

South Gloucestershire Council  
New Local Plan

Housing and Economic Land Availability  
Assessment (HELAA)

Draft Method Report

December 2023

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# Background

## Overview

The preparation of a Strategic Housing Land Availability Assessment (SHLAA) is required by the National Planning Policy Framework (NPPF) (para 68). The Government's National Planning Practice Guidance (NPPG) supports the preparation of Housing and Economic Land Availability Assessments (HELAA) as part of the same exercise. For clarity we will refer to this process as the HELAA assessment.

## Purpose of the HELAA

The HELAA in its final form will identify a future potential supply of land which is suitable, available and achievable for housing and economic development over the plan period. This can then form a part of the evidence base when preparing the Local Plan and support any work undertaken on sub regional planning issues. This will provide information to assist spatial strategy development, and more detailed site development considerations. The NPPG makes it clear that the assessment is an important source of evidence to inform plan-making and decision-taking, and the identification of a 5-year supply of housing land.

The preparation of the HELAA accords with the most up to date guidance available in the Government's Planning Practice Guidance, (NPPG) which notes that such assessments should:

- Identify sites and broad locations with potential for development;
- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

This approach ensures that all potential land supply options are assessed together to help inform which sites are potentially the most suitable and deliverable taking into account constraints and other factors that influence delivery. The HELAA will be prepared alongside the emerging South Gloucestershire new Local Plan to inform potential strategy choices, site allocations and evidence gathering.

The HELAA is an evidence source providing an audit of the amount of land available for housing and economic development. It aims to provide a realistic number of dwellings or amount of employment land that each site can potentially provide by assessing the site in order to determine whether it is suitable, available and achievable. It also indicates the potential timescales for their delivery. The HELAA is not part of the development plan and does not in itself allocate sites.

The identification of sites does not imply that there is a presumption in favour of any development proposal, or that planning permission will be granted or refused should an application be submitted. The status of a site may change over time. In all cases the Council will exercise its statutory duties in relation to the consideration and determination of planning applications. A site considered to be suitable, available and achievable does not mean the site will be allocated for development. The HELAA's role in the process is to create a pool of sites that could be considered for allocation. It is the Local Plan's role to consider and consult on potential allocations, from this

pool. The Local Plan will need to take account not just of the suitability of the site but how or if that site ultimately aligns with the Plan's spatial strategy and objectives. This process will also require consultation and close working with communities, developers, statutory bodies and other interested parties. The HELAA represents just one part of a wider evidence base and should not be considered in isolation of other evidence. The HELAA integrates and links to other evidence and the economic development monitoring and projections. It informs rather than determines the plan making process.

National Planning Policy Guidance states that *'the assessment is an important evidence source to inform plan-making and decision taking...However the assessment does not in itself determine whether a site should be allocated for development'* (NPPG Paragraph: 001 Reference ID: 3-001-20190722).

## **Context**

Following the decision of the West of England Combined Authority (WECA) Mayor to stop all work on the West of England Combined Authority Spatial Development Strategy (SDS) in May 2022, the Local Plans for Bath & Northeast Somerset, Bristol and South Gloucestershire will now provide the strategic planning framework for the WECA area.

The issue of housing need will accordingly now be addressed through individual Local Plans for each of the Local Councils. To achieve this the Councils will continue their longstanding history of joint working and cooperation with each other and with other key bodies on strategic, cross boundary matters as they prepare their Local Plans.

South Gloucestershire council began preparation of its new Local Plan in 2020. Following the WECA decision in May 2022 the Local Plan was changed in scope to ensure its content and policies would provide the strategic framework for each UA in the WECA area where the SDS would previously have done so.

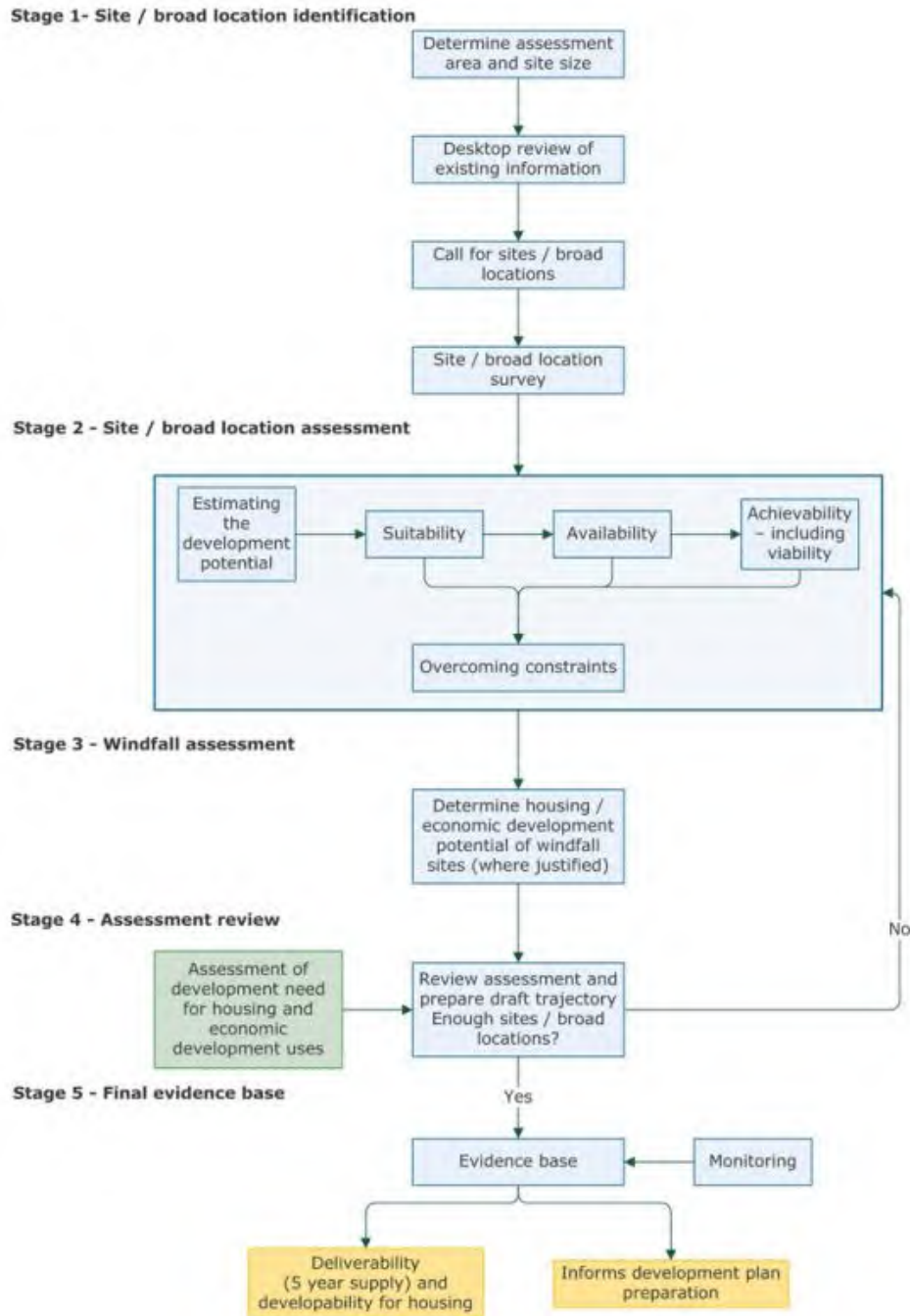
The HELAA will build on, and replace, historic versions of the South Gloucestershire Council SHLAA. All sites previously considered within the SHLAA where relevant to do so, will be included within the HELAA. The sites included within this HELAA and subject to the draft methodology have been significantly informed by a range of Call for Site exercises. Call for Sites exercise took place between July and October 2020 and the council has continued to receive call for sites submission through Regulation 18 Local Plan consultations undertaken in 2020 and 2022. The new HELAA will bring all this data together into a single technical report.

The West of England Combined Authority working with Bath & North East Somerset, Bristol and South Gloucestershire had previously published a SHLAA methodology to support the work on the SDS. This methodology will replace this and all other previous versions of the SHLAA or HELAA method.

# HELAA Methodology

## The Stages of HELAA preparation

The South Gloucestershire HELAA will follow the steps in the methodology set out in the NPPG. The following diagram taken from the NPPG summarises the stages required:



## Stage 1: Site/Broad location identification

### 1a Determine assessment area and site size

The assessment area for the HELAA will cover the Local Authority area of South Gloucestershire.

It was agreed that for the purposes of conducting a Call for Sites that no site size limit or minimum should be given. This was to ensure as wide a range of potential sites could come forward as possible.

The HELAA will seek to identify sites for allocation where they are able to deliver 5 or more dwellings<sup>1</sup>, or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above ([HELAA NPPG](#) para 009). This approach does not exclude smaller sites from coming forward during the plan period and separate policy mechanisms will be progressed to consider and determining applications for these types of developments. However, it is not considered effective or efficient to assess and potentially allocate sites for the new Local Plan which would provide less than 5 homes or 0.25 hectares of employment land, unless through the clustering of smaller sites it was demonstrated that this threshold could be reached that made it effective to consider undertaking. Such sites will be discounted from consideration in the HELAA. The Council has previously made an allowance for small windfall sites when calculating the supply of housing land and will continue to monitor this going forward.

### **1b Desktop review of existing information**

NPPG outlines that local authorities should be proactive in identifying as wide a range of sites and broad locations for development as possible. At this stage the Council has identified sites from the following sources:

- The Call for Sites database carried forward from the 2018 Call for Sites exercise, including sites previously submitted during earlier Call for Sites exercises.
- New sites identified during the 2020 Call for Sites exercise which was open between 7<sup>th</sup> July 2020 and 20<sup>th</sup> October 2020. This has included the submission of council owned sites as well as engagement from other public sector bodies.
- New sites identified during the 2020 and 2022 Call for Sites exercises undertaken as part of the Regulation 18 Local Plan consultations. The 2022 Call for Sites exercise closed on 4<sup>th</sup> April 2022.
- Opportunities identified through the Council's non-statutory vision and strategic infrastructure led master plans relating to Kingswood, Yate, Bristol North Fringe, Parkway Station and Severnside and other promotional and regeneration activities undertaken by the council and its partners.
- The current range of Call for Sites can be viewed on our interactive map [here](#).
- The Call for Sites will also be open during our Local Plan Phase 3 consultation which runs from 6<sup>th</sup> December 2023 to the 07 February 2024.

