear that further information is asked e.g. what bus routes (if any) serve the nearest bus stop, how frequently does a bus stop there? What train line is the station on? Do trains actually stop at that station?	In terms of transport an amendment will be made to the illustrative proforma to provide this information. In terms of amenities a prompt will be added in to request information on any known capacity issues	Changes to pro forma in line with officer comments

			<p>Similar questions should be asked about the closest amenities – what are they? If a surgery or dentist, does it have the capacity to take on any additional residents?</p> <p>It was felt that the questions are not searching enough and it would be easy for a potential site to get a tick because it's near a station, but in reality trains don't stop there so it's not of any benefit to the locality.</p>	Each local Authority will be able to adapt the illustrative proforma to better reflect the local context.	
WDC & SDC 31	Other - District Councillor for the northern ward of Campden and Vale at Cotswold District Council	General	Concerned about the amount of new housing being built on the Warwickshire/Gloucestershire border which will increase significantly the amount of traffic passing through both villages on the B4632.	Noted. This is a matter for the detailed Local Plan process to consider and will need to be addressed by the Local Authorities concerned.	No change

Responses received solely by North Warwickshire Borough Council

Comment reference	Respondent	Page / para reference	Consultation response (summary)	Officer response	Proposed change to methodology
NWBC1	Water Orton Parish Council		<p>WOPC concerns;</p> <ol style="list-style-type: none"> 1. Essentially ANY site could be developed, comment in section 1.7 is too wide. Any assessment whether sites could be developed <u>have</u> to include such aspects as: <ol style="list-style-type: none"> a. Can the local infrastructure support the development? (traffic impact, sufficient health facilities? school places etc?) 	<p>Comments noted. Para 1.7 reflects the process. Parish Councils will be consulted. Points a, b and c will be integral parts of any site assessment process prior to any potential allocation.</p> <p>Officers will use mapping to identify initial site constraints. and engage</p>	No change

			<p>b. A flood assessment should be carried out at the initial stage.</p> <p>c. Any reduction in open space should be sympathetic with national recommendations e.g. If assessments provide negative feedback, any site that "could" be developed must be accompanied by a plan to mitigate the identified problems.</p>	with statutory and non-statutory consultees during detailed site discussions.	
NWBC2	Water Orton Parish Council		<p>2. Local Parish and Town councils should be consulted at the initial stage to provide local knowledge and expertise.</p> <p>As a general point, this proposed policy is for Warwickshire and should not allow 'trading' housing stock numbers with other areas .</p> <p>Water Orton is particularly vulnerable on this point as it is neighbouring not only Birmingham council but also Solihull council</p>	Comments re-"trading" noted but will only arise where Duty to Co-operate issues of adjoining authorities lack of capacity and shortfalls arise. Aware of concerns but this is a more strategic issue above the individual authorities HELAA.	No change

Agenda Item No 6

**Local Development Framework
Sub-Committee**

12 September 2022

Report of the Chief Executive

**Local Development Scheme (LDS)
September 2022**

1 Summary

- 1.1 This report brings to Members a revised up to date Local Development Scheme.

<p>Recommendation to Executive Board</p> <p>That the Local Development Scheme is approved.</p>

2 Consultation

- 2.1 Consultation has taken place with the relevant Members and any comments received will be reported at the meeting.

3 Local Development Scheme

- 3.1 This report brings to Members an update of the Local Development Scheme (LDS) to reflect the work that is to be carried out and to ensure that the legal process for the production of the documents is adhered to.

- • • 3.2 The revised document is attached as Appendix A. It can be altered/updated at any time.

- 3.3 The revised LDS reflects the adoption of the Local Plan in September 2021.

- 3.4 A new document for the LDS is an Employment Development Plan Document which will look to develop the Local Plan policy LP6.

- 3.5 The Gypsy and Traveller Development Plan Document continues to be part of the work programme and reflects ongoing planning applications and appeals.

- 3.6 The LDS also lists the Supplementary Planning Documents (SPDs) which it is intended to produce. The list has expanded to include both the Open Space and Recreation SPD and the Affordable Housing SPD.

4 Report Implications

4.1 Finance and Value for Money Implications

4.1.1 The costs of the programme of work are funded through the Local Development Framework budget.

4.2 Legal and Human Rights Implications

4.2.1 It is a requirement of the Planning and Compulsory Purchase Act 2004 that a Local Development Scheme is prepared and maintained, outlining the work programme to produce the various Local Development Documents required under that Act and other legislation. The Scheme must also specify the geographical area to which each such document relates, set out those documents which will be prepared jointly with others and give a timetable for preparation of the documents concerned. The revisions to the scheme which are Appended to the report ensure that the Council continues to discharge this responsibility.

4.3 Environment, Climate Change & Health Implications

4.3.1 Sustainability appraisals are required to accompany all Local Development Documents identified by this Local Development Scheme. Consultants are engaged to work alongside the Forward Planning Team. The Local Development Scheme and the associated plans and documents take into account evidence of housing needs, landscaping appraisal, habitat biodiversity audit, climate change and other assessments to inform future development frameworks. All the various assessments help inform a sustainability appraisal.

4.4 Equality Implications

4.4.1 An equality impact assessment has been carried out on the Local Plan which sets out the overarching spatial vision for the Borough over the next 15 years.

4.5 Links to Council's Priorities

4.5.1 The delivery of the Local Development Framework is linked to all of the Council priorities.

The Contact Officer for this report is Dorothy Barratt (719250).

