



Local Plan 2031
Part 1
**Strategic Sites
and Policies**
*Strategic Housing
Land Availability
Assessment (SHLAA)*

Appendix
28
Responses to
February 2013
Consultation

Officer response to representations made on Draft SHLAA Methodology

Person ID	Agent ID	Response to SHLAA Methodology	Officer response	Action
Redrow Homes South Midlands (723103)	Mr David Bainbridge (723097)	It would be best practice to establish a working party including developers/agents to assess the initial assessment by the Council and to provide the opportunity for developers/agents not on the working party to comment on the draft prior to publication.	The SHLAA will form an evidence based document as part of the February 2014 Local Plan Consultation (Housing Delivery Update). This will provide an opportunity for comments to be received with respect to outcomes of the assessment. These comments will be looked at as part of the next update to the SHLAA.	No further action
Mr David McWhirter (730296)		These comments are submitted by the Small Village Alliance. We support the policy of looking for land around the established towns and larger villages. This conforms with the guidance in the NPPF and fits with Vale policy. It also supports key principles such as "sustainability". Two specific points we would ask to be changed please:- Table 2, Para 6.1. The IHSP should NOT be used as a source document. It was withdrawn and an assurance given by the Vale that it would not be used in future plans. The IHSP caused huge disquiet and needs to be put to bed once and for all. Table 4. Policy Reasons for excluding sites. The penultimate reason is "land in open countryside and adjacent smaller less sustainable settlements" should be more precise. In effect this part is about small villages. We would like to see this made clear and suggest the section read as follows "land in open countryside and adjacent to smaller less sustainable sites such as the rural small villages"	<p>The IHSP screening report has been treated as an evidence document to cross check the land promoted through the IHSP and that now promoted through the SHLAA. The methodology for the SHLAA is quite different and the SHLAA serves a different purpose.</p> <p>Draft Guidance was produced by Government in August 2013 setting out a new form of methodology for land assessment. To ensure clarity of your point in relation to policy reasons for excluding sites, paragraph 1.6 of our updated methodology states that we will only assess sites within or on the edge of market towns, local service centres and larger villages (including Harwell Oxford Campus and land to the west and north of Didcot also). As a result, sites which were submitted to us within or on the edge of smaller villages have not been assessed as part of this SHLAA update.</p>	Updated methodology ensures that sites in small villages are not assessed as part of this update to the SHLAA.
Mr Paul Phillipson (729505)		I am pleased that the need for sustainability is recognised. It is in my view imperative for the reasons of School, road capacity public transport water etc. and now also internet in rural areas for both business and access to services. Sustainability becomes particularly relevant because Government guidance seems to indicate that all land not subject to intrinsic constraints (Para 7.5) including that outside the development boundary of a settlement (Para 7.7) should be considered for development. In my view such guidance is reckless in the extreme although clearly the SHLAA methodology recognises the issue to some degree by focusing on larger settlements. I am glad to have this opportunity to comment and hope that many will. The community opinion needs to be taken into account. The majority of votes at the Fernham Village Meeting were against development.	Noted	None
Mrs E	Mrs Emily	The NPPF requires Local Planning Authorities to have a clear understanding of	The council is using the SHLAA to identify potential	No further action

