

### Schedule of HELAA Draft Methodology Comments received

Organisation/ Contact Name	Rep No.	Comment	Response	Action (additional text shown in <b>bold</b> )
Mr David Akerman	HELAA1	<p>Methodology should include a full assessment of infrastructure constraints, existing infrastructure improvement plans and strategies, and predicted issues should potential housing and economic land developments take place. Infrastructure components addressed should include trunk roads, local roads, traffic capacities, hospital capacity, GP capacity, dental practice capacity, shopping capacity, utilities capacity, waste disposal (wastewater included), flood containment and alleviation capacities, all forms of amenity, etc.</p> <p>Development proposals should explicitly address all relevant “quality of life” issues. Summaries should be provided for each proposal addressing not only infrastructure implications but also practicality, costs, environmental impacts, and the like.</p>	<p>The HELAA methodology considers existing provision of infrastructure when assessing individual sites. The HELAA does not allocate sites nor does it grant planning permission. A full assessment of infrastructure constraints should be undertaken at planning application stage.</p> <p>The HELAA identifies sites and broad locations with potential for housing and/or economic development. It does not set out development proposals.</p>	None.
Highways England (Mr Kevin Bown)	HELAA2	Our only comment is with regards para 3.10. For completeness, given that any contributions towards highway schemes on the strategic road network are likely to be secured via S278 agreements, there should be a reference to this in the paragraph. In turn, while SRN schemes should not be referred to in your CIL R123 List, they should be referred to in your IDP.	Noted.	Text has been amended.
Historic England (Mr Martin Small)	HELAA3	We support the identification of sites within Historic Parks and Gardens and Scheduled Monuments as sites unsuitable for development in principle. Development within the setting of these heritage assets can also be harmful to their significance	Noted.	None.

		<p>although we accept that being within the setting should not necessarily be considered an automatic bar to development, provided the significance of the asset is not harmed, which should be addressed in the stage 2 assessment or through site-specific criteria or, for speculative applications, the historic environment policies of the Plan. (Advice on the setting of heritage assets is contained within our publication “The Setting of Heritage Assets”:  <a href="https://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a>).</p>		
	HELAA4	<p>Paragraphs 6.13 and 6.14 on “Category 2” designations are unclear. Paragraph 6.14 advises that sites that fall wholly within Category 2 designations will not proceed to stage 2 of the assessment. Why then are these not Category 1 designations? If sites that fall wholly within Category 2 designations will not proceed to stage 2, what is meant by the first sentence of paragraph 6.14 that sites subject to Category 2 designations “may proceed to Stage 2 and be assessed further if it is considered feasible to mitigate the potential impacts of development” – is that intended to refer to sites not wholly within Category 2 designations?</p> <p>Category 3 designations are sensitive areas and features which may affect the nature or extent of development appropriate for a site within? including? adjacent to? these areas and features. The distinction between Category 2 and Category 3 sites is not clear – are Category 2 sites where development might not be acceptable at all and Category 3 sites where development will be acceptable but only of an appropriate nature and extent?</p>	Noted.	Amend methodology to remove reference to category 1, 2 or 3 designations.

		<p>Or is the council contemplating an interim assessment between the stage 1 automatic exclusions and the stage 2 detailed assessments for category 2 designations? If neither then the Category 2 designations and paragraphs 6.13 and 6.14 appear to add little, if anything, to the process, and the Category 2 designations could become Category 1 or 3 designations.</p> <p>The setting of heritage assets and historic landscapes could be considered as “Category 3” “designations”, alongside conservation areas, although in both cases a site may be so important to the significance of the asset or the special interest, character and appearance of the conservation area that its development would not be acceptable. This would be identified during the stage 2 assessment, which should have regard to, in particular, paragraphs 125, 132-135, 137 and 139 of the National Planning Policy Framework (as recognised in paragraph 7.11 of the HELAA Methodology document).</p>		
	HELAA5	<p>We welcome the reference to the involvement of the Council’s in-house heritage and archaeology specialists in the stage 2 assessment in paragraph 7.2. Subject to other commitments and priorities we would also be pleased to comment on potential sites, in confidence, at this stage if that would be helpful.</p> <p>We also welcome the reference to listed buildings in the second bullet point under paragraph 7.7, although we would prefer “heritage assets”, and the second bullet point of paragraph 7.14. However, somewhere we would like to see specific reference to the</p>	Noted.	<p>Paragraph 7.7 has been removed.</p> <p>Insert bullet point 3 of paragraph 5.11 (formerly 7.14) to read “<b>potential impacts on the significance or special interest of heritage assets and their settings;</b>”</p>

