

Strategic Housing and Economic Land Availability Assessment (SHELAA)

Methodology

April 2018

1.0 Introduction

1.1 The Mid Sussex Strategic Housing and Employment Land Availability Assessment (hereafter referred to as the Assessment) is a comprehensive study of the availability, suitability and likely viability of land to meet the identified need for housing. The National Planning Policy Framework (NPPF) sets out the Government's requirement that local planning authorities produce an Assessment. The Assessment will form part of the evidence base and background information to inform the preparation of the Council's development plan documents.

1.2 Paragraph 159 of the NPPF states that local planning authorities should:

"prepare a Strategic Housing Land Availability Assessment 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."

Paragraph 161 goes on to state that local planning authorities should also assess the:

"existing and future supply of land available for economic developmentReviews of land available for economic development should be undertaken at the same time as or combined with, Strategic Housing Land Availability Assessments"

1.3 Further guidance on how to undertake an Assessment is set out in the Planning Practice Guidance. The Planning Practice Guidance states that:

"Plan makers should have regard to the guidance in preparing their assessments. Where they depart from the guidance, plan makers will have to set out reasons for doing so"

The methodology set out in this document details how the Council will be undertaking its Assessment. It has been developed against the standard methodology set out in the Planning Practice Guidance.

1.4 MSDC prepared a SHLAA in 2016 to identify suitable sites for housing to inform the preparation of the District Plan. The assessment process on which the SHLAA was based was prepared in February 2015. This SHELAA provides an update to the 2016 document.

1.5 The Assessment is a background paper only. It lists possible housing and economic development sites, and provides an assessment of the potential of those sites for development. Once completed, it will form a key part of the evidence base for the Council's development plan documents and will be used to help inform judgements on the future development and the allocation of land for housing.

1.6 The Assessment excludes the area of Mid Sussex District that is within the South Downs National Park (the parishes of Fulking, Albourne, Poynings, Pyecombe and parts of Hurstpierpoint and Sayers Common and Hassocks Parishes are within the National Park). The National Park Authority is the planning authority for that part of the District and is preparing its own Development Plan for National Park. The National Park Authority has published a Strategic Housing Land Availability Assessment that covers the National Park.

2.0 Parameters of the Assessment

2.1 The Assessment will be an evidence paper only. It is not a statement of Council policy and does not allocate land. It will be used to help inform judgements on future development and the allocation of land for housing and employment.

2.2 The Assessment will consider as many options as possible for accommodating residential and employment development. The findings of the Assessment do not pre-empt or prejudice any decision the Council may make in the future on any particular site and does not alter any existing policies or land use designations as set out in the District Plan or Neighbourhood Plans. Judgements

concerning whether sites should be allocated in the future will be made through the statutory plan processes. This will further test the suitability of any sites identified in the Assessment which may be proposed for housing or employment development, including Strategic Environmental Assessment and Sustainable Appraisal.

Purpose and aims of the Assessment

2.3 The purpose of the Assessment is to:

- Identify sites and broad locations with potential for housing and employment;
- assess their development potential; and
- assess their suitability for development and the likelihood of development coming forward.

The Assessment aims to identify as many sites with development potential as possible in and around as many settlements as possible. This will identify a 'palette' of sites, from which Members will be able to choose sufficient sites to meet the Council's objectively assessed housing needs, with additional flexibility and a buffer, to take account of non-delivery or under-delivery on some sites. For employment sites, the Assessment will demonstrate whether or not there is a sufficient supply of suitable economic land to meet identified needs and provide a 'palette' of sites that could be allocated to meet identified needs.

The Assessment is an important evidence source to inform plan making as it identifies:

- all potential development sites, including sites that have not been put forward to the Council
- the suitability, availability and likelihood of sites; and
- potential constraints that could impact on the suitability, availability and achievability of sites.