Frost (734801)	Warner (724596)	<p>housing needs in their area (paragraph 159). In order to do this, a Strategic Housing Land Availability Assessment (SHLAA) should be produced which should 'establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period.' Practice guidance was issued by the Department of Communities and Local Government on SHLAA production in July 2007 and the Council has used this guidance to formulate the SHLAA methodology. In addition the Planning Advisory Service (PAS) produced further guidance in June 2008 entitled 'Strategic Housing Land Availability Assessment and Development Plan Document Preparation.' The Council's SHLAA methodology implies that the sites surveyed will be limited to those which have a capacity for 10 dwellings or more and on land in and immediately adjoining the main towns and the larger villages. However, this is at odds with the CLG guidance which states 'in areas dominated by smaller rural settlements (such as the Vale), it may be necessary to identify all the sites with potential for housing.' The PAS guidance also advises that SHLAA assessments can cover all settlements with housing potential both urban and rural and beyond existing settlements, and can cover all sites with housing potential on both previously developed and greenfield land (page 3). The guidance clearly states that 'all greenfield sites which are reasonable candidates for housing should be identified and assessed from the outset, even where there may be opposition to some of them. The better the process of selection at the outset of the SHLAA, the less chance that "new" sites will come forward later in the plan-making process which the authority will then realise should have been included and assessed' (page 5). Clearly local authorities need to examine and consider all of the possible options from the start of the process so that if following the review there are still insufficient sites, it will be possible to investigate how this shortfall can be best planned for. There is nothing in any of the guidance papers for SHLAA production to suggest that the Council has reasonable grounds to exclude any sites from consideration in the SHLAA due to their location. The Council must ensure that genuine opportunities to provide sustainable rural communities through the provision of further housing are not missed as the greater focus on the larger settlements has resulted in the required housing land not being delivered. Proposals for further housing can help to make settlements such as Sparsholt more, not less, sustainable, especially where an identifiable local for housing exists and where there are a number of services and facilities already serving the village. In light of the above and given the Council's current lack of a 5 year land supply, it is considered that the SHLAA methodology should be amended to be more flexible so that it does not exclude the consideration of the smaller settlements or land which does not immediately adjoin an existing boundary.</p>	<p>sites for housing and to ascertain whether there is a reasonable prospect of sufficient land capacity to accommodate proposed housing over the plan period. We have focussed this area of search on sites within or adjacent to the most sustainable settlements. This is in accordance with national policy, which highlights the importance of sustainable development.</p> <p>The draft National Planning Practice Guidance published in August 2013 states that site surveys "should be proportionate to the detail required for a robust appraisal". As our emerging Local Plan Part 1 is focused on strategic sites and policies, then the focus of this update to the SHLAA should be to look at larger sites (10+ dwellings). The draft guidance suggests that the assessment should cater for sites capable of accommodating five or more dwellings. We have incorporated this into our final report, but only assessed sites capable of accommodating 5-9 dwellings where they have been submitted to us and are located within or on the edge of the settlements as identified in paragraph 1.6.</p> <p>The SHLAA process is ongoing and can be added to and updated during the life of the Local Plan. Therefore if the council cannot identify sufficient land in the more sustainable settlements it will consider widening the area of search.</p>	
Dr Cindy Matthews (730289)		<p>We can find no reference, within the terms of consideration for development sites, for a local need analysis for additional housing. There only seems a requirement to satisfy Vale-wide figures with no weight given to housing need</p>	<p>The SHLAA does not allocate sites for housing or set housing target. This is an evidence document to ascertain the land available with potential for</p>	<p>Ensure that allotments and open green space within or on the edge of settlements are retained where they continue to serve the community.</p>

		<p>of local inhabitants. The figures outlined in Vale of White Horse Housing Needs Assessment Update 2011 and Oxfordshire HMA are general population forecasts and are not tailored to localities. Watchfield Parish Council are currently conducting a Housing Needs Survey for the village as any immediate need has already been satisfied by the approval of an additional 120 houses in September, 2012. Watchfield is also on the extreme western edge of the Vale and will be within 2 miles of the 8000+ home development on the eastern edge of Swindon. Geographically, the housing supply due to come on stream would seem to exceed requirement. We have several issues with the criteria used to determine the suitability of sites to be surveyed. The Parish Portrait- Preferred Options of Watchfield contains inaccuracies which imply it is a more sustainable site than in reality. Under Services and Facilities; there is one public house, located 1km from the village centre, not 3; there is no Indian take away in the village; and the hourly bus service to the main hubs are located over 400m from the village centre. In A Study of Village Facilities in the Vale, July 2009 the overall score should be 16, not 20, as there are no food or drink outlets, or hourly bus services within 400m of the village centre. The fundamental problem with development within Watchfield is that the village is totally enclosed and has no scope for peripheral expansion. It is bounded by the A420 Shrivenham bypass, MOD land and Shrivenham golf course. There is a finite amount of open space which currently falls below the area specified in your own review in PPG17 Assessment and Greenspace Strategy. This review of ALL villages in the Vale fails to mention Watchfield at all in its overview (Appendix E1), but does specify that, for the existing population with no further development, the provision of equipped play areas, amenity green space, grass pitches, natural green space, multi-use and tennis courts, and teenage facilities is already below the minimum requirement. If the population is increased by building on existing open space, with no additional land available on the periphery, the figures can only get worse. Point 7.7 of the SHLAA contradicts point 7.5 with regard to the consideration of public open space as potential housing sites. In your Policy reasons for excluding sites (Table 4) the loss of important public open space and other recreation land is a valid reason for excluding sites in Watchfield as existing open space has not been identified as surplus by your leisure study.</p>	<p>housing. The Local Plan will set housing targets for the district. The SHLAA must demonstrate that there is sufficient deliverable land to accommodate the housing targets. Representations in relation to the housing targets should be made through the Local Plan process.</p> <p>An updated Town and Village Facilities study has been prepared for February 2014 and will form part of the councils February 2014 local plan consultation (Housing Delivery Update).</p> <p>Draft National Planning Practice Guidance was published in August 2013 and as a result we have had to amend the structure of our methodology to reflect this.</p> <p>We will exclude formal public open space and allotments from the assessment as they do not have housing potential, but will assess them if they have been submitted to us. If such spaces have been unintentionally included through our desktop assessment, such space will be deemed unsuitable as long as it they are in active use. Our general approach is that land which is in active use for the benefit of the community will not be deemed suitable in principle for housing.</p>	
Mrs Emily Warner (724596)	Kibswell Homes (734804)	<p>The 1 hectare site forms an area of overgrown land to the rear of Green Close off Hanney Road in Steventon. It is surrounded residential development on two and a half sides and is within the built up area of the settlement. The site is within the Lowland Vale but is not within the Steventon Conservation Area. A small part of the site is covered by Flood Zone 2 however this should not be reason to exclude the site for consideration in the SHLAA (please see subsequent comments on the SHLAA draft methodology). Vehicular access would be available through the purchase of third party land. Steventon has a need for further housing as identified in the now abandoned IHSP (55 houses). Steventon is an identified Large Village and the site is within close proximity to</p>	<p>Comments noted. This submitted site will be assessed as part of the SHLAA along with other submitted sites.</p>	

