

Appendix G: SHLAA Methodology Compliance Check

The production of the SHLAA Report 2011-12 was carried out under the direction set out in the Councils adopted SHLAA Methodology 2009. However, during the undertaking of the Councils first SHLAA officers identified various issues with the adopted methodology that were not successful in practice and in an attempt to produce a robust SHLAA took steps to overcome any difficulties that arose. The table set out below appraises the current methodology and identifies if and where the Council have deviated from the adopted approach and sets out the measures taken to rectify and/or mitigate those aspects of the methodology that would have otherwise disrupted the process, or where it was felt that an alternative approach was more beneficial.

The Basildon Borough Council Strategic Housing Land Availability Assessment Methodology was adopted by Cabinet on 15th October 2009 and was produced in accordance with Government guidance in Planning Policy Statement 3: Housing (November 2006) and the Strategic Housing Land Availability Assessments Practice Guidance (July 2007). In producing the methodology the council undertook a formal stakeholder consultation on the draft document for 6 weeks, from 16th June – 30th July 2009, to which 19 organisations responded resulting in 178 comments. A consultation report on the methodology and how comments were responded to can be found on the council's website.

It should be noted that if necessary, the Council will review the current Methodology to make allowances for any changes to legislation, corporate approaches and where it is found that the methodology is detrimental to the production of the SHLAA.

<u>Paragraph in SHLAA Methodology</u>	<u>Issue/Conflict/Potential Misinterpretations</u>	<u>Mitigation Steps</u>	<u>Possible/Suggested Future Amendments</u>
<p>Para 4 – Consultation on the draft methodology followed the approach to engagement with delivery stakeholders, and consultation on technical studies, outline in the Draft Basildon District Statement of Community Involvement 2009.</p>	<p>The Statement of Community Involvement 2009 has now been amended and a revised draft has been adopted (January 2012). However, despite setting out the Council's process to consult specific people and in a specific manner, this only relates to Development Plan Documents (DPD) and not evidence bases. As such this will not impact the consultation on the SHLAA and merely represents a reference to an out of date version of the same document.</p>	<p>None taken. The Council will, in any future consultation, ensure that the necessary stakeholders and individuals are consulted on the SHLAA which may take place independently or alongside other DPD documents.</p>	<p>Any reference to the Statement of Community Involvement 2009 will need to be updated if and when the Methodology is reviewed for clarity.</p>
<p>Para 8 (3) – Local Planning Authorities are required to:</p> <p>Where it is not possible to identify specific sites for years 11-15 of the plan, indicate broad locations for future growth</p>	<p>No broad locations for development have been considered in the SHLAA Report 2011-2012 and no specific methodology has been devised for this. In the absence of strategic options for the Councils Core Strategy, at the time of undertaking the assessment, officers had no information on which to justify a need for broad locations.</p>	<p>No mitigation steps necessary.</p>	<p>The Green Belt represents a constraint to development for SHLAA purposes and in order to establish consistency and to appraise the green belt in its own right; broad locations of assessment were established using natural boundaries. This enabled the Council to consider the green belt of the borough in manageable sections, against the 5 purposes set out in Planning Policy Guidance 2: Green Belt. Should there be a need to consider broad locations in the</p>

