

Appendix 2 - Summary of Comments on the Draft SHLAA Methodology

Organisation/ Individual	Summary of Comments	Council's Response
The London Green Belt Council	<p>We refer the Council to Government's assurance of 'robust defence' of the Green Belt given in the Prime Minister's statement on housing to the House of Commons on 11 July 2007. This assurance has been consistently reiterated by the DCLG without qualification.</p> <p>It is hoped that the Council will interpret this message as requiring a very strict and limited implementation of any GB policy relaxations on 'adjoining settlements', with any boundary reviews undertaken in accordance with PPG2 criteria.</p> <p>The Council should also ensure that any assessment of sites gives low priority to sites in the Green Belt.</p>	Comments noted. No suggested changes to the methodology.
Natural England (Gordon Wyatt)	No comments on the draft methodology.	Noted. No changes to the methodology.
Herts & Middlesex Wildlife Trust (Carol Lodge)	<p>Suggest that bullet 1 under 'Sites to be excluded from the SHLAA' should be rephrased to read 'protected areas of recognised importance for wildlife/habitat e.g. Sites of Special Scientific Interest (SSSIs), Local Nature Reserves'.</p> <p>Similarly, bullet point 4 should read 'Ancient Woodland'.</p> <p>What will be the Council's approach regarding other sites of nature conservation importance such as County Wildlife Sites?</p>	<p>Noted. Bullet 1 of paragraph 7.17 will be amended.</p> <p>Noted. Bullet 4 of paragraph 7.17 will be amended.</p> <p>The assessment forms which have been developed for urban and Green Belt sites include the identification of physical constraints such as: SSSIs, Local Nature Reserves, Ancient Woodland, TPOs, County Wildlife Sites, other important habitat/green corridors etc.</p>
Hertfordshire Constabulary (Michael Rachlin)	No comments on the draft methodology	Noted. No changes to the methodology.
The Rambler's Association	No comments on the draft methodology. However, we are very	Comments noted. Site assessment criteria include: whether a site is an

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<p>(Phil Escritt)</p>	<p>concerned about the potential implications of the process on the countryside in St Albans District (especially the Green Belt) and the possibility that the Council's Green Spaces Strategy may identify certain green spaces as surplus to requirements and therefore possible candidates for housing development.</p> <p>As more people are crammed into the District, it will become even more important for green spaces and open countryside to be protected to the greatest possible degree. In addition, as individual sites are identified, it will also be important to analyse the impact on public rights of way and other footpaths/access arrangements.</p>	<p>important green space to be protected and whether there would be an impact (positive or negative) on rights of way and/or other public access arrangements.</p>
<p>Highfield Park Trust (John Ely)</p>	<p>I have no specific comments to make and the methodology seems fine.</p>	<p>Noted. No changes to the methodology.</p>
<p>Barker Parry Town Planning (Steven Barker)</p>	<p>With regard to Section 8 the 'sieving process', this is clearly a pre-requisite of any successful exercise but obviously there needs to be some structure and consistency to the reasons for not proceeding with a given site and your panel needs to be aware of these. Presumably the constraints also need to be weighted in some way, so clarification and amplification of the sieve would be helpful.</p> <p>The SA/SEA stages follows site selection, which is not unreasonable as this is a SHLAA and not an LDF document. It does mean, however, that marginal sites which may be sieved or saved could score higher or lower respectively in any SA/SEA. That being the case, the end product of the SHLAA needs to exceed the LDF requirements to safeguard further possible losses at the SA/SEA stage.</p>	<p>Noted. Officers are assessing every site against a standard set of assessment criteria (for urban and Green Belt sites). The first part of the assessment covers key physical and policy constraints and ends with an Officer recommendation as to whether the site should be taken forward for more detailed assessment.</p> <p>It is these completed assessment forms which will be used during the 'sieving workshop' to determine which sites will be dropped from the long list. Reasons will be provided, where sites are not to be taken forward.</p> <p>The site search will exceed the LDF requirements (i.e. we will look for more sites than necessary to meet the RSS14 housing requirements for St Albans District).</p>
<p>EDF Energy (Ian Robertson – Infrastructure Planner)</p>	<p>Para 7.28 mentions utilities as a physical constraint. This is a correct and valid point which may have cost implications, the scale of which could vary considerably.</p> <p>In the penultimate bullet point you mention cost considerations but do</p>	<p>Comments noted. The more detailed assessment of shortlisted sites will include assessment of all likely costs including necessary infrastructure and utilities.</p> <p>It would be useful to have some input from EDF Energy during the</p>