		<p>a range of shops and facilities and public transport options. Development on the site would make a positive contribution to the delivery of mixed housing including that which is affordable. Careful design would ensure the Conservation Area and Lowland Vale would be preserved. The site is available, achievable and suitable for housing. Kibswell Homes are fully committed to developing the site and could proceed promptly on a stand-alone and self-funded basis. The Council's draft methodology indicates that sites will be discounted for consideration in the SHLAA where the majority of the land is within Flood Zones 2 and 3. Only a small proportion of the site is included within Flood Zone 2 and as such it should be included within the assessment. Notwithstanding this, a SHLAA is required to consider the potential of all greenfield sites which are reasonable candidates for housing and these should be identified and assessed from the outset. In accordance with the SHLAA guidance (CLG, 2007) it is also important that the assessment is comprehensive because of the nature of the housing challenge in the Vale (there is a need to identify more sites for housing to address the lack of a 5 year housing land supply) and the nature of the area (which is dominated by smaller rural settlements). Excluding any site from the assessment would not provide a full and proper assessment of the best way to accommodate housing needs in the District. The Council should, therefore, consider the development opportunity which is provided by all sites, including those in flood zones 2 and 3. Whilst it is preferential to provide development outside of flood zone areas, flood risk is only one consideration regarding the suitability of a site and should therefore be considered as part of a wider sustainability strategy and where necessary, be informed by an appropriate sequential test.</p>		
Kibswell Homes (734804)	Mrs Emily Warner (724596)	<p>Paragraph 159 of the NPPF requires Local Planning Authorities have a clear understanding of housing needs in their area. A SHLAA should be produced in order to 'establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.' Practice guidance was issued by the Department of Communities and Local Government (CLG) on SHLAA production in July 2007 and the Council has used this document to formulate its draft SHLAA methodology. In addition, the Planning Advisory Service (PAS) produced further guidance in June 2008 entitled 'Strategic Housing Land Availability Assessment and Development Plan Document Preparation.' The Council's draft methodology indicates that Green Belt sites will be excluded from consideration in the SHLAA but notes that when the survey has been completed, an assessment will be made as to whether it is necessary to review any of the policy exclusions applied. The CLG SHLAA guidance advises that particular types of land or areas may be excluded from the Assessment, and then following the review if there are still insufficient sites, an investigation can be made of how the shortfall should best be planned for. However, it is also clear that that except for more clear-cut designations (such as Sites of Special Scientific Interest), the scope of the Assessment should not be narrowed down</p>	<p>Draft National Planning Practice Guidance was published in August 2013. We have had to adjust our methodology to reflect the section on the assessment of land availability.</p> <p>It states that the "comprehensive list of sites and broad locations... should be assessed against national policies and designations to establish which have reasonable potential for development and should be included in the site survey". It also states that "sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness, but these constraints must be set out clearly".</p> <p>As a result of this, we have assessed sites within or on the edge of larger settlements (Market towns, local service centres and larger villages) located in the Green Belt and AONB. We will clearly identify</p>	<p>All sites within the Green Belt and AONB will be assessed in the same manner as all other sites in the SHLAA. These national designations will be clearly identified for sites which are suitable in principle in these locations.</p>