			future these boundaries could be utilised.
<p>Para 9 – Policy H1 of the East of England Plan sets out the housing figures for the Region.</p>	<p>In July 2010 the Secretary of State wrote to local authorities stating the Government’s intention to abolish Regional Spatial Strategies (RSS) and return decision making powers on housing and planning to local councils. At the time of preparing the 2011-2012 SHLAA, there was uncertainty regarding the weight to be attributed to the housing figures previously set out in the East Midlands Regional Plan and there was a Council led inclination to look at devising its own local figure for housing delivery, thus removing the clarity on the Council’s housing numbers which need to be delivered.</p>	<p>In an attempt to accommodate this uncertainty in the standing of the RSS, and the steer towards more localised planning, the SHLAA was undertaken independently of pre-determined housing figures. Instead, sites were assessed on their own merits with awareness of the constraints identified in the SHLAA methodology and the Green Belt Methodology.</p> <p>It is intended that the SHLAA, in collaboration with other evidence bases, will be able to contribute to the determination of the local figure.</p>	<p>Paragraph 9 needs to be amended to redefine the Council’s approach going forward.</p> <p>However, as the uncertainty generated by the national shift in Local Development Frameworks has been experienced across the Country, the alteration to the SHLAA methodology is not felt to be an area which undermines the SHLAA and its contributions to local planning at this time.</p>
<p>Para 11 – The Regional Spatial Strategy (RSS), the East of England Plan, which includes housing targets for each local authority in the region, is currently being reviewed to cover the period up to 2031. This will result in revised housing targets, which the Core Strategy will need to accommodate at the appropriate time.</p>	<p>See comments on Para 9 above.</p>	<p>See comments on Para 9 above.</p>	<p>Paragraph 11 needs to be amended to redefine the Council’s approach going forward.</p> <p>However, as the uncertainty generated by the national shift in Local Development Frameworks has been experienced across the Country, the alteration to the SHLAA methodology is not felt to be an area</p>

			which undermines the SHLAA and its contributions to local planning at this time.
<p>Para 13 – The relevant Development Plan Document of the LDF (the Core Strategy) will determine which sites are allocated for housing development...For this reason, the SHLAA can only consider whether sites are potentially suitable for housing. In addition, sites considered in the SHLAA cannot be given scores or rankings: to do so may present difficulties for developers taking part in the SHLAA site assessments.</p>	<p>The Core Strategy identifies strategic areas of growth which do not just relate to housing. The Core Strategy does not specify which sites are allocated for housing development and this will be the responsibility of the Site Allocations Development Plan Document (DPD). The SHLAA's role is to assess whether sites are potentially suitable for housing, which can form part of the evidence base identifying sites which the Council may wish to consider through the Site Allocations DPD. This paragraph of the SHLAA Methodology is not explicit enough to make this clear.</p>	<p>No mitigation undertaken at this time.</p>	<p>Should the methodology undergo revision, the opportunity to rephrase this paragraph should be utilised for clarity.</p>
<p>Para 28 – A SHLAA Consultative Group will be created to be involved with Stage 7 of this SHLAA and test the SHLAA results (Stage 8), before the draft SHLAA is published for consultation with the wider stakeholder group.</p>	<p>This paragraph is open to misinterpretation and could be construed to read that consultation with stakeholders will take place twice at Stages 7 and again before the full draft report is published for consultation at stage 8. This is not the case and the reference is to the consultation at stage 7 (viability and achievability)</p>	<p>A stakeholder event was held on 23rd November 2011 regarding the assumptions and variables to be used to assess viability. This work also invited comments on possible yields, build costs and other considerations necessary to this stage of the SHLAA process and vital to the</p>	<p>When the opportunity arises, Para 28 should be reworded to offer more clarity.</p>

	<p>which helps inform the completion of the assessments.</p>	<p>completion of stage 8 in reviewing the findings of the SHLAA. The undertaking of this workshop is in compliance with the methodology and was crucial to the completion of the SHLAA Report 2011-12.</p> <p>This stakeholder group have been offered the opportunity to remain part of the panel for the future and can help to inform future SHLAA reviews.</p> <p>As such procedure was followed and no mitigation was needed.</p>	
<p>Para 30, point 6 – Employment Capacity Study, incorporating an Employment Land Review (by Roger Tym & Partners on behalf of BDC). This is nearly complete and will be used to inform the approach of the SHLAA and the LDF takes to sites currently used for employment.</p>	<p>The SHLAA only assesses sites on their housing potential and not for employment at this time. However, no comprehensive Employment Land Review has been completed but the findings of the adopted Employment Capacity Study (2008) stated that existing employment land needed to be retained for the future. The retention of employment land has been a factor for consideration throughout the SHLAA process.</p>	<p>No mitigation actions were necessary.</p>	<p>When the opportunity arises references to the Employment Capacity Study should be clarified in the methodology to reflect the current status.</p>