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	<p>not specifically mention 'utilities' unless you class them under 'infrastructure'. It should be noted that the cost of supplying one particular site as opposed to another could be totally different, sometimes requiring significant offsite works. The timescale for completing any works may also have an impact on choice of site.</p>	<p>second stage of the site assessment process. Officers will contact Mr Robertson to discuss how EDF can usefully become involved.</p>
<p>Smallford Residents' Association (Steve Ross)</p>	<p>It is our view that the Green Belt should not be sacrificed for any housing outlined in the previous LDF consultations. The document should include 'Green Belt' under para 7.17 – Sites to be excluded from the SHLAA.</p> <p>In paragraph 7.43, how do you assess 'sustainable'?</p> <p>In paragraph 7.45, how is community strategy defined and how will sufficient infrastructure for a development scheme be determined?</p>	<p>Government policy states that SHLAAs must include all possible housing sites, including greenfield and Green Belt sites. However, the sieving process will ensure that only 'reasonable' candidate sites for housing development will be given further detailed consideration (i.e. those sites with insurmountable physical or policy constraints will not be taken forward).</p> <p>Detailed assessment forms have been developed for assessing both urban and Green Belt sites – these include a series of assessment criteria which will enable the Council to examine the suitability, sustainability, accessibility, achievability and viability of a site for housing development.</p> <p>Reference to the Community Strategy means the Sustainable Community Strategy for St Albans District, which was adopted by the Local Strategic Partnership in the summer of 2007.</p> <p>Officers will contact utilities providers, Hertfordshire Highways, public transport companies etc, to discuss possible infrastructure needs for sites under consideration.</p>
<p>Rippon Development Services (Roger Rippon)</p>	<p>The uncertainties surrounding future housing numbers in St Albans and adjoining Districts (resulting in delays in finalising the East of England Plan) mean that it is impossible to assess with any accuracy the scale of the housing land identification task that the SHLAA will have to meet. Consequently, your decision to press ahead with the objective data gathering stages of the SHLAA on the broadest possible basis must be the correct and responsible approach and is supported in principle.</p>	<p>Support welcomed.</p>

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	<p>Problems will arise during the more subjective later stages of the SHLAA, until such time as the RSS is approved and the District's housing requirements are known. We therefore suggest that you do not proceed with the site sieving process or beyond until RSS14 has been finally approved by Government. The main reason is that the latter stages of site selection will be strongly influenced by the scale of development to be accommodated, particularly if a substantial amount of new housing development is to be directed to Hatfield or Hemel Hempstead.</p> <p>Your approach to considering possible change of use of all poor and average employment sites is supported.</p> <p>PPS3 and the SHLAA good practice guidance express the importance of stakeholder participation. It is therefore essential that the Council ensures that all parties have proper involvement in the site selection process <u>before</u> Council Members take decisions on the SHLAA document. Establishing a working group/consultation panel should be essential and sufficient time must be built into the timetable for its effective involvement.</p> <p>I consider that the timescale proposed for production of the SHLAA is unrealistic, bearing in mind the likely number of sites to be examined, the need for stakeholder involvement and the fact that there is no clear timetable for final approval of RSS14.</p> <p>In other respects, the suggested methodology appears to be sound and a reasonable basis for carrying out the SHLAA.</p>	<p>It is agreed that the latter stages of the SHLAA will be influenced by the District's housing requirements in RSS14. However, it is imperative that work progresses with completion of the Council's evidence base if we are to meet the key milestones for preparation of the Core Strategy, Site Allocations and Development Control Policies DPDs. At present, it is anticipated that RSS14 will be published in its final form in May 2008. Whilst the site sieving process will need to be undertaken before then, there will still be time to reflect on the finalised housing figures in RSS14 before the draft SHLAA is put together.</p> <p>Support welcomed.</p> <p>Agreed. Those organisations who have expressed an interest in having further involvement in the SHLAA process will be contacted shortly to explore ways in which the Council can best utilise their professional expertise.</p> <p>The SHLAA timetable was drawn up without any clear idea of how many sites would need to be assessed. Once the final number of sites is known, it may be necessary to revisit the timetable and make the necessary adjustments.</p> <p>Support welcomed.</p>
Highways Agency (Lee Talbot)	No comments on the methodology.	Noted. No changes to the methodology.
Pegasus Planning Group	Martin Grant Homes and Hamilton Homes endorses much of the draft	Support welcomed. Those organisations who have expressed an