Extant housing allocations will also be included for review to identify if the existing allocation is fit for purpose and identify any potential uplift over the plan period.

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<sup>1</sup> Where a site has been promoted for less than 5 dwellings however it is large enough to accommodate more than 5 dwellings based on the HELAA Method for estimating development potential (see Stage 2a), the site will be retained in the process as the HELAA Method calculation will be used.

## **1c Call for Sites/broad locations**

The range of Call for Sites exercise have created a wide ranging and comprehensive evidence base of potential development opportunities for consideration through the plan-making process within South Gloucestershire. The majority of these sites submitted are proposed for residential, employment or mixed use although some sites have been submitted for non-residential/employment purposes. These non-residential/employment sites may not necessarily be appropriate for assessment through the HELAA, however there may be other workstreams being progressed through the Local Plan where the identification of these sites may be helpful.

Through these exercises the Council has identified in the order of 500 sites for further consideration as of April 2022 covering an area around 6,000ha. The Council also expects to continue to receive Call for Sites updates including new sites as part of the ongoing preparation of and consultation on its new Local Plan. These will also need to be included in the assessment as future updates to the HELAA. As part of the HELAA assessment progresses these sites will be either carried forward into a pool of sites, for further investigation against emerging new local plan strategy drivers, reasonable alternatives and related assessment to be considered for potential allocation or discounted due to their lack of suitability, availability or achievability.

The sites have been mapped and can be viewed online [here](#). Each site has a unique reference which can be used to search for a particular site. Further information on each site can be found by selecting a site including access to the redacted site submission form and other supporting information received.

A list of all the sites considered at this stage can be found in Appendix 1.

## **1d Site/Broad location survey**

### **Initial sift of sites and broad locations**

The national planning policy guidance NPPG (Paragraph 014) makes clear that when taking into account national policy and designations, there may be some sites and broad locations which are clearly not suitable.

A number of major constraints which are considered to be 'showstoppers' have been identified based on policy and good practice in alignment with the previously published WECA and UA SHLAA and HELAA methodologies.

Where a site or broad location is wholly affected by a major constraint(s), it will be discounted at this stage. Where a site or broad location is partially affected by a major constraint(s), the unaffected part of the site or broad location will be taken forward (provided the remaining area still meets the site size thresholds). This approach reflects national policy (NPPF footnote 7) and guidance by allowing the HELAA to focus on those sites and locations with reasonable potential.

The following designations are considered major constraints:

- Ancient Woodland
- Common Land

- Flood Zone 3b<sup>2</sup>
- Health and Safety Executive Inner Zones
- International ecological sites (SAC/SPA/RAMSAR/SSSI)
- Local Nature Reserves
- Open Access Land
- Mineral Safeguarded Sites
- National Nature Reserves
- Nationally Registered Parks and Gardens
- National Trust Inalienable Land
- Registered Battlefields
- Regionally Important Geological Sites
- Scheduled Monuments
- Sites already developed with no prospect of intensification or redevelopment (professional judgment)
- Working mineral sites

Consideration of additional constraints identified in footnote 7 of the NPPF, such as Green Belt, Cotswolds Area of Outstanding Natural Beauty (AONB), designated Local Green Spaces (PSP4 sites on our adopted policies map) and other site specific constraints will be undertaken as part of the Stage 2 assessment set out below.

As recommended by NPPG, a range of key information will be recorded for each site using GIS mapping and analysis of site constraints. NPPG Paragraph 015 notes that the following information could be recorded:

- 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, flood risk, natural features of significance, location of infrastructure/utilities);
- potential environmental constraints;
- consistency with the development plan's policies;
- proximity to services and other infrastructure, such as public transport;
- where relevant, development progress (e.g. ground works completed, number of units started, number of units completed); and
- initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.

## **Stage 2: Site/broad location assessment**

### **2a Estimating development potential**

NPPG (Paragraph 016) states that estimating the development potential of a site or broad location for growth can be guided by existing or emerging planning policy, including locally determined policies on density. National Policy outlines in Chapter 11

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<sup>2</sup> Only Flood Zone 3b is considered in the major constraints and sites or sections of sites falling into Flood Zone s3 b will not be considered. In relation to Flood Zone 3a, locations in this zone may still be considered in line with national guidance and subject to satisfaction of necessary policy tests.



(Making effective use of land) that policy should make efficient use of land including in a way that makes ‘as much use as possible of previously developed or ‘brownfield land’ (NPPF paragraph 119).

In determining the proposed use of the site, the use identified by the site promoter in the Call for Sites submission will be applied. If no use is identified, the capacity assumptions below relating to residential and mixed-use sites will be applied.

This methodology sets out capacity assumptions for residential and mixed-use sites based on a density typology and size-based gross/net discount. Mixed use sites represent an important source of employment provision, as these include employment and community facilities. The initial calculation below will be applied to identify a net developable area for housing that accounts for infrastructure and other likely requirements for the land (e.g. landscaping, response to constraints and mixed use):

- Sites under 2 hectares proposed for 100% residential: (90% of the site) x (Up to 2 hectares) x (dwellings per hectare).
- Sites between 2 – 10 hectares proposed for 100% residential: (75% of the site) x (hectares of the site) x (dwellings per hectare).
- Sites above 10 hectares with an assumption for mixed use: (50% of the site) x (hectares of the site) x (dwellings per hectare).<sup>3</sup>

As shown in Table 1, a set of density typologies will be applied to give the initial dwellings per hectare (dph) assumption based on the broad location of the site. Where a range is specified, the lower end will be applied in order to be suitably cautious regarding constraints and context. As further technical evidence becomes available as part of any concept planning exercises, the initial density assumptions will be reviewed and considered to establish site capacities/densities as required. Accordingly, capacities generated from this exercise should be considered as a guide only. Any final site capacity may be derived from applying other technical considerations as explained below.

Table 1: Location type density assumptions

Location type	Initial dph assumption <sup>4</sup>
Suburban centres (high streets and transport hubs) and market town centres	70dph – 85dph
Suburban (including urban extensions)	50dph to 65dph
Market towns (outside centres including urban extensions)	50dph
New settlements	50dph to 65dph
Rural/villages	40dph

<sup>3</sup> This is based on the assumption that the mixed-use site will be residential led with a smaller employment and community element.

<sup>4</sup> Where a dph range has been used the initial theoretical capacity will be calculated on the lower end of the range. This is to ensure a reasonable assumption before specific site constraints/opportunities are fully understood and investigated.

For mixed use sites, where the mix of uses and the proportion of these uses is set out in the Call for Sites submission in a masterplan or vision document, this will be used and the above density assumptions will be applied.

For economic development, a minimum plot ratio of 0.4 will be applied as this is a recognised conservative estimate used in Employment Land Reviews (including South Gloucestershire's Employment Land Review 2021). Therefore, on a site of 1 ha, 40% of the site would be the net developable area. Floorspace densities will not be applied, and the development potential will consist of the net developable area. It is considered that this represents a consistent and reasonable approach for the purposes of the HELAA given that at this stage the proposed employment uses and proposals of many sites will be undefined or will consist of several types of employment or retail uses with only approximate indication of mix and related areas.. Where the floorspace has been specified in the Call for Sites submission, the proposed floorspace will be used in the HELAA.

Assumptions made in relation to developable areas and capacity at this stage remain indicative. If, in assessing the development potential of a site or broad location, it is found that the developable site area or potential capacity falls below the size thresholds set out in Stage 1a, then the site or broad location will be excluded from further assessment, subject to considering whether it could effectively form part of a cluster of sites.

Where a site has planning permission, the final capacity has been adjusted to take the permission into account, as this gives a more accurate indication of what is likely to be built out on site. Should the permission lapse, the applicant should take into account the adopted or emerging Local Plan policy on density. Care has been taken to ensure there has been no double counting between permissions and allocations when calculating the total housing and employment capacities.

Estimating the capacity of a site is an indicative estimation and does not dictate the final capacity possible or suitable in planning terms. Design and specific site circumstances, as the new local plan progress and ultimately at the outline or and then full or reserved matters application stage will determine final capacity. It is important to note this to ensure the HELAA does not unintentionally misguide the viability and lead to inflated site prospects.

For some sites there will be justification for a deviation from the above approach where site specific constraints identified through the assessment show that the overall site as submitted may not be suitable for development, but modified areas might be. In such cases, the Council will make appropriate adjustments to the net developable area in these cases where it is considered the standard calculation does not take into account the constraints identified.

The HELAA seeks to apply a consistent approach to the initial calculation of development capacity applying the above assumptions. It is acknowledged that in some cases the site promoter has identified a proposed development scale in terms of the net developable area and/or density. Where the promoter has demonstrated site capacity has been considered (e.g. through preparing a D&A statement or

masterplan), this figure has been used instead of the high-level HELAA calculation. This is in recognition that the HELAA assumption (set out above) is a high-level initial desk-based assessment.

It is also important to note that this initial stage of HELAA site assessment, many Call for Site submissions and first public display of potential site allocations in the Phase 3 new Local Plan consultation, are based on primarily high-level evidence and assumptions available at the time. It is expected that as the new local plan progresses, further work is undertaken by site promoters and work by all parties is undertaken to determine phasing of development and site masterplan, capacities, developable areas and exact areas for different land uses will evolve.

### **Estimating Development Potential of Urban and Market Town Sites**

For a number of sites, officers have been able to go further to investigate site capacities for urban and market town sites. This section sets out the process which has been used to establish the draft urban and market town potential site allocation capacity figures, which are set out in Section 4 of the Phase 3 Local Plan public consultation. A full urban and market town site capacity background report will be available at the Regulation 19 stage to support the draft site allocations.