Time parameters of study

2.4 The Assessment will cover the period up to 2031 to accord with the plan period for the District Plan.

3.0 Background

- 3.1 The Mid Sussex District Plan was adopted in March 2018. A Strategic Housing Land Availability Assessment (SHLAA) and a separate Employment Land Availability Assessment (ELAA) were prepared to inform the preparation of the District Plan. The District Council has committed to the preparation of a Site Allocations Development Plan Document. This document will allocate a 'residual' amount of housing to ensure that the District Plan Housing Requirement is met in full¹ and sufficient employment land to meet the job requirement of the District Plan.
- 3.2 The opportunity has been taken to review the SHLAA methodology, the SHLAA and ELAA as part of preparation of the Site Allocations Document to ensure that the document is informed by the most robust and up to date evidence.
- 3.3 The Scrutiny Committee for Community, Housing and Planning, 14th November 2017 considered a report that introduced the Site Allocations Development Plan Document. The report:
- 1) Provided information on the early stages of the preparation of the Site Allocations DPD, which includes a call for sites, the preparation of a SHELAA and a Site Selection Report;
 - 2) Set out the proposed arrangements for the establishment of a member working group to oversee the preparation of the Site Allocations DPD
 - 3) Notified members about the establishment of a Developer Liaison group to engage with the development community.
- 3.4 The Scrutiny Committee for Community, Housing and Planning, 17th January 2018 considered a report that asked members to consider the process for assessing sites through the SHELAA.

The role of the SHELAA and the Site Selection Report

- 3.5 The 17th January 2018 Scrutiny Committee report explained the role of the SHELAA and the Site Selection Report, which together will inform the Site Allocations DPD. The SHELAA lists all of the sites which have been promoted to the Council for consideration for development by landowners through the 'Call for Sites' which took place between October 2017 and February 2018. The list also includes sites which were included in the 2016 SHLAA, which continue to be promoted for development.
- 3.6 The SHELAA report comprises a map of each of the sites, and text which provides a brief analysis of the suitability, availability and achievability of each site. The SHELAA also includes a list and map of each site which has been rejected from further consideration because of absolute constraints to development of the site or if it is below the size threshold (minimum size 0.25ha or capacity of 5 units for housing sites; 500m² for employment floorspace). At the end of this stage the SHELAA can be published.
- 3.7 The Site Selection report is the second stage of the site selection process. It builds on the work already undertaken in the SHELAA, but will be published separately from it. The Site Selection Report will:
- 1) assess the extent to which the development of each site would comply with the policies and spatial strategy of the adopted District Plan and the Neighbourhood Plan (where relevant).
 - 2) provide a more detailed assessment of the opportunities and constraints associated with each site

¹ Subject to Habitats Regulations Assessment

- 3) provides for more detailed evidence testing, and early engagement with landowners and statutory consultees

Key Differences between the SHLAA 2015 and the SHELAA 2018

3.8 There are a couple of key differences between the methodologies of the SHLAA 2015 and the SHELAA 2018. These are:

- 1) the two stage assessment process of the SHELAA and the Site Selections Report now provides a clear distinction between the 'policy off' assessment in the SHELAA, and the assessment in the Site Selections Report which considers the policy context of proposed development;
- 2) in the revised SHELAA, only sites where development would be precluded by absolute constraints or fall below the size threshold are removed from the assessment process. Previously, some sites were excluded from further assessment due to their location being wholly outside and unrelated to existing settlement built up area boundaries;
- 3) The Site Selections Report makes provision for a full considerations of both opportunities and constraints, and allows for engagement with landowners so that constraints can be discussed and possible mitigation measures can be discussed.

4.0 Methodology

Who has been involved

- 4.1 The NPPG requires that when the SHELAA assessment process is reviewed, Local Planning Authorities should work with neighbouring Local Planning Authorities in the housing market area and the functional economic market area. Key stakeholders including adjacent authorities, Town and Parish Councils, land promoters and developers have had the opportunity to be involved in the revision of the SHELAA methodology. The Council will continue to work with key stakeholders throughout the assessment process to ensure that the Assessment is undertaken in a robust and joined up manner.
- 4.2 The Council has formed a Mid Sussex Developers Liaison Group which includes representatives from across the development industry. It is intended that the meetings will provide an opportunity for constructive dialogue and will inform the Plan making process. The first meeting of the Group took place on the 28th November 2017. There were 18 attendees, representing landowners, developers companies, land promoters and registered housing providers. At the meeting the group received a copy of the proposed methodology for the SHELAA and Site Allocations DPD.
- 4.3 MSDC Officers met planning policy officers from Crawley Borough Council, a neighbouring authority in the housing market area. Horsham District Council was unable to attend, and was consulted by email. Authorities in the functional economic market area including Brighton and Hove Council, Adur and Worthing Council and Eastbourne and Lewes Council also attended a meeting to discuss the SHELAA assessment process.
- 4.4 A briefing for Town and Parish Councillors was held on 7th December 2017. Twelve Parish and Town Councils were represented at the briefing.
- 4.5 All consultees were given the draft SHELAA and Site Selections Report methodology to review, and were asked to submit comments to MSDC by a given date. Consultees were advised that if no response was submitted, it would be taken that they had no objections to the proposed methodology. Feedback was received from a number of respondents. Appendix 1 sets out the comments which were received, and identifies where these have resulted in changes to the SHELAA and Site Selection Report assessment presented to Members.