		<p>by existing policies designed to constrain development so that the Local Planning Authority is in the best possible position when it comes to decide its strategy for delivering its housing objectives. A SHLAA is required to consider the potential of greenfield sites which are reasonable candidates for housing and these should be identified and assessed from the outset. Green Belt sites should not necessarily be ruled out. In accordance with the SHLAA guidance it is also important that the assessment is comprehensive because of the nature of the housing challenge in the Vale (given there is a need to identify more sites for housing to address the lack of a 5 year housing land supply) and the nature of the area which is dominated by smaller rural settlements. The PAS guidance notes that sufficient sites outside existing settlement boundaries should be included to enable the authority to be as confident as possible that enough developable sites will be identified to meet the housing target, and to provide for the genuine consideration of alternatives as part of the plan making process. In light of the above it is considered that the Council's SHLAA methodology should amended to be more flexible so that, in this case, it does not automatically exclude the consideration of Green Belt land.</p>	<p>that sites which are suitable in principle are still constrained by these designations where relevant.</p> <p>Any site within the Green Belt and AONB has been assessed at a high level, and the results contained in the SHLAA are not informed by a Green Belt review or Landscape capacity study.</p>	
<p>Mrs Emily Warner (724596)</p>	<p>Merton College (736883)</p>	<p>Paragraph 159 of the NPPF requires Local Planning Authorities have a clear understanding of housing needs in their area. A SHLAA should be produced in order to 'establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.' Practice guidance was issued by the Department of Communities and Local Government (CLG) on SHLAA production in July 2007 and the Council has used this document to formulate its draft SHLAA methodology. In addition, the Planning Advisory Service (PAS) produced further guidance in June 2008 entitled 'Strategic Housing Land Availability Assessment and Development Plan Document Preparation.' The Council's draft methodology indicates that Green Belt sites will be excluded from consideration in the SHLAA but notes that when the survey has been completed, an assessment will be made as to whether it is necessary to review any of the policy exclusions applied. The CLG SHLAA guidance advises that particular types of land or areas may be excluded from the Assessment, and then following the review if there are still insufficient sites, an investigation can be made of how the shortfall should best be planned for. However, it is also made clear that that except for more clear-cut designations (such as Sites of Special Scientific Interest), the scope of the Assessment should not be narrowed down by existing policies designed to constrain development so that the Local Planning Authority is in the best possible position when it comes to decide its strategy for delivering its housing objectives. A SHLAA is required to consider the potential of greenfield sites which are reasonable candidates for housing and these should be identified and assessed from the outset. Green Belt sites should not necessarily be ruled out. In accordance with the SHLAA guidance it is also important that the assessment is comprehensive because of the nature of the housing challenge in the Vale (given there is a need to</p>	<p>Draft National Planning Practice Guidance was published in August 2013. We have had to adjust our methodology to reflect the section on the assessment of land availability.</p> <p>It states that the "comprehensive list of sites and broad locations... should be assessed against national policies and designations to establish which have reasonable potential for development and should be included in the site survey". It also states that "sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness, but these constraints must be set out clearly".</p> <p>As a result of this, we have assessed sites within or on the edge of larger settlements (Market towns, local service centres and larger villages) located in the Green Belt and AONB. We will clearly identify that sites which are suitable in principle are still constrained by these designations where relevant.</p> <p>Any site within the Green Belt and AONB has been assessed at a high level, and the results contained in the SHLAA are not informed by a Green Belt review or Landscape capacity study.</p>	<p>All sites within the Green Belt and AONB have been assessed in the same manner as all other sites in the SHLAA. These national designations/policy constraints are clearly identified for sites which are suitable in principle in these locations.</p>

		identify more sites for housing to address the lack of a 5 year housing land supply) and the nature of the area which is dominated by smaller rural settlements. The PAS guidance notes that sufficient sites outside existing settlement boundaries should be included to enable the authority to be as confident as possible that enough developable sites will be identified to meet the housing target, and to provide for the genuine consideration of alternatives as part of the plan making process. In light of the above it is considered that the Council's SHLAA methodology should be amended to be more flexible so that it does not automatically exclude the consideration of Green Belt land.		
Mrs Deborah Lewis-Pryde (737233)		The 5 year statement "does not provide a basis for establishing a five year supply". The arbitrary numbers bear no relevance to possible locations within Childrey. Childrey should no longer be listed as a larger village and we will seek to amend this to "small village". The details of this plan were circulated amongst the Childrey Parish Councillors and they were unanimous to support the above comments.	The categorisation of villages within the hierarchy is not established through the SHLAA. Childrey is not being assessed in the SHLAA. An updated Town and Village Facilities study is being published alongside the February 2014 local plan consultation (Housing Delivery Update). In this, Childrey remains a "smaller village".	No further action
Mr David Walton (724845)	Mr David Walton (737284)	Marcham Parish Council believes that major housing developments within the large villages is not sustainable. Where developments are within the range 5 to 10 new houses then these can be assimilated into the community, but sites with substantially more than that number put too much pressure on the infrastructure of the village. This applies particularly to our local primary school which is already at capacity, and the s106 funds for education are not normally sufficient to build enough classrooms to cope with the extra children from any large scale development. Having to bus or taxi some primary-age village children into Abingdon is likely to fracture the community and is not sustainable. The Parish Council supports the rejection of all new house building on flood plain land. It also supports the ban on creating any new 'island' settlements within the Vale.	The SHLAA is an evidence document and it is not the document that identifies Marcham as a Larger Village. This is established through the emerging local plan. Cumulative impact on infrastructure as well as other issues are considered as part of the Local Plan. The SHLAA applies the settlement hierarchy and seeks to establish the land capacity within the hierarchy. Representations on the settlement hierarchy should be made through the Local Plan consultation process. The SHLAA is a high level assessment of sites which identifies if the land in itself is suitable in principle. The process of allocating a site as part of our Local Plan will be informed by a much more detailed and robust evidence base than what is contained in this methodology. Your comments with respect to flood plain land and 'island' settlements have been welcomed and are noted.	No further action
Pye Homes (737272)	Mrs Emily Warner (724596)	The Council's draft SHLAA methodology indicates that sites will be discounted for consideration where the majority of the land is within Flood Zones 2 and 3. Only a very small proportion of the site is included within Flood Zone 2 and as such it should be included within the assessment. Notwithstanding this, a SHLAA is required to consider the potential of all greenfield sites which are reasonable candidates for housing and these should be identified and assessed from the outset. In accordance with the SHLAA guidance (CLG,	Individual site submissions will be assessed in accordance with the SHLAA methodology and therefore the site specific comments are not addressed here. The council is using the SHLAA to identify potential sites for housing and to ascertain whether there is a	Flood Zones 2 and 3 will remain as an intrinsic reason for a site to be deemed unsuitable except where it affects only a small portion of the site. Our final results, in terms of the total potential housing capacity for the entire district, exclude any land which is in Flood Zone 2 and 3.