The capacity methodology responds to the National Planning Policy Framework (NPPF) requirement set out in Chapter 11 'Making effective use of land.' In particular, Para 125a provides a strong direction to develop and provide policies which optimise the use of land and to significantly uplift the average densities of residential development in sustainable locations which are well-served by public transport.

### **Urban and Market Town Sites - Initial HELAA capacity and site selection**

The HELAA process provided the initial site capacity figure, considering location, access to shops and services, and any significant site constraints, such as flooding, contamination, or landscape features. That initial site capacity figures was set out in the Phase 2 public consultation. For the urban and market town site capacities set out in the Phase 3 public consultation, the HELAA approach was used as a starting point, with the more detailed capacity process carried out for each urban and market town site, to test the initial figures and to provide a more realistic and deliverable capacity.

There are two main calculations which support the stated capacity figure for each site; density and developable site area, both of which are summarised below.

### **Urban and Market Town Sites - Site capacity – density**

The density assumption depends on the site's location and is linked to how sustainably located each site is and the character of the local context. A site located

near to the centre of one of the sustainable town centres is likely to be able to support a higher density of development, when compared with a site in a more remote or rural location, due to access to shops, services and public transport options. The immediate surrounding context of every site will be different, and this context is taken into account as part of the capacity methodology. This part of the process is supported by the [Density and Character Study \(Jan 2022\)](#), which was commissioned to investigate the various sustainable Urban Lifestyle areas referred to at Phase 2. That study analysed each of the areas, with the result being a series of bespoke density ranges, taking into account character and context, location, local shops, services and facilities, including access to public transport and open spaces.

This density study has been augmented by a context analysis of each of the proposed urban market town site allocations. This analysis includes a review of the site and context, including known features such as flooding, landscape, heritage, and planning designations. This information is available through the South Gloucestershire Cadcorp interactive map, which can be found [here](#). Recent relevant planning applications were also considered, as well as any Design Review Panel (DRP) submissions.

For sites which are located outside of the Urban Lifestyle areas identified in the Density and Character Study, the existing density of a number of residential areas immediately adjacent to the site were analysed and used as a baseline. A percentage uplift figure was then applied to this baseline to achieve an optimised-density figure. This figure was then checked to ensure that the resulting figure was appropriate to the context and could be used.

### **Urban and Market Town Sites - Site capacity: developable area**

The second part of the process involves calculating how much of a site can be developed for homes and their associated parking and access requirements; the developable area. Often most of the total area of smaller urban sites can be used to provide homes and associated parking, but for some medium and most larger sites, at least some of the site area is normally set aside for areas of Public Open Space (POS), or possibly even employment uses, community facilities, shops etc. A developable area table specific to urban and market town areas within South Gloucestershire has been developed, based on adopted figures, research and best-practice from other local authority areas, and from analysis of developable areas from permitted local developments within South Gloucestershire. It is common for Local Authorities to use this approach and provides a clear and defined method which can be applied consistently across all sites.

### **Urban and Market Town Sites -The site capacity**

The density and developable areas calculations are brought together to determine how many new homes can be provided on each site.

It should be noted that the capacity figures, development considerations and supporting context analysis set out in each of the site template sheets, is not exhaustive or final and may change during the process towards Regulation 19, through the examination process and the adoption of the sites as allocations.

Both the density and developable area estimates that underpin the proposed site capacity figures are a way of establishing a more realistic capacity than the higher-level HELAA process, and are both subject to change, depending on site-specific considerations. The capacity figures which are provided are the starting point for more detailed design work, which in each case will determine the final capacity for each site.

## 2b Suitability

NPPG outlines that a site can be considered suitable if 'it can provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.' (NPPG HELAA, Paragraph: 018 Reference ID: 3-018-20190722). NPPG adds that when considering constraints, plan-makers may wish to consider the information collected as part of the initial site survey, as well as other relevant information, such as national policies, appropriateness and likely market attractiveness for the type of development proposed, contribution to regeneration priority areas, and the potential impacts including the effect upon landscapes (including landscape features, nature and heritage conservation) (Paragraph 018).

The initial sift undertaken at Stage 1d will have already removed sites or parts of sites which are impacted by major constraints. The assessment of suitability will therefore focus on other constraints and policy consistency. These are shown in Table 2 below and have been based on policy and good practice and alignment with other UA SHLAA and HELAA methodologies. It is acknowledged that some of these constraints could impact on the net developable area of sites however in comparison to the major constraints set out in Stage 1d, the impact of these constraints is less definitive and professional judgement will need to be applied.

Table 2: Other constraints and policy consistency

Physical Constraints	<p>Access:</p> <ul style="list-style-type: none"> <li>• Access to the site (vehicular and pedestrian)</li> <li>• Public Rights of Way (PROW)</li> </ul> <p>Contamination and Pollution:</p> <ul style="list-style-type: none"> <li>• Contamination</li> <li>• Air Quality</li> </ul> <p>Hazardous risks:</p> <ul style="list-style-type: none"> <li>• Electric tower buffer</li> <li>• Overhead lines</li> <li>• Gas/oil pipelines</li> </ul>
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	<p>Flood Risk and Drainage:</p> <ul style="list-style-type: none"> <li>• Flood zones 2 and 3a</li> <li>• Surface water and groundwater flooding</li> <li>• Drainage features</li> </ul>
Environmental Constraints	<p>Ecology:</p> <ul style="list-style-type: none"> <li>• Priority Habitats</li> <li>• Site of Nature Conservation Interest (SNCI)</li> <li>• Local Wildlife Site (LWS)</li> <li>• Buffers of international ecological sites (SSSI, SAC, SPA, Ramsar)</li> <li>• Buffer of Ancient Woodland</li> <li>• Tree Preservation Order (TPO)</li> <li>• Best and Most Versatile Agricultural Land (BMV)</li> </ul> <p>Landscape:</p> <ul style="list-style-type: none"> <li>• Area of Outstanding Natural Beauty (AONB)</li> <li>• Landscape Character Area</li> <li>• Landscape features (topography/Slopes/views)</li> <li>•</li> </ul>
Heritage Constraints	<ul style="list-style-type: none"> <li>• Archaeological Areas</li> <li>• Conservation Areas</li> <li>• Listed Buildings</li> <li>• Locally Listed Parks and Gardens</li> </ul>
Development Plan and NPPF Consistency	<ul style="list-style-type: none"> <li>• Adopted/emerging allocations</li> <li>• Green Belt</li> <li>• Land type (brownfield/greenfield, urban/rural)</li> <li>• Designated Local Green Space</li> <li>• Minerals Safeguarding Areas</li> <li>• Safeguarded Employment Sites</li> <li>• Made Neighbourhood Plan Areas</li> </ul>
Impact of development on the surrounding area	<ul style="list-style-type: none"> <li>• Likely impact of development on neighbouring land uses</li> <li>• Likely impact of neighbouring land uses on development (including motorways, railway lines etc)</li> </ul>

In accordance with NPPG, the assessor will consider the GIS analysis and will review each site applying professional judgement to consider the relevance of the identified constraints and whether the constraints can be mitigated.

Sites will be internally assessed by the Council's specialist officers including landscape, heritage, archaeology, transport. Specialist input for Flood Risk and Contamination has been led by GIS queries where specific potential constraints have been identified on or in proximity to the site. Ecological constraints have been considered through GIS analysis at this stage and further investigation may be required by specialists on selected sites. The specialist officer comments will feed into the assessment process and will be combined with multi-disciplinary workshops where best professional judgement will be applied on a site-by-site basis.

If the assessor concludes that constraints cannot be mitigated, the site will be discounted at this stage. Where constraints are identified which the assessor believes

could be mitigated, it will be important to outline this through the potential allocation proposal. This will ensure that potential constraints or assets on the site will be taken into account during the allocation process, as well as the eventual application stage.

Taking into consideration all of the constraints and the potential for mitigation, a conclusion on suitability will be reached based on the following suitability categories:

- **Potentially Suitable** – Where the site is not affected by any constraints or where there are a number of constraints however it is considered likely that these could be mitigated.<sup>5</sup>
- **Unsuitable** – Where the site is affected by constraints and it is considered that no mitigation that would result in an acceptable outcome is possible.

Some of the above constraints or the requirement for mitigation may further limit the net developable area beyond the initial size-based gross/net discount and professional judgement will be applied to assess this. This judgement will take into consideration whether the initial gross/net discount could be sufficient to accommodate any required mitigation. This judgement will be applied on a site-by-site basis and therefore the outcomes may differ from the standard approach highlighted in the previous section.

#### *Approach to Green Belt*

It should be noted that although Green Belt is identified in the policy consistency section of Table 2 above, at this stage of the assessment, the HELAA will not discount sites on the basis of them being in the Green Belt. This is because work is progressing to prepare a Green Belt Assessment to support the South Glos Local Plan , the findings of which will be considered alongside the findings of the HELAA in order to determine which (if any) Green Belt sites should be taken forward.

#### *Approach to AONB*

In addition, while the assessment will consider the percentage of the site within an AONB, these sites will not be automatically discounted at this stage. The impact of development on the AONB will be considered at the proceeding stages when further detailed site investigation work and concept framework development is undertaken.

#### *Approach to Safeguarded Employment Sites*

Sites have not been ruled out where they are currently safeguarded employment sites. Instead, further work will need to be done beyond the HELAA to establish whether it is appropriate or reasonable for existing safeguarded employment sites to change to other uses. And also what form of development mix would be appropriate on sites that are currently safeguarded. This was considered an appropriate approach as at the time further employment evidence was being commissioned and the new local plan strategy, individual site options and approaches were emerging.

#### *Approach to Services and Facilities*

Access to services/facilities and the sustainability of the site more generally will not be considered at this stage. This will be considered as the sites progress and the

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<sup>5</sup> As it is not possible at this stage to definitively determine whether a site is suitable, the categories only consist of 'potentially suitable' and 'unsuitable'.