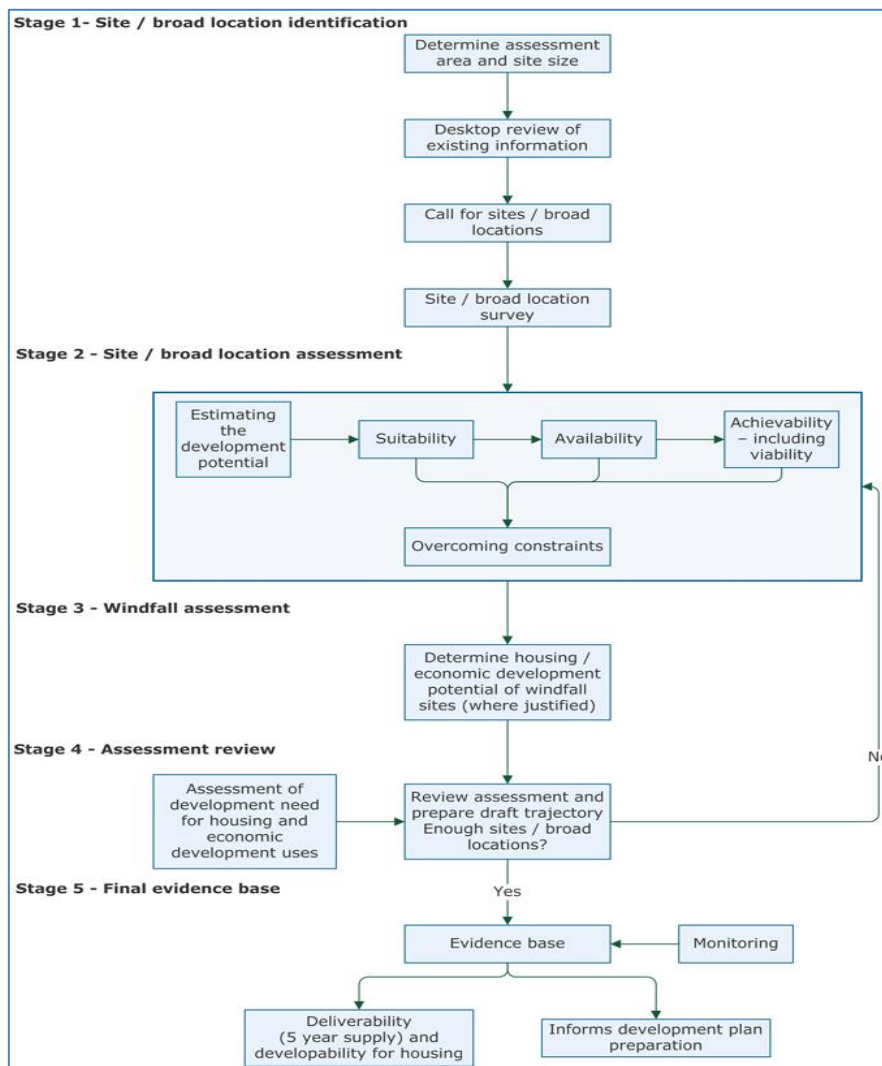
Who will undertake the Assessment

- 4.6 Planning Officers from the Planning Policy team of Mid Sussex District Council will lead and undertake the majority of work for the Assessment. The Policy team benefits from having a high degree of local knowledge including natural and historic conservation issues and in-house expertise with GIS electronic mapping.
- 4.7 Officers from the Policy Division will work closely with interdepartmental colleagues at all stages of the Assessment including members of the Housing and Development Management Departments, the Trees and Landscape Officer, the Property Team and the Urban Designer.