<p>Para 31 – The Project Team have analytical and related abilities appropriate to the nature of the work required by this project. For example, the lead officer is a chartered town planner (MRTPI) and the Sustainability Assessment Officer is an Associate Member of the Institute of Environmental Management and Assessment (AIEMA).</p> <ul style="list-style-type: none"> • Principal Planning Officer - Forward Plans (lead officer) • Sustainability Assessment officer (SA/SEA site assessments) • Research & Monitoring Officer (development monitoring) 	<p>This does not accurately represent the resourcing of the SHLAA project and is too prescriptive for a strategic document.</p>	<p>No mitigation actions have been necessary.</p>	<p>When the opportunity arises all references to resourcing the SHLAA should be removed and adds no value to the methodology.</p>
<p>Work Programme, Para 37 and Para 38 and accompanying table – The draft work programme, set out below, has taken into account anticipated staff availability and resources. The time taken to complete the survey phases are entirely dependant upon the number of staff available, which is yet to be confirmed. Therefore two date ranges have been given. These date ranges have been carried though to the later stages. Currently there are a number of unknowns, which may impact on the</p>	<p>This does not accurately represent the resourcing of the SHLAA project and is too prescriptive for a strategic document.</p>	<p>No direct mitigation actions have been necessary and the work programme of the team and Local Development Scheme are written to reflect a wide range of documents being produced by the Council and more accurately reflects the Council's timetables.</p>	<p>When the opportunity arises all references to resourcing the SHLAA should be removed and adds no value to the methodology.</p>

<p>overall timetable, such as the final number of sites to be assessed and the exact nature of the sites themselves. Therefore the above timetable may have to be revised once Stage 4 is completed.</p>			
<p>Page 11, Text box – A wide range of sites will be assessed for the SHLAA. However, only those sites potentially suitable for housing will be included in the SHLAA itself. If a site is not included in the SHLAA because the site assessment concludes that it is not potentially suitable for housing, the reason for this will be recorded in the SHLAA.</p>	<p>The SHLAA does not exclude sites from the SHLAA based on their suitability unless there are long standing issues that would prevent the site from being developed for the foreseeable future i.e. ancient woodland, overwhelming constraints such as a significance of oil pipelines covering the site, insufficient site size and also where a site has been commenced/completed. Therefore the current wording within the methodology could be considered as misleading.</p> <p>The SHLAA is an on-going process, which means year on year the sites, as well as any new sites submitted to the Council, will continually be assessed. All sites will continue to be stored on a SHLAA database and annually reviewed to ensure that any</p>	<p>All sites were considered for assessment and appraised. Where sites did need to be excluded this was done following the commencement of the assessment process. All sites have been entered into the SHLAA database and the overall outcome of each site is detailed in (Appendix H).</p>	<p>When the opportunity arises this text box should either be removed or reworded for clarity to the methodology.</p>

	change to policy or constraints etc is taken into account.		
Para 39, A, second bullet and B, second bullet – All planning permission data in the SHLAA relates to the monitoring period to 31 March 2009.	This statement is outdated and overly specific for a document which is to be used alongside an annually reviewed SHLAA.	In order to reflect the current position, data used on planning permissions and those under construction etc was taken from the most up to date monitoring period.	When the opportunity arises reference to the date of the monitoring period should be altered to reflect annual monitoring periods as opposed to a specific point in time.
Para 40, E, points 1 & 2	Information regarding the Call for Sites is overly prescriptive and proposes consideration of sites in broad locations. During the SHLAA process it was determined that the creation of broad locations for the consideration of development was not necessary at this time.	Broad locations have not been utilised to consider large areas for development. All SHLAA sites were considered individually whether they be within the urban area or the green belt. Any sites that do fall within the green belt were subjected to a sensitivity testing using the Green Belt Methodology included within the wider SHLAA report to ensure that the purposes of the green belt, set out in PPG2, were a key consideration in the assessment process.	References to the treatment of the Call for Sites needs to be simplified and reworded to avoid any misunderstanding in how they will be treated.
Para 40, E, point 3 – Not all the sites submitted were proposed for housing. Even so, all the sites will be reviewed under the SHLAA. However, only sites assessed as being suitable for housing will be included in the final SHLAA report.	This statement implies that only sites assessed as being suitable for housing will be included within the SHLAA, which is misleading.	All sites were assessed, including sites that were not submitted for consideration for housing. However, in these particular cases sites were found to be unavailable as the landowner did not want to progress the site for housing. A	When the opportunity arises, the methodology should be re-worded for clarity. The SHLAA will assess each site in accordance with the methodology and will document the outcome of each assessment through the SHLAA Report annually.