Council's Local Plan objectives and spatial strategy are incorporated into the process of establishing a new strategy and/or strategy alternatives for the new Local Plan. This was considered an appropriate way forward in the absence of an established settlement hierarchy which other authorities use as a basis for removing sites through the HELAA.

*Approach to Flood Risk including Sequential and Exceptions Tests.*

A significant portion of the district is impacted by higher flood risk zones including Flood Zone 2, 3a and 3b. As outlined above sites or parts of sites covered by Flood Zone 3b have been removed from the process and are considered unsuitable. At this stage in the process the Council also considers sites fully covered by Flood Zone 3a to be unsuitable for housing, however it has taken a view on parts of sites where some of the site falls within Flood Zone 1 or 2. In these cases, a view has been taken on whether the removal of higher-level flood zones render the entire site unsuitable or if a portion of the site could be appropriate for development. It is important to note that in these cases the capacity may not align with that submitted by the promoter.

The Council has taken this approach as it does not consider that both the sequential and exceptions tests can be engaged at this stage as it remains to be appropriately demonstrated that sites within Flood Zone 1 and 2 are unable to deliver the housing requirement over the plan period. The Council will aim to steer new development towards Flood Zone 1 and where there are no reasonably available sites in Flood Zone 1, the sites within Flood Zone 2 will be considered. As the spatial strategy progresses and sites are considered against other assessments, the Council may exhaust sites within Flood Zone 1 and 2 and a reassessment of sites in Flood Zone 3a may then be required as part of the HELAA iterative process. At this stage, for the reasons explained above, it is not considered that an assessment on this basis is currently justified.

## **2c Availability**

NPPG outlines that a site can be considered available if on the best information available (confirmed by the Call for Sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development.' (NPPG HELAA Paragraph: 019 Reference ID: 3-019-20190722).

Paragraph 019 adds that: *'the existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise.'* As part of this, the delivery record of the developer or landowner can be a relevant consideration.

The NPPF (Annex 2: Glossary) defines 'deliverable' as follows: *'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.'*

Based on NPPG and NPPF, the assessment of availability will therefore focus on the following factors:



- Planning history
- Whether there is a willing landowner
- The current use of the site and whether it is in active use
- Number of landowners
- Potential for access/legal constraints or ransom strips

At this stage it will not be possible to undertake full legal surveys of all submitted sites and therefore the Council will make use of the best available information in the assessment of sites. Information provided in Call for Site submissions and professional judgement will be applied. For the purposes of the high-level assessment, it is assumed that sites submitted through the Call for Sites with a clearly identified landowner or promoter indicate a willing landowner unless there are duplicate or overlapping submissions relating to a site which are contradictory or indicate otherwise.

Where a site was submitted through the Call for Sites prior to 2018, the Council has asked the site promoters to resubmit these sites. Sites which were not resubmitted are assumed to be unavailable.

Where a site has planning permission and it is fully built out or it is currently under construction and it is included in the [Councils Housing Trajectory](#), these sites will be discounted from the HELAA process in order to avoid double counting.

It is acknowledged that the process only provides an indication of availability at this stage and further evidence (including Land Registry documentation) will be required to reach a definitive determination.

In accordance with NPPG (Para 021) consideration will be given as to how constraints which affect availability (including unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners) can be overcome.

Based on the assessment of the above factors, a high-level conclusion on availability will be reached based on the following availability categories<sup>6</sup>:

- **Potentially Available** – Based on best available information the site has willing landowner(s) and there are unlikely to be legal constraints or ransom strips. The site is not in active use or part of the site is in active use and there is evidence these uses are likely to cease. The site has full detailed planning permission and a signed S106 with clear evidence of delivery or the site has outline planning permission and an unsigned S106 however there is clear evidence of delivery.
- **Unavailable** - Based on best available information the site does not have a willing landowner. The site has complex ownership and/or potential legal constraints/ransom strip which is unlikely to be resolved. The majority of the site is in active use and there is evidence this use is unlikely to cease within the plan period. The site was submitted through the Call for Sites prior to 2018 and has not been resubmitted.

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<sup>6</sup> These categories are not exhaustive but provide an indication of how the above factors will contribute to the conclusion. Professional judgement will be applied taking into account all factors collectively.

- **No current evidence of availability** - Based on best available information, it is unknown if the site has a willing landowner. The site is in active use, and it is unknown if this can be resolved. The site has outline planning permission and an unsigned S106 and no evidence of delivery.

As part of the availability assessment, we identified two areas where further detailed work was required. This included sites promotions that overlapped, as well as sites submitted in 2018 where we had not had any contact since.

For those sites submitted in 2018 the Council attempted to contact these promoters to confirm they were still actively promoting the site. We also asked if they would be able to provide proof of land ownership to support our assessment. Where we did not hear back from promoters, we have considered these sites to be unavailable. Where we have had a response confirming the promoter is still actively promoting the site, we have concluded that the site is still available.

We have contacted those site promoters where there is an identified overlap and have sought to remove sites which are either no longer being promoted or which are now being promoted by a larger site promotion. Where we have been unable to confirm that overlapping site submissions are being promoting together, we have separated these by confirming land ownerships. The Council will no longer accept overlapping sites and where sites do overlap, the Council will require proof of landownership.

## 2d Achievability

NPPG outlines that a site can be considered achievable '*where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time.*' (NPPG HELAA Paragraph: 020 Reference ID: 3-020-20190722). This is essentially a judgement about the economic viability of a site or broad location, and the capacity of the developer to complete and let or sell the development over a certain period (Para 020). As part of this, it will be important to identify whether there are likely to be any abnormal costs that may result in the proposed development being financially unviable, for instance due to a need to deliver major utilities infrastructure or undertake remediation works on contaminated sites. The findings from the suitability assessment and the consideration of mitigation requirements will assist in identifying whether there are likely to be any abnormal costs. In accordance with NPPG, consideration will be given as to how any achievability constraints can be overcome.

The assessment of achievability will therefore focus on the following factors:

- Market attractiveness as far as this is understood at the time
- Whether a viability assessment has been undertaken
- Whether the site has a promoter or developer on board
- The number of developers involved (if relevant)
- Whether there are likely to be any abnormal costs
- Whether any funding has been secured (for example, in relation to strategic transport infrastructure schemes)

The likely phasing of development will also be recorded including the estimated start date, lead in time and build-out rates for the development of different scale of sites. On the largest sites, allowance should be made for several developers to be involved. Information submitted through the Call for Sites will be used in the first instance. This will be tested for reasonableness. The Council's estimate will also be used if there is no information provided in the Call for Sites submission.

At this stage, a desk-based assessment based on best available information and professional judgement will be applied to determine the achievability of the sites. It is recognised that additional evidence on market attractiveness and economic viability including discussions with site promoters or landowners may be required to reach a definitive conclusion on achievability.

Sites which are identified as not being suitable and available for development will not be considered achievable.

Based on the assessment of the above factors, a high-level conclusion on achievability will be reached based on the following categories:

- **Potentially Achievable**- Based on best available information, the site has no obvious issues which are likely to impact the viability of the site or there are issues identified however further information is required to determine if these can be addressed.
- **Unachievable** - Based on best available information the site has clear viability issues which are unlikely to be addressed during the plan period.

### **Deliverable versus Developable**

National guidance outlines that as part of the HELAA assessment sites should be categorised based on their likely built out timeline during the plan period. This is a first attempt to understand how sites that 'pass' the HELAA may influence a robust housing land supply and in particular the first five years of the plan. This ensures that any adopted plan can demonstrate a 5-year housing land supply in the first five years of the plan but also throughout the plan period, which is usually 15 years. Sites are therefore categorised in the report as either deliverable, developable or undeliverable/undevelopable.

### **Deliverable**

Sites have been categorised as deliverable where there is a reasonable assumption, based on the information available at the time, that the site could in theory start delivering homes in the first five years of the plan. For the HELAA Report, sites that are considered suitable, available and achievable have been assumed to be deliverable, unless based on officer judgement, there is a clear reason that this may not be the case. Sites that are suitable, available and achievable but are proposed for over 500 dwellings are not considered deliverable but are instead considered developable, unless there is clear evidence that this is unlikely to be the case. This reflects the Lichfield's 'Start to Finish' research (2020) which monitored 97 case studies and determined that, on average, sites that were delivering more than 500

homes where more likely to start delivering their first homes after 5 years from allocation in the local plan. This takes account of the process involved to deliver homes including the procurement of outline and reserved matters planning permission.

### **Developable**

Sites has been categorised as developable where there is a reasonable assumption, based on the information available at the time, that they could in theory start delivering homes after the first 5 years of the plan but within the plan period. To start these sites include those that are considered suitable, available and achievable but are proposing more that 500 homes. Also included are sites that are suitable but are not available or achievable, unless there are clear reasons why sites would not be developable.

### **Undeliverable/undevelopable**

Sites that have been assessed as unsuitable, unavailable and unachievable will be considered undeliverable and undevelopable and this will be reflected in the HELAA Report. These are sites that are either not suitable for development or that are unlikely to deliver homes in the 15-year plan period.

### **Duty to Cooperate**

In the interests of the Duty to Cooperate, the method report will be shared with WECA, the UAs within the WECA area and adjoining LPAs which the Council shares an administrative boundary with. The comments received will be reviewed and where appropriate will feed into the methodology.

### **Engagement**

This method and the HELAA report will be published as part of the next stage of the Local Plan consultation, and we will encourage active engagement from site promoters and other stakeholders.

Accordingly, we will continue to engage with site promoters as site investigation and consideration moves beyond HELAA to ensure we have the most up to date information, particularly around ensuring a site's availability.

### **Further Site Investigation**

The HELAA method set out above will provide an initial assessment of sites and their capacity. Further detailed site investigation work and concept framework development will be required. This will remain under review and it is anticipated that this will include:

- Further assessment of other site constraints including transport or opportunities arising from activities such as masterplanning exercises.
- Implications of the constraints identified and potential mitigations where appropriate to overcome them.
- Consideration of access to services/facilities and sustainability more generally.