Planning Practice Guidance

- 4.8 The Planning Practice Guidance sets out five main stages for the undertaking of an Assessment. The methodology sets out in turn, how each of these stages is to be undertaken as part of the Assessment process. The stages of the Assessment are set out in Figure 1.

Figure 1 – Assessment of Land Availability process and outputs



Source: National Planning Policy Guidance (March 2014)

Stage 1 – Site/ broad location identification, assessment area and site size

Determine the assessment area and site size

- 4.9 The assessment will identify all sites and broad locations regardless of the amount of development needed to provide an audit of available land. The assessment will provide information to enable identification of sites and locations suitable for allocation through a development plan document.
- 4.10 The assessment will assess a range of different site sizes from small scale developments, to extensions to towns and villages and new settlements. Sites that can deliver 5 or more dwellings or economic development on sites of 0.25 hectares (or 500 square meters of floor space) and above will be considered.

Identifying sites and broad locations

- 4.11 The Assessment will seek to maximise sources of housing potential and a thorough site search and desktop review will be undertaken. It will be necessary to consider sites presently in the planning process as well as new opportunities, including sites that have not been put forward to the Council. Government Guidance² identifies a number of sites within and outside of the planning process and this has been used as the basis for sites that should be included in the Assessment as set out in Table 1.

Table 1 – Sources of sites with potential for housing

Sites in the planning process
<ul style="list-style-type: none"> • land allocated (or with permission) for employment or other land uses which are no longer required for those uses • existing housing allocations and site development briefs • unimplemented / outstanding planning permissions for housing • planning permissions for housing/employment that are under construction
Sites not currently in the planning process
<ul style="list-style-type: none"> • planning applications that have been refused or withdrawn • vacant and derelict land and buildings • surplus and likely to become surplus public sector land • land in the local authority's ownership • 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 • additional housing opportunities in established residential areas, such as under-used garage blocks • large scale redevelopment and re-design of existing residential areas • sites in rural settlements and rural exception sites • sites in rural locations • urban extensions • new free standing settlements

²National Planning Practice Guidance (March 2014)

Call for potential sites and broad locations

- 4.12 A call for potential sites and broad locations for development will be issued for each SHELAA review. This will target a wide an audience as possible. This will include emails/ letters and e-mail alert. In addition information placed on the Council's website to inform parties not currently known to the Council. Respondents will be asked to complete a pro-forma to ensure an initial assessment of the site/broad location can be made. A copy of the pro-forma is available on the Council website at <http://www.midsussex.gov.uk/planning-building/strategic-housing-and-economic-land-availability-assessment/> . The promoters of sites already in the Assessment will be contacted, where possible, to confirm that the information that the council holds is up to date.

Site and broad location surveys

- 4.13 Any new sites and broad locations that emerge from data sources and call for sites will be assessed against national policies and designations to establish which have a reasonable potential for development and should be included in the site survey.
- 4.14 Practice Guidance states that all sites identified by the desktop review should be visited to aid the robustness of the Assessment, but that site surveys should be proportionate to the detail required for a robust appraisal. The object of site surveys is to:
- Ratify inconsistent information gathered through the call for sites and desk assessment
 - get an up to date view on development progress
 - gain a better understanding of what type and scale of development may be appropriate,
 - gain a more detailed understanding of deliverability; and how any barriers and how they could be overcome,
 - identify further sites with potential for development that were not identified through data sources or the call for sites.
- 4.15 It may not be necessary to visit each site identified by the desktop review, particularly those that have commenced development or are subject to extant planning permission, as the Planning Policy team currently monitors completions and can consult with colleagues from the Development Management and Building Control Departments. In addition, the Planning Services team at West Sussex County Council, in conjunction with Mid Sussex District Council, also monitor the progress of housing sites as part of the West Sussex Housing Land Study. It is therefore proposed, that a site visit will not be necessary where comprehensive information on a site is known through these sources. All other remaining sites (that meet the criteria as outlined below) will be surveyed as part of the Assessment and this will aid in providing evidence if there is a reasonable chance of a site being developed for housing.