		reference to all sites will appear in the SHLAA report.	
<p>Para 40, F, Point 1 – Sites submitted for inclusion in the draft Replacement Local Plan.</p>	<p>The inclusion of these sites has stemmed from an out of date process and due to issues surrounding the source of their submission establishing availability of these sites has been difficult thus impacting on the number of potential sites identified through the SHLAA process.</p> <p>Consistency in the sites submitted through the Replacement Local Plan has also raised issues as some sites covered entire settlement areas and land parcels that were evidently not under the same ownership and included established and existing facilities and housing developments.</p>	<p>To ensure that the approach conformed with the adopted methodology, these sites were included for consideration as part of the site assessment process. The majority of sites identified through the RLP process were resubmitted during the Call for Sites exercises and officers felt that this was an acceptable indication that there was still interest in developing the land and secured landownership/agent details at this latter phase. These sites are now in the 'system' and will be considered periodically through the review process.</p>	<p>The initial database of SHLAA sites has now been established including sites from a variety of sources. When the opportunity arises, Section 40 should be rationalised to explain that the source of sites will be from those that are submitted to the Council going forward.</p>
<p>Para 40, G</p>	<p>Whilst the Urban Capacity Sites have and should be included in the SHLAA process, information set out in this document is misleading, limiting the UCS sites included in the process to 18 and providing overly prescriptive detail which could conflict with the undertaking of the SHLAA.</p>	<p>The SHLAA process superseded that of the Urban Capacity Study and in order to be consistent in the Councils approach to the SHLAA and ensure the suite of sites considered is broad; all sites identified in the UCS were considered. Exceptions to these were where site development had commenced or landowners</p>	<p>The initial database of SHLAA sites has now been established including sites from a variety of sources. When the opportunity arises, Section 40 should be rationalised to explain that the source of sites will be from those that are submitted to the Council going forward.</p> <p>The amendments to this section overall would also apply to footnote</p>

		had specifically expressed a reluctance to have them considered.	18 which adds no value to the SHLAA.
<p>Para 40, H – The town centres could potentially provide a significant number of additional homes in the future.</p>	<p>Due to the complexity of Town Centres and their need to provide multi functional development, this site source is felt to be inappropriate to the SHLAA. The Town Centres across the Borough are a focus for regeneration and will be considered for development through other means i.e. Basildon Town Centre Masterplan. In some cases entire town centres were submitted to the Council by people other than landowners and without their consent which would likely result in an inaccurate assessment.</p>	<p>To ensure that legitimately submitted sites within town centres were considered appropriately, where sites were submitted under the Call for Sites, or as part of the UCS they were assessed individually under their own merits.</p>	<p>Reference to the consideration of town centres through the SHLAA should be removed.</p>
<p>Para 40, K – Land in non-residential use which may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of mixed-use development</p>	<p>In the absence of informed evidence bases such as employment and/or local centre land assessments, it is considered inappropriate to consider the sites under this category. Furthermore, unless there is evidence of an inclination from the landowner to develop, availability cannot be established and therefore the assessment of these sites would be redundant. By default, sites</p>	<p>To ensure that legitimately submitted sites were considered appropriately, where sites were submitted under the Call for Sites, or as part of the UCS etc they were assessed individually under their own merits.</p>	<p>This category should be removed from the methodology and adds no value.</p>