- Investigation of delivery prospects including phasing and indicative trajectories, particularly at larger scale strategic locations.
- Review of the site capacities proposed in the light of further information and indicative site delivery performance.
- Further assessment of achievability and availability for example where additional evidence has been submitted including Land Registry documentation or a viability assessment which could enable a more definitive conclusion to be reached.
- Consideration of the outcomes of the SGC Stage 2 Green Belt Assessment.
- Consideration of the impact of development on sites within an AONB.
- A Sustainability Appraisal of all sites assessed through the HELAA will also be undertaken.

## Appendix 1: Long list of Call for Sites)

Site Reference	Address
SG001	Land at Crossways, Thornbury
SG002	Land at, Marsh Farm, East Pucklechurch
SG003	Land at The Griffin, Warmley
SG004	Land South of Gloucester Road, Almondsbury
SG005	Land to the north of Warmley, East Fringe
SG006	Land to rear of 37-39 Birgage Road, Hawkesbury Upton
SG007	Field to west of Engine Common
SG008	West Pucklechurch
SG009	Land at Church Lane, Cromhall, GL12 8AL
SG010	Field to South of Tanhouse Lane (Opposite Leechpool Dairy Farm)
SG011	Fields to West of Engine Common (Adjacent to 13 Engine Common)
SG012	Woodland and Fields to the east of North Road
SG014	Land to East of Engine Common
SG017	Hicks Common Livery Stables and associated Land
SG018	Land adjacent, Brendon, Wotton Road, Rangeworthy
SG019	Land off, Charfield Hill, Charfield
SG020	Land at Cromhall Quarry
SG021	Land at Longcross Farm, Cromhall
SG022	Land between France Lane and Park Street, Hawkesbury Upton
SG023	Land to the rear of The Buthay, Wickwar

Site Reference	Address
SG024	Land to the West of B4058 at Bagstone, between Court Orchard and The Old Plough
SG025	Land to West of Sodbury Road
SG026	Part of France Lane Farm, Hawkesbury Upton
SG027	Land at Bristol Road, Hambrook
SG028	The Chalet, Alveston Hill, Alveston
SG029	Land at Townsend Marshfield
SG030	Land south of Gloucester Road, Thornbury
SG031	Land south of Horwood Lane, Wickwar
SG032	Land at Castle Farm Road, Hanham
SG033	Land at Church Road, Severn Beach
SG034	Land on the East side of Dyers Lane, Iron Acton, Bristol
SG035	Oldbury Power Station Site, Oldbury Naite, Thornbury
SG036	Land at Windmill Farm, Sodbury Road, Wickwar
SG037	Noades House, Old Hundred Lane, Tormarton
SG038	Garden of 7 Yate Rocks
SG039	Land at Ford Farm, Yate Rocks
SG040	Land South of Merlin Road
SG042	Land at Yate Rocks, Yate BS37 7BT
SG043	Land to the south west of Lawnes Farm, Forty Acre Lane, Alveston
SG045	Land west of Sodbury Rd, Wickwar
SG046	Land adjoining and to the rear of 65-67 Cleeve Hill
SG047	Land to the rear of Park Farm, Barry Road, Oldland Common
SG048	Leechpool Dairy Farm, Tanhouse Lane, Rangeworthy, BS37 7QA

Site Reference	Address
SG049	4 Townsend Lane, Almondsbury, BS32 4DY
SG050	Harvey Shopfitters Ltd, Warehouse & Premise adjacent to 19 Common Rd, Hanham
SG051	Land at Brewery Hill, Upton Cheyney, Bristol, BS30 6LY
SG052	Land at North West Thornbury
SG053	Land north and east of Lyde Green Road, Emersons Green
SG054	Crossways Business Park, Crossways Lane, Thornbury
SG055	Land alongside the B4061 (Old Gloucester Road) and the A38 at Whitfield/Falfield
SG056	Lansdown House, Whitewall Lane, Thornbury
SG057	Land at Bristol Road, Cromhall
SG058	Land off Chase Lane, Wickwar
SG059	Land to rear of Ducie Close, Cromhall, GL12 8AH
SG060	Woodend Farm, Woodend Lane, Cromhall
SG061	Land near Old Gloucester Road, Alveston
SG062	Tortworth Garden Village
SG063	Land adjacent to Falfield Village, Eastwood Park, Falfield
SG064	Land adjacent to The Firs, Crossways Lane, Thornbury
SG065	Land at Barnhill, Chipping Sodbury
SG068	Land East of Coalpit Heath
SG070	Land east of Abson Road, Pucklechurch
SG072	Fishers Farm, Hallen
SG074	Land and buildings at Bowling Hill, Chipping Sodbury
SG075	Land and buildings at London Road, Warmley



Site Reference	Address
SG077	Lucus Works, Kingswood
SG079	Land north of High Street, Iron Acton, South Gloucestershire
SG080	Land at Yew Tree Farm, Morton Street, Thornbury
SG081	Land by Aust Road and Elberton Road, Olveston(3)
SG082	Land at Hanham Cricket Club
SG083	Land at Rudgeway
SG084	Corner of Forty Acre Lane, Alveston, BS35 3QU
SG086	Land by Aust Road and Elberton Road, Olveston(1)
SG087	Land at, Catherine Hill, Olveston
SG088	Land at, Shubbery Farm, Shortwood
SG089	Land north of Hackett Lane, Thornbury
SG090	Land rear of, Playing Field, Tockington
SG091	Land North of, Forty Acre Lane, Alveston
SG092	Land to the North of Wotton Road, Charfield
SG093	Land west of North Road - Engine Common (inc. Football Ground)
SG095	Land at East Charfield
SG096	Land at Vattingstone Lane Alveston
SG098	Land north of Wotton Road, Charfield
SG100	Land at Badminton Road, Yate
SG101	Land at Haw Lane, Olveston
SG102	Land at Upper Hazel Farm, Strode Common, Alveston
SG103	Glebe Field and Wood
SG104	Land at Bromley Heath Road, Bromley Heath
SG105	Land to the north of Abbots Road/Court Farm Road

Site Reference	Address
SG106	Land South of, Forty Acre Lane, Alveston
SG107	Land off Park Road
SG108	The Ridings, Wickwar Road, Chipping Sodbury
SG110	Land at Roundways Coalpit Heath
SG111	Land east and west of Westerleigh Road
SG112	Land east of Chipping Soddbury
SG113	Land to the south of Charfield
SG114	Woodlands Golf Course, Trench Lane, Almondsbury, (Woodlands Garden Village)
SG115	Buckover Garden Village
SG116	Land of the west side of Carsons Road Warmley
SG119	Land at, Hallen Field, Severn Road, Hallen
SG121	Land at, Cromhall, South Gloucestershire
SG122	Glebe land, Falfield,
SG126	Land to the south of Park Street, Hawkesbury Upton, Nr Badminton
SG129	Land off, Engine Common Lane, Yate
SG131	Land at, Cossham Street, Mangotsfield
SG133	Land adjoining Elm Tree Cottage, Hardy Lane, Tockington
SG134	Land to the South of Hardy Lane and West of Lower Tockington Road
SG135	Land to the west of, Ableton Lane, Severn Beach
SG136	Land at, Bank Road, Pilning
SG139	Land between, Brins Close, Field Farm Close and Hunts Ground Rd, Stoke Gifford
SG140	Lower Marlwood Farm, Kington Lane, Thornbury

Site Reference	Address
SG150	Jarrocks Estate, Westerleigh Road, Westerleigh
SG157	Land at, Post Farm, Thornbury
SG158	Land adjacent, Westways, Wotton Road, Rangeworthy
SG159	Land at, Wick Quarry, Wick
SG163	Land to the rear of, Burma House and Bella Vista, Westerleigh Road, Westerleigh
SG169	Rowley Fields, Watery Lane
SG170	Land at, Totter oak Farm, Little Sodbury
SG171	Land to the East of, Kings Square, Bitton
SG172	Land to the Rear of, London Road, Wick
SG174	Land at Old Hundred House, Tormarton,
SG177	Land off, Alveston Hill, Thornbury
SG178	Land off, Beacon Lane, Winterbourne
SG179	Land adjacent, The Bungalow, Cutts Heath
SG180	Land at, Wotton Road, Charfield
SG181	Site W3, Land off, Bristol Road
SG182	Site W2, Land off, Bristol Road
SG183	Site W1, Land off, Bristol Road
SG189	Land adjacent, Church Farm, Acton Turville
SG193	Jarretts Nurseries, Barry Road, Oldland Common
SG204	Land off, Tanners Lane, Marshfield
SG209	Land at, Shortwood
SG212	Land north of, London Road, Wick
SG213	Land at Severn Road, Severn Beach

Site Reference	Address
SG227	East of, Green Lane, Marshfield
SG228	Land off, Wotton Road, Rangeworthy
SG230	Land at, Townsend Lane, Almondsbury
SG232	Land adjacent 375, Badminton Road, Yate
SG235	Land at, Bennetts Barn, Tormarton
SG242	Land off, Perrinpit Road, and Bristol Road
SG246	Pitt Farm
SG256	West of Park Lane, Frampton Cotterell
SG279	Westmarsh Lane, Oldbury on Severn,
SG280	Land south of the B4055, Easter Compton
SG285	Homeapple Hill, South of Bridgegate Common
SG289	Land adjacent to The Fosse, Crossways Lane, Thornbury
SG291	Land adjoining 92 Wotton Road, Charfield
SG292	Land at Alveston Road, Old Down
SG295	Cloisters Road, Winterbourne, BS36 1LL
SG300	Tall Trees, Almondsbury
SG304	Hill Farm, Westerleigh Hill, Westerleigh
SG310	Land at Holly Hill Farm, Iron Acton
SG311	Land at Holly Hill Lane, Iron Acton, BS37 9XZ
SG312	Land Behind 189 - 207 North Road Yate
SG313	Paddock off the British, off North Road Yate
SG315	Land Off Station Road Iron Acton
SG316	Rear of:- 359 North Road, Yate
SG320	Abbots Way, Gloucester Rd, Almondsbury