		<p>2007) it is also important that the assessment is comprehensive because of the nature of the housing challenge in the Vale (there is a need to identify more sites for housing to address the lack of a 5 year housing land supply) and the nature of the area (which is dominated by smaller rural settlements). Excluding any site from the assessment would not provide a full and proper assessment of the best way to accommodate housing needs in the District. The Council should, therefore, consider the development opportunity which is provided by all sites. Whilst it is preferential to provide development outside of flood zone areas, flood risk is only one consideration regarding the suitability of a site and should therefore be considered as part of a wider sustainability strategy.</p>	<p>reasonable prospect of sufficient land capacity to accommodate proposed housing over the plan period. We have focussed this area of search on sites within or adjacent to the most sustainable settlements. This is in accordance with national policy, which highlights the importance of sustainable development.</p> <p>Sites where part of the land is within Flood Zones 2 and 3 will be assessed in line with all other sites in the district. In some cases, we have split sites to better reflect land which may be suitable in principle and adjacent land which is unsuitable due to flooding.</p> <p>The SHLAA process is ongoing and can be added to and updated during the life of the Local Plan. If the council cannot identify sufficient land in the more sustainable settlements it will consider widening the area of search or reviewing policy designations.</p>	
(736665) The President and Scholars of Corpus Christi College, Oxford	Miss Naomi Hubbard (722921)	Sites in West Hendred (a smaller village) should be considered in the SHLAA methodology as housing would support community facilities.	<p>For the purpose of this update, which will provide an evidence base for the Local Plan Part 1 – Strategic Sites and policies, we are focussing on the more sustainable settlements in the district. This is to be consistent with the National Planning Policy Framework which promotes development in sustainable locations.</p> <p>The SHLAA process is ongoing and can be added to and updated during the life of the Local Plan. If the council cannot identify sufficient land in the more sustainable settlements it will consider widening the area of search or reviewing policy designations.</p>	No further action
Hannick Homes and Development (737503)	Mr Lewis (724276)	The purpose of a SHLAA as set out in the practice guidance notes and paragraph 159 of the NPPF is 'to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period'. The SHLAA methodology, identifies a comprehensive list of site sources. However, given that the Local Plan will have to look beyond the currently defined development boundaries and other policy constraints in order to accommodate the emerging housing requirements, it is important that any discounting should reflect these changing circumstances. Whilst the NPPF indicates that there may be areas where development should be restricted, this is not the same as preventing development in those areas. Therefore the criteria for assessing the suitability	It is appropriate to assess all physical and policy constraints that exist for all sites as these can affect the suitability and developability of a site. For example if a site is steeply sloping it may affect the developability of the site or its appropriateness in the landscape. A physical constraint like this would not automatically discount the site but it is relevant to consider it against other factors to ensure a comprehensive assessment.	Ensure a consistent approach so that sites are not discounted automatically for having sloping land but that is it a physical constraint that will be considered when assessing whether the site is developable or suitable.