	under this category, where there is an interest to develop, will have been submitted through processes such as the Call for Sites.		
Para 40, L – Additional housing opportunities in established residential areas, such as underused garage blocks	Unless there is evidence of an inclination from the landowner to develop, availability cannot be established and therefore the assessment of these sites would be redundant. By default, sites under this category, where there is an interest to develop, will have been submitted through processes such as the Call for Sites.	To ensure that legitimately submitted sites were considered appropriately, where sites were submitted under the Call for Sites, or as part of the UCS etc they were assessed individually under their own merits.	This category should be removed from the methodology and adds no value
Para 40, M – Large scale redevelopment and re-design of existing residential areas.	Unless there is evidence of an inclination from the landowner to develop, availability cannot be established and therefore the assessment of these sites would be redundant. By default, sites under this category, where there is an interest to develop, will have been submitted through processes such as the Call for Sites.	To ensure that legitimately submitted sites were considered appropriately, where sites were submitted under the Call for Sites, or as part of the UCS etc they were assessed individually under their own merits.	This category should be removed from the methodology and adds no value
Para 40, N – Sites in rural settlements	This section is not clear and open to misinterpretation. Any green belt review must be undertaken as part of the Site Allocations process and not the SHLAA. Furthermore, Rural Exception Sites, are sites which come forward through need, not	No mitigation was necessary here.	This category should be removed from the methodology and adds no value and is open to misinterpretation.

	allocation and therefore cannot be looked at for potential supply in the first instance.		
Para 40, O – Potential Urban Extensions and Intensification / redevelopment / expansion of settlements	Broad Locations should only be considered through SHLAA where housing supply cannot be demonstrated. However, it has not been demonstrated that this is the case. This paragraph is open to misinterpretation.	To ensure that legitimately submitted sites were considered appropriately, where sites were submitted under the Call for Sites, or as part of the UCS etc they were assessed individually under their own merits. No attempt was made to include this category otherwise.	This category should be removed from the methodology and adds no value and is open to misinterpretation.
Para 40, P – Any additional areas identified during the course of the study	This 'Catch All' category adds no value to the SHLAA. Unless there is evidence of an inclination from the landowner to develop, availability cannot be established and therefore the assessment of these sites would be redundant. By default, sites under this category, where there is an interest to develop, will have been submitted through processes such as the Call for Sites.	To ensure that legitimately submitted sites were considered appropriately, where sites were submitted under the Call for Sites, or as part of the UCS etc they were assessed individually under their own merits.	This category should be removed from the methodology and adds no value.
Para 41 – Potential land for housing will include identified sites, but may also encompass broad locations.	As a result of the extensive site sources listed in paragraph 40 this section is duplication and may be open to misinterpretation.	To ensure that legitimately submitted sites were considered appropriately, where sites were submitted under the Call for Sites, or as part of the UCS etc they were assessed individually under	This paragraph should be removed from the methodology and adds no value.

		their own merits. The purpose of the SHLAA is to identify potential housing land and this will be done based on the assessments of those sites which are submitted.	
<p>Para 42 – The following areas will be excluded from the SHLAA:</p> <ul style="list-style-type: none"> i Scheduled monuments ii Areas at risk from flooding iii Sites of Scientific Interest (SSSI) and Local Nature Reserves (LNR) iv Land in the Marshes Protection Area v Business and Industrial Estates vi Oil/Gas Pipeline Precaution Zones, High Voltage Overhead Transmission Lines (HVOTL) and immovable communication links vii Buffer zones around Wastewater / Sewage Treatment Plants 	<p>Whilst the constraints should be noted on each of the individual site proformas, it does not mean they should be excluded from the SHLAA. This is because some of these constraints can be overcome or development can be sensitively designed or mitigated. All constraints should be assessed as a cumulative when determining whether the SHLAA site is suitable for housing development.</p>	<p>All constraints were noted on the site proformas. The constraints listed along with highway constraints were cumulatively assessed to identify if a SHLAA site was suitable for housing development.</p>	<p>Remove the term ‘excluded’ as these are noteworthy constraints but to not necessarily result in a site being excluded.</p>
<p>Para 45 – The sources of land (that are identifiable sites) to be surveyed will be those identified in Stage 2.</p>	<p>As detailed above, not all the categories identified in stage 2 are realistic or practical for assessment.</p>	<p>Call for Sites, UCS and Replacement Local Plan Sites were assessed as detailed in stage 2.</p>	<p>Remove the paragraph.</p>
<p>Para 49 – There is merit in considering all the identified sites and areas as specific sites. However,</p>	<p>The entire Borough is surrounded by Green Belt and therefore this should all be assessed</p>	<p>In order to consider the Green belt for its value and enable officers to manage the</p>	<p>Reword the section to remove the misinterpretation and clarify the approach.</p>