Site Reference	Address
SG323	Stable Folly, Stowell Hill Road, Tytherington
SG327	Land at the Paddock Site
SG328	Land to the East of Badminotn Road, North of Lockington Road
SG330	Land at Over Lane, Almondsbury, BS32 4BT
SG332	Land at Hortham Lane, Almondsbury, BS32 4JH
SG346	Land south of Shortwood Hill, Mangotsfield, BS16 9PF
SG347	Land Adjacent Lyde Green Farm, Emersons Green
SG348	Land Adjacent to Tormarton
SG350	Land opposite The Fosse, Crossways Lane, Thornbury, BS35 3UE
SG360	Land off High Street, Doynton next to Three Horseshoes
SG361	Land off High Street, Doynton Between The Acre & Brook House
SG363	Land off High Street, Oldland Common
SG367	Villa Farm, Aust, BS35 4AX
SG372	The Sawmills, Bath Road, Bridge Yate
SG380	Land off Bristol Road
SG381	Land at Fieldgrove Lane, Bath Road, Bitton
SG382	Land at Pool Lodge Farm, Dyers Lane, Iron Acton
SG383	Land at Dyers Lane, Iron Acton
SG384	Land at Frome Mill Farm, Nibley Lane, Nibley
SG386	Land at Short Hill Road, Westerleigh
SG387	Land at Shortwood
SG388	Land at Yate Road, Iron Acton
SG389	Land at April Octtage, 180 Shortwood Road, Pucklechurch
SG390	Land Adjacent to 6 Sherbourne Close, Kingswood

Site Reference	Address
SG391	Land Adjacent to Severn View, 80 Gloucester Road, Rudgeway
SG392	Land at Field 1 Old Rectory, High Street, Iron Acton
SG393	Land at Field 2 Old Rectory, High Street, Iron Acton
SG394	Land on the West Side of Ram Hill, Coalpit Heath
SG395	Land South of the Hollybush Inn, Bath Road, Bridgegate
SG396	Land between Wotton Road and Chruch Lane, Rangeworthy
SG397	Land at 4 Harris Barton, Frampton Cotterell
SG399	Land at Hambrook Business Park, The Stream, Hambrook
SG400	Land to the South of Minerva, 15 Gloucester Road, Rudgeway
SG401	Land Between Over Lane and the B4055, Easter Compton
SG402	Land at New Farm, 215 Bristol Road, Frampton Cotterell
SG403	Land at Ryedown Lane, Bitton
SG404	Land at 9 Engine Common Lane, Yate
SG405	Land at Pool Farm, Whitfield, Wotton Under Edge
SG406	Land at Woodhouse Eaves
SG407	Land Adjacent to The Homestead, Manor Road, Wick
SG408	Land East of Trinity Lane, Chipping Sodbury
SG409	Land to the west of Stowell Hill Road, Tytherington
SG410	Land at 2 Peters Cottages, Sodbury Road, Wickwar
SG411	Land at The Worthys, Bradley Stoke
SG412	Land at Grove Farm, Coxgrove Hill, Pucklechurch
SG413	Land at the Carpenters Arms, 10 Church Road, Wick
SG414	Land on the North East Side of Old Gloucester Road, Hambrook
SG415	Land on the North West Side of Gloucester Road, Almondsbury

Site Reference	Address
SG416	Land at West Street Farm, West Street, Tytherington
SG417	Land on the West Side of Severndale, Severn Road, Hallen
SG418	Land at Straight Mile, Gloucster Road, Rudgeway
SG419	Land at 404 North Road, Yate
SG421	Land at Washingpool Lodge, Main Road, Easter Compton
SG422	Land at North Avon Magistrates Court, Kennedy Way, Yate
SG423	Land at Players Lane, Hambrook
SG425	Land on the North Side of Shaymoor Lane, Lyde Green
SG426	Land at Park Mill Farm and Quarry Farm, Thornbury
SG427	Land to the Rear of Almshouses, Marshfield
SG428	Land at former Kleeneze Site, Ansteys Road, Hanham
SG429	Land at Manor Farm, Tormarton
SG430	Land at Bristol Road, Frampton Cotterell
SG431	Land at School Garden Nursery, Elberton Road, Olveston
SG433	Land at Ben's Tiles and Reclamation Ltd, 119 Bristol Road, Frampton Cotterell
SG434	Land at Alveston Hotel, Davids Lane, Alveston
SG435	Land North of Perrinpit Road, Frampton Cotterell
SG436	Land at Filton 20 Business Park, Golf Course Lane
SG437	Land to the NOrth of the Railway Line, Winterbourne
SG438	Land at Iron Acton, Near Bristol Road (B4058)
SG441	Land at Over Court Farmhouse and Outbuildings (Over Court Barns) and Adjoining Land
SG442	Land at Jupiter Road, Patchway

Site Reference	Address
SG443	Land at the Rose and Crown, Wotton, Rangeworthy
SG444	Land at Thornbury
SG445	Land at Tytherington
SG446	Land at York Gardens, Winterbourne
SG447	Land at Springwater Farm, Brewery Hill, Bitton
SG448	Land at Church Farm, Moorhouse Lane, Hallen
SG449	Land at Wotton Road, Rangeworthy
SG450	Land Adjacent to A38, Alveston
SG451	Land Rear of Acacia Avenue
SG452	Land at Lower Woodhouse Farm, Fernhill, Almondsbury
SG453	Land at Church Lane, East of Elberton Road, Elberton
SG454	Land Adjoining 294 Badminton Road, Coalpit Heath
SG455	Land at Rockland, Dodmore Crossing, Westerleigh
SG457	Land at Harts Cottage, Gloucester Road, Almondsbury
SG458	Land RO Beaufort Hunt PH, Borad Street, Chipping Sodbury
SG459	Land at Westerleigh
SG460	Land at The Grange, Elberton
SG462	Land at 65 Abbots Road, Hanham Abbots
SG463	Land on the West side of Churchend Lane, Charfield
SG465	15 and 17a, London Road, Warmley
SG467	River View, Land adjacent to Frome Mill Farm
SG469	Land West of Yate Road & Stover Road, Yate
SG470	Land at Beech Hill Farm, Westerleigh Road, Yate
SG471	Woodlands Farm, 103 Badminton Road, Coalpit Heath



Site Reference	Address
SG474	Land rear of Bath Road
SG477	Stover Bridge, Nibley Gardens, Bridge Road
SG478	Stover Trading Estate
SG480	Grange Farm, Tormarton
SG481	Land to the east of the B4055, Pilning Station
SG482	Land to West of North Road and South of Mission Road, Engine Common
SG483	Down Road Field
SG498	Oxbarton Mead Road
SG547	Highwood Road Cribbs Causeway
SG569	Savages Wood Road, Land Off
SG593	Whitehouse Lane
SG599	Land at Oakfield Farm, Green Lane
SG601	Land at Brook Farm Junction 14
SG602	Land at Plot E10, Northfield Park, Hayes Way, Patchway
SG603	Land at Cribbs Causeway
SG604	Land at Sports Ground, Station Road, Henbury
SG605	Land at Hanham Community Centre
SG606	Land at Springfiled Lakes, Bath Road-Brewery Hill, Bitton
SG607	Bridge View, Westerleigh Road, Westerleigh
SG608	Land at Vilner Farm, Thornbury
SG609	Land at Jeffries Hill Bottom, Hanham
SG610	Land on the South Side of Court Farm, Longwell Green and South of Stratton Place, Court Farm Road
SG612	Henfield Paddock, Henfield Road, Coalpit Heath

Site Reference	Address
<b>SG613</b>	Land on the north side of Badminton Road
<b>SG615</b>	Castle Farm, Poplar Lane, Wickwar, Wotton-Under-Edge, GL12 8NS
<b>SG616</b>	Land at Gllslake Farm, Pilning
<b>SG617</b>	Sodbury Road, Wickwar, Wotton-Under-Edge, GL12 8NR
<b>SG618</b>	Land to the South of Church Lane, Winterbourne
<b>SG619</b>	Land at Down Road and badminton Road
<b>SG620</b>	Land to west of Park Farm
<b>SG621</b>	Land East of North Road, Engine Common
<b>SG700</b>	Land to rear of 1 Cleves Court Court Farm Road Longwell Green Bristol BS30 9AW
<b>SG701</b>	Meadow Lodge Farm, The Hollows, Coalpit Heath, BS36 2UX
<b>SG703</b>	Land to rear of 91 High Street, Wick, Bristol, BS30 5QQ
<b>SG704</b>	Land south of Yate Road, Yate
<b>SG705</b>	Land to the north of The Old Rectory, Charfield
<b>SG706</b>	Millstream Works, Station Works, Wickwar, Wotton-Under-Edge, GL12 8NB
<b>SG707</b>	Land Next To Hill Crest, Nibley Lane, Nibley, Bristol, BS37 5JG
<b>SG708</b>	Hallen Wood Yard, Berwick Lane, Hallen, Bristol, BS10 7RR
<b>SG710</b>	The Stables, Bristol Road, Iron Acton, South Glos. BS37 9TF
<b>SG711</b>	Land at Grey Gables, Vicarage Lane, Olveston,
<b>SG712</b>	Land to the north of Beacon Lane, Winterbourne
<b>SG713</b>	Land to west of Wotton Road, Rangeworthy
<b>SG714</b>	Land at Heneage Lane and The Gables, Falfield
<b>SG715</b>	Land at Merry Heaven Farm, Alveston
<b>SG716</b>	Land at Forty Acre Lane, Alveston