Information to be collected during survey

- 4.16 The following characteristics will be recorded as part of the site survey
- site size, boundaries and location
 - current land use and character
 - Land uses and character of surrounding area
 - Physical constraints (e.g. access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure/utilities)
 - Potential environmental constraints
 - Where relevant, development progress
 - Initial assessment of whether the site is suitable for a particular type of use/ mixed use development

Stage 2: Site/broad location assessment

Calculating the development potential

4.17 The Planning Practice Guidance states that the development potential of each identified site should be guided by existing and emerging policy, including locally determined policies on density. Relevant existing schemes can be used as the basis for assessment, adjusted for any individual site characteristics for a particular use. The housing densities provided by the Assessment are indicative to the theoretical potential for future development. It should be noted that, as stated in Paragraph 2.2, the Assessment does not pre-empt or prejudice any decision the Council may make in the future on any particular site and the assumptions made on densities should not be taken out of this context.

Assessing the suitability of sites

4.18 The assessment of the suitability of sites will be informed by the policies in the District Plan and the market and industry requirements in the housing market and functional economic area. Factors that will be taken into account include:

- Physical limitations - including access and flood risk
- Landscape impacts – including AONB, natural and heritage conservation, Ancient Woodland, SSSI, Local Nature Reserve
- Likely market attractiveness
- Environmental/amenity impacts

4.19 In the Planning Practice Guidance states that sites which have particular policy constraints should be included in the assessment for the sake of comprehensiveness but these constraints must be clearly set out, including where they severely restrict development. Planning Practice Guidance goes onto state that the comprehensive list of sites and broad locations derived from data sources and the call for sites should be assessed against national policies and designations to establish which has reasonable potential for development and should be included in the site survey. Figure 2 sets out the sites/areas that are to be included with the SHELAA but will not progress to consideration in the Site Selection Report. However, as part of the review of the Assessment all sites currently in the existing Assessment but excluded, will be tested again to review the appropriateness of previously defined constraints.

Figure 2 – Sites/areas to be excluded from detailed Assessment

Sites/ areas to be excluded from detailed Assessment	Justification
Site that could not accommodate 5 or more dwellings	NPPG methodology
Potential employment sites that are less than 0.25 hectares/ could not deliver 500 square meters of employment floor space	NPPG methodology
Site predominantly or wholly contains a European Nature Conservation Site (Special Area of Conservation – SAC)	Given legislative protection, no significant adverse could be tolerated.
Sites predominantly or wholly contains a site of Special Scientific Interest (SSSI) There are 13 SSSI's, covering 639.7ha, which makes up 1.9% of the	Given legislative protection, no significant adverse effects could be tolerated. A conservative approach is applied, which assumes that sites intersecting by <50% could conceivably be designed to avoid effects. NPPF – Para 118 states that proposed development on land within or outside a SSSI should not normally

District).	be permitted.
Site predominantly or wholly contains a Scheduled Monument	Given legislative protection, no significant adverse effects could be tolerated. A conservative approach is applied, which assumes that sites intersecting by <50% could conceivably be designed to avoid effects NPPF – Para 132 states that substantial harm to or loss of designated heritage assets, including scheduled monuments should be wholly exceptional.
Residential sites lying wholly or mostly (>50%) within flood zones 2 and 3	The functional flood zone is not developable as set out in the National Planning Practice Guidance; Flood Risk and Coastal Change

4.20 Once the above factors have been taken into account a judgement has been made as to whether the site can progress to consideration through the Site Selection Report. It will only be those sites that are subject to the absolute constraints, as identified in figure 2, that will not progress to the Site Selection Report stage.

Assessing the availability of sites

4.21 A site is considered to be available for development, when, on the best information available there is confidence that there are no legal or ownership problems. The existence of a planning permission does not necessarily mean that the site is available. If potential problems are identified an assessment will need to be made as to how and when they can realistically be overcome.

Assessing the achievability of sites

4.22 If there is a reasonable prospect that the particular type of development will be developed on a site at a particular point in time, then a site is considered to be achievable. This is essentially a judgement about the economic viability of a site and the capacity of the developer to sell the development.

4.23 The economic viability of a housing site is a significant factor in its potential for development. A site may be severely restricted by physical problems or limitations such as access, infrastructure or contaminated land that can affect the achievable density and the cost of the scheme, both to the detriment of its economic viability.