<p>that would be very resource intensive. A pragmatic approach needs to be taken. When considering Green Belt sites, nearby sites will be grouped together and assessed as one area. This will provide more detail than looking at the general area as a potential broad location, and will reduce the actual number of sites assessments required.</p>	<p>comprehensively. However, this paragraph suggests the grouping of submitted sites to create broad locations should be the approach yet this does not value the green belt and the role that it plays in its own right.</p>	<p>assessment of green belt sites a Green Belt Methodology was created and has been utilised in the undertaking of the SHLAA. The methodology divides the Green Belt up into smaller sub-sections based upon natural boundaries such as hedgerows and waterways. It then considered these sub-sections against the 5 purposes of the Green Belt set out in PPG2: Green Belts. If any of these sub-sections were found to be too valuable to the purposes of the Green Belt then any SHLAA sites located within the sub-section was not be assessed in any detail. However, if the sub-section did not clearly meet the 5 purposes of the green belt then it was considered that on further study some element of development may be a possibility. In these cases, SHLAA sites within these areas were assessed in detail. As the SHLAA does not allocate land for development, there is still no guarantee that these sites will be allocated in future but knowledge of them is</p>	
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		considered important and if there is a need to release any of these sites then a comprehensive approach has been taken.	
<p>Para 50 – Other Council Services and stakeholders will be consulted to verify the data recorded by the above processes.</p>	<p>There is a possibility of misinterpretation in this paragraph suggesting that a wider consultation would take place. Council Departments such as Highways and Estate Management and stakeholders who submitted sites were consulted where appropriate to ensure that the results of the surveying phase were, to their knowledge, accurate and to reaffirm the availability of sites and inclination to develop.</p>	<p>A 'Fact Checking' consultation process was undertaken August –September 2011 on sites that underwent detailed assessment with submitters of sites and relevant council departments.</p>	<p>Reword this section for clarity.</p>
<p>Para 53 _ The density range calculations will take into account the following (supplemented, as necessary, by sketch / sample schemes):</p> <ul style="list-style-type: none"> • Accessibility • Characteristics of the site and surrounding areas, • Identified constraints, • Existing proposals, e.g. for town centres regeneration schemes / masterplans, • Illustrative developer / 	<p>This regard to density calculations in not inaccurate but could be considered as vague as no clear methodology or approach to calculation is set out.</p>	<p>In order to be consistent in assessing yield on sites, officers used a combination of information sources including character area appraisal information set out in the Urban Capacity Study (2004), yields from expired planning permissions on sites where they were relevant, as well as yield information from permissions and completions of adjacent and/or nearby sites.</p>	<p>This paragraph should be reworded and expanded to explain the approach to density yields for assessment purposes.</p>

landowner schemes for similar sites.		Some density figures may have been rationalised as part of the viability study and amended accordingly.	
Para 56 – Stakeholders will be consulted, in particular, on these availability and achievability elements of the assessment. The SHLAA Consultative Group would be involved in Stage 7.	This group could only be created as part of Stage 7 viability work.	The group were created as part of the viability assessments and held its first meeting on 23 rd November 2011. Stakeholders were asked at that meeting, whether they wished to remain on the workgroup to be utilised going forward.	N/A
Para 62 – The allocation of development land will be made in the LDF Core Strategy.	Due to a change in the Councils approach, the Core Strategy will only allocate strategic sites and it will now be the role of the Site Allocation DPD to allocate land for development. As such this statement is inaccurate.	No mitigation necessary	Remove this paragraph as to specify which document will deal with which aspect of the SHLAA adds no value.
Para 64 – The guidance says that broad locations can include town centres, existing residential areas, potential urban extensions and the intensification/ redevelopment/ expansion of settlements. Town centres have been included as one of the categories in Stage 2.	No need for broad locations has been established at this stage of the SHLAA. Also, as a result of the necessary changes to Paragraph 40, this section is no longer relevant.	No mitigation necessary.	For the longevity of the methodology, this section should remain but reworded to clarify that Broad Locations will be considered when needed, not as a matter of course. Consideration of Broad Locations should also be informed by evidence bases and/or development briefs.
Para 65 – As mentioned earlier, many of the residential areas that could provide significant numbers of	This section is open to misinterpretation and adds no value to the SHLAA.	No mitigation necessary.	Remove this paragraph.