		<p>assessment of the impact on the significance or special interest of heritage assets and their settings, perhaps as part of a more detailed methodology for the assessment of the potential impact of possible sites on heritage assets. Such a methodology should include the following factors:</p> <ul style="list-style-type: none"><li>• All heritage assets should be considered encompassing buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, because of their heritage interest (archaeological, architectural, artistic or historic). These include designated heritage assets and assets identified by the local planning authority (including local listing).</li><li>• Implications of development (positive and negative) for the setting of a heritage asset and its significance should be considered.</li><li>• The potential archaeological interest of a site.</li><li>• In considering implications for landscape and townscape character, relevant information on the present day historic character of places should be utilised, as for example historic landscape characterisation, historic environment assessments, historic area assessments, extensive urban surveys and conservation area appraisals, and other historic characterisation studies.</li><li>• The specific consideration of settlement character may also be appropriate, as for example whether development would significantly alter the historic settlement pattern (positively or negatively).</li></ul> <p>Our advice on “Managing Significance in Decision-Taking in the Historic Environment” (<a href="https://historicengland.org.uk/images-">https://historicengland.org.uk/images-</a></p>		
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Natural England (Mr Nick Williams)	HELAA6	<p>The methodology outlines that ‘sites within’ SPA, SAC, Ramsar, SSSI will be excluded from further assessment. We would advise that the wording is altered to; ‘land within or outside a designated site likely to have an adverse effect’ or similar, to capture the message within the legislation and NPPF.</p> <p>“...proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted” (NPPF, para 118)</p> <p>Legislation and the NPPF advises that planning permission should not normally be granted for development that is likely to have an adverse effect on the integrity of a European site and adverse effect on a SSSI.</p>	Noted.	Amend Table 3 (formerly Table 4): Category 1 designations to read “Sites within, <b>or adjacent to</b> , a...”

		The wording used in the methodology describes 'sites within' European designation however we advise that you also have regard to functional land that supports any European site. This functional linkage of land beyond the boundary of the European site may fulfil a role in terms of supporting the populations of which the site was designated. Providing a potentially important role in maintaining or restoring a protected population at favourable conservation status.		
Natural England (Mr Nick Williams)	HELAA7	<p>The methodology refers to ancient woodland, whilst we fully support the protection of this habitat it is important not to overlook the importance of all irreplaceable habitats.</p> <p>"...planning permission should be refused for all development resulting in the loss or deterioration of <i>irreplaceable habitats, including ancient woodland</i> and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss." (NPPF, para 118)</p> <p>As such '<i>irreplaceable habitats, including ancient woodland</i>' would provide a more robust wording for the methodology.</p>	Noted.	Ancient woodland has been included in Table 3 (formerly Table 4).
CBRE obo Premier Marinas	HELAA8	We agree that the strategy and area based policies should not be applied to the HELAA process, however, question why the strategic delivery policies are also not excluded, given that they are in place to guide a specific quantum of development within a specific context. For example, the safeguarding of existing employment sites under Policy 26 does not necessarily reflect the emerging evidence base, which will itself be informed by the HELAA. We would	The Council have amended the methodology and have not considered the sites against the strategic delivery policies. However, regarding existing employment sites, the NPPF supports the retention of such sites in	The methodology has been amended to remove reference to the strategic delivery policies.

		suggest that the NPPF and PPG offer sufficient guidance on site assessment.	order to support and maintain economic growth and viability.	
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