

Cheltenham, Gloucester and Tewkesbury Housing and Economic Land Availability Assessment (HELAA) Methodology

Cheltenham Borough Council
Gloucester City Council
Tewkesbury Council

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Disclaimer

*The Housing and Economic Land Availability Assessment (HELAA) lists and maps sites fully or partially within Cheltenham Borough, Gloucester City, and Tewkesbury that may have potential for residential and/or economic development. It is important to note they are **NOT** sites allocated for development. The decisions regarding which sites will be proposed for allocation will be made in the SLP, which will be subject to engagement through the Strategic and Local Plan process and examination before any site or plan is considered by Councils for adoption. Sites may also be allocated through neighbourhood development plans. The identification of potential sites in the HELAA does not state or imply that the Councils will necessarily grant planning permission for development. All planning applications will continue to be determined against the current development plan and other relevant material considerations. The HELAA includes estimates of potential on individual sites. These are not based on detailed designs so should not be assumed as acceptable for the purposes of development management decisions and should not prejudice any decision that may be made on the site at a later date. The boundaries of sites are based on the information provided by third parties. The HELAA does not limit the amendment of these boundaries for the purposes of a planning application.*

1. INTRODUCTION

Purpose of the HELAA

- 1.1 The Housing and Economic Land Availability Assessment (HELAA) is one of a number of technical evidence base documents that will inform the preparation of the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (the 'SLP'). The purpose of the HELAA is to assist in identifying suitable land which is available for housing and economic development to meet identified needs; to consider the development potential and to estimate when a development could occur. Unlike some other key evidence documents which set out the need for new development, the HELAA identifies the potential capacity for delivering that development.
- 1.2 **Importantly, the HELAA does not allocate sites. The inclusion of land within HELAA assessments has no planning weight and does not in itself determine whether a site should be granted planning permission or allocated in a development plan for development.** Assessments made through a HELAA are indicative only and do not prejudice assessments made through the development plan or planning application processes or preclude them from being developed for other purposes. Decisions on whether sites are allocated for a specified land use are made through Local Plans or Neighbourhood Plans.
- 1.3 The HELAA methodology has been used by Cheltenham Borough Council, Gloucester City Council and Tewkesbury Council to develop a joint HELAA which identifies future land supply which is suitable, available and achievable for housing and economic development uses over the SLP plan period.

2. POLICY CONTEXT

- 2.1 The policy context for HELAA's is set out in the [National Planning Policy Framework](#), and the Planning Practice Guide (PPG). This refers to preparing a strategic housing land availability assessment and refers to the need to support economic growth and productivity. Detailed guidance on how local planning authorities should undertake housing and economic land availability

assessments is set out in the PPG¹. This reaffirms the advantages of carrying out land assessments for housing and economic development as part of the same exercise and that such an assessment should:

- *“Identify sites and broad locations with potential for development;*
- *Assess their development potential;*
- *Assess their suitability for development and the likelihood of development coming forward (the availability and achievability)”².*

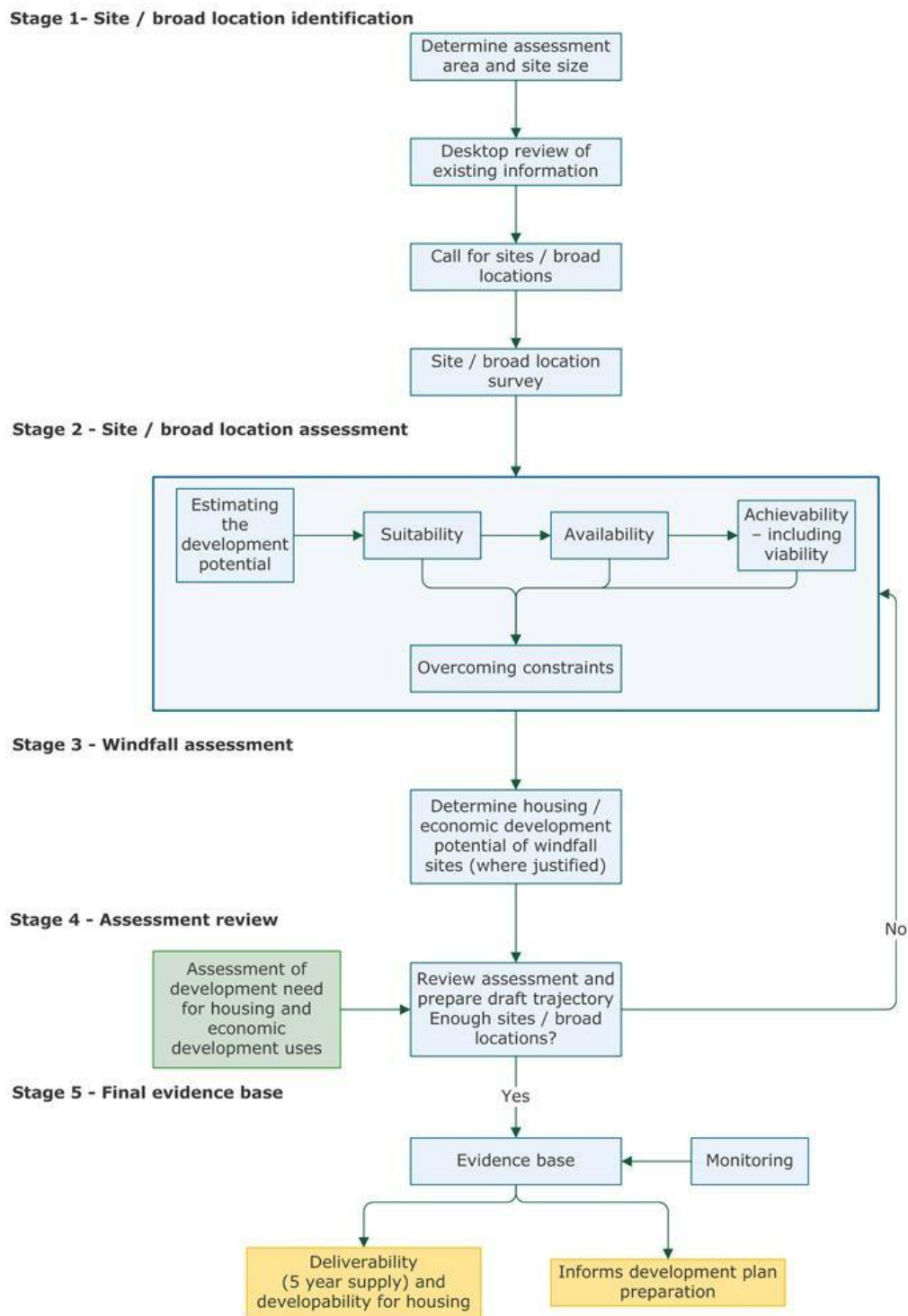
3. METHODOLOGY

- 3.1 The HELAA methodology is based on the standard methodology set out in the PPG and is a joint approach between the SLP authorities. The following sections expand upon the standard methodology providing additional clarification of the approach. Unless otherwise stated, each stage relates to the assessment of both housing and economic uses.
- 3.2 This HELAA methodology updates and brings together previous separate approaches to assessing the availability of land for housing and economic uses. Housing land availability was previously assessed through the Strategic Assessments of Land Availability Assessment (SALA), and employment monitoring reports assessed the availability of employment land. A new HELAA, based on the updated methodology set out in this report, will inform the SLP.

¹ [PPG, Housing and economic land availability assessment.](#)

² [PPG, Housing and economic land availability assessment](#), Paragraph: 001 Reference ID: 3-001-20190722.

Figure 1: Methodology – flowchart as set out in the PPG³



³ [PPG, Housing and economic land availability assessment](#), Paragraph: 005 Reference ID: 3-005-20190722

Stage 1 – Identification of sites and broad locations

- 3.3 Stage 1 is to identify sites for further assessment for housing and economic development. This section outlines the decisions and actions that will be completed.

Determining site size

- 3.4 The PPG includes advisory thresholds for sites and broad areas. For housing development, the advice is to assess sites capable of accommodating five or more dwellings⁴. However, it is also noted that paragraph 73 of the NPPF (2024) states *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area...and are often built-out relatively quickly”* and that *“local planning authorities should: a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved”*. For economic uses, the advice in the PPG⁵ is to assess sites of 0.25 ha or 500 square metres of floorspace.
- 3.5 The three LPAs will follow the PPG in assessing sites for residential development that are able to accommodate five or more dwellings, but there will be discretion during the HELAA preparation to deviate from this if appropriate and justified in particular instances. Likewise, the threshold of 0.25 hectares or 500 square metres of floorspace for sites for economic uses is a guide and the HELAA may assess smaller sites if there is good reason.

Desk top review of existing information

- 3.6 The PPG provides a table, as shown in Figure 2 below, relating to the types of site and potential data source that may be particularly relevant. This list should not be viewed as exhaustive.

⁴ [PPG, Housing and economic land availability assessment](#), Paragraph: 009 Reference ID: 3-009-20190722

⁵ PPG, Housing and economic land availability assessment, Paragraph: 009 Reference ID: 3-009-20190722

Figure 2: Types of Sites and Potential Data

Type of Site	Potential Data
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning applications records Development Briefs
Planning Permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completions records
Planning applications that have been refused or withdrawn	Planning application records
Land in the local authority's ownership	Local authority records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, central government, National Health Service, police, fire services, utilities services, statutory undertakers
Sites with permission in principle, and identified brownfield land	Brownfield land registers (parts 1 and 2) National Land Use Database Valuation Office database Active engagement with sector
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	Local authority empty property registers English Housing Survey National Land Use Database Commercial property databases (e.g. estate agents and property agents) Valuation Office database Active engagement with sector Brownfield land registers
Additional opportunities for un-established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector
Sites in rural locations	Local and neighbourhood plans

Large scale redevelopment and redesign of existing residential or economic areas	Planning applications Ordnance Survey maps Aerial photography
Sites in adjoining villages and rural exceptions sites	Site surveys
Potential urban extensions and new free-standing settlements	

Call for sites / broad locations

3.7 At an early stage in preparing or revising a HELAA, the SLP authorities undertook a “call for sites” exercise. The purpose of this was to provide an opportunity for landowners and interested parties to submit a site to the SLP authorities for consideration as a potential allocation in the SLP. There have been further opportunities, including during 2025, to submit sites. There may be further opportunities outside the specific call for sites periods for sites to be considered in a further HELAA update.

Site / broad location survey

3.8 The PPG advises that all sites (subject to site size thresholds) derived from data sources and the call for sites should be assessed against national policies and designations to establish which have reasonable potential for development and should be included in the site survey.

3.9 The PPG states that *“At this stage, there may be some sites which, when taking into account national policy and designations, it will not be appropriate to carry out these more detailed assessments for, where it is clear that they will not be suitable for development. The initial surveys need to be proportionate, with a more detailed assessment being made at Stage 2⁶”*. An initial desktop review of sites and broad locations has been carried out to exclude those where they would be significantly constrained by the following criteria set out in Figure 3. Where an exclusion constraint exists on part of a site or broad area, it will not be excluded from the assessment. In such circumstances the constraint will be considered within the more detailed Stage 2 assessment. Appendix 1 contains further information on HELAA Assessment Criteria.

⁶ [PPG, Housing and economic land availability assessment](#), Paragraph: 014 Reference ID: 3-014-20190722

Figure 3: Potential Exclusion Category⁷

Category	Reason for exclusion
Flood Zone 3	<p>The three SLP authorities have taken a precautionary approach to the exclusion of sites that are entirely or partially within FloodZone 3. This is to ensure a consistent approach by using the latest flood risk information from the Environment Agency or the latest Strategic Flood Risk Assessment once this has been updated for the SLP, including climate change allowances.</p> <p>The area of the site within Flood Zone 3 is discounted from the gross area. Sites that are significantly constrained by Flood Zone 3 will be assessed as unsuitable for residential use.</p> <p>Sites which are within Flood Zone 3 and classed as vulnerable to climate change will be assessed as unsuitable for residential use.</p> <p>Where a site is being considered for potentially 'Less Vulnerable' or 'Water Compatible' uses⁸, e.g. green infrastructure, the site will not be discounted but will need to be subject to the sequential and, if necessary, the exception test.</p>
Site access - physical access to a site has not been identified or potential access to the site is not clear from further assessment.	<p>Where the physical access to a site is not established, or no evidence has been submitted to demonstrate the site can be accessed via existing infrastructure, or there is no clear potential to access the site, the site will be assessed as unsuitable / not achievable.</p> <p>Examples of this could include where a site is 'land-locked' and/or would require the demolition of properties that are not within the boundary of the site submitted. Consideration will also be given to land ownership restrictions which may prevent the delivery of a site i.e. third party land between the nearest access/highway and the site.</p>

⁷ [PPG, Housing and economic land availability assessment](#), Paragraph: 011 Reference ID: 3-011-20190722

⁸ Table 2 in PPG Flood risk and coastal change Paragraph: 079 Reference ID: 7-079-20220825

<p>Relationship to an existing settlement</p>	<p>A site's relationship to an existing settlement is linked to sustainability considerations including reliance on private vehicles, access to facilities and services, community cohesion and recognising the value and varied functions of rural areas. It is considered less likely that more isolated sites, poorly related to settlements will be selected for allocation in the SLP process.</p> <p>However, some sites which, on the face of it, may be not so well located to established settlements could still have a chance of selection for allocation depending on the chosen spatial strategy, for example, sites in transport corridors, clustered with other potential sites or more suitable for employment uses. Therefore, this is not an exclusion criteria at this stage.</p> <p>Available information and evidence will be collated in the HELAA. The iterative HELAA will also interface with updated SLP employment land review (ELR) evidence that is anticipated to cover greenfield sites as well as established employment sites.</p> <p>The HELAA will also consider if larger isolated sites can present the opportunity to provide community facilities and infrastructure as part of their potential development to enable future sustainability.</p>
<p>European Designated Sites - Special Area of Conservation (SAC), Special Protection Area (SPA) or possible SAC/SPA</p>	<p>Legislation and the NPPF advises that planning permission should not be granted for development that is likely to have an adverse effect on the integrity of a European site.</p> <p>Sites entirely within or adjacent to a SAC / SPA or potential SAC/SPA will be assessed as unsuitable for development.</p>
<p>Scheduled Monuments</p>	<p>Irreplaceable historical assets. The NPPF states that substantial harm to or loss of scheduled monuments should be wholly exceptional.</p>

	<p>Sites which are entirely within the designation or have a designation on site will be assessed as unsuitable for development, unless they are part of an ongoing regeneration scheme or a site that has previously secured planning permission.</p> <p>If part of the site falls within a designated site, the net area will be calculated accordingly.</p>
Ancient Woodlands	<p>The NPPF advises that planning permission should not normally be granted for development which results in the loss or deterioration of ancient woodland.</p> <p>Sites entirely within the designation will be assessed as unsuitable for development. If part of the site falls within a designated site, the net area will be calculated accordingly.</p>
Site of Special Scientific Interest (SSSI)	<p>Legislation and the NPPF advises that planning permission should not normally be granted for development that is likely to have an adverse effect on a SSSI (Site of Special Scientific Interest).</p>
Locally designated sites of importance for biodiversity (Local Wildlife Sites / Reserves)	<p>The NPPF requires LPAs to identify, map and safeguard components of local wildlife-rich habitats.</p> <p>Accordingly, locally designated sites of importance for biodiversity such as Local Wildlife Sites / Reserves will be considered unsuitable for development unless any harm can be adequately mitigated.</p>
Grade I, II*, and II Registered Parks or Gardens	<p>Registered Parks and Gardens are heritage assets designated by Historic England and are protected by the NPPF. Accordingly, land within a Grade I, II* or II Registered Park and Garden will be considered unsuitable at this stage, unless it is substantially already in lawful use.</p>
Protected Green Space (Locally Important Open Space, Local Green Space, Public Green Space, Allotments)	<p>Protected green areas are of particular importance to local communities and designated in Local or Neighbourhood Plans and comply with the requirements of the NPPF.</p> <p>Where the entire site is designated Local Green Space, or the site is significantly constrained by the designation, the site will be assessed as unsuitable for development, unless forming part of a strategic scheme.</p>

3.10 Given that there were relatively few sites that met the exclusion criteria during stage 1, all submitted sites that met the size thresholds were provided with a full assessment.

Stage 2 – Site / broad location assessment

3.11 Stage 2 was to assess the development potential of each site / broad location identified in Stage 1. This included a desktop assessment and may include site visits as well as having regard to information submitted by promoters. The assessment of suitability, availability and achievability will inform the decision as to whether a site or broad location can be considered deliverable, developable, potentially developable or not currently developable.

3.12 All sites identified for inclusion in the HELAA are mapped and information about them is recorded in the sites database.

3.13 In accordance with the PPG, the following information (in no priority order) is recorded at the survey stage:

- i. Site size, boundaries, and location;
- ii. Current land use and character;
- iii. Land uses and character of surrounding area;
- iv. Physical constraints (e.g. Access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure/utilities);
- v. Potential environmental constraints;
- vi. Where relevant, development progress (e.g. Ground works completed, number of units started, number of units completed), including current planning status and planning history on the site;
- vii. Accessible green space;
- viii. Existing policy summary;
- ix. Indicative housing density, and net area after infrastructure / policy constraints have been factored in;
- x. Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.

- 3.14 A summary of the assessment criteria is provided in Appendix 1.
- 3.15 As set out in the respective Local Development Schemes⁹, the intention is that the SLP will supersede the policies in the various documents that comprise the Development Plan¹⁰. Existing Development Plan policies which limit use of a site or area, such as Green Belt, but provide context to the current land use and constraints or designations, are not applied as a reason for excluding a site from further consideration at this stage of the assessment. Sites that are considered to be deliverable, developable or potentially developable will be subject to further detailed assessment, informed by up-to-date evidence including strategic flood risk assessment, landscape character assessment and sensitivity analysis, a review of the Green Belt and a review of settlement hierarchy and boundaries. The up-to-date evidence base will be an important factor when assessing the suitability, availability and achievability of sites and broad locations and their potential inclusion in the plan area.

Estimating development potential

- 3.16 The PPG advises that development potential of sites should be guided by the existing or emerging planning policy, including locally determined policies on density¹¹. The assessment of development potential is likely to be based on a number of factors including information from promoters of sites, design principles and other local information. Density multiplier assumptions may also be applied. The estimating of development potential within the HELAA does not in itself determine that it is suitable for development or that it should be allocated for development. The potential is indicative only and does not prejudice assessments made through the development plan or planning application process.
- 3.17 Site capacities are assigned based on evidence from promoters of sites, urban design principles and other local information. Where evidence is unavailable, or suggested densities are considered inappropriate for the site,

⁹ [Cheltenham Borough Council LDS](#), [Gloucester City Council LDS](#) and [Tewkesbury Borough Council LDS](#)

¹⁰ These documents are listed in the respective Local Development Schemes. This does not include any 'made' Neighbourhood Development Plans; Waste or Mineral Plans

¹¹ [PPG, Housing and economic land availability assessment](#), Paragraph: 016 Reference ID: 3-016-20190722

the following density assumptions have been applied for each local authority. These density categories align with the National Model Design Code (NMDC) (2021) categories, which include 'Urban Neighbourhoods' 60-120 dwellings per hectare (dph), and 'Suburbs' 40-60 dph. It is intended they are developed in more detail when the Design Code for the SLP areas is published (scheduled for 2026).

- Cheltenham – 60-120 dwellings per hectare (dph) for sites within the main built up area (examples include, Pittville, Lansdown, St Pauls, Fairview, St Peters, All Saints) and 40-60 dph for areas outside of this (examples include, Hatherley, Leckhampton & Warden Hill, Benhall, Charlton Kings, Hesters Way, Oakley);
- Gloucester City - 60-120+ dph is used for the main built up area (examples include, Westgate, Kingsholm & Wotton, Matson, Robinswood and White City and Barton & Tredworth), and 40-60 dph for areas outside of this; and,
- Tewkesbury – 60-120 dph for areas within 400m of a railway station, and 40-60 dph for areas outside of this. In very limited locations 20-40 dph might be considered.

3.19 For the HELAA calculations, the lower end of the density range is generally used (e.g. 40 dph for rural areas in Tewkesbury). However, applications at the higher end of the density range are encouraged in the appropriate site context.

3.20 To account for a proportion of the site that will be taken up by infrastructure and landscaping, a density multiplier is applied to achieve a net developable area based on the following assumptions:

Figure 4: Density Multiplier Assumptions

Site Size (ha)	Discounted site area	Area for housing
0 - 0.4	10%	90%
0.4 - 2	17%	83%
2+	37%	63%

3.21 Site capacity is expressed as a developable area in hectares. Where

necessary this can be used to calculate floor space and jobs capacity using guidance on densities. It is for the plan making process to identify locations for specific types of employment development.

Assessing availability

3.22 The PPG advises that “A site can be considered available for development, when, 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. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available”¹². “A site is likely to be considered unavailable where, for example there are unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners”¹³. The assessment of each site will be classified into the categories set out in Figure 5.

Figure 5: Availability Classification¹⁴

Available	<ul style="list-style-type: none"> Confirmation of availability within the next 15 years has been received from the landowner and there are no known legal issues or ownership problems.
Potentially available	<ul style="list-style-type: none"> The landowner or a third party with an interest has promoted the land but confirmation has not been received from the landowner that the land will be available within the next 15 years. The land is in multiple ownerships and may have site assembly issues. The land accommodates an existing use which would require relocation but arrangements are not in place to achieve this.

¹² [PPG, Housing and economic land availability assessment](#), Paragraph: 019 Reference ID: 3-019-20190722

¹³ [PPG, Housing and economic land availability assessment](#), Paragraph: 021 Reference ID: 3-021-20190722

¹⁴ [PPG, Housing and economic land availability assessment](#), Paragraph: 011 Reference ID: 3-011-20190722

Availability unknown	<ul style="list-style-type: none"> • The landowner has not expressed an interest in promoting the site and availability remains unknown following investigations. • The landowner has expressed an interest in promoting the site in the past but has not responded to subsequent enquires for a period no shorter than three years. • The land is subject to legal issues upon which further information is required before a robust decision can be made on availability.
Not available	<ul style="list-style-type: none"> • The landowner has confirmed that the land is not available for development in the next 15 years. • The land is subject to known legal issues which are unlikely to be overcome within the next 15 years.

Assessing suitability

3.23 The PPG indicates that a number of factors could be considered when assessing suitability of sites / broad locations. As set out in the PPG, *“A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated”*¹⁵.

- 3.24 Constraints and opportunities will be considered. These could include both those that are existing or proposed, and that are as a result of a policy approach or are intrinsic to the site.
- i. Constraints are factors which limit or restrict the ability to develop a site. In some instances constraints may prevent development at a particular point in time, whilst in others they might limit or influence the type, form or capacity of a site;
 - ii. Opportunities are beneficial factors. These might be the result of existing factors such as accessibility of a site to facilities, or they might be created through development itself such as contributing to regeneration or a community aspiration.

3.25 As set out under Stage 1 under the ‘Site / broad location survey heading’

¹⁵ [PPG, Housing and economic land availability assessment](#), Paragraph: 018 Reference ID: 3-018-20190722

and shown in Figure 3: Potential Exclusion Categories, where a site or broad area is only partially within the functional flood plain or will be taking climate change into account, this will be considered within the more detailed Stage 2 assessment. When considering constraints and opportunities, this will include considering physical constraints or limitations as part of a site’s potential suitability. The impact of some considerations may limit or influence the type, form or capacity of a site. In some instances, where the impact is significant and cannot be mitigated some considerations might prevent a site being suitable for development unless circumstances change. Conversely, the impact of development may positively influence the suitability of a site by way of creating specific opportunities.

3.26 Suitability considerations are wide ranging but will be based on planning related constraints and will include the site’s location and the potential impacts on nature, landscape and heritage features amongst other aspects.

3.27 The assessment of each site will be classified into the categories set out in Figure 6. The assessment of suitability is indicative only and does not prejudice assessments made through the development plan or planning application processes.

Figure 6: Suitability Classification¹⁶

Suitable	<ul style="list-style-type: none"> The site offers a suitable location for development and there are no known constraints which significantly inhibit development for the defined use.
Potentially suitable	<ul style="list-style-type: none"> The site offers a potentially suitable location for development but is subject to a policy designation which inhibits development for the defined use. The development plan process will determine the future suitability for the defined use.
Suitability unknown	<ul style="list-style-type: none"> The site requires further assessment before a robust decision can be made on its suitability for being developed for the defined use.

¹⁶ [PPG, Housing and economic land availability assessment](#), Paragraph: 011 Reference ID: 3-011-20190722

Unsuitable	<ul style="list-style-type: none"> The site does not offer a suitable location for being developed for the defined use or there are known constraints which significantly inhibit development. The site is unlikely to be found suitable for the defined use within the next 15 years.
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Assessing Achievability

3.28 The PPG advises that “A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic [viability of a site](#)¹⁷, and the capacity of the developer to complete and let or sell the development over a certain period”¹⁸.

3.29 Given the importance of a site's suitability and availability to the assessment of achievability, ordinarily it would only be those sites which have been assessed as suitable or potentially suitable, or available or potentially available that will be considered in terms of achievability.

3.30 As set out in the PPG¹⁹, “Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable”. Therefore, generic viability information where available will be drawn on to inform the assessment of achievability.

3.31 The assessment of each site will be classified into the categories set out in Figure 7.

Figure 7: Achievability Classification²⁰

Achievable	<ul style="list-style-type: none"> There is a reasonable prospect that the site will be developed for the defined use within the next 15 years.
Potentially achievable	<ul style="list-style-type: none"> The achievability of the site is inhibited by an external factor where the timing of resolution is unknown. The delivery of the resolution will determine the future achievability of the site.

¹⁷ [PPG, Viability](#), including Paragraph: 003 Reference ID: 10-003-20180724

¹⁸ [PPG, Housing and economic land availability assessment](#), Paragraph: 020 Reference ID: 3-020-20190722

¹⁹ [PPG, Viability](#), including Paragraph: 003 Reference ID: 10-003-20180724

²⁰ [PPG, Housing and economic land availability assessment](#), Paragraph: 011 Reference ID: 3-011-20190722

Achievability unknown	<ul style="list-style-type: none"> The site is subject to issues upon which further information is required before a robust decision can be made on achievability.
Unachievable	<ul style="list-style-type: none"> There is no reasonable prospect that the site will be developed for the defined use within the next 15 years.

Overcoming constraints and assessing of deliverable and developable

3.32 The assessment of suitability, availability and achievability of sites and broad areas will provide information on which the judgement can be made in the plan making context as to whether a site can be considered deliverable over the plan period. The definitions of deliverable and developable are set out within the NPPF²¹. The assessment of each site will be classified into the categories set out in Figure 8.

3.33 If evidence is provided which demonstrates that an identified constraint can be overcome, this will be taken into account in the review of the HELAA and may result in a site that was not developable to be subsequently deemed developable.

²¹ See glossary within the [NPPF \(2024\)](#)

Figure 8: Deliverable and Developable Classification²²

Deliverable (years 1-5)	<ul style="list-style-type: none"> The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years.
Developable (years 6-10, 11-15)	<ul style="list-style-type: none"> The site is a suitable location for defined use and there is a reasonable prospect that the site is available and could be viably developed in years 6-10 or 11-15.
Potentially developable	<ul style="list-style-type: none"> The site has been identified as potentially suitable and/or potentially available. Whether the site becomes developable will depend on further assessment through the plan making process, e.g. whether circumstances support the amendment or removal of existing designations, and further investigations into its availability.
Not developable within the next 15 years ²³	<ul style="list-style-type: none"> Those sites assessed as having significant policy and/or environmental constraints that means that the site is unlikely to become suitable in the next 15 years. Those sites assessed as being unlikely to become available in the next 15 years. Those sites assessed as having no reasonable prospect of becoming achievable in the next 15 years.

Stage 3 – Windfall assessment

3.34 The term ‘windfall’ is defined as “Sites not specifically identified in the development plan²⁴. The NPPF²⁵ and PPG²⁶ set out that, where justified, windfall sites can contribute towards housing supply. Details of any windfall allowance will be provided within the Councils Housing

²² [PPG, Housing and economic land availability assessment](#), Paragraph: 011 Reference ID: 3-011-20190722

²³ With “larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area”, this timeframe will be extended to at least the next 30 years “to take into account the likely timescale for delivery” as per paragraph 22 of the [NPPF \(2024\)](#)

²⁴ See glossary within the [NPPF \(2024\)](#)

²⁵ [NPPF \(2024\)](#), Paragraph 73

²⁶ [PPG, Housing and economic land availability assessment](#), Paragraph: 023 Reference ID: 3-023-20190722

Monitoring reports.

- 3.35 In Cheltenham Borough, windfall sites are considered from 1st April 2017 onwards. Within Gloucester City, windfalls are considered from 1st April 2014. In Tewkesbury Borough, windfalls are considered from 1st April 2003. This approach is consistent with each Councils respective housing monitoring data.

Stage 4 – Assessment review

- 3.36 Based on an assessment of sites and broad locations through Stages 1 to 3, an indicative trajectory will be prepared setting out how much housing and economic floorspace can be provided against housing and economic need, and at what point in the future. If there are not enough sites / broad locations, then the assessments will be revisited²⁷. If following the review process, there is still insufficient capacity then the PPG advises “*that it will be necessary to investigate how this shortfall should be best planned for*”.

Stage 5 – Final evidence base

- 3.37 The results of the HELAA site assessments and various constraints that form part of the site assessment process are available to view as an interactive map and associated table which will include:

- i. An assessment of each site or broad location, including:*
 - a. Where these have been discounted, evidence justifying reasons given;*
 - b. Where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;*
 - c. An indicative trajectory of anticipated development based on the evidence available”²⁸*

²⁷ [PPG, Housing and economic land availability assessment](#), Paragraph: 025 Reference ID: 3-025-20190722

²⁸ [PPG, Housing and economic land availability assessment](#), Paragraph: 026 Reference ID: 3-026-20190722

4. Monitoring

- 4.1 The assessment of sites will be kept up to date. There has already been updates to the assessments to take account for changes and there will be a further update to the assessments to take account for further changes. This may include:
- i. The inclusion of newly identified sites;
 - ii. Changes in the planning status of a site;
 - iii. Changes to the development potential of a site, e.g. due to adjustments as site specific evidence emerges;
 - iv. Changes in the suitability of a site, e.g. as a result of new information or changes in the extent of severity of constraints;
 - v. Changes in the availability of a site, e.g. as a result of changes in ownership or the landowner's intentions; and
 - vi. Changes in the achievability of a site.

Appendix I: HELAA Assessment Criteria

Criteria	Comments
Area within Flood Zone 2 or 3 (% of site / ha)	<p>As per the methodology, the area within Flood Zone 3 has been calculated and then excluded from the gross area to inform the revised residential site yield. Only an area above 2% within Flood Zone 3 has been deducted to allow for a degree of tolerance of the scale of mapping of Flood Zone data.</p> <p>The three SLP authorities have taken a precautionary approach to the exclusion of sites that are entirely or partially within Flood Zone 3. This is to ensure a consistent approach by using the latest flood risk information from the Environment Agency or, the latest Strategic Flood Risk Assessment once this has been updated for the SLP, including climate change allowances.</p>
Geographic, topographic and highways constraints	Physical restrictions to yield for example could be - any physical infrastructure or constraints that may limit the ability to develop the site e.g. steep slope, proximity to airport or motorway (noise).
Within designated Green Belt boundary (overlap % of site / ha)	Is the site within the Green Belt boundary? As per the LUC 2025 / 2026 study which examined Green Belt boundaries based on the latest PPG Green Belts (February 2025) Green Belt - GOV.UK .
Includes previously developed land (PDL) (Yes/No/Partial)	Does the site include PDL as defined in Annex 2 of NPPF (2024)?
Brownfield Register Site?	Is the site included in Part 1 of the local authority's Brownfield Register?
Neighbourhood Plan information	Is the site within a Neighbourhood Plan area and / or 'Made' Neighbourhood Plan?
Adopted JCS Strategic Allocation (Yes/No)	Is the site allocated in the Joint Core Strategy (2017)?

Criteria	Comments
Adopted JCS Strategic Safeguarded Land (Yes/No)	Is the site located within an area of Safeguarded Land in the Joint Core Strategy (2017)?
Current Planning Status and Relevant Planning History	Identifies the latest planning information such as current planning permissions, planning applications and relevant historic planning permissions.
Current and past uses	Provides context on current and historic land use(s) on the site.
Relationship to existing settlement	Does the site lie within, adjacent or outside the built form of a settlement.
Character of the Area and surrounding land uses	A summary of character and surrounding land uses.
Surface water flood zone (High/Medium/Low)	Does the site lie within a surface water flood zone? Surface water flooding will be assessed further through the SFRA and in consultation with the Lead Local Flood Authority.
Agricultural Land classification (ALC) (overlap % of site / ha in each category)	The DEFRA agricultural land classification is used to determine the category of agricultural land. Higher quality agricultural land will not be used unless there is a shortage of sites.
Cotswolds National Landscape (overlap % of site / ha)	Does the site lie within the Cotswolds National Landscape. In November 2023, all designated Areas of Outstanding Natural Beauty (AONB) were renamed to National Landscapes.
Ancient Woodland (overlap % of site / ha)	Is there any Ancient Woodland on the site?
Tree Preservation Orders (number / area on site and proximity within 20m)	Are there any Tree Preservation Orders on the site?
Landscape Sensitivity	Landscape sensitivity classification using existing Landscape Character Assessment and Sensitivity studies. The Landscape Character Assessment and Sensitivity Study evidence base

Criteria	Comments
	<p>will be reviewed as part of the emerging evidence for the SLP.</p> <p>Does the site currently lie within a Special Landscape Area (SLA) as defined in the respective Local Plan?</p>
<p>Sites of Special Scientific Interest (SSSI) (overlap % of site / ha and proximity within 1km)</p>	<p>Does the site lie within a SSSI?</p>
<p>Proximity to European sites (Special Area of Conservation, Special Protection Area and/or Ramsar site) (overlap % of site / ha and proximity within 1km)</p>	<p>Does the site lie in proximity to any European Site or Zone of Influence?</p>
<p>Proximity to National Nature Reserves (overlap % of site / ha and proximity within 1km)</p>	<p>Does the site lie within proximity to any National Nature Reserves?</p>
<p>Local Wildlife Sites / Reserves (overlap % of site / ha)</p>	<p>Does the site lie within any Local wildlife Sites / Reserves?</p>
<p>Gloucestershire Local Nature Recovery Strategy</p>	<p>Identification of opportunities for investment in the enhancement of natural capital in the SLP area. Data is sourced from the Gloucestershire Local Nature Recovery Strategy: Local Nature Recovery Strategy Gloucestershire LNP</p>
<p>Regionally Important Geological Sites (RIGS) (Overlap % of site / ha)</p>	<p>Does the site lie within a RIGS?</p>
<p>Green Infrastructure</p>	<p>Does the site contain Green Infrastructure?</p>
<p>Proximity to Grade I, II or Grade II* listed buildings (number on site and proximity within 20m)</p>	<p>Identifies the number and name of any Grade I, II or II* listed buildings within or in proximity of the site.</p>

Criteria	Comments
Proximity to Scheduled Monuments (number on site and proximity within 50m)	Does the site lie in proximity to any Scheduled Monuments?
Proximity to Grade I, II or Grade II* Registered Park or Garden (Overlap % on site / ha)	<p>Does the site lie within any Grade I, II or Grade II* Registered Park or Garden?</p> <p>Historic England recommend that <i>all</i> Registered Parks and Gardens are excluded from the HELAA, as such how the development affects the intrinsic setting of the registered parks and gardens will be assessed on a site-by-site basis.</p>
Archaeological sites	<p>Does the site contain any archaeological deposits?</p> <p>Data to be sourced from the Gloucestershire Historic Environment Record and Gloucestershire County Council Archives.</p>
Proximity to Conservation Areas (Overlap % on site / ha and proximity within 50m)	Does the site lie within / in proximity to any Conservation Areas?
Proximity to Battlefields (Overlap % on site / ha and proximity within 50m)	Does the site lie within / in proximity to any Battlefields?
Within an Air Quality Management Area	Does the site lie within an Air Quality Management Area?
Contamination (Yes/No)	Is there any known contamination on the site?
Topography	Topography has been assessed using OS maps and has been a desktop exercise.
Utilities infrastructure (e.g. electricity pylons, oil/ gas pipelines)	<p>Is there any utilities infrastructure on the site?</p> <p>The area impacted by oil or gas pipeline buffer zones has been calculated and then excluded from the gross area to inform the revised residential site yield.</p>

Criteria	Comments
Site Access	How is the site accessed? Assessment based on information submitted to the LPA and officer judgement but will be subject to a Highways technical assessment.
Public transport accessibility (intersect within 400m / 800m % of site / ha)	Is the site located within the catchment of high frequency public transport?
Minerals resources, safeguarding and minerals and waste consultation area (Yes/No)	Does the site lie within a Minerals Resources, Safeguarding and Minerals and Waste Consultation Area as defined in the Gloucestershire Minerals Local Plan and Waste Core Strategy?
Sewage treatment works / Cordon Sanitaire (Overlap % on site / ha)	Does the site lie in proximity to sewage treatment works or within a Cordon Sanitaire?
Public Rights of Way network (PRoW) on site (Yes/No)	Do any PRoWs cross the site?
Local cycle path or Sustrans routes (proximity within 50m)	Do any local cycle path or Sustrans routes cross the site?
Accessible Green Space	Is there defined accessible green space within proximity of the site?
Protected Green Space (Locally Important Open Space / Local Green Space / Public Green Space / Allotments) (Overlap % on site / ha)	Is there protected Green Space within the site?
DfT Connectivity Score (Min/Max/Mean)	The DfT connectivity score indicates how well a location is connected to essential services and opportunities via various modes of transport.
Planning Approvals	Land which has been approved but not yet built out is still considered as part of the HELAA.

Appendix 2: Responses to the SLP winter 2023 / 24 public consultation raising matters relating to the published October 2023 HELAA Methodology

HELAA Criteria	Consultee	Site	Consultation feedback	Council response
AONB	Black Box Planning Ltd (Henry Clegg) on behalf of Waddeton Park Ltd	Land at Glenfall Way, Charlton Kings, Cheltenham	AONB site suitable for sensitive development, in particular self build housing plots. Paragraph 11 (b) of the National Planning Policy Framework requires plans to contain strategic policies that, as a minimum, provide for objectively assessed need, including housing and needs of specific groups such as those requiring self-build plots. Paragraph 11(b) does not preclude development within AONBs, stating that the application of policies in the framework concerning the protection of AONBs must present a strong reason for restricting the scale, type or distribution of development within the plan area. While the Site is located entirely within the AONB, the application of policies contained within the framework protecting them does not provide a strong reason for	Amended the AONB assessment to no longer be a reason for exclusion of sites from the HELAA. Subject AONB sites to scrutiny against the updated landscape sensitivity evidence once available.

			preventing the Site from being allocated in the plan.	
Green Belt	Evans Jones Ltd, on behalf of VRL Applications Ltd, are promoting circa 4.33 hectares of land at Badgeworth Road, Cheltenham for either residential or employment uses.	Land at Badgeworth Road, Cheltenham	<p>SLP state: A greenfield site located outside of the built up area of Cheltenham to the west. The site lies within the Green Belt. It forms part of a wider Strategic Segment of Land which was identified in the JCS Green Belt Review 2011 (SE10) which, overall, was judged to make a significant contribution towards Green Belt purposes.</p> <p>Boyer state: The Site lies within the Green Belt. The JCS Green Belt Review (September 2011) prepared by AMEC identified the Site as part of a much larger cell of land (SE10) as making a 'significant contribution' to the purposes of Green Belt. As previously detailed, Pegasus Group have undertaken a Green Belt Assessment which in considering the effect on openness and the purposes of the Green Belt considers the sites removal of the sub parcel is considered to have a negligible effect</p>	No change to methodology. Amended HELAA site information with updated information.

			<p>and there is a strong case for its removal to facilitate sustainable infill development that would relate well to existing development and result in robust Green Belt boundaries.</p> <p>Circa 4.33 hectares of land is located within the designated Green Belt, it is in close proximity to areas which have been removed from it, with other commercial developments being constructed on this land. The site being in close proximity to these areas means that it will be seen in the context of the wider commercial development in the area, and not the greenfield development to the west.</p> <p>Boyer are concerned with the approach to RAG assessments dated December 2023, which does not reflect a "policy off" approach to the assessment of sites. It is noted that sites within the Green Belt have been given a lower score due to the Green Belt land use allocation. We consider that sites should be assessed solely on the basis of their deliverability and</p>	
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			<p>availability as part of the HELAA. It is for the local plan review to consider and apply local plan policies, such as the extent and review of the Green Belt. As presently drafted the HELAA methodology risks sustainably located sites, that are available and deliverable, being given a reduced score, which is not consistent with the purpose of the HELAA.</p> <p>Boyer believe due to the sites location adjacent to the Principal Urban Boundary and to the south of commercial uses at Corinthian Park a more detailed Green Belt analysis at site level should be undertaken as there is merit for the Site being removed from the Green Belt as detailed by the Green Belt Assessment undertaken by Pegasus Group.</p>	
AONB land west of Dowdeswell Park	Propernomics (Simon Ward)	Land west of Dowdeswell Park, London Road, Charlton Kings	To be accurate, the assessment should consider the features of the "net area" for development rather than the "gross area" (some parts of the site are well suited to	Net development areas within sites are matters for more detailed planning stages than the HELAA unless the site contains any exclusion criteria.

			<p>development; others are more suited to landscaping and BNG for example).</p> <p>The council has already assessed the location as an area of lower sensitivity within the Settled Lowlands (area LCA 8.2). Circa 1 ha within the southern part of site S148 ("S148 South"), immediately west of Dowdeswell Park and adjacent to London Road, is especially low in the landscape with low sensitivity. This remains the case and is very apparent from a site visit.</p> <p>In reality, no part of the proposed development is in Flood Zone 3 because the layout of development would avoid the River Chelt. It is a positive feature not a constraint. This can be illustrated by reference to the following flood map for the southern part of site S148 ("S148 South"); the part of the site north of the river, being on higher ground, is also unaffected by flooding.</p>	<p>Amended the AONB check to no longer be a reason for exclusion of sites from the HELAA. Subject AONB sites to scrutiny against the updated landscape sensitivity evidence once available.</p> <p>Methodology in Figure 3 states: Potential Exclusion Criteria <i>"Where a site is being considered for potentially 'Less Vulnerable' or 'Water Compatible' uses, e.g. green infrastructure, the site will not be discounted but will need to be subject to the sequential and, if necessary, the exception test."</i></p>
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			<p>Although the site is detached from the Principal Urban Area, it adjoins Dowdeswell Park; plus other development of residential and business floorspace has occurred successfully nearby. The site is separated from listed buildings by London Road and/or screened by trees.</p>	<p>Site information has been reviewed and any updates to conclusions made.</p>
<p>Accessibility to services and facilities</p>	<p>GCC Highways</p>	<p>N/A</p>	<p>The HELAA methodology makes no reference to the City Science broad site assessment. Section 3.12 of the HELAA methodology page 12 – needs to also include looking at the ‘The proximity to services and other infrastructure, such as public transport’ as suggested by the guidance and required by the emerging objectives of the SLP. Para 3.14 talks about next stage of detailed assessment for sites – Sites that are considered to be deliverable, developable or potentially developable will be subject to further detailed assessment, informed by up-to-date evidence including strategic flood risk assessment,</p>	<p>DfT Connectivity scoring added to Appendix 1 to inform site assessment.</p>

			<p>landscape character assessment and sensitivity analysis, a review of the Green Belt and a review of settlement hierarchy and boundaries. It is suggested that this should also include an assessment of whether a site does or could provide sustainable access to services and facilities, including high frequency PT to clearly identify those sites where active and sustainable transport would be a genuine alternative. Para 3.23 Suitability considerations are wide ranging but will include the site's location and the potential impacts on nature, landscape and heritage features amongst other aspects. Need to ensure the potential to access to services and facilities by active modes and PT is part of this process.</p>	
Biodiversity	Gloucestershire Wildlife Trust	N / A	<p>Suggested wording change in that sites including a wildlife designation, including those that fall partly into a designation, are unlikely to be considered.</p>	<p>Figure 3 now states: "<i>Locally designated sites of importance for biodiversity (Local Wildlife Sites / Reserves): The NPPF requires LPAs to identify, map and safeguard components of</i></p>

			Paragraph 3.22 mentions the need for mitigation not enhancement.	<p><i>local wildlife-rich habitats. Accordingly, locally designated sites of importance for biodiversity such as Local Wildlife Sites / Reserves will be considered unsuitable for development, unless any harm can be adequately mitigated.</i></p> <p>No change to paragraph 3.22 as it is concerned with whether a constraint renders a site unsuitable or unachievable rather than the approach to mitigation or enhancement.</p>
Heritage Assets: Identification of Sites and broad locations	Historic England	N / A	As Grade II Registered Historic Parks and Gardens are less significant than Grade I and Grade II*, we recommend that <i>all</i> Registered Parks and Gardens are excluded from the HELAA.	<p>Methodology amended. Figure 3 now states: <i>“Registered Parks and Gardens are heritage assets designated by Historic England and are protected by the NPPF. Accordingly, land within a Grade I, II* or II Registered Park and Garden will be considered unsuitable at this stage, unless it is substantially already in lawful use.”</i></p>

Heritage Assets: Site/ broad location assessment	Historic England		<p>We welcome the inclusion of listed buildings, scheduled monuments, Registered Historic Parks and Gardens, locally listed heritage assets and archaeological sites (from the HER) as part of the assessment. We do not think that the simplistic use of 'proximity' (which varies between asset types and authorities) to generate a yes/no response will add a great deal to the assessment, as it will not necessarily help to identify either the level of potential harm or opportunities for enhancement. We therefore recommend that, where relevant, further commentary on potential historic environment impacts is included in the assessment. This analysis could benefit greatly from the input of the authorities' Conservation Officers and Archaeology advisers.</p>	<p>Further assessment on a site's impact on heritage assets to be provided by internal Conservation Officers, where relevant.</p>

<p>Heritage Assets: Assessing Suitability</p>	<p>Historic England</p>		<p>We welcome the reference to potential impacts on landscape and heritage features as part of the assessment of suitability. We are also pleased to note that both constraints and opportunities will be considered, such as the potential for regeneration. There may be situations in which the reuse and refurbishment of a heritage asset could form the centre piece of a regeneration project (e.g. Healings Mill). Equally, we would expect any sites that are likely to have unacceptable adverse impacts on the historic environment not to be taken forward.</p>	<p>Noted. No change to methodology.</p>
<p>Heritage Assets: Heritage Impact Assessment</p>	<p>Historic England</p>		<p>We recognise that, as stated at paragraph 1.2 of the methodology, the HELAA does not determine whether a site should be allocated. This makes it particularly important that potential heritage impacts (both positive and negative), including impacts on setting, are considered as part of the subsequent process of developing the Local Plan. We recommend Heritage Impact</p>	<p>Noted. No change to methodology.</p>

			<p>Assessment (HIA) of all potential site allocations as a step between the HELAA and the selection of site allocations for inclusion in the plan and drafting of associated policies. HIA should also recommend measures for mitigation and enhancement to be incorporated into the plan as policy criteria. This work can be carried out in-house by heritage specialists, or by consultants. Other South West local authorities who are undertaking or have recently undertaken this work include Teignbridge, East Devon, BCP Council and Exeter City Council. Historic England's published guidance, including a 5-step process for proportionate HIA in the context of Local Plans, can be found in The Historic Environment and Site Allocations in Local Plans.</p>	
Design and character assessments	David Lock (Nick Freer) for Hallam Land Management		In seeking for higher density development, the NPPF also states that significant uplifts in density may be inappropriate if it results in built development that would be wholly	The comments are noted, and separate urban capacity studies have been undertaken for Cheltenham Borough, Gloucester City and Tewkesbury

			<p>out of character with the existing area. The spatial strategy within the SLP will need to make effective use of land within urban areas to deliver housing, however, the capacity of sites will need to be informed by character analysis and a biodiversity net gain strategy. The HELAA maps show a limited number of sites that are available within the urban area and the availability and capacity will require careful assessment. These type of sites often cannot accommodate the required levels of infrastructure, affordable housing and community benefits in the same way that greenfield sites can.</p>	<p>town.</p> <p>The densities for the HELAA have been reviewed to reflect updated Government guidance on densities and have been set out in a separate Topic Paper.</p>
Green Belt review	David Lock (Nick Freer) for Hallam Land Management		<p>The Joint Core Strategy (JCS) Green Belt Assessment (September 2011) was prepared as part of the Joint Core Strategy evidence base. This assessment is clearly out-of-date as it was prepared 13 years ago, considers the Green Belt boundaries before there was green belt release through the JCS, and refers to previous planning policy guidance in</p>	<p>The Green Belt is being reviewed as part of the SLP evidence base.</p>

			PPG2. Given that housing needs should be met in full across the three authority areas, the time frame for the Plan, and the strategic cross-boundary nature of the Green Belt designation, we consider the SLP will need to be supported by a Green Belt review and consider Green Belt releases of land for housing. Any Green Belt review will need to take full account of existing and emerging development proposals as well as planned infrastructure investment when considering how different parts of the Green Belt perform against the NPPF criteria.	
Strategic Flood Risk Assessment	David Lock (Nick Freer) for Hallam Land Management		The latest available data should be utilised where practicable, for example the M5 Junction 10 improvements scheme demonstrates up to date flooding evidence within the locality.	The latest available evidence is being used for the updated HELAA and SLP.
Employment use	Black Box Planning for Brockeridge Business Park	N / A	Settlement relationship for employment suitability.	Methodology has been updated. Figure 3 Exclusion Category has been updated and states: "A site's relationship to an existing

				<p><i>settlement is linked to sustainability considerations including reliance on private vehicles, access to facilities and services, community cohesion and recognising the value and varied functions of rural areas. It is considered less likely that more isolated sites, poorly related to settlements will be selected for allocation in the SLP process. However, some sites which, on the face of it, may be not so well located to established settlements could still have a chance of selection for allocation depending on the chosen spatial strategy, for example sites in transport corridors, clustered with other potential sites or suited for employment uses. Therefore, this is not an exclusion criteria at this stage. Available information and evidence will be collated in the HELAA. The iterative HELAA will also interface with updated SLP employment</i></p>
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				<i>land review (ELR) evidence that is anticipated to cover greenfield sites as well as established employment sites.</i>
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Appendix 3: Responses made to the SLP winter 2023 / 24 public consultation and SLP response

This Appendix details responses made to the SLP winter 2023 / 24 public consultation raising matters relating to the published October 2023 HELAA Sites Information & Methodology and sets out the SLP response to these.

HELAA Criteria	Consultee	Site	Consultation feedback	Council response
Site Yield	Black Box Planning Ltd (Henry Clegg) on behalf of Waddeton Park Ltd	Land at Glenfall Way, Charlton Kings, Cheltenham	Indicative yield identified is 42 dwellings. However “adopting a landscape led approach to a high quality self-build development, the yield is more realistically in order of 6 dwellings.”	The methodology is being updated with higher densities, not lower, in accordance with government guidance.
Site Access	Boyer	Land off Badgeworth Road	<p>SLP state: Via Badgeworth Road to be confirmed by Highways technical assessments.</p> <p>Boyer state: The Site could be accessed from the west along Badgeworth Road or towards the north east along N Rd W, near to the adjacent Reddings Community Centre. Vehicular access is currently proposed from North Road West with an additional pedestrian and emergency access on Badgeworth Road. The Site is</p>	Site information has been reviewed.

			also situated approximately 700 metres from a roundabout junction with the A40, which in turn provides immediate connectivity to Junction 11 of the M5.	
Site Yield	Boyer	Land off Badgeworth Road	<p>SLP site yield conclusion is 87. Boyer state site yield can achieve 100-120.</p> <p>Boyer agree with the SLP indicative housing density of 30 dwellings per hectare.</p>	The methodology has been updated with higher densities.
Principal Urban Boundary location and Landscape corridor at Badgeworth Road	Boyer	Land off Badgeworth Road	<p>SLP state: The site is within the Green Belt; however the role of the green belt will be reviewed as part of the evidence update of the SLP. Potentially suitable for housing.</p> <p>Boyer state: Due to the Site's location adjacent to the Principal Urban Boundary and to the south of the commercial uses at Corinthian Park a more detailed Green Belt analysis at site level should be undertaken as there is merit for the Site being removed from the Green Belt. Within close proximity to the Site and to the</p>	The Green Belt is being reviewed as part of the SLP evidence base, and the site conclusions will be updated accordingly.

		<p>south of the Site within the larger Green Belt cell SE10 is residential development along The Reddings and parts of Branch Road. In both instances, Badgeworth Road forming a physical barrier to development to the countryside to the west.</p> <p>... It is considered that as part of the SLP Review an updated Green Belt assessment should be undertaken and in accordance with paragraph 143 of the NPPF when defining Green Belt boundaries the plan should define boundaries clearly, using physical features that are readily recognisably and likely to be permanent. In this case Badgeworth Road is the physical barrier that would give a defensible limit of the Green Belt whilst allowing the Joint Authorities to allocate additional land to fulfil the housing requirement for the plan period. Furthermore, as shown within the accompanying Concept Masterplan (please refer to the</p>	
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			<p>Vision Document) the proposed scheme has been designed to incorporate a landscape corridor along its western boundary along with public open space in the north-western concern.</p> <p>Collectively these aspects will enhance existing vegetation in this part of the site to provide suitable mitigation from view further afield.</p>	
Distance from Listed Building land at Badgeworth Road	Evans Jones Ltd, on behalf of VRL Applications Ltd	Land at Badgeworth Road, Cheltenham (Ref: S049b	<p>The 2023 HELAA site assessment incorrectly states that the site is within 250 metres of a Grade I, II or Grade II* listed building. As can be seen in the extract from Historic England website below, the nearest listed buildings are located to the east of the site on Hatherley Lane with the nearest listed building over 450m away from the eastern boundary. Furthermore, there is no intervisibility between the site and these listed buildings.</p>	Site information updated following amendments to HELAA methodology.
Suitability for Employment land at Badgeworth	Evans Jones Ltd, on behalf of VRL	Land at Badgeworth Road, Cheltenham (Ref: S049b	<p>Is it unclear why the previous HELAA assessment found the site 'not developable' for employment purposes when the site was found</p>	Site information has been reviewed.

Road	Applications Ltd		to be 'potentially developable' for housing.	
Suitability for Development land at Badgeworth Road	Evans Jones Ltd, on behalf of VRL Applications Ltd	Land at Badgeworth Road, Cheltenham (Ref: S049b	The previous HELAA assessment (December 2023) found no physical constraints that potentially could impact the development of the site and deemed the site 'available' for development and deliverable within 5 years. The current assessment went on to find the site 'potentially suitable' for employment but then concluded that the site was 'unachievable'. This does not make sense based on the draft HELAA methodology. Even on the basis that the green belt currently represents an external factor which inhibits the development of the site, it is considered that the site should still be classed as 'potentially achievable' for employment purposes.	Site information has been reviewed.

<p>Site Location land at Badgeworth Road</p>	<p>Evans Jones Ltd, on behalf of VRL Applicatio ns Ltd</p>	<p>Land at Badgeworth Road, Cheltenham (Ref: S049b</p>	<p>Further to the suitability of the site for employment use, it is noted that the HELAA assessment states that the site is not within the built-up area of Cheltenham. Whilst that is the case, it is located on the edge of Cheltenham and is certainly not isolated. Moreover, it is heavily influenced by existing built development. Notably, the southern site boundary lies adjacent to the busy A40, with a large car dealership and major transport hub opposite.</p> <p>The site is in close proximity to the A7 West Cheltenham strategic site as allocated through the JCS. This is now known as the 'Golden Valley Development'. This allocates 'approximately 45 hectares of B-class led employment land to be focussed upon a cyber security hub and other high technology and high 'Gross Value Added' generating development and ancillary employment uses'. Whilst this is fully supported, it is important to point out that the JCS</p>	<p>Site information has been reviewed.</p>
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			plan period only runs to 2031 and there will be an ongoing need to allocate further employment land going forward to sufficiently meet future employment needs.	
AONB land west of Dowdeswell Park	Properno mics (Simon Ward)	Land west of Dowdeswell Park, London Road, Charlton Kings	It is an error to say that the site includes part of the adjacent "Mineral Safeguarding Area for Sand and Gravel". Compared to the Title Plan (see separate attachment), the safeguarded area (shaded with the tan colour in the following plan) is to the west of the site boundary.	Site information has been reviewed.
Flood Risk	David Lock (Nick Freer) for Hallam Land Management	Land off Stokes Road, Bishops Cleeve	Support flood risk approach. The proportion of land that falls within Flood zone 3 is very small in the context of the scale of the site but that the site also offers very substantial opportunities for addressing, beneficially, flood risk but also to deliver wider benefits as part of any development.	No change to methodology.

Green Belt	Zesta Planning for Gloucestershire Airport	Land at Gloucestershire Airport	Support the Green Belt approach in the methodology. Potential mitigation approaches to site issues identified.	No change to methodology.
HELAA & Call for Sites Initiative	Highnam Parish Council		Highnam has grown at a faster rate than the majority of other communities in the Borough so should not be required to take any appreciable additional numbers. It was always understood that proper town and country planning looked at future needs, trends and visions rather than taking an opportunistic approach to site allocation for development as appears to be the case now. It is our considered opinion that this whole part of the exercise should not have been undertaken at this stage but left until the broad strategic framework for future development had been completed at which point general localities for future development could be properly identified and assessed irrespective as to whether	The HELAA is a government requirement at this stage of the SLP. No change to methodology.

			individual sites had been previously put forward or not.	
Loss of productive farmland and biodiversity	Highnam Parish Council	HIG009 – Land south of A40 straddling Highnam and Churcham	One of the three options put forward for a new 4,000 house settlement. We were greatly surprised and extremely disappointed that this option had been put forward for consideration especially given its firm rejection by the Forest of Dean District Council (FoDDC) as recently as January 2021. We can do little better than attach the Six Parish Council Communications Group Report on the Local Plan Preferred Option which Highnam helped prepare. Circumstances have not changed, and we would strongly urge that this option be dropped in its entirety for all the reasons eloquently set out in the Report. We would hope also, as part of its statutory Duty to Collaborate, that the Borough will closely work with its FoDDC colleagues to better understand why this proposal was not taken forward.	Options will be evaluated at later stages of the SLP.

HELAA site	Highnam Parish Council	HIG010: Land to west of Highnam	<p>This includes land already the subject of the recently approved in outline at planning appeal so should be omitted from this assessment. With regard to the remainder of the field to the west of the Lassington Reach sites, we remain extremely concerned about the prospect of further opportunistic and unconnected planning proposals coming forward with potential for additional inappropriate road accesses on to the B4215 road. The land to the south of the B4215 currently forms the long established and well patronised Rodway Hill Golf Club. It has been laid out with undulating contours, judicious landscape planting, and forms an important leisure facility and wildlife haven. It should be protected against development and retained in its current use.</p>	<p>Land which has been approved but not yet built is still considered in the HELAA assessment as circumstances may change.</p> <p>No change to methodology. The site has been assessed against the HELAA methodology.</p>
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HELAA site	Highnam Parish Council	HIG011	This open farmland has no discrete means of access for development, lies in established open farmland, and has no intrinsic merit for alternative use development.	Site information has been reviewed.
HELAA site	Highnam Parish Council	HIG006, 007 and 013	These sites were speculatively put forward by a development promoter called Terra Strategic over 6 years ago. They were very strongly opposed at the time by local residents following presentation at a Public Meeting in the village. These sites straddle Lassington Wood, an important wildlife, leisure and amenity facility much enjoyed by residents. These sites are all totally unsuitable for any form of development, indeed HIG006 lies on the crest of a prominent hill and landscape feature, and HIG013 largely comprises steeply sloping, unstable land. We were concerned that these sites were included as we have heard nothing further from the land promoter for many years and were dismayed to learn	Site information has been reviewed.

			<p>that the initial assessment of these sites rated them as potentially suitable for development This calls into question the competence of those making these assessments or demonstrates that no on site detailed analysis of their suitability has been undertaken.</p>	
HELAA site	General Public (Chloe Smart)	HIG010A – West of Highnam	<p>Rodway Hill Golf Course has been included within the above parcel of land. The site is an operational golf course, which offers both membership and pay and play options. There are currently 402 members and over 30,000 rounds of golf played at the site every year. The site also includes a driving range and tourist eco pods which are a popular draw to the site and the surrounding area.</p> <p>On that basis, the site is not a suitable preferred option for residential development and would be met by strong opposition from those who value the facility and the local community.</p>	The site has been evaluated against the HELAA methodology.

HELAA sites	Avison Young (Charlotte Taylor Drake) for Hallam Land Management	Land north of Old Gloucester Road, NW Cheltenham	Concept opportunities schemes provided for land identified as BOD009, BOD010, BOD011 and BOD012. Agree with the conclusion of the site assessments for each site, which set out that this land is potentially suitable for housing and could be delivered in the next 5-10 years. These sites are an opportunity to deliver growth that aligns with infrastructure investment.	No changes to methodology.
Flood Risk	David Lock (Nick Freer) for Hallam Land Management	N / A	Flood zone 3 (page 10 and para 3.22): the precautionary approach is understood and Hallam notes that sites with parts affected by Flood Zone 3 will not be discounted (pending a more detailed consideration through the SFRA during stage 2 of the HELAA) – rather that those parts of the site that are in Flood Zone 3 will be excluded from the gross site area at this stage of the HELAA. Hallam supports this approach.	No changes to methodology.

<p>Estimating Development Potential</p>	<p>David Lock (Nick Freer) for Hallam Land Management</p>	<p>Land to the north of Stoke Road, Bishops Cleeve (BIS012).</p>	<p>Hallam welcomes the approach to the assessment of site capacity including, in particular, reliance upon evidence from promoters of sites and urban design principles in the first instance – and failing that, default density assumptions. Hallam would make the additional observation that, where there is limited or no evidence of capacity from promoters or from other primary evidence sources, then this might suggest a lack of confidence or commitment to delivery and hence impinge upon judgments of availability and achievability. Hallam has submitted preliminary master planning and capacity evidence for land to the north of Stoke Road, Bishops Cleeve (BIS012).</p>	<p>No changes to methodology.</p>
<p>Assessing Suitability</p>	<p>David Lock (Nick Freer) for Hallam Land Management</p>		<p>Hallam notes the suitability classification set out in Figure 6 but has some concerns particularly in relation to the classification of “potentially suitable sites”. In essence this appears to be a very broad category which results in</p>	<p>The proximity to an existing settlement boundary is a consideration. The emerging development strategy will determine the extent to which settlement boundaries will be extended to accommodate additional growth. For the purposes of the HELAA and in line with the</p>

		<p>very few sites being considered “suitable”. The concern relates to the lack of distinction in the definition between different types of policy designation. It appears that a site that may be located adjacent but outside a settlement boundary (BIS012 for example), notwithstanding that settlement boundary being derived in an out of date plan, and such a site being suitable in all other regards, would be considered of equal merit to a site carrying no such benefits and being impacted upon by more substantive policy constraints. Hallam advocates that sites that are in other respects suitable for development, but are located adjacent to settlement boundaries should, by definition, be defined as suitable rather than potentially suitable. It will be for the plan making process to determine whether such sites should be allocated for development.</p>	<p>methodology, sites that are not within the settlement boundary are assessed as potentially suitable as they are still subject to the settlement boundary policy constraint.</p>
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HELAA site	David Lock (Nick Freer) for Hallam Land Management	Site BIS012 Land off Stoke Rd, Bishops Cleeve	<p>Site yield conclusion: Hallam confirms that the vast majority of the site is available for built development alongside delivering significant benefits in terms of green infrastructure, a restored river corridor and substantial BNG benefits. Significant work has been undertaken which affirms the lack of general constraints to development and to the design process. There is therefore a high degree of confidence, or evidence, to support estimates of capacity in the site. Hallam note the application by the Council of default densities but consider that a sufficient evidence base exists to update the assessment of capacity to some 900-1200 new homes and to update the assessment of achievability given the body of evidence to support this site.</p> <p>Relationship to Existing Settlement of Bishops Cleeve: Whilst the description of the status of the site</p>	<p>The methodology has been updated with higher densities.</p> <p>The partial description was for brevity and has been expanded to better reflect its status.</p>
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			<p>as “Adjacent to the settlement of Bishops Cleeve” is of course accurate, it is only a very partial description. The site immediately abuts sites allocated for development in the Tewkesbury Local Plan, and/or with planning permission and in an advanced stage of implementation. Such sites include:</p> <ul style="list-style-type: none"> * Cleavelands Bishops Cleeve (10/01216/OUT); and • the Spitfire Homes scheme, also to the north of Stoke Road (18/00249/OUT) to the North The latter proposal was allocated for employment development in the Adopted Tewkesbury Local Plan but secured permission for a mixed use development, on appeal (APP/G1630/W/19/3229681). <p>The conclusions of the Inspector hearing that appeal are relevant to site BIS012: “Bishop’s Cleeve is a suitable location for development of this scale [up to 215 dwellings, up to 2.24 ha of employment use</p>	<p>Site information has been reviewed.</p>
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			<p>and up to 0.2ha of retail uses] and the appeal site is a suitable location, in strategic terms, for providing development at Bishop's Cleeve. Moreover, the appeal site is accessible to services and facilities by a choice of non-car modes of transport." Agricultural Land Classification: the Site assessment spreadsheet indicates that site BIS012 is of Grade 3 quality agricultural land. Desktop records show that the former Ministry of Agriculture, Fisheries and Food (MAFF) previously carried out a semi-detailed ALC survey around Bishop's Cleeve. MAFF's assessment of Bishop's Cleeve included over half of the BIS012 site (47ha of the available 75ha). MAFF's assessment found that the site is predominantly subgrade 3b with only a very small element of subgrade 3a along the northern boundary. MAFF's assessment demonstrates that the site is not the best and most versatile agricultural Land and should be</p>	<p>Site information has been reviewed.</p> <p>No change to methodology.</p>
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			<p>considered favourably for development over sites that are of more agricultural merit.</p> <p>Site Access: The Council's December 2023 HELAA Spreadsheet notes that access for the site would be obtained from Stoke Road. For completeness the assessment may also take into account a second means of access – through the Spitfire Homes' development – enhancing further connectivity with Bishops Cleeve. Hallam Land has the right to provide a vehicular access (including pedestrian and cycle connection) directly into the movement network of the Spitfire development (18/00249/OUT and 21/00214/APP). Access by non-car modes is also available through the Cleavelands development.</p> <p>Overall Constraints: the spreadsheet notes that "land within Flood Zone 3 has been removed from the overall</p>	<p>Site information has been reviewed.</p> <p>No change to methodology.</p>
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			<p>developable area and the remaining land will have to be mitigated for flooding". Hallam supports this approach and would add that not only is the proportion of land that falls within Flood zone 3 very small in the context of the scale of the site but that the site also offers very substantial opportunities for addressing, beneficially, flood risk but also to deliver wider benefits as part of any development.</p> <p>Achievability: the site is notated by the Councils as "potentially suitable" and "potentially achievable". For the reasons set out above is considered entirely rather than potentially suitable for housing/employment development</p>	Site information has been reviewed.
All HELAA criteria checks	Ridge & Partners for Bloor Homes	ASHC038 - Land to the south of Wheatpieces, Tewkesbury	Development concept scheme provided. As identified as part of the original submissions for the draft JLP, the subject site remains 'suitable', immediately 'available' and 'achievable', demonstrated by	No change to methodology.

			part of the planning permission (application reference: 22/00834/OUT). If allocated this site could deliver an additional 370 to the already consented 250 new homes, combined providing approximately 610 new homes within a timeframe of 10 years.	
Access and impact of the Strategic Road Network (SRA)	National Highways	<p>S161 – Land north of Bamfurlong Lane. Cheltenham. (18.7Ha) Proposed Use: Mixed Use</p> <p>06NEW17 – Land East of Winnycroft Lane and North of Green Farm. Gloucester City Council. Land Area: Unspecified Proposed Use: Mixed Use</p>	This site appears to share a boundary with the M5 motorway. Access will need to be provided via the local road network. If this site was to proceed, consideration of noise and visual intrusion of the M5 is required. We have recent examples of residential development experiencing noise issues because of having been located too close to the SRN. We encourage and endorse planning policy being proactive in avoiding this issue to ensure the wellbeing of future residents. The National Highways soft estate must not be relied upon to contribute any mitigation to the site as the management of our estate may	No change to methodology. Strategic site has been assessed under ref STAV019 and 06NEW17 has secured planning permission. Potential accesses have been assessed from the local road network.

			<p>from time to time affect any real or perceived benefits. Our soft estate management includes cyclical maintenance and periodic renewal, either of which could involve significant reduction in any available screening benefit until new planting is well established. Consideration in delivery would also need to be given to potential implications on SRN drainage, boundary treatment and Geotech.</p>	
<p>Site Access, Noise and Visual Intrusion</p>	<p>National Highways</p>	<p>Tewkesbury Council. Various Sites: North003 – Land at Northway Mill ASHC037 – Tewkesbury Garden Town TEWK001 – Land adjacent to Alderman Knight School, Ashchurch Road, Tewkesbury ASHC022A – Land at Walton Cardiff, Tewkesbury ASHC022B – Land</p>	<p>Within Tewkesbury Borough there are a substantial number of sites that straddle the M5 corridor that are considered ‘potentially deliverable’ on the map. A high proportion of these share a common boundary with the M5. In all cases, access will need to be provided from the local road network as opposed to the M5</p> <p>For sites alongside the SRN consideration of noise and visual intrusion is required. We have recent examples of residential development experiencing noise</p>	<p>Noted. No change to methodology as access was considered from the local road network as opposed to the M5.</p> <p>Noted. No change to methodology. Planning policy for later stages of the SLP. Site mitigation against noise and visual intrusion will be dealt with at both planning policy and development</p>

		<p>at Walton Cardiff, Tewkesbury ASHC030 - Land at Rudgeway Farm, Tredington, Tewkesbury, GL20 7BN - Land West of the M5 ASHC026 - Land at Fiddington House Farm, Tredington, Tewkesbury, GL20 7BP ELM011 - Land North West of Junction 10 of M5 at Hardwicke, GL51 9TN UCK010 - Land to the North East of Junction 10 of M5, Uckington BOD001 - Boddington BOD014 - Land at Butler's Court BOD011 - Land north and south of Old Gloucester</p>	<p>issues because of having been located too close to the SRN. We encourage and endorse planning policy being proactive in avoiding this issue to ensure the wellbeing of future residents. The National Highways soft estate must not be relied upon to contribute any mitigation to the site as the management of our estate may from time to time affect any real or perceived benefits. Our soft estate management includes cyclical maintenance and periodic renewal, either of which could involve significant reduction in any available screening benefit until new planting is well established. Consideration in delivery would also need to be given to potential implications on SRN drainage, boundary treatment and Geotech. With the HELAA identifying a number of sites adjacent, or facing the SRN, classed as 'potentially deliverable' it is vital that a cumulative transport modelling evidence base is developed closely</p>	<p>management stages. Infrastructure provision is considered.</p> <p>Transport modelling evidence is being developed. We will continue to work closely with National Highways.</p>
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		<p>Road, Cheltenham, GL51 OTG STAV019 - Land South of the B4063, Bamfurlong CHU024 - Land at White House Farm BRO004 - Land north of Brockworth (Parcel 1)</p> <p>Several sites that share a boundary with the A46, the majority of which appear to fall within ASHC037 - Tewkesbury Garden Town.</p>	<p>in consultation with National Highways to inform any identification of allocations. Clustering of potential housing and economic sites offers potential benefits to residents and businesses of high connectivity and improves the viability of sustainable travel. However, the SRN is a critical national asset for strategic transport and therefore site allocations should be considered in this wider context. We welcome close working to ensure that any transport evidence base is undertaken to meet our requirements and to avoid abortive work.</p>	
New Settlements	Up Hatherley Parish Council	Ashchurch	Further developments of new settlements such as Ashchurch can, if well planned, provide a significant contribution to the 35,000 units of accommodation required.	Noted. No change to methodology.

Highnam	Tewkesbury Town Regeneration Partnership	HIG010 HIG011 HIG006, 007 and 013	<p>The current network of services to the existing community (gas, electricity, domestic water, surface and foul water drainage, telephonies, broadband etc.) are already at full capacity. Service outages, leaks and general breakdowns are a regular occurrence. This creates serious constraints on additional development, the provision of which would take this beyond breaking point. Surface water flowing off the new housing development at Lassington Reach is already creating downstream flooding problems through Highnam Court and beyond through Minsterworth to the River Severn</p> <p>HIG010: Land to west of Highnam (remainder of the field) and Rodway Golf Club are both totally unsuitable areas for development for each and every reason stated above.</p>	<p>No change to methodology. Infrastructure provision is also considered elsewhere within the evidence base, including within the Infrastructure Delivery Plan, working in partnership with Infrastructure providers.</p> <p>A Strategic Flood Risk Assessment is being produced which will holistically evaluate flood risk across the SLP area.</p> <p>Site information has been reviewed.</p>
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			<p>HIG011: This open farmland has no discrete means of access for development, lies in established open farmland, and has no intrinsic merit for alternative use development.</p> <p>HIG006, 007 and 013: These sites straddle Lassington Wood, an important wildlife, leisure and amenity facility much enjoyed by residents. These sites are all totally unsuitable for any form of development, indeed HIG006 lies on the crest of a prominent hill and landscape feature, and HIG013 largely comprises steeply sloping, unstable land.</p>	
Suitability for development	Marrons, instructed on behalf of Rosconn Strategic Land	Land to the West of Evesham Road, Bishops Cleeve, Cheltenham, Gloucestershire (Site reference GOT010)	We note that the above has concluded at this stage that GOT010 is not developable for housing given that it has been deemed “unrelated to an existing settlement.” There is no other commentary within the emerging evidence base that elaborates further or provides any more substantive justification for this	Site information has been reviewed.

		<p>conclusion. It is correct that GOT010 does not physically adjoin the built up area of an established settlement, but it is incorrect to suggest that it is “unrelated” to an existing settlement. GOT010 lies within close proximity to a number of key services and facilities associated with Bishops Cleeve to which it is accessible by sustainable means of transport.</p> <p>The Gotherington Cross Garage abuts the site’s eastern boundary, which has the benefit of an associated convenience store. GOT010 is also within walking distance of new Cleavelands/Greenacres local centre with retail and employment units together with a community building. Also within walking distance, lie sports pitches and play areas associated with that development. Bishops Cleeve centre is under 2km walking/cycling distance, which comprises a range of local</p>	<p>The site has also been reviewed in the context of a larger strategic opportunity.</p> <p>Site information has been reviewed.</p>
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		<p>facilities such as supermarkets, a bank, post office, cafés and restaurants.</p> <p>To the point that GOT010 is physically unrelated to the any existing settlement, we would point out that it adjoins GOT009 to the south, which has been assessed as “potentially suitable” for housing within the draft site assessments. Should GOT009 come forward, GOT010 would represent a logical continuation of it and there would be no physical detachment from the settlement.</p> <p>We would further note that the decision to, at this stage, screen out GOT10 due to its relationship to the settlement is inconsistent with the draft HELAA methodology, which only suggests screening out sites on this basis “where they would not form part of an extension to other suitably located sites considered in the HELAA.” As set out above, GOT010 is an extension of GOT009 to the south,</p>	
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			<p>the latter of which has been assessed as “potentially suitable” for housing. As such, the draft HELAA Assessment is clear that GOT010 should not have been excluded at this initial stage.</p>	
<p>Site suitability:</p>	<p>Turley, on behalf of Tata Steel</p>	<p>Kyderminster Road, Winchcombe Site ref: WIN009</p>	<p>The site at Kyderminster Road is considered in the HELAA Draft Site Assessment (Ref: WIN009), with the overall assessment concluding that the site is ‘not developable’. The assessment’s conclusions on suitability state that: ‘The site is within the Cotswolds AONB. Not suitable for housing or employment uses.’ Aside from its location with the AONB, no other constraints to development are identified. What is not clear from the assessment of WIN009 is that this conclusion results from the overall approach to AONB sites set out in the HELAA methodology. Figure 3 of the HELAA methodology explains that, as a precautionary measure, all sites within the AONB designation will be assessed as</p>	<p>Site information has been reviewed.</p> <p>The emerging strategy will determine if there is a requirement for sites in the Cotswolds National Landscape to be</p>

		<p>unsuitable for development. The HELAA assessment itself confirms (within the 'Overcome Constraint' section) that whilst the site is within the AONB landscape sensitivity will be assessed as part of the updated SLP evidence base. Until this is completed, it is considered premature to conclude that the site is 'undevelopable'</p> <p>Whilst our client's site is located within the AONB, it is not in an area that has previously been identified as being of 'High' landscape sensitivity. Our client has previously demonstrated that site's overall contribution to the AONB is low and residential development at the site will not have a significant impact on the AONB. This has been established by the Landscape and Visual Impact Assessment which accompanied the most recent planning application and as confirmed by the updated Landscape and Visual Technical Note which accompanies this</p>	<p>taken forward to help meet the overall need.</p> <p>Site information has been reviewed.</p>
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		<p>submission and is discussed further below. This position was accepted by the Council's Landscape Officer, who raised no objection to the application, and the Planning Officer, who recommended the application for approval.</p> <p>As discussed within the accompanying Landscape and Visual Technical Note, there have been a number of significant changes to the local context since the previous planning application at the site. This includes the development of new allotments and community orchard to the north-west of the site (application ref: 22/00786/FUL). The development includes the erection of sheds, greenhouses and / or polytunnels on individual plots, the erection of a community geodome greenhouse, a field shelter and a storage unit. The allotments are accessed from Mountview Drive via a new track which passes through</p>	
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			<p>the new cemetery to the north, which also incorporates an area of car parking. This has changed the use and appearance of the adjoining land, giving the site a reduced physical and visual connection with the open countryside and a greater sense of connection and association with the developed areas of Winchcombe to the east. Construction has also commenced on a new a residential development of 100 dwellings (application ref: 21/00496/FUL) on land to the south of the site. A belt of mature conifers which formerly lined the site's northern boundary has been removed and the new housing area can be seen from within the proposed Kyderminster Road site. This development has enlarged the extent of containment of the proposed site by built development. Collectively, the changes to the local context around the site have resulted in a stronger enclosure of the site by</p>	
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			development and greater urban influences on the character of the site. This has also weakened the visual and physical connections of the site with the surrounding countryside.	
Site suitability of Walton Cardiff, Tewkesbury	Black Box Planning on behalf of Redrow	ASHC043 – Land at Walton Cardiff	The site is assessed as being 'available', 'potentially suitable' and 'potentially achievable' for housing. With reference to the HELAA methodology, 'potentially suitable' is suggested as the site offering a potentially suitable location for development but is subject to a policy designation which inhibits development for the defined use. Whilst there are constraints in relation to the site as identified above, these are certainly not constraints which significantly inhibit development. With reference to the PPG, the site provides a suitable location for development when considered against the relevant constraints and their potential to be mitigated. Therefore, the site should be	<p>The proximity to an existing settlement boundary is a consideration. The emerging development strategy will determine the extent to which settlement boundaries will be extended to accommodate additional growth. For the purposes of the HELAA and in line with the methodology, sites that are not within the settlement boundary are assessed as potentially suitable as they are still subject to the settlement boundary policy constraint.</p> <p>Changes to the HELAA methodology have been made to align with NPPF requirements. This includes safeguarding locally designated sites of importance for biodiversity (including Local Wildlife sites).</p>

		<p>assessed as being 'suitable'.</p> <p>The site is also assessed as being 'potentially achievable'. With reference to the HELAA methodology, there is a reasonable prospect that the site will be developed for the defined use within the next 15 years and should therefore be assessed as being 'achievable'. Overall, the site should be assessed as being 'developable', with reference to the HELAA methodology</p>	<p>This site contains a designated local wildlife site – this is considered to significantly inhibit development, and the assessment has been updated accordingly.</p>
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Appendix 4: New Sites submitted during and since the SLP Public Consultation (winter 2023 / 24)

Local Authority	Site Name
Cheltenham	The Briars (formerly known as Flowerdale Farm)
Cheltenham	Hardwick Campus, Uni of Glos
Cheltenham	Cavendish House
Tewkesbury	Land to the east of Fiddington (C)
Tewkesbury	Land to the east of Fiddington (B)
Tewkesbury	Land to the east of Fiddington (A)
Tewkesbury	Land off Badgeworth Lane, Shurdington
Tewkesbury	Land at Ashville Business Park off Down Hatherley Lane
Tewkesbury	Land to the south of Wheatpieces, Tewkesbury
Tewkesbury	Carrant Gardens, Tewkesbury
Tewkesbury	Smow Farm, Tewkesbury
Tewkesbury	Land west of A435 and south of Stoke Orchard Road, Bishops Cleeve
Tewkesbury	Land at Myrtle cottage, Gretton
Tewkesbury	Ascot house Farm, Old Gloucester Road, Hayden
Tewkesbury	Land to the south of Gretton Road, Gotherington,
Tewkesbury	Land between Court Drive and School Road, Apperley
Tewkesbury	Church Lane Farm, Elmstone, Hardwicke
Tewkesbury	The Briars (formerly known as Flowerdale Farm).
Tewkesbury	Land at Hempsted Lane, Gloucester
Tewkesbury	Boddington Villages
Tewkesbury	North of Badgeworth Lane, Shurdington
Tewkesbury	Cold Pool Lane, Badgeworth
Tewkesbury	North West of Ledbury Road, Maisemore
Tewkesbury	West of Cheltenham
Tewkesbury	Land south of Lawn Road, Ashleworth
Tewkesbury	Land to the north of Cheltenham Road East, Churchdown
Tewkesbury	Fortitude, Birdlip Hill
Tewkesbury	Land at Dawn Nurseries, Shurdington Road, Badgeworth
Tewkesbury	Land at Poultry Houses, Evesham Road, Littleworth, Greet
Tewkesbury	Land south of Badgeworth Lane, Shurdington
Gloucester	Land at Hempsted Lane, Gloucester
Gloucester	Lloyds building, Gloucester

Gloucester	Site beside 161 Bristol Road, Gloucester
Gloucester	Site opposite 143 Bristol Road, Gloucester
Gloucester	Old BT unit, Bristol Road, Gloucester
Gloucester	Parkend, Western Road, Gloucester

Appendix 5: Changes made to the HELAA Methodology

This Appendix outlines document changes made by the SLP planning officers, and not in direct response to stakeholder feedback on the methodology. *Italics / underlined* text refers to text which has either been added and ~~strikethrough~~ for deletions (and referred to as such in the table below).

Officer Change Made	Justification
Disclaimer added at start of report.	Clarifies the purpose of HELAA and its limitations.
Tewkesbury Borough Council changed to <u>Tewkesbury Council</u> throughout the report.	Name changed throughout to reflect Council name change.
Para 1.1 second instance of HELAA in full removed.	Already defined earlier in Para 1.1
Para 1.1 an identified need changed to <u>identified needs</u>	Grammatical change.
Para 1.1 added para to read: <u>Unlike some other key evidence documents which set out the need for new development, the HELAA identifies the potential capacity for delivering that development.</u>	Clarifies purpose and intent of the HELAA.
Para 1.2 added text to read: <u>Importantly, the HELAA does not allocate sites.</u>	Clarifies the HELAA does not allocate sites.
Para 1.3 tense change from will be to <u>has been</u> .	Reflects that the HELAA methodology has and is being used as part of the HELAA.
Para 1.3 added text to read: <u>which identifies future land supply which is suitable, available and achievable for housing and economic development uses over the SLP plan period.</u>	Clarifies purpose if the HELAA.
Para 2.1 specific paragraph reference to the NPPF deleted	In light of NPPF being revised in December 2024.

<p>Para 3.1 added text to read:</p> <p><u>and is a joint approach between the SLP authorities.</u></p>	<p>Clarifies the HELAA is a joint methodology.</p>
<p>New Para 3.2 added to read:</p> <p><u>This HELAA methodology updates and brings together previous separate approaches to assessing the availability of land for housing and economic uses. Housing land availability was previously assessed through the Strategic Assessments of Land Availability Assessment (SALA), and employment monitoring reports assessed the availability of employment land. A new HELAA, based on the updated methodology set out in this report, will inform the SLP.</u></p>	<p>Clarifies the HELAA is a joint and updated methodology.</p>
<p>Previous Para 3.4 (now para 3.5) Removed <i>individual LPAs</i> and amended para to read:</p> <p><u>there will be discretion during the HELAA preparation to deviate from this if appropriate and justified in particular instances.</u></p>	<p>Provides clarity on HELAA.</p>
<p>Previous Para 3.4 (now Para 3.5) Removed <i>deviate from</i> and amended text to read:</p> <p><u>HELAA may assess smaller sites if there is good reason.</u></p>	<p>Provides clarity on HELAA.</p>
<p>Previous Para 3.6 (now Para 3.7) Amended para to now read:</p> <p><u>At an early stage in preparing or revising a HELAA, the SLP authorities undertook a "call for sites" exercise. The purpose of this was to provide an opportunity for landowners and interested parties to submit a site to the SLP authorities for consideration as a potential allocation in the SLP. There have been further opportunities, including during 2025, to submit sites. There may be further opportunities outside the specific call for sites periods for sites to be considered in a</u></p>	<p>Clarifies that further sites may be submitted outside the specific call for sites periods.</p> <p>Grammatical change.</p>

<p><u>further HELAA update.</u></p> <p>Changed tense from <i>will be</i> to <i>has been</i></p>	
<p>Previous Para 3.8 (now Para 3.9) Added text to read:</p> <p><u>Appendix 1 contains further information on HELAA Assessment Criteria.</u></p>	<p>Introduces Appendix 1 as links to this section of the methodology.</p>
<p>Figure 3: added <u>potential</u> to title. Now reads: <u>Potential Exclusion Category</u></p>	<p>Change reflects that in most instances it would require exclusion, however if evidence supports inclusion, part of the site may be included.</p>
<p>Figure 3: Flood Zone 3 Added commentary to read:</p> <p><u>Sites which are within Flood Zone 3 and classed as vulnerable to climate change will be assessed as unsuitable for residential use.</u></p> <p>Added text to read:</p> <p><u>e.g. Green Infrastructure</u></p>	<p>Added to reflect national guidance and to provide example of a water compatible use for clarity.</p>
<p>Figure 3: Relationship to an Existing Settlement. Replaced Para to read:</p> <p><u>A site's relationship to an existing settlement is linked to sustainability considerations including reliance on private vehicles, access to facilities and services, community cohesion and recognising the value and varied functions of rural areas. It is considered less likely that more isolated sites, poorly related to settlements will be selected for allocation in the SLP process. However, some sites which, on the face of it, may be not so well located to established settlements could still have a chance of selection for allocation depending on the chosen spatial strategy, for example sites in transport corridors, clustered with other potential sites or more suitable for employment</u></p>	<p>Added for clarity and to respond to public consultation comments.</p>

<p><u>uses. Therefore, this is not an exclusion criteria at this stage.</u></p> <p><u>Available information and evidence will be collated in the HELAA. The iterative HELAA will also interface with updated SLP employment land review (ELR) evidence that is anticipated to cover greenfield sites as well as established employment sites.</u></p> <p><u>The HELAA will also consider if larger isolated sites can present the opportunity to provide community facilities and infrastructure as part of their potential development to enable future sustainability.</u></p>	
<p>Figure 3: Scheduled Monuments Added text to read:</p> <p><u>Unless they are part of an ongoing regeneration scheme or a site that has previously secured planning permission. If part of the site falls within a designated site, the net area will be calculated accordingly.</u></p>	<p>Added for clarity as impact on Scheduled Monument may already have been assessed via the development management process or through corporate strategies. Additionally full mitigation may be able to be secured through careful design and buffering on larger sites that contain a designation within, subject to further assessment.</p>
<p>Figure 3: Ancient Woodlands Added text to read:</p> <p><u>If part of the site falls within a designated site, the net area will be calculated accordingly.</u></p>	<p>Added for clarity as TPO's on site may be able to be mitigated against with careful design and appropriate buffering, subject to further assessment.</p>

<p>Figure 3: New Heading added:</p> <p><u>Locally designated sites of importance for biodiversity (Local Wildlife Sites / Reserves)</u></p> <p>New commentary added:</p> <p><u>The NPPF requires LPAs to identify, map and safeguard components of local wildlife-rich habitats. Accordingly, locally designated sites of importance for biodiversity such as Local Wildlife Sites / Reserves will be considered unsuitable for development unless any harm can be adequately mitigated.</u></p>	<p>Added to ensure consistency with the NPPF in protecting locally designated sites of importance for biodiversity throughout the SLP area.</p>
<p>Figure 3: Cotswold’s Area of Outstanding Natural Beauty (National Landscape)</p> <p>Removed para that read:</p> <p>Deleted row.</p>	<p>Removed for clarity as Cotswolds National Landscape should not be an exclusion criterion. The requirement for any sites within the Cotswolds National Landscape to come forward should be by informed by the emerging development strategy and any potential sites assessed against the Landscape Character and Sensitivity study undertaken as part of the SLP evidence.</p>
<p>Figure 3: Grade II Registered Parks or Gardens</p> <p>Amended category to read:</p> <p><u>Grade I, II*, and II Registered Parks or Gardens</u></p> <p>Amended exclusion criteria to read:</p> <p><u>Registered Parks and Gardens are heritage assets designated by Historic England and are</u></p>	<p>Added to ensure terminology is correct and for clarity to ensure consistency with national guidance and to account for sites already lawfully within other uses within the designation.</p>

<p><u>protected by the NPPF. Accordingly, land within a Grade I, II* or II Registered Park and Garden will be considered unsuitable at this stage, unless it is substantially already in lawful use.</u></p>	
<p>Figure 3: Local Green space Amended category to read:</p> <p><u>Protected Green Space (Locally Important Open Space, Local Green Space / Public Green Space / Allotments)</u></p> <p>Amended exclusion criteria to add:</p> <p><u>unless forming part of a strategic scheme.</u></p>	<p>Amended to ensure that this refers to all types of protected green space within the SLP authorities' area. Also, for clarity as a strategic scheme could incorporate local green space on site within the wider design.</p>
<p>Previous Para 3.9 (replaced with new Para 3.10) to read:</p> <p><u>Given that there were relatively few sites that met the exclusion criteria during stage 1, all submitted sites that met the size thresholds were provided with a full assessment.</u></p>	<p>To provide clarity that all sites meeting the size thresholds were fully assessed in stage 2 of the HELAA.</p>
<p>Previous Para 3.10 (now Para 3.11) Past tense changed to current tense.</p>	<p>Grammatical change.</p>
<p>Previous Para 3.11 (now Para 3.12) Past tense changed to current tense.</p>	<p>Grammatical change.</p>
<p>Previous Para 3.12 (now Para 3.13) Added text to read:</p> <p><u>(in no priority order)</u></p> <p>Change bullet points to numbering and added new bullet points to read:</p> <ul style="list-style-type: none"> vii. <u>Accessible green space;</u> viii. <u>Existing policy summary;</u> ix. <u>Indicative housing density, and net area after infrastructure / policy constraints have been factored in;</u> x. <u>Initial assessment of whether the site is suitable for a</u> 	<p>Added to reflect the HELAA methodology and to make clear that all factors are given equal consideration.</p>

<p>Previous Para 3.16 (now Para 3.17) added:</p> <p><u>or suggested densities are considered inappropriate for the site...</u></p> <p><u>These density categories align with the National Model Design Code (NMDC) (2021) categories, which include 'Urban Neighbourhoods' 60-120 dph, and 'Suburbs' 40-60 dph. It is intended they are developed in more detail when the Design Code for the SLP areas is published (scheduled for 2026)</u></p> <ul style="list-style-type: none"> • <u>Cheltenham – 60-120 dwellings per hectare (dph) for sites within the main built up area (examples include, Pittville, Lansdown, St Pauls, Fairview, St Peters, All Saints) and 40-60 dph for areas outside of this (examples include, Hatherley, Leckhampton & Warden Hill, Benhall, Charlton Kings, Hesters Way, Oakley);</u> • <u>Gloucester City - 60-120 dph is used for the main built up area (examples include, Westgate, Kingsholm & Wotton, Matson, Robinswood and White City and Barton & Tredworth), and 40-60 dph for areas outside of this; and,</u> • <u>Tewkesbury – 60-120 dph for areas within 400m of a railway station, and 40-60 dph for areas outside of this. In very limited locations 20-40dph might be considered.</u> 	<p>The density assumptions were revised to reflect the NPPF (2024) Chapter 'Achieving appropriate densities', specifically Para 130: "Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site."</p>
<p>New Para 3.19 added to read:</p> <p><u>For the HELAA calculations the lower end of the density range is generally used (e.g. 40 dph for rural areas in Tewkesbury). However, applications at the higher end of the density range are encouraged in the appropriate site context.</u></p>	<p>To demonstrate a realistic approach to potential density has been taken through the HELAA.</p>

<p>Figure 5: Availability Classification table Amended 'Availability Unknown' first bullet point to read:</p> <ul style="list-style-type: none"> <i>The landowner has not expressed an interest in promoting the site <u>and availability</u> remains unknown following investigations.</i> 	<p>Added for clarity.</p>
<p>Previous Para 3.21 (now 3.24) Changed bullet points to numbering.</p>	<p>To make the document clearer.</p>
<p>Previous Para 3.23 (now Para 3.26) Added text to read:</p> <p><i><u>will be based on planning related constraints</u></i></p>	<p>Added for clarity.</p>
<p>Previous Para 3.30 deleted which read: <i>The HELAA will put sites into 'abeyance' where there is no evidence of recent promotion by the landowner(s). To be 'held in abeyance' means that the site is excluded from further assessment at the time of publishing the HELAA but will remain on a database of known potential sites. These sites will be reconsidered when the HELAA is next updated, as circumstances may have altered. A Red, Amber, Green (RAG) rating will be used within the HELAAs.</i></p>	<p>Due to GDPR and to ensure that the HELAA adequately demonstrates available land, it is not considered appropriate to hold sites in 'abeyance'. Instead, they will be assessed on the information available at the time and previous promoter's landowners given the opportunity to submit up to date information.</p>
<p>Previous Para 3.32 (now Para 3.34)</p> <p>Amended last sentence of paragraph to read: <i>Details of any windfall allowance will be provided within the HELAA <u>Councils Housing Monitoring reports.</u></i></p>	<p>Added for clarity.</p>
<p>Previous Para 3.31 (now Para 3.33) Added <i><u>subsequently</u></i> into the sentence.</p>	<p>Added for clarity.</p>

<p>Figure 8: Deliverable and developable classification table</p> <p>Deleted text in the fourth box which read:</p> <p>(sites will be put in 'abeyance')</p>	<p>To clarify that sites will no longer be held in abeyance. Instead, they will be assessed on the information available at the time and previous promoter's landowners given the opportunity to submit up to date information.</p>
<p>New Para 3.35 Added which reads:</p> <p><u><i>In Cheltenham Borough, windfall sites are considered from 1st April 2017 onwards. Within Gloucester City, windfalls are considered from 1st April 2014. In Tewkesbury Borough, windfalls are considered from 1st April 2003. This approach is consistent with each Councils respective housing monitoring data.</i></u></p>	<p>Added to clarify what dates windfall sites are considered from.</p>
<p>Amended previous Para 3.33 (now Para 3.36) to read:</p> <p><i>Based on <u>an</u> assessment of sites and broad locations through Stages 1 to 3, an indicative trajectory will be prepared setting out how much housing and amount of economic floorspace that can be provided against housing and economic need, and at what point in the future.</i></p>	<p>Grammatical change.</p>
<p>Previous Para 3.34 (now Para 3.37)</p> <p>Amended paragraph to now read:</p> <p><u><i>The results of the HELAA site assessments and various constraints that form part of the site assessment process are available to view as an interactive map and associated table which will include:</i></u></p>	<p>To make clear how the outputs of the site assessments will be published and to make the document clearer.</p>

<p>Deleted first bullet point that read:</p> <ul style="list-style-type: none"> • “A list of all sites or broad locations considered, cross-referenced to their locations on maps; <p>Changed all bullet points to numbering.</p>	
<p>Para 4.1</p> <p>Past tense changed to current tense.</p> <p>Amended paragraph to read:</p> <p><u>The assessment of sites will be kept up to date. There has already been updates to the assessments to take account for changes and there will be a further update to the assessments to take account for further changes. This may include:</u></p> <p>Changed bullet points to numbering.</p>	<p>Grammatical change.</p> <p>To clarify that the HELAA is an iterative process.</p> <p>To make the document clearer.</p>
<p>Appendix 1: Area within Flood Zone 3 (% of site)</p> <p>Amended heading to read:</p> <p><u>Area within Flood Zone <u>2 or 3</u> (% of site / ha)</u></p>	<p>Added to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix 1: Physical Constraints</p> <p>Amended heading to read:</p> <p><u>Geographic, topographic and highways constraints</u></p> <p>Amended commentary to read:</p> <p><u>Physical restrictions to yield for example could be any physical infrastructure or constraints that may limit the ability to develop the site e.g. steep slope, proximity to airport or motorway (noise).</u></p>	<p>Amended to distinguish this section from the Utilities Infrastructure criteria that is set out later in Appendix 1.</p>

<p>Appendix 1: Within JCS Adopted Green Belt (Yes/No)</p> <p>Amended heading to read:</p> <p><u>Within designated Green Belt boundary (overlap % of site / ha</u></p> <p>Amended the commentary to read:</p> <p><u>Is the site within the Green Belt boundary? As per the LUC 2025 study which examined Green Belt boundaries based on the latest PPG Green Belts (February 2025) Green Belt - GOV.UK.</u></p>	<p>Deleted and amended to reflect that the sites are assessed against the latest available Green Belt guidance.</p>
<p>Appendix 1: Includes previously developed land (PDL) (Yes/No)</p> <p>Amended criteria to read:</p> <p><u>(Yes/No/Partial)</u></p>	<p>Amended to show the HELAA provides a full assessment of a sites PDL status.</p>
<p>Appendix 1: Included on Part 1 of the Brownfield Register (Yes/No)</p> <p>Amended heading to read:</p> <p><u>Brownfield Register site?</u></p>	<p>Altered 'criteria' heading to better reflect contents.</p>
<p>Appendix 1: The site is within a Neighbourhood Plan designated area or part of Reg 14 and/or Reg 16</p> <p>Amended heading to read:</p> <p><u>Neighbourhood Plan Information</u></p> <p>Amended commentary to read:</p> <p><u>Is the site within a Neighbourhood Plan area and / or 'Made' Neighbourhood Plan?</u></p>	<p>Altered 'criteria' heading and commentary to better reflect contents.</p>
<p>Appendix 1: Flood Zone 2, 3a and 3b</p> <p>Deleted row.</p>	<p>Deleted as flood zone 2 reference is now included within the first row of the table.</p>

<p>Appendix 1: Surface Water Flood Zone (Yes/No)</p> <p>Amended heading to read:</p> <p><u>Surface Water Flood Zone (High/Medium/Low)</u></p> <p>Deleted text within comments that read:</p> <p><u>As at December 2023, the data available to the three LPAs varies.</u></p>	<p>Amended as the data is now reported back through the GIS and is consistent across the SLP authorities.</p>
<p>Appendix 1: Groundwater flood zone (Yes/no or % of site)</p> <p>Deleted row.</p>	<p>Amended as Groundwater flooding will be assessed through the SFRA.</p>
<p>Appendix 1: Agricultural Land Grade classification (ALC)</p> <p>Amended heading to read:</p> <p><u>Agricultural Land Grade classification (overlap % of site / ha in each category)</u></p> <p>Replaced commentary to read:</p> <p><u>The DEFRA agricultural land classification is used to determine the category of agricultural land. Higher quality agricultural land will not be used unless there is a shortage of sites.</u></p>	<p>Altered to use correct terminology and to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix 1: Cotswold's National Landscape (within Yes/No)</p> <p>Amended criteria to read:</p> <p><u>Cotswolds National Landscape (overlap % of site / ha)</u></p> <p>Amended commentary to delete paragraph that read:</p> <p><u>The December 2023 draft HELAA includes references to the Cotswolds AONB.</u></p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>

<p>Appendix 1: Ancient Woodland (Yes/No)</p> <p>Criteria amended to read:</p> <p><u>Ancient Woodland (overlap % of site / ha)</u></p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix 1: Tree Protection Orders (Yes/No)</p> <p>Altered heading to read:</p> <p><u>Tree Preservation Orders (number / area on site and proximity within 20m)</u></p>	<p>Altered to use correct terminology and to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix 1: Veteran Trees (Yes/No)</p> <p>Deleted row.</p>	<p>Deleted as veteran trees are covered and assessed under TPO criteria above.</p>
<p>Appendix 1: Locally Important Open Space (Yes/No)</p> <p>Deleted row.</p>	<p>Deleted as Locally Important Open Space is now included within Public Open Spaces criteria towards the end of the table.</p>
<p>Appendix 1: SLA (Special Landscape Area) (Yes/No)</p> <p>Deleted row.</p>	<p>Deleted as incorporated into the Landscape Sensitivity criteria below.</p>
<p>Appendix 1: Landscape Sensitivity</p> <p>Added new paragraph within commentary that reads:</p> <p><u>Does the site currently lie within a Special Landscape Area (SLA) as defined in the respective Local Plan?</u></p>	<p>Included to clarify that SLA's are considered in the HELAA.</p>
<p>Appendix 1: Sites of Special Scientific Interest (SSSI) (Yes/No)</p> <p>Heading amended to read:</p> <p><u>Sites of Special Scientific Interest (SSSI) (overlap % of site / ha and proximity within 1km)</u></p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>

<p>Appendix 1: Proximity to European sites (Special Area of Conservation, Special Protection Area and/or Ramsar site)</p> <p>Heading amended to read:</p> <p><u>Proximity to European sites (Special Area of Conservation, Special Protection Area and/or Ramsar site) (overlap % of site / ha and proximity within 1km)</u></p> <p>Deleted paragraph that read: A distance for the assessment has not been specified.</p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix 1: Proximity to National Nature Reserves (Yes/No)</p> <p>Heading amended to read:</p> <p><u>Proximity to National Nature Reserves (overlap % of site / ha and proximity within 1km)</u></p> <p>Commentary amended to read:</p> <p><u>Does the site lie within proximity to any National Nature Reserves?</u></p> <p>Deleted paragraph that read: A distance for the assessment has not been specified.</p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix 1: Proximity to Local Wildlife Sites (Yes/No)</p> <p>Heading amended to read:</p> <p><u>Local Wildlife Sites /Reserves (overlap % of site / ha)</u></p> <p>Deleted paragraph that read: A distance for the assessment has not been specified.</p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>

<p>Appendix 1: Wildlife Trust Reserves Deleted row</p>	<p>Deleted as Wildlife Reserves are now included in the row above.</p>
<p>Appendix 1 Nature Recovery Network Deleted row.</p>	<p>Deleted to reflect that this has now been superseded by the Gloucestershire Local Nature Recovery Strategy as data is sourced from the Gloucestershire Natural Capital Mapping Project: GLNP Natural Capital (gcerdata.com)</p>
<p>Appendix 1 Added new heading: <u>Gloucestershire Local Nature Recovery Strategy</u> Added new commentary to read: <u>Identification of opportunities for investment in the enhancement of natural capital in the SLP area. Data is sourced from the Gloucestershire Local Nature Recovery Strategy.</u> <u>https://www.gloucestershirenature.org.uk/local-nature-recovery-strategy</u></p>	<p>Added to reflect the updated Gloucestershire Local Nature Recovery Strategy and source of data.</p>
<p>Appendix 1: Regionally Important Geological Sites (RIGS) (Yes/No) Amended heading to read: <u>Regionally Important Geological Sites (RIGS) (overlap % of site / ha)</u></p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix 1: Potentially Regionally Important Geological Sites (Yes/No) Deleted row.</p>	<p>Deleted as up-to-date information is not available.</p>
<p>Appendix 1 Proximity to Local Geological Sites (Yes/No) Deleted row.</p>	<p>Deleted as covered by RIGS criteria above.</p>

<p>Appendix 1 'Potential Locally Important Geological Sites' (Yes/No)</p> <p>Deleted row.</p>	<p>Deleted as up-to-date information is not available.</p>
<p>Appendix 1: Added new heading:</p> <p><u>Green Infrastructure</u></p> <p>Added new commentary to read:</p> <p><u>Does the site contain green infrastructure?</u></p>	<p>Included to indicate that Green Infrastructure on site is assessed as part of the HELAA.</p>
<p>Appendix 1: Proximity to Grade I, II or Grade II* listed buildings (Within 500m) (Yes/No)</p> <p>Amended heading to read:</p> <p><u>Proximity to Grade I, II or Grade II* listed buildings (number on site and proximity within 20m)</u></p> <p>Altered commentary to read:</p> <p><i>Identifies the number and name of any Grade I, II or II* listed buildings <u>within or in proximity of</u> the site.</i></p> <p>Deleted commentary that read:</p> <p><i>Due to the varying characteristics of each LPA, different distances have been used for the assessment.</i></p> <p><i>Tewkesbury BC – assets recorded within 500 metres of the site.</i></p> <p><i>Cheltenham BC – assets recorded within 250 metres of the site.</i></p> <p><i>Gloucester City Council – assets recorded based on officer judgement due to the extensive number of heritage assets within the city.</i></p>	<p>Amended to better reflect local character and conditions of the listed buildings and site context and how they are identified / assessed.</p>

<p>Appendix I: Proximity to Scheduled Monuments (Yes/No).</p> <p>Amended heading to read:</p> <p><u>Proximity to Scheduled Monuments (Number on site and proximity within 50m)</u></p> <p>Deleted paragraph that read:</p> <p>A distance for the assessment has not been specified.</p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix I: Proximity to Grade I or Grade II* Registered Park or Garden (Yes/No):</p> <p>Amended heading to read:</p> <p><u>Proximity to Grade I, II or Grade II* Registered Park or Garden (Overlap % on site / ha)</u></p> <p>Amended commentary to read:</p> <p>Does the site lie in proximity to <u>within</u> any Grade I, II or Grade II* Registered Park or Garden?</p> <p>Deleted paragraph that read:</p> <p>A distance for the assessment has not been specified.</p> <p>Added new commentary to read:</p> <p><u>Historic England recommend that all Registered Parks and Gardens are excluded from the HELAA, as such how the development affects the intrinsic setting of the registered parks and gardens will be assessed on a site-by-site basis.</u></p>	<p>Altered to clarify both the terminology and the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix I: Proximity to local Historic Park or Gardens (Yes/No)</p> <p>Deleted row.</p>	<p>Deleted as covered by the Registered Park or Garden criteria above.</p>

<p>Appendix 1, Proximity to locally listed heritage assets (Yes/No)</p> <p>Deleted row.</p>	<p>Deleted as information is not currently available through the HELAA mapping.</p>
<p>Appendix 1: Proximity to archaeological sites (Yes/No)</p> <p>Amended heading to read:</p> <p><u>Archaeological Sites</u></p> <p>Amended commentary to read:</p> <p><u>Does the site contain any archaeological deposits?</u></p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix 1: Proximity to conservation areas (within / distance in metres)</p> <p>Amended heading to read:</p> <p><u>Proximity to conservation areas (Overlap % on site / ha and proximity within 50m)</u></p> <p>Deleted paragraph that read:</p> <p>A distance for the assessment has not been specified.</p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix 1: Proximity to battlefields (Yes/No)</p> <p>Amended heading to read:</p> <p><u>Proximity to battlefields (Overlap % on site / ha and proximity within 50m)</u></p> <p>Amended commentary to read:</p> <p><u>Does the site lie within / in proximity to any Battlefields</u></p> <p>Deleted paragraph that read:</p> <p>A distance for the assessment has not been</p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>

<i>specified.</i>	
Appendix 1: Historic Landscape Character Areas Deleted row.	Deleted as information is not currently available through the HELAA mapping and landscape sensitivity will be assessed through the emerging landscape character assessment and sensitivity analysis.
Appendix 1: Ecology Deleted row.	Deleted as information is not currently available through the HELAA mapping and ecology is addressed elsewhere in the table and will also be assessed through the Habitats Assessment to inform the SLP.
Appendix 1: Within an Air Quality Management Area (Yes/No) Amended heading to read: <u><i>Within an Air Quality Management Area?</i></u> Amended commentary to read: <u><i>Does the site lie within an Air Quality Management Area?</i></u>	Altered to clarify the HELAA approach to assessing the sites through the methodology.
Appendix 1: Contamination (% of site) Amended heading to read: <u><i>Contamination (Yes/No)</i></u>	Altered to clarify the HELAA approach to assessing the sites through the methodology.

<p>Appendix 1: Utilities infrastructure (e.g. electricity pylons, oil/ gas pipelines)</p> <p>Added commentary to read:</p> <p><u>The area impacted by oil or gas pipeline buffer zones has been calculated and then excluded from the gross area to inform the revised residential site yield.</u></p>	<p>Amended to clarify the HELAA approach to assessing the sites through the methodology and explain that the net site area will be recalculated accordingly.</p>
<p>Appendix 1: Local cycle path or Sustrans routes (Yes/No)</p> <p>Amended heading to read:</p> <p><u>Local cycle path or Sustrans routes (proximity within 50m)</u></p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix 1: Local Recreation Routes (Yes/No)</p> <p>Deleted row.</p>	<p>Deleted as information will be picked up in other rows.</p>
<p>Appendix 1: Local Green Space (LGS) (Yes/No)</p> <p>Deleted row.</p>	<p>Deleted as Local Green Space is now included within Public Open Spaces criteria towards the end of the table.</p>
<p>Appendix 1: Accessible Green Space (Yes/No)</p> <p>Amended heading to read:</p> <p><u>Accessible Green Space</u></p> <p>Amended commentary to read:</p> <p><u>Is there defined accessible green space within proximity of the site?</u></p>	<p>Altered to clarify the HELAA approach to assessing the sites through the methodology.</p>
<p>Appendix 1: Public Open Spaces (Yes/No)</p> <p>Amended heading to read:</p> <p><u>Protected Green Space (Locally Important Open Space / Local Green Space / Public Green Space / Allotments) (Overlap % on site / ha).</u></p>	<p>Amended to refer to all types of open spaces included within the assessment and the HELAA approach to these.</p>

Amended commentary to read: <u><i>Is there protected Green Space within the site?</i></u>	
Appendix 1: Added new heading: <u><i>DfT Connectivity Score (Min/Max/Mean)</i></u> Added new commentary to read: <u><i>The DfT connectivity score indicates how well a location is connected to essential services and opportunities via various modes of transport.</i></u>	The Department for Transport have created a connectivity tool that has been incorporated into the HELAA.
Appendix 1: Inform Gloucestershire Accessibility Score Deleted row.	The DfT connectivity tool provided by the Department for Transport supersedes this information.
Appendix 1: Added new heading: <u><i>Planning Approvals</i></u> Added new commentary to read: <u><i>Land which has been approved but not yet built out is still considered as part of the HELAA.</i></u>	Added to provide clarification.
Appendix 2 Added: <i>Responses to the SLP Winter 2023/24 public consultation raising matters relating to the published October 2023 HELAA Methodology.</i>	Added to identify comments that were raised during the SLP Winter 2023/24 public consultation relating to HELAA methodology, and the SLP response to them.
Appendix 3 Added: <i>Responses to the SLP Winter 2023/24 public consultation raising matters relating to the published October 2023 HELAA Sites Information & Methodology.</i>	Added to identify comments that were raised during the SLP Winter 2023/24 public consultation relating to HELAA Sites Information & Methodology, and the SLP response to them.

Appendix 4 Added: <i>New Sites submitted during the SLP Public Consultation (winter 2023/ 24).</i>	Added to identify the new sites submitted.
Appendix 5 Added: <i>Changes Made to HELAA Methodology.</i>	Added to clarify the changes made to the HELAA methodology.