		of sites should not include arbitrary factors such as 'sloping land' (paragraph 9.3). Similarly paragraph 9.6 needs to be updated to reflect the NPPF's requirement that deliverable sites must be viable.		
Mr Nathan McLoughlin (737357)	Mr Nathan McLoughlin (737353)	The site is 31 ha in size and it is anticipated that not all of it will be required for development. Other Comments as follows: Table 4 shows a series of Policy reasons for excluding development sites, there is the concern that proximity to a conservation area is an issue for discounting sites and does not reflect any assessment of the setting of the conservation area or how development could be accommodated within it. What does "smaller less sustainable settlements mean"? Which settlements are discounted by this process? It is recommended that the methodology be on a "Policy Neutral" basis, given the difficulties the Council is experiencing with the Local Plan in this respect.	Sites that are in or adjacent to Conservation Areas will be assessed within the SHLAA. Being adjacent to a Conservation Area is important when undertaking a site assessment. A site will not automatically be discounted because it is adjacent to a Conservation Area. However, it is a relevant constraint to consider against other factors to ensure a comprehensive assessment in undertaken for sites. We will review the methodology to ensure that this is clear. The SHLAA process is ongoing and can be added to and updated during the life of the local plan. If the council cannot identify sufficient land in the more sustainable settlements it will consider widening the area of search or the need for policy review e.g. green belt.	Ensure a consistent approach so that sites are not discounted automatically for being adjacent to a conservation area.
Mr George Edmonds-Brown (730281)		St Helen Without Parish Council has considered the points in the Strategic Housing Land Availability Assessment (SHLAA) Consultation on Methodology and Call for Sites and should be grateful if the following points could be included in the consultation response - "Regarding the village of Shippon the Parish Council does not wish any change to policy GS3(IV), regarding limited infilling within the area defined on the proposals map. However, as stated and adopted in the Shippon Village Plan, the two redundant farmyards – Manor Farmyard and Church Farmyard, both located in Barrow Road; the Parish Council would like to see appropriate development. This development should retain the existing stone farm buildings and walls which preserve the character and integrity of this part of the village. Where there is a demand on the Vale to provide future housing requirements, then these two sites should be considered to be Exception Sites."	Shippon is not identified as a larger settlement in the emerging Local Plan and therefore would not be considered in the SHLAA. However, redevelopment of farm buildings can be considered under existing policies in the adopted Local Plan 2011.	No further action
Ms Tina Brock (730245)		6.1 of the above states that sites submitted for potential development through the abandoned Interim Housing Supply Policy (IHSP) would be reviewed. Three site screenings in Cumnor Parish were submitted as part of the IHSP. All applications were located within the green belt and at the time the Council was assured that the proposals submitted would be rejected by the Vale on the grounds that applications for development in the green belt would not be entertained. The Council would like confirmation that this still stands and the sites would not be included within the SHLAA.	Draft National Planning Practice Guidance was published in August 2013. We have had to adjust our methodology to reflect the section on the assessment of land availability. It states that the "comprehensive list of sites and broad locations... should be assessed against national policies and designations to establish which have reasonable potential for development and should be included in the site survey". It also states that "sites, which have particular policy constraints,	All sites within the Green Belt and AONB have been assessed in the same manner as all other sites in the SHLAA. These national designations/policy constraints are clearly identified for sites which are suitable in principle in these locations.

			<p>should be included in the assessment for the sake of comprehensiveness, but these constraints must be set out clearly”.</p> <p>As a result of this, we have assessed sites within or on the edge of larger settlements (Market towns, local service centres and larger villages) located in the Green Belt and AONB. We will clearly identify that sites which are suitable in principle are still constrained by these designations where relevant.</p> <p>Any site within the Green Belt and AONB has been assessed at a high level, and the results contained in the SHLAA are not informed by a Green Belt review or Landscape capacity study.</p>	
The Garden Centre Group	Mr Gregory Gray (724648)	See letter	<p>Your comments have been welcomed and are noted.</p> <p>Draft National Planning Practice Guidance was published in August 2013. We have had to adjust our methodology to reflect the section on the assessment of land availability.</p> <p>It states that the “comprehensive list of sites and broad locations... should be assessed against national policies and designations to establish which have reasonable potential for development and should be included in the site survey”. It also states that “sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness, but these constraints must be set out clearly”.</p> <p>As a result of this, we have assessed sites within or on the edge of larger settlements (Market towns, local service centres and larger villages) located in the Green Belt and AONB. We will clearly identify that sites which are suitable in principle are still constrained by these designations where relevant.</p> <p>Any site within the Green Belt and AONB has been assessed at a high level, and the results contained in the SHLAA are not informed by a Green Belt review or Landscape capacity study.</p>	All sites within the Green Belt and AONB have been assessed in the same manner as all other sites in the SHLAA. These national designations/policy constraints are clearly identified for sites which are suitable in principle in these locations.