<b>Site Reference</b>	<b>Address</b>
<b>SG717</b>	Land off Midland Way, Thornbury
<b>SG718</b>	Land at Crossways, Thornbury
<b>SG719</b>	The Meads, Common Mead Lane, Hambrook,
<b>SG720</b>	Land at Cloverly Road, Oldland Common, BS30 8TX
<b>SG721</b>	Land behind 143 High Street Marshfield
<b>SG722</b>	Little Park Farm, Chipping Sodbury, Bristol.
<b>SG724</b>	Land at Fernhill, Almondsbury
<b>SG725</b>	Land at Woodmans Cottage, Eastwood Park
<b>SG726</b>	Land at Merville Farm
<b>SG727</b>	Land on the South Side of Gaunts Earthcott Lane
<b>SG728</b>	Land at North Road, Yate
<b>SG729</b>	Land to the east of Bristol Road
<b>SG730</b>	Land to east of B4058 at Heath End
<b>SG731</b>	Land at Townwell, Cromhall
<b>SG732</b>	Land to rear of 450 North Road, Yate
<b>SG733</b>	South side of 122 Westerleigh Road, Pucklechurch
<b>SG735</b>	Viridor Waste Management, North Way, Filton
<b>SG736</b>	The Orchard Hacket Lane Thornbury
<b>SG737</b>	Land at 12, The Park, Willsbridge BS30 6EE
<b>SG738</b>	Jarretts Garden Centre, Bath Road
<b>SG739</b>	Land at Talbots End, Cromhall
<b>SG740</b>	Land at Talbots End, Cromhall
<b>SG741</b>	Land to North of New Street, Charfield
<b>SG742</b>	Land adjacent to north of Heath End Garage

Site Reference	Address
SG743	Land at Downs Farm and Whistledown Farm,
SG744	Land at Angers Farm, Earthcott
SG745	Land at Church Hill (known as 'The Lagger'), Oldbury on Severn BS35 1QG
SG746	Land at Pilning Railway Station, Station Road, Pilning BS35 4JW
SG747	Land between Hallen Road and Moorhouse Lane, Hallen
SG748	Land at Wellinghouse Farm, Moorhouse Lane
SG749	The Oaks, Filton Road, Hambrook,
SG750	Old Stores, Chapel Road, Oldbury-on-Severn
SG751	Hill House Farm, Sodbury Road, Wickwar
SG752	White House Lane, Church Road, Pilning
SG753	Land South Side of Church Road
SG754	Land at the University of the West of England
SG755	Swanmoor Stoke
SG756	Land west of Sodbury Road
SG757	Land south of Wickwar Road, Rangeworthy
SG759	Land north of Holbrook Lane
SG760	Land south of Abbots Road
SG761	Land south of Upper Tockington Road
SG762	Land west of Winterbourne Hill
SG764	Brookman's Quarry
SG765	Dunkirk Barn
SG766	Feltham Farm, Hinton Road, Pucklechurch BS16 9JS
SG767	Behind Bridgegate House London Road
SG768	Land off Gloucester Road (B4061)

Site Reference	Address
SG769	Land north of Haw Lane, Olveston
SG770	Land south of Badminton Road
SG771	Land north of The Down, Old Down
SG772	The Old Windmill, Falfield (Parcel A)
SG773	The Old Windmill, Falfield (Parcel B)
SG776	Land at Rushmoor Dairy, Badminton
SG777	Buffer Depot, Acton Turville
SG778	Land at Station Road
SG779	Land at Castle Inn Farm
SG780	Land on South Side of Central Avenue, Bristol
SG781	Land North of A38, Alveston
SG782	Land at Cann Lane, Wick
SG784	The Hayfields off Cossham Street
SG785	Woodhouse Park
SG786	Land off Gaunts Earthcott Lane
SG787	Land adjoining Spring Farm
SG788	Badminton Road, Winterbourne
SG789	Land by Aust Road and Elberton Road, Olveston(2)
SG791	Webbs Heath Farm
SG792	Land to the south of Tanhouse Lane, Engine Common, Yate, South Gloucestershire, BS37 7PX
SG793	Land north and west of Hambrook, Bristo
SG794	Green Lane
SG795	Land At France Lane To East Of Hawkesbury

Site Reference	Address
SG796	Land at Badminton Road
SG797	Land at Grey Cot
SG798	Land south west of Cromhall Lane
SG799	Land adjoining 1-6 Aust Road, Northwick
SG800	Land South of Mapleridge Lane
SG801	Land off North Road, Yate, BS37 7LJ
SG802	Land on the north of Bury Hill Lane
SG803	Land off Claypitt Hill
SG804	Land at Hares Farm
SG805	Land at Pound Farm
SG806	Land at Morton Farm
SG807	Pilning Village Hall and playing field
SG808	Bank Road, Pilning BS35 4JG
SG810	Engne Common Yate
SG812	Land at Gilslake Farm
SG816	Yate Town Centre
SG817	Land to west of Wotton Road
SG820	Nibley Road Bird Farm, Nibley Lane, Yate BS37 5JG
SG821	Recreation Ground Oaklands Drive, Almondsbury
SG822	Crossley Farm, Swan Lane, Winterbourne BS36 1RH
SG823	Field to south of Rock View, Engne Common Lane
SG824	West of Yate Rocks
SG825	Land off Blackhorse Hill
SG826	Land at Hideaway Cottage, Whitfield GL12 8DR

Site Reference	Address
SG828	The Saw Mills, Cuckoo Lane
SG829	Land east of Inglestone Road / Alexander Hosea School, Wickwar, South Gloucestershire
SG830	The Vicarage, The Glebe, Pilning
SG833	Land East of Coldharbour Lane, Stoke Gifford, Bristol, BS16 1FJ
SG834	Willsbridge Nursery, off Keynsham Road (A4175), Willsbridge
SG835	Former Silverhill School, Swan Lane, Winterbourne, Bristol BS36 1RL
SG836	Land off Chapel Lane, Old Sodbury
SG838	Land Ajoining The Lodge, Gloucester Road, Thornbury, BS35 3TU
SG839	Land at the rear of Esperanza, Blackhorse Hill, Easter Compton, South Gloucestershire, BS35 5PR
SG840	Land to rear of 60 Westerleigh Road, Pucklechurch, Bristol
SG841	Land to the rear of Home Farm
SG842	Land at Berrows Mead
SG845	Leigh Farm Leigh Lane
SG846	Land to the East of Court Farm Road
SG847	Land North of Holbrook Lane
SG848	Land off Oldbury Lane
SG849	Whiteshill House
SG850	Land west of B4061
SG851	Land to the west of Wotton Road
SG852	Heneage Farm, Moorslade Lane
SG853	Land North of Moorslade Lane
SG854	Land off Moorslade Lane

Site Reference	Address
SG855	Land at Dyers Lane
SG856	Thornbury Health Centre Eastland Road
SG857	Downend Clinic Buckingham Gardens
SG858	Filton Clinic Shields Avenue
SG859	The Plough and Horseshoe Inn Gloucester Road
SG860	Land to the rear of the Steadings
SG861	Bolbrek Filton Road
SG862	Boydwick Farm
SG864	Land South of Luckington Road
SG865	Land to the North of Tormarton Road
SG866	Land to the West of Burton Road
SG867	Land to the South of Sodbury Road
SG868	Lower Shortwood
SG869	Land at Filton Retail Park, Fox Den Road
SG870	Plot 9000, Western Approach Buisness Park. Govier Way
SG871	Tytherington Quarry, Tytherington Road
SG872	Barnhill Quarry
SG873	Land east of Webbs Heath
SG874	Land at Church Quarry Baden Hill Road
SG875	Land between Tower Hill and Baden Hill Road
SG876	Land South of Almondsbury Garden Centre
SG877	Exhibition House, North View
SG878	Leyland Court Equestrian Centre
SG879	Rear of 32 Cleeve Hill



Site Reference	Address
SG880	Land to the South of Manor Road
SG881	Backfield Farm Business Park
SG882	Land adjacent to Grey Cottage
SG883	Land at Lapwing Farm
SG884	Land to rear of Silverhill School, Winterbourne
SG885	Site W2, Land off, Bristol Road
SG886	Land to north of New Road, Rangeworthy
SG887	Part of France Lane Farm, Hawkesbury Upton
SG889	The Grange School,
SG890	Land at The Paddock
SG892	Land at Hortham Lane, Almondsbury
SG893	Land at Crossways
SG894	Land at Gloucestershire Road
SG896	Glenfern and Land to East of Carsons Road
SG897	Land north of A420 and south of Goose Green
SG898	Vilner Farm
SG899	Kings Chase Shopping Centre
SG900	Land at Tytherington Quarry Wotton-underEdge Gloucestershire GL12 8UW
SG901	Abson Road Pucklechurch
SG904	28 Engine Common Lane Yate Bristol BS37 7PX
SG906	Land Adjacent to 82 Gloucester Road Rudgeway BS35 3RS
SG907	Land adjacent to Severn Beach Railway Station
SG908	Land South of Yate Road Yate
SG910	Homeapple Close

Site Reference	Address
SG911	Former Brightside Insurance
SG912	Land east of Chipping Sodbury
SG913	Land to West of Sodbury Road Wickwar
SG914	Land at Tanhouse Meadows Yate
SG916	Bristol Uniforms Limited 1 Wathen Street
SG917	Land at Tytherington
SG918	Land north-east of Pilning
SG920	Land off Whiteshill Common Hambrook
SG921	Land adjoining Hambrook Lane & Sturden Lane
SG922	The Land at the Old Beer Store High St Badminton GL9 1DG
SG923	Land to the East of Lymekiln Lane
SG924	Land Off Tockington Lane
SG925	46 Broad Street
SG926	The Quarters Colony Farm
SG927	The Old Vicarage
SG928	Land to the North of Berkeley Vale Motors
SG929	Land at Swan Lane
SG930	South East of Bell Land and Cattybrook Farm
SG931	Gilslake
SG932	Land at Varley Farm

## Appendix 2 Sites removed from Assessment

The table below sets out sites that have been removed from the report and the reason why. This includes sites that are duplicates or overlaps with other existing sites. Work was undertaken to identify the correct site to take forward based on contact with site promoters and landowner evidence. Also included are sites submitted for non-development uses for example where a site was promoted for a Green Belt extension. This goes beyond the purpose of the HELAA and is not the right place to assess sites for this kind of promoted use. Finally the list includes sites that have been withdrawn by the promoter as they no longer wish to promote the site for the proposed use.

