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**Our ref:** Gloucester HLAA  
**Your ref:** SHLAA/06/08  
**Date:** 11 June 2008

Dear Georgina Wood

**Strategic Housing Land Availability Assessment, Land for Housing, Gloucester**

Thank you for consulting us on the Revised Methodology for Gloucester Housing Land Availability Assessment (HLAA), June 2008. We have previously been consulted on the Scoping Report for HLAA (March 2007) and have provided our comments related to flood risk, groundwater and contaminated land, water quality etc. (see letter Ref. Gloucester HLAA Scoping dated on 23 April 2007). Therefore, this letter seeks the opportunity to ensure our previous comments were taken on board and to provide additional comments where necessary. See below.

We are pleased you have incorporated Flood risk, contamination water supply and drainage related questions in your Checklist of Site Details (Annex 1). However, we would recommend dividing the drainage question into two and establish whether it is foul drainage or surface water drainage.

In relation to comments about constraints (see section 2.2) we would advise you to make it clear in the HLAA that these constraints do not cover flood risk and that this issue will be assessed in the Strategic Flood Risk Assessment (SFRA) and will be a consideration for any allocations.

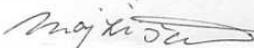
Stage 5 Section 3.13 mentions certain characteristics which will be recorded for the site survey. We would like to highlight that the SFRA has not been completed yet and therefore it is difficult to establish potential flood risk locations in the Gloucestershire County.

Although Section 3.27 mentions that constraints can be overcome, it is not necessarily the case in terms of flood risk. Flood zone 3b 'functional

floodplain' is defined in Planning Policy Statement 25: Development and Flood Risk "as land where water has to flow or to be stored in times of flood". This may be identified as having a 1 in 20 year probability of flooding. More vulnerable use developments such housing should not be permitted in this zone. However, in Flood zone 2 and 3a providing the proposed development passes Sequential and Exceptional Test and by adopting appropriate mitigation measures for example increasing floor levels flood risk constraints could be overcome.

I hope our comments are of use. Please do not hesitate to contact us if you have any queries.

Yours sincerely

PP   
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11 September 2008

Dear Ms Wood  
Gloucester City Council  
Strategic Housing Land Availability Assessment (SHLAA)

My apologies for not responding to your letter on the above matter sooner. However, we have already sent out a letter concerning SHLAA preparation to all District Councils in the South West. (See our letter of the 28<sup>th</sup> April 2008). For reference I simply repeat the advice contained in that previous letter.

We are sending this letter to all Local Authorities in the Region who are, or will be, preparing SHLAAs to inform emerging Local Development Frameworks.

Our recent involvement, as a statutory body, with various local authorities across the country has indicated there is an opportunity to provide generic advice to inform capacity judgements by guiding how best to identify suitable, deliverable and developable potential sites for housing development and how to shape future 'places' in Wiltshire County Council through an efficient process.

CLG SHLAA Practice Guidance, July 2007, provides the broad basis by which these studies should be carried out. This letter will help clarify the application of CLG advice in respect of the historic environment and demonstrate how consideration of it needs to shape judgements and decision making during the SHLAA process.

We hope our advice will also help to ensure your SHLAA is technically sound in accordance with government planning policy, such as PGI 5 and 16, and can be used as robust evidence in support of any Local Development Document.

An initial sifting of sources of sites with potential for housing (stage 2 of the CLG Practice Guide) provides the opportunity to exclude certain "clear out designations" from the SHLAA. These could include, for example, Scheduled Monuments, Historic Parks and Gardens and World Heritage Sites.

By the proper consideration of a site/areas historic environment and contextual features (at stage 5 and 6 of the SHLAA (CLG practice guide, 2007)), where character and physical constraints are assessed, greater certainty of housing supply and more reasonably accurate capacity assumptions will be established. This will also help ensure spaces and places are created that maintain and improve local character (PPS3 Housing).

Also at stage 7a of the SHLAA and with reference to paragraph 38 of the CLG practice guide, it is clear that one needs to consider the historic environment as a determining factor in the process of establishing when and whether sites are likely to be developed i.e. their suitability.

The extent to which the historic environment affects the principle of deliverability will depend on the particular characteristic of the site/area in question e.g. a modest appropriate infill development in a conservation area may have greater potential (deliverability) than a suggested development within a designated historic park and garden. Therefore our advice should not necessarily be seen as a constraint on the delivery of more homes but as means to provide greater certainty, clearly identifying at an early stage the likely deliverability of the estimations you may suggest.

The setting of designated heritage features, from known Scheduled Monuments to Listed Buildings, is a key component of their character and importance and needs to be considered as part of the site identification process. The development of a site near to a designated feature may have a considerable negative impact on its setting and may exclude the site at an early stage in the SHLAA process.

To determine what aspects of the historic environment should be considered in the assessment of a sites potential, the use of the following description might be helpful.

- All designated historic assets should be considered together with non-designated features of local historic or architectural interest and value since these can make an important contribution to creating a sense of place and local identity. This covers buildings, and other structures and features, archaeological remains, historic open spaces and the historic character of the Districts' rural landscapes and townscapes.
- Key features will include: significant known, likely archaeology including Scheduled Monuments; Historic Parks and Gardens; Conservation Areas; Listed Buildings; local listings; World Heritage Sites; rural landscapes and urban townscapes.

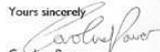
Environmental analysis should look beyond specific designations and consider the wider landscape and townscape impact of housing development.

We strongly advise that you engage conservation, archaeology and urban design colleagues at the local and/or county level to ensure you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered as part of the SHLAA. They will be able to provide you with the Historic Environment Records for the area including any 'characterisation' study, and ensure a joined-up and robust approach is undertaken (Para 12 CLG practice guide, July 2007).

Whilst it is appreciated that the SHLAA cannot in itself determine whether a site should be allocated for housing development or not, we hope our recommendations help to ensure your estimations of housing potential are reasonably accurate having due regard to the important determining factors such as the influence of the historic context. (Stage 6, CLG practice guide, 2007).

If you require further assistance in respect of the consideration of the historic environment in the preparation of your SHLAA please do not hesitate to contact us.

Yours sincerely



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