<p>new homes have already been identified through the planning process. Other potential within urban / residential areas will have been identified in earlier stages of the SHLAA. Therefore specific urban residential areas will not be included as broad locations in the SHLAA.</p>			
<p>Para 66 – Therefore, broad locations in the SHLAA will be those sites and locations that may be suitable for new housing in the District. It is important that all potential sources of land are looked at to ensure that the SHLAA is comprehensive, especially as the majority of land suggested through the Call for Sites exercise is located in the Green Belt.</p>	<p>This section is open to misinterpretation and adds no value to the SHLAA.</p>	<p>No mitigation necessary.</p>	<p>Remove this paragraph.</p>
<p>Para 67 – Broad locations may include individual identified sites (such as those proposed through the Call for Sites exercise) within a wider area, but will be assessed as a whole. This will enable the broad locations to be considered comprehensively.</p>	<p>This section is open to misinterpretation and adds no value to the SHLAA.</p>	<p>No mitigation necessary. However, in order to ensure sites across the borough are treated comprehensively the Green Belt methodology was created. Furthermore, where sites were submitted as part of the Call for Sites, UCS etc, they will be considered independently and on their own merits.</p>	<p>Remove this paragraph.</p>
<p>Para 68 – Just as with specific sites, there is no guarantee that an area identified as a broad location will be</p>	<p>No need for broad locations has been established at this stage of the SHLAA. Also, as a result of</p>	<p>No mitigation necessary.</p>	<p>For the longevity of the methodology, this section should remain but reworded to clarify that</p>

allocated for development.	the necessary changes to Paragraph 40, this section is no longer relevant.		Broad Locations will be considered when needed, not as a matter of course. Consideration of Broad Locations should also be informed by evidence bases and/or development briefs.
Para 71 & 72	As the SHLAA has been delayed the last five year of dwelling completions will no longer be 2003 – 2008. Furthermore, this methodology to identify windfalls does not take into account character areas and the potential difference of dwellings coming forward in different areas. Point 4 also lacks clarity.	Windfalls have not been calculated into this initial SHLAA and therefore no mitigative action has been necessary.	This section is overly prescriptive and needs to be simplified so that in the eventuality that windfalls need to be considered in land supply, the Council can do so based on the correct information and circumstances at the time. Both of these paragraphs should either be restructured for simplicity or removed.
Page 20 - Annexe 1 – Site Proforma	Due to the change in processes adopted by the Council the viability aspect and market assessment was undertaken independently of the Council and therefore was not completed in the manner set out.	The proformas were completed up to the Market Assessment section of the proforma to ensure consistency in the appraisal process. All of the findings from the proformas and the viability work has been compiled into the SHLAA database and will continue to be so in future SHLAA.	An example of the database printout should replace the SHLAA site survey form.
Page 26, Local Planning Authority – The local authority responsible for planning matter in its areas. Essex	Basildon Distict Council is now a Borough Council.	No mitigation actions were necessary.	Change Basildon District to Basildon Borough. This should be the case for all reference to Basildon District.

County Council and Basildon District Council are both local Planning Authorities for different planning matters in Basildon District.			
Page 26, Planning Policy Guidance Notes (PPG) Planning Policy Statement (PPS) – Government guidance on planning policy issues. There are 25 PPGs on different planning topics. PPGs are being replaced by Planning Policy Statements (PPS).	There are a mixture of PPG and PPS. The coalition Government has decided to consolidate and amend these guidance notes and statements to produce a National Planning Policy Framework (NPPF).	Consider the NPPF and its implication it could have in the planning process. This will be fundamental when the NPPF is adopted as national policy.	Remove reference that PPS will replace PPG and clarify there is a mixture of both at present.
Page 27, Section 106 agreement	Whilst a section 106 is still in place at the moment, the Community Infrastructure Levy (CIL) will eventually replace this.	Section 106 is to be continued until CIL is brought in.	Some recognition of contributions should be made but allow for emerging processes such as CIL.