4.24 An evaluation will be made on the availability and estimated costs of required infrastructure to develop a site. For the purpose of the Assessment, the criterion for infrastructure is defined as water, surface and foul water drainage, highways and transport, electricity and gas. The requirement for contributions towards affordable housing and other necessary infrastructure through Section 106 agreements will also need to be considered in the overall assessment of site viability.

Timescale

4.25 Consideration has to be given as to the likely delivery timescale of each site. This gives a broad indication as to whether the site would come forward in the shorter or medium-long term.

Stage 3 Determining the housing potential of windfall sites

- 4.26 The National Planning Policy Framework outlines³ that an allowance for windfall sites in the five year supply can be made if there is compelling evidence. In these circumstances an allowance may be included but should be realistic having regard to the SHELAA, historic windfall delivery rates and expected future trends and should not include residential gardens. The Windfall Study is set as a separate report to the SHELAA.

Stage 4 Assessment review

- 4.27 The NPPG requires that following the initial survey of sites and the assessment of their deliverability/developability have been made, the housing potential of all sites will be collated to produce an indicative housing trajectory that sets out how much housing can be provided and at what point in the future. As set out above following the publication of the SHELAA and Site Selection Report will be prepared. It will be the Site Selection Report that will set out the indicative housing trajectory, rather than the SHELAA. A Housing Trajectory is included within the District Plan and will be updated annually through the Monitoring Report.
- 4.28 Practice Guidance recommends that an overall risk assessment should be made as to whether sites will come forward as anticipated as the Assessment may conclude that insufficient sites have been identified to meet strategic housing requirements and that further sites need to be sought. If this is the case, it will be necessary to investigate how this shortfall should best be planned. This will include revisiting the Assessment e.g. changing assumptions of potential particular sites or reviewing constraints. If there is still a shortfall in sites, consideration needs to be given to how needs might be met in adjoining areas. This will be addressed in the Site Selection Report.

Stage 5 Final evidence base

- 4.29 The NPPG states that the Assessment should provide a set of standard outputs to ensure consistency, accessibility and transparency. The SHELAA and the Site Selection Report will provide this evidence. The SHELAA will set out:
- a list of sites and broad locations, cross-referenced to maps showing locations and boundaries of specific sites;
 - an assessment of the deliverability/ developability of each identified site/ broad location (i.e. in terms of its suitability, availability and achievability to determine whether a site is realistically expected to be developed and when; and
 - Evidenced and justified reasons will be given for sites that have been discounted (either because site is not of sufficient site or due to absolute constraints;

The Site Selection Report will set out:

- A more detailed assessment of each of the sites;
- the potential type and quantity of housing that could be delivered on each identified site broad location;
- where constraints have been identified, an assessment of how barriers to delivery could be overcome; and
- An indicative trajectory of anticipated development and consideration of associated risks

³ Paragraph 48, NPPF

Appendix 1 – Table of Responses to Consultation on SHELAA and Site Selection Report Assessment

Respondent	Comment	MSDC Response
<p>East Grinstead Town Council</p>	<p>The test of availability in Stage 2 of the SHELAA should refer to District Plan and Neighbourhood Plan policies, not just to District Plan policies.</p> <p>Site Selection Report – Spatial Strategy – sites should be considered against District and Neighbourhood Plans, noting supporting text.</p> <p>Site Selection report – Setting the Strategy – Constraint limitations should be considered here.</p> <p>Under Detailed Assessment of Constraints and Opportunities, the task should include an evaluation of the District Plan and Neighbourhood Plan evidence base.</p> <p>In the same section, for sites positioned close to the MSDC border, a desk top study of neighbouring planning authorities' conditions should be considered.</p> <p>Known site infrastructure and funding of infrastructure should also be taken account of.</p> <p>Tourism should be included in the constraints and opportunities assessment.</p>	<p>Disagree: the SHELAA provides a 'policy off' assessment; availability is tested against evidence of promotion, issues of multiple ownership, ransom strips or operational requirements of landowners</p> <p>Disagree: the suitability of sites is determined against planning policies. Inclusion of supporting text may lead to potential for conflicting guidance.</p> <p>Disagree: This section refers to policy considerations – Constraints and Opportunities are considered separately in the Detailed Assessment of Constraints and Opportunities.</p> <p>Disagree: the assessment will refer to adopted policies of the Development Plan which have been tested through an independent Examination.</p> <p>Agree: a desk top study will be undertaken for these sites.</p> <p>Agreed; this is covered by the change of wording which takes account of site opportunities and constraints.</p> <p>Disagree.</p>
<p>Albourne Parish Council</p>	<p>How will sites which have been refused on appeal be assessed through the SHELAA?</p>	<p>Sites which have previously been refused on appeal will be reviewed to understand whether the reasons for refusal still apply, or whether the policy context has changed since then. It is not considered</p>