Oxford Diocesan Board of Finance(7 29202)	Miss Jo Unsworth (742261)	<p>Our principal objection to the proposed SHLAA methodology is the exclusion from the assessment of sites that are not considered suitable for development under current policy restrictions – i.e. those set out in Table 4 of the consultation document. This approach contravenes paragraph 7 of the CLG Good Practice Guidance – and indeed paragraph 2.1 of the consultation document – which states that the objective of the SHLAA is to identify as many sites as possible with housing potential. Further, paragraph 8 of the CLG Good Practice Guidance states that one of the purposes of the SHLAA should be to identify “whether plan policies need to be reviewed to enable identified sites to be developed for housing”; and that when determining which sites should be included in the assessment “the scope of the Assessment should not be narrowed down by existing policies designed to constrain development, so that the local planning authority is in the best possible position when it comes to decide its strategy for delivering its housing objectives” (paragraph 21). It is therefore important for the SHLAA to include all potential sources of sites (save those with physical constraints, as identified in Table 3) so that it is fit for purpose, i.e. to inform plan-making. It is not for the SHLAA to address whether any policy or, for example, Green Belt designation should change: this is a matter for the Local Plan (this is the point at which potential policy restrictions to development are assessed). For this reason the consultation document is disingenuous when it says, at paragraph 2.2, that “the assessment is a technical document which will be used to inform the choices made in the Local Plan, but does not make decisions in itself”</p> <p>– this is precisely what the SHLAA is seeking to do by excluding sites which do not conform with current planning policies. In addition, paragraph 25 of the CLG Good Practice states that “in areas dominated by smaller rural settlements, it may be necessary to identify all the sites with potential for housing.” Given the predominantly rural character of the Vale, the principle of this guidance should be applied, and therefore a minimum threshold of 10 dwellings should not be upheld. Indeed, smaller rural sites (which may be acceptable under rural exception policies) might identify a significant potential source of supply. This is especially important due to the District’s housing land supply deficit, which makes it vital that all sites with housing potential are considered in the SHLAA.</p>	<p>Draft National Planning Practice Guidance was published in August 2013. We have had to adjust our methodology to reflect the section on the assessment of land availability.</p> <p>It states that the “comprehensive list of sites and broad locations... should be assessed against national policies and designations to establish which have reasonable potential for development and should be included in the site survey”. It also states that “sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness, but these constraints must be set out clearly”.</p> <p>As a result of this, we have assessed sites within or on the edge of larger settlements (Market towns, local service centres and larger villages) located in the Green Belt and AONB. We will clearly identify that sites which are suitable in principle are still constrained by these designations where relevant.</p> <p>Any site within the Green Belt and AONB has been assessed at a high level, and the results contained in the SHLAA are not informed by a Green Belt review or Landscape capacity study.</p> <p>The draft guidance also recommends a lower threshold of sites capable of accommodating 5 or more dwellings. We have adopted this approach but only assessed sites capable of 5-9 dwellings where they have been submitted to us as part of our call for sites and where they are located within or on the edge of the settlements identified in paragraph 1.6 of our methodology.</p>	<p>All sites within the Green Belt and AONB have been assessed in the same manner as all other sites in the SHLAA. These national designations/policy constraints are clearly identified for sites which are suitable in principle in these locations.</p>
Mr Ken Dijkman (729581)	Mr Kenneth Dijkman (724542)	<p>The SHLAA is intended to consider additional growth mainly on the edge of larger settlements but small villages such as Denchworth may benefit disproportionately from modest increased growth as this will help existing services and facilities to survive.</p>	<p>The categorisation of villages within the hierarchy is not established through the SHLAA. Denchworth is not being assessed in the SHLAA as the Local Plan Consultation Draft published in Feb 2014 identifies it as a smaller village. Representations on the spatial strategy should be made through the Local Plan consultation process.</p>	<p>No further action</p>

			The SHLAA process is ongoing and can be added to and updated during the life of the local plan. If the council cannot identify sufficient land in the more sustainable settlements it will consider widening the area of search or the need for policy review e.g. green belt.	
Mr Mathew Green (742383)	Mr Kenneth Dijksman (724542)	The Draft Methodology (Table 1) explicitly excludes new free standing settlements as a source of sites to be included in the assessment. This is justified on the basis that there is 'no evidence to support this and nothing has ever been submitted to the Council in relation to a new settlement'. This is no longer true; this submission proposes that the Vale of White Horse consider the long-term national and regional benefits of a free standing Oxford Garden City in this most sustainable of locations at the heart of Science Vale UK. Given the large area of available open land it is envisaged that Oxford Garden City could ultimately accommodate a population of 20,000 – 30,000. This proposed new settlement is of an importance and scale which puts it beyond the relatively short term housing allocations which are likely to flow directly from this particular Strategic Housing Land Availability Assessment. This government advice in the practical guidance issued in July 2007 indicates that new settlements would 'normally be signalled by the Regional Spatial Strategy'. The regional spatial strategy for this area, the South-East Plan is set to be abolished. It would appear therefore that this embryonic proposal for Oxford Garden City must be addressed through the duty to cooperate between the relevant Oxfordshire authorities, principally Oxfordshire County Council Oxford City, SODC and the Vale of White Horse. In the first instance it is necessary to inform the authority of the site via this SHLAA assessment submission and to request that a new settlement be added to table 1 and justified on the basis of broader long-term regional benefits and the duty to cooperate with neighbouring authorities.	<p>The Local Plan will identify the level of housing required within the district. This will be based on evidence of objectively assessed housing need identified in the Oxfordshire SHMA. The council will first seek to accommodate its own housing need in full. If following the SHMA, any of the Oxfordshire authorities identify that they cannot fully accommodate their objectively assessed housing need, the council will fulfil its statutory 'duty to cooperate' in partnership with all the other Oxfordshire authorities. As part of this, the council would participate in any necessary joint work to identify and assess options in accordance with national policy and SEA regulations so as to establish how and where any unmet need can best be accommodated within the Oxfordshire housing market area.</p> <p>The SHLAA seeks to identify potential sites for housing and to ascertain whether there is a reasonable prospect of sufficient land capacity to accommodate proposed housing over the plan period. We assessed all sites adjacent to the more sustainable settlements as identified in the emerging Local Plan spatial strategy even if the site falls within a policy designation. We will then identify those sites that are suitable without high level constraints and those that are suitable subject to review of policy constraints. We will then review if there is enough capacity without a review of policy designations and if not consider the need for a review of policy. The SHLAA process is ongoing and can be added to and updated during the life of the Local Plan. If the council cannot identify sufficient land in the more sustainable settlements it will consider widening the area of search or the need for policy review e.g. green belt.</p> <p>We have focussed this area of search on sites within</p>	No further action