***Local Development
Scheme
for
North Warwickshire***

October 2022



**North Warwickshire
Borough Council**

- 1 North Warwickshire Borough Council is required by the Planning and Compulsory Purchase Act 2004 to prepare and maintain a Local Development Scheme (LDS). An LDS sets out a timetable for the production of new or revised Development Plan Documents (such as a Local Plan) over a three-year period to 2025. It is regularly reviewed to keep it up to date. This LDS version supersedes previous versions.
- 2 The Development Plan Documents for North Warwickshire are:
 - North Warwickshire Local Plan 2021
 - Warwickshire Waste Core Strategy (adopted July 2013)
 - Warwickshire Minerals Local Plan
 - Arley Neighbourhood Plan
 - Austrey Neighbourhood Plan
 - Coleshill Neighbourhood Plan
 - Fillongley Neighbourhood Plan
 - Hartshill Neighbourhood Plan
 - Mancetter Neighbourhood Plan
 - Water Orton Neighbourhood Plan
- 3 The Statement of Community Involvement was adopted in April 2007 and was updated during the lockdown for the pandemic reflecting the difficulties of depositing physical documents at the Council House and other locations. The document will be reviewed in 2023 to see if it requires further updating.
- 4 A further 7 Neighbourhood Plan Areas have been formally designated. These are:
 - Atherstone covering Atherstone Parish and a small part of Grendon Parish
 - Corley Parish
 - Curdworth Parish
 - Dordon Parish
 - Nether Whitacre Parish
 - Polesworth Parish
- 5 Consideration of a CIL (Community Infrastructure Levy) charge is ongoing, and it is envisaged that, if approved, a charging schedule could be in place by 2024.
- 6 This LDS confirms the updated work programme which is attached as Appendix A.
- 7 The Borough Council adopted the Local Plan in September 2021. The evidence underpinning the Local Plan will be reviewed over the next few years to assess as and when a review will be required.
- 8 The needs of the Gypsy & Traveller community have been incorporated into the new Local Plan. However, consideration needs to be given to updated evidence which may require additional sites/pitches being brought forward so a separate development plan document will be prepared.
- 9 The Local Plan has a policy dealing with Strategic Employment Sites - LP6. The Borough Council will start to prepare an Employment Development Plan Document which will look, if it is found to be necessary, to allocate a site for such purposes.

- 10 The Minerals and Waste Documents are the responsibility of Warwickshire County Council. The County Council adopted Minerals Plan in July 2022. Further information can be found on the County Council's website: www.warwickshire.gov.uk.
- 10 With the adoption of the Local Plan the focus of the Forward Planning team will move to the implementation of the Local Plan. A number of Supplementary Planning Documents (SPD's) will be prepared to assist with the interpretation of policy. These are also outlined in Appendix A.

Appendix A

Development Plan Document

Document Title	Subject matter and geographical area	Chain of Conformity	Consultation	Publication of Submission Draft DPD & Public Consultation	Submission and Examination of DPD	Adoption and Publication of DPD	Policies it will replace
Gypsy and Travellers DPD	It will look to allocate sites for the Gypsy and Traveller community.	Local Plan and NPPF	Spring 2023	Autumn 2023	Early 2024	2024	May replace LP10
Employment DPD	It will look to allocate sites if necessary	Local Plan and NPPF	Early 2023	Summer 2023	Winter 2023	2024	LP6

Supplementary Planning Documents

Document Title	Geographical area	Chain of Conformity	Consultation	Adoption of SPD
Open Space and Recreation SPD	Whole Borough	Local Plan	Autumn 2022	Winter 2022
Bin Storage SPD	Whole Borough	Local Plan	Autumn 2022	Winter 2023
Affordable Housing SPD	Whole Borough	Local Plan	Spring 2023	Winter 2022
Developer Contributions	Whole Borough	Local Plan	Spring 2023	Winter 2022
Residential Design SPD	Whole Borough	Local Plan	Winter 2022	Summer 2022
Design Principles SPD (Site H4)*	Land East of Polesworth and Dordon	Local Plan	Spring 2023	Summer 2023
Design Principles SPD (Site H2)*	Land to north-west of Atherstone	Local Plan	Spring 2023	Summer 2023
Parking SPD	Whole Borough	Local Plan	Spring 2023	Summer 2023
Shop Fronts SPD	Whole Borough	Local Plan	Spring 2023	Autumn 2023

* SPD production will be reviewed depending on progression of Master Plan for site.

Further Information Sources

Below are links to websites which will assist should you require further information:

- The Council's website:
www.northwarks.gov.uk/info/20002/planning/1357/new_local_plan
- National Planning Policy Framework
www.gov.uk/government/publications/national-planning-policy-framework--2
- Planning Practice Guidance
www.gov.uk/government/collections/planning-practice-guidance
- The Planning and Compulsory Purchase Act 2004:
www.legislation.gov.uk/ukpga/2004/5/contents
- The Town and Country Planning (Local Planning) (England) Regulations 2012:
[/www.legislation.gov.uk/uksi/2012/767/contents/made](http://www.legislation.gov.uk/uksi/2012/767/contents/made)
- Neighbourhood Plan Act
www.legislation.gov.uk/ukpga/2017/20/contents/enacted
- Planning Advisory Service:
www.local.gov.uk/pas
- Planning Portal:
www.planningportal.co.uk/

Further assistance:

If you require any further information, please contact the Forward Planning Team:

Email: planningpolicy@northwarks.gov.uk;
Write to: Forward Planning Team, The Council House,
South Street, Atherstone, CV9 1DE
Ring: 01827 719499 / 719451 / 719250