Site reference	Address	Reason for Removal
<b>SG013</b>	Land West of Bristol Road, Thornbury	Duplicate (See SG850)
<b>SG015</b>	Land at Poplar Farm, Frampton Cotterell	Overlap (See SG729)
<b>SG016</b>	Land rear of Arnolds Field Estate and the Buthay, Wickwar	Overlap (See SG023)
<b>SG041</b>	Land rear of Mount Pleasant Farm, Longwell Green, BS30 9DG	Overlap (see SG474)
<b>SG067</b>	Land at Hortham Lane, Almondsbury	Duplicate (see SG892)
<b>SG076</b>	Land to rear of Willow Cottage, Siston Hill, Warmley	Overlap (see SG005)
<b>SG085</b>	Land Adjacent to the Ashlands, London Road	Overlap (see SG897)
<b>SG094</b>	Land at Shaymoor Lane, Pilning	Overlap (see SG755)
<b>SG137</b>	Land off, London Road, Bridgegate	Overlap (see SG897)
<b>SG248</b>	Greenacres	Non-development use proposed (allotment and play space)
<b>SG259</b>	Land at Hanham Hall, off Gover Road, Hanham	Non-development use proposed (Green Belt extension)
<b>SG281</b>	Washingpool Farm and Easter Compton Area West of M5	Overlap (see SG755)
<b>SG282</b>	Shortwood Lodge Golf Club, Bristol	Overlap (see SG868)
<b>SG283</b>	Land at Williams Close, Longwell Green	Overlap (see SG474)
<b>SG284</b>	Land to the South of Cleve RFC, Mangotsfield	Overlap (see SG784)
<b>SG298</b>	Land north of Siston Hill, Warmley	Overlap (see SG005)
<b>SG299</b>	Land off Goose Green, Siston	Overlap (see SG005)
<b>SG305</b>	Land at Dyers Lane, Iron Acton	Overlap (see SG855)
<b>SG308</b>	Land at Mounds Court Farm, Webbs Heath Road, Warmley, Bristol, BS30 5LU	Overlap (see SG897)

Site reference	Address	Reason for Removal
<b>SG322</b>	Land adjacent to Alexander Hosea Primary School, Wickwar	Duplicate (see SG829)
<b>SG343</b>	Rock House Farm, Main Road, Shortwood - ( Site 4)	Overlap (see SG868)
<b>SG362</b>	Land Off Redfield Hill, Oldland Common	Overlap (see SG047)
<b>SG385</b>	Land at Riverside Farm, Land near Cog Mill, Bristol Road, Frampton Cotterell	Duplicate (see SG729)
<b>SG424</b>	Land at 111 Marshfield Common Road, Pilning	Overlap (see SG755)
<b>SG432</b>	Land at Webbs Heath and Springfields, Bridgegate, Warmley	Overlap (see SG897)
<b>SG464</b>	Land at Webbs Heath and Springfields, Bridgegate, Warmley	Overlap (see SG897)
<b>SG472</b>	Land to the Rear of Mount Pleasant Farm, Longwell Green	Overlap (see SG474)
<b>SG475</b>	Land at Shortwood Road, Pucklechurch	Overlap (see SG008)
<b>SG476</b>	April Cottage, 180 Shortwood Road	Overlap (see SG008)
<b>SG582</b>	The Grange School,	Duplicate (see SG889)
<b>SG644</b>	Land off Itchington Road	Overlap (see SG416)
<b>SG723</b>	Off Bridge Road, Shortwood, Mangotsfield, Bristol. Adjacent to Shortwood Golf Club.	Overlap (see SG868)
<b>SG815</b>	Gilslake	Duplicate (see SG931)
<b>SG843</b>	Land at Brereton Way (including Cowhorn Hill Depot) Tower Road South	Withdrawn by promoter
<b>SG844</b>	Frampton End Farm	Withdrawn by promoter
<b>SG888</b>	Land East of Coalpit Heath	Duplicate (see SG068)
<b>SG891</b>	Land east of Abson Road, Pucklechurch	Duplicate (see SG070)
<b>SG895</b>	Well House, The Chipping	Overlap (see SG868)

## **Appendix 3: Site selection process (including HELAA)**

Below sets out the process undertaken to narrow down the sites submitted in the Call for Sites to eventually end up with our emerging preferred strategy of sites which is currently being consulted on in the Phase 3 New Local Plan. This process goes beyond HELAA and brings together a number of different pieces of evidence including the Sustainability Appraisal. A full site selection topic paper will be produced and form part of the evidence base for the Regulation 19 consultation.

### **Stage 1 – initial sieve and data cleanse**

This stage involved a ‘clean up’ of the full list of call for sites, which totalled 523 at May 2023.

A cleansed list of call for sites was the output of this stage. This cleansed list began the process of consideration through Sustainability Appraisal and started to inform consideration of reasonable alternatives (lenses).

The first stage cleanse of information involved;

- the council contacting promoters where sites were overlapping to identify the owner (and promoter) of sites and remove overlaps.
- removing duplicate submissions; where separate representatives of landowners (and in some cases those without backing of landowners) had submitted site information, leading to multiple references for the same parcel of land.
- removal of sites that had already received planning permission and commenced (and in some cases completed) build out, for example SG291 at Charfield.
- removal of a small number of sites promoted for non-development uses for example SG259 which was promoted for Green Belt extension which were also discounted from the HELAA process.
- sites were discounted which had been previously submitted but which had since been withdrawn by the promoter, for example SG843 and SG844 which were promoted by South Gloucestershire Property Services.
- sites which were not considered capable of delivering 5 homes or more
- Sites where we had not heard from the promoters since 2018. The council attempted to make contact with these promoters, and sites were discounted where no response was received.

This led to an initial list of 393 sites, to be considered through the stages set out below. At this stage these 393 sites were assessed at individual site level through SA, recognising that not all of these would eventually feature within the reasonable alternatives which were also the subject of SA. Below we explain the further stages that allowed us to identify these reasonable alternatives (lenses).

### **Stage 2 – Housing and Economic Land Availability Assessment (HELAA)**

The full methodology of the HELAA assessment is being released on the new local plan evidence base page [here](#)

The HELAA assessment investigates each site's suitability, availability and achievability, as required by government guidance.

- Sites that were assessed as being suitable, available and achievable were considered deliverable within the next 5 years or developable over a longer period if they were promoted for more than 500 homes.
- Sites that were considered to be suitable but not available or achievable were considered to be developable over a longer period (with potential to develop within the plan period).
- Sites that were considered deliverable or developable at this stage were considered to be appropriate to progress to the next stage.

Sites that were assessed as unsuitable, unavailable, and unachievable, were considered to be undeliverable/undevelopable and effectively and were not considered at the next stage to inform generation of reasonable alternatives.

Sites which did not pass the HELAA assessment did not progress to inform the generation of strategic alternatives (lenses) in stage 3 and 4.

On some sites, very detailed site analysis and information came forward outside of the HELAA process, such as through determination of a planning application, or through preparation of evidence for an appeal. The HELAA is a proportionate and strategic level assessment using information and professional judgement available at the time, but not undertaken to the level of a pre-app, planning application or appeal. In a limited number of cases a finely balanced HELAA assessment may of lead to a site passing through this stage, to be included in stage 3 and 4, but then later did not pass the HELAA where updated information and site analysis became available.

### **Stage 3 – Applying national and local objectives and forming alternatives (lenses)**

The sites that passed the HELAA then progressed to stage 3. Sites at this stage were considered against emerging objectives to inform three strategic scale reasonable alternatives (lenses).

Three lenses were investigated which considered national planning objectives and local council objectives: No Green Belt Loss, Urban Edge development and Transport Corridors and Hubs. A description of each lens is available to view in the Phase 3 consultation document [here](#). The pool of sites at this stage both informed and were informed by the generation of reasonable alternatives.

In formulating the lenses, sites at certain locations were discounted. Reasons included:

Sites that were located at villages and settlements which had already been as unsuitable for growth through a local plan led strategy approach in the Phase 2

consultation document, within the **Creating Sustainable Villages and Settlements** chapter, were discounted. This approach is set out in [detail here](#). These were villages considered unsustainable due to a lack of services and facilities within the community and/or a lack of public transport, walking or cycling connections to sustainability and within reasonable distance access adjacent higher order settlements or the urban edge.

In parallel to, sites which were considered remote from existing settlements, but which were not of a scale to create new sustainable or self-contained settlements were also excluded. This was considered appropriate to avoid creation of new smaller scale villages and hamlets which would be car dependent, reliant on council funding to provide any infrastructure, future school or public transport routes and infrastructure.

There was one site that was included in lens one which did not pass the HELAA assessment. This was SG912 East of Chipping Sodbury. This was a later additional to reasonable alternative, lens 1, as it was shown that lens 1 No Green Belt Loss did not have enough sites to meet the housing need with HELAA sites that passed. This was flagged within the No Green Belt Chapter and the potential negative heritage impacts of the site are flagged and recognised in the lens. In addition, at the time of undertaking work to generate the lenses, there was a planning appeal process on a site in Wickwar SG025. Although this site did not ultimately pass HELAA due to range of constraints impacting suitability, at the time of generating reasonable alternatives, it was included in lens 1.

#### **Stage 4 – Emerging Preferred Strategy**

The strengths and weaknesses of the lenses and the sites within were considered at this stage. In addition to SA objectives and relative site merits, consideration was given to each lens's performance against National planning objectives and local objectives set out in our Local Plan.

For example reducing the impact on climate change, reducing private car-based travel, reducing the need for costly or currently unsupported new strategic infrastructure and potential for new development to be located close to existing infrastructure services and facilities.

From this we then put together the emerging preferred strategy which has sought to minimise the weaknesses and maximise the strengths identified, whilst demonstrating the plan can meet the housing requirement.