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		necessary to change the SHELAA assessment process to reflect this advice.
Adur and Worthing Council	<p>Only residential sites which lie wholly within the functional flood plan (Flood Zone 3b) should be excluded from further consideration.</p> <p>Employment sites in Flood Zone 3 should be included in the SHELAA, as such sites are usually classed as 'less vulnerable' to flood risk.</p>	<p>Agreed:</p> <p>Agreed: The SHELAA methodology has been amended accordingly. assessment.</p>
Brighton and Hove Council	<p>The Council should reconsider the average density for built up areas, especially in town centres, where there is potential for higher density housing.</p> <p>Phase II of the Site Selection process should look at potential impacts pre-and post - mitigation measures.</p>	<p>Agreed: the SHELAA Stage 2 text has been amended to note that a review of densities will reflect the most up to date information.</p> <p>Agreed: the text has been amended accordingly in the Site Selection Report.</p>
Horsham District Council	<p>Should the SHELAA refer to exclusion of Ancient Woodland, or sites within a reasonable distance of it?</p> <p>Will Local Nature Reserves be automatically excluded– although it is appreciated they don't have as much protection under the NPPF as SSSIs.</p> <p>No reference has been given to viability when assessing the achievability of the sites- it is mentioned under NPPG "Stage 2: How should the development potential be calculated?"</p>	<p>The NPPF notes that planning permission should be refused for developments which result in the loss of ancient woodland, unless the need for, and benefits of the development in that location clearly outweigh the loss. This is not an absolute constraint, and this planning balance will be applied in the Site Selection document.</p> <p>Agreed; Local Nature Reserves are not an absolute constraint to development and, as above, would be considered later in the Site Selection process.</p> <p>Agreed; the text of the Stage 2 assessment 'Assess achievability' has been amended accordingly.</p>
Quod	<p>Where constraints to potential development are identified, consideration should be given to whether these can be overcome with mitigation measures.</p> <p>The methodology should recognise that some larger sites/freestanding</p>	<p>Agreed – text amended accordingly in Site Selection paper.</p> <p>Agree: this issue is already addressed in the Detailed</p>

	<p>developments will have the ability to deliver services/infrastructure on site.</p> <p>Site assessments should not rely on conclusions previously reached, but use all up to date information.</p> <p>The reference to 'relationship to built up areas/adjacent settlement' as a constraint should be removed to ensure that freestanding settlements are given fair consideration.</p>	<p>Assessment of Constraints and Opportunities section of the Site Selection Report – 'capacity to provide infrastructure'.</p> <p>Agreed; no change required to SHELAA.</p> <p>The Detailed Assessment of Opportunities and Constraints section has been amended to clarify Built Up Area boundaries could be a constraint or an opportunity.</p>
<p>Denton Homes</p>	<p>Developers should be given the opportunity to discuss any key constraints identified in Stage 2 of the SHELAA process so that mitigation measures can be identified if appropriate.</p> <p>Developers should be consulted on the likely deliverability of sites, so that the Council has the most up to date information.</p> <p>In the Site Selection Paper, further engagement with landowners/agents/developers should take place to explore mitigation measures.</p> <p>It should be clear how the SA will inform the Site Selection process.</p>	<p>Agreed; the language has been changed in this section to clarify what is meant by constraints in the SHELAA process, and in the Site Selection report, we have made clear measures to review mitigation measures to address constraints.</p> <p>The Site Selection Report already makes clear that developers will be consulted. Where information on sites is not up to date, officers will make every effort to contact developers/agents for an update on deliverability.</p> <p>Agreed: this issue is already covered in the Site Selection assessment process.</p> <p>Agreed: every effort will be made to ensure that any comments on sites are transparent, and that sources of information such as the Sustainability Appraisal are referred to.</p>