			<p>or adjacent to the most sustainable settlements. This is in accordance with national policy, which highlights the importance of sustainable development.</p> <p>The SHLAA process is ongoing and can be added to and updated during the life of the local plan. If the council cannot identify sufficient land in the more sustainable settlements it will consider widening the area of search or the need for policy review e.g. green belt.</p>	
Mr Eastwood (748024)	Mrs Emily Warner (722577)	<p>The Council's SHLAA methodology implies that the sites surveyed will be limited to those which have a capacity of 10 dwellings or more, and on land in and immediately adjoining the main towns and the larger villages. However, this is at odds with CLG guidance (2007) which states 'in areas dominated by smaller rural settlements (such as the Vale), it may be necessary to identify all the sites with potential for housing'. 2008 guidance from the Planning Advisory Service (PAS) also notes that the SHLAA assessments can cover all settlements with housing potential on both previously developed and greenfield land (page 3). The guidance clearly states that 'all greenfield sites which are reasonable candidates for housing should be identified and assessed from the outset, even where there may be opposition to some of them. The better the process of selection at the outset of the SHLAA, the less chance that "new" sites will come forward later in the plan-making process which the authority will then realize should have been included and assessed (page 5). Clearly local authorities need to examine and consider all of the possible options from the start of the process so that if following the review there are still insufficient sites, it will be possible to investigate how this shortfall can be best planned for. There is nothing in any of the guidance papers for the SHLAA production to suggest that the Council has reasonable grounds to exclude any sites from consideration in the SHLAA due to their location. The Council must ensure that genuine opportunities to provide sustainable rural communities through the provision of further housing are not missed as the greater focus on the larger settlements has resulted in the required housing land not being delivered. Proposals for further housing can help for housing exists and where there are a number of services and facilities already serving the village. In light of the above and given the Council's current lack of a 5 year land supply, it is considered that the SHLAA methodology should amended to be more flexible so that it does not exclude the consideration of the Vale's smaller settlements.</p>	<p>The SHLAA seeks to identify potential sites for housing and to ascertain whether there is a reasonable prospect of sufficient land capacity to accommodate proposed housing over the plan period. We propose to assess all sites adjacent to the more sustainable settlements as identified in the emerging Local Plan spatial strategy even if the site falls within a policy designation. We will then identify those sites that are suitable without high level constraints and those that are suitable subject to review of policy constraints. We will then review if there is enough capacity without a review of policy designations and if not consider the need for a review of policy. The SHLAA process is ongoing and can be added to and updated during the life of the Local Plan. If the council cannot identify sufficient land in the more sustainable settlements it will consider widening the area of search or the need for policy review e.g. green belt.</p>	No further action
Radley College (741313)	Ms Gemma Care (741289)	See letter	<p>Your comments have been welcomed</p> <p>Draft National Planning Practice Guidance was published in August 2013. We have had to adjust our methodology to reflect the section on the assessment of land availability.</p>	All sites within the Green Belt and AONB have been assessed in the same manner as all other sites in the SHLAA. These national designations/policy constraints are clearly identified for sites which are suitable in principle in these locations.

			<p>It states that the “comprehensive list of sites and broad locations... should be assessed against national policies and designations to establish which have reasonable potential for development and should be included in the site survey”. It also states that “sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness, but these constraints must be set out clearly”.</p> <p>As a result of this, we have assessed sites within or on the edge of larger settlements (Market towns, local service centres and larger villages) located in the Green Belt and AONB. We will clearly identify that sites which are suitable in principle are still constrained by these designations where relevant.</p> <p>Any site within the Green Belt and AONB has been assessed at a high level, and the results contained in the SHLAA are not informed by a Green Belt review or Landscape capacity study.</p> <p>The draft guidance also recommends a lower threshold of sites capable of accommodating 5 or more dwellings. We have adopted this approach but only assessed sites capable of 5-9 dwellings where they have been submitted to us as part of our call for sites and where they are located within or on the edge of the settlements identified in paragraph 1.6 of our methodology.</p>	
Mr Mark Hines (762992)		<p>Allocation of sites needs to be quick and efficient to ensure delivery of much needed. This site is able to deliver 600 homes in four years of a mixture of tenures with Circa 40% affordable rented homes 20% open market rented homes and the remaining 40% provided as open market sale units. All to code level 6 and above. A funding solution to ensure delivery of these units has also been identified. The site is well connected and ultimately could be a very sustainable development. The SHLAA methodology is a good way of identifying sites but does not guarantee delivery of much needed units, merely identifies potential sites. This needs to be rectified by ensuring developers stick to a delivery programme.</p>	<p>Your comments have been welcomed and are noted. The purpose of the SHLAA is to provide a high level assessment of sites across the larger settlements in the district, as set out in paragraph 1.6 of the updated methodology. Sites which may be considered for allocation will be subject to a more detailed and robust evidence base. Such work would be undertaken separate from this assessment should we need to consider making further housing allocations.</p>	