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<p>(John Holden)</p>	<p>methodology statement and support adoption of a partnership approach. They would wish to become involved at key stages in the SHLAA process, particularly when assessing the deliverability and developability of individual sites or broad locations.</p> <p>Our clients consider that the Council should establish a consultation panel or workshop sessions so that local expertise and knowledge is used fully to test the deliverability/ developability of sites.</p> <p>We concur with paragraph 7.12 that amendments to the existing Green Belt boundary will need to be considered. We also support the observation in paragraph 3.5 that it will be necessary for the LDF to provide a policy framework to 2026.</p> <p>We agree with the approach in paragraph 7.23 that the preliminary findings of the Green Belt boundary study undertaken in 2003 should be revisited.</p> <p>In paragraph 7.24, the proposed approach to assessing potential supply of housing sites fails to disguise the fact that, in essence, the perceived potential supply from such source represents a windfall allowance. We object to this approach as it contradicts the guidance in PPS3.</p> <p>The approach advocated in paragraph 7.51 is supported and we would suggest that our clients should be involved in the process to utilise their local knowledge/expertise and ensure that the assessment is realistic, reflecting market conditions.</p> <p>We object to paragraph 7.58 as it appears to place some reliance on a windfall allowance to justify the amount of land actually to be identified in the Site Allocations DPD, contrary to Policy H1 of RSS14 Proposed Changes which says that district allocations should be minimum targets to be achieved. It is suggested that the LDF must identify sufficient deliverable/developable locations in the Site Allocations DPD to ensure that the housing provision in Policy H1 of RSS14 is achieved. It is our view that any windfall sites that meet the tests of Policy H1 are deemed</p>	<p>interest in having further involvement in the SHLAA process will be contacted shortly to explore ways in which the Council can best utilise their professional expertise.</p> <p>Agreed. See comments above.</p> <p>Support welcomed.</p> <p>Support welcomed.</p> <p>This approach follows recent guidance on SHLAAs that has been issued by the Planning Advisory Service (PAS). Whilst we are hoping to receive clarification on the approach advocated, Officers do not think it would be appropriate to propose any different approach at present.</p> <p>Support welcomed. We will be contacting interested parties to discuss their further involvement in the SHLAA process shortly.</p> <p>The Council intends to identify as many potential housing sites as possible, rather than simply looking to find sufficient sites to meet the District's housing requirements as set out in Policy H1 of RSS14. Nevertheless, Government guidance still says that a judgement may need to be taken as to whether there are exceptional local circumstances which justifies some reliance on a windfall allowance for certain sources of housing site, once all possible opportunities for housing development have been explored.</p>
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	<p>to be additional to the housing completions arising from locations identified in the Site Allocations DPD.</p>	
<p>Harpenden Town Council (John Bagshaw)</p>	<p>We are disappointed that PPS3 says windfalls should not be included in the first 10 years of land supply, unless there are genuine local circumstances that prevent specific sites being identified. Can this be robustly challenged?</p> <p>With the proposed substantial growth at Hemel Hempstead and Welwyn Garden City/Hatfield and the likelihood that some of this growth will need to be located in St Albans District, we need to resist any further take of Green Belt land locally.</p> <p>We would not wish forward planning to go beyond 2026, which could put present Green Belt land at even greater risk, when sustainability (Sustainable Communities) issues are more clearly understood. This is already a present concern.</p> <p>We are passionate that all available brownfield land now available, and any coming on stream, should be utilised first to meet housing demand.</p> <p>The Town Council considers that Green Belt must only be used as a very last resort. Land swaps of Green Belt land are really not acceptable. You need Green Belt land around you where you can see it and appreciate it, and where it serves as a buffer against coalescence of villages and towns, not over the horizon as newly re-designated new areas of Green Belt..</p> <p>Whilst we do recognise the difficulties in the requirement to provide 7,200 new homes by 2021, we would support any policy decisions that can provide these, without the taking of any Green Belt land, and which also take full account of our continuing concern of sustainability.</p> <p>We wish to make it clear that we do not support and will resist any</p>	<p>PPS3 is now adopted Government policy guidance. However, as mentioned above, the Council will reserve judgement on whether there are genuine local circumstances which justify some reliance on windfall allowances, until towards the end of the SHLAA process.</p> <p>Whilst it is the Council's current policy to resist further development in the Green Belt, Central Government guidance on undertaking SHLAAs includes a requirement for Local Planning Authorities to look at <u>all</u> possible housing sites, including greenfield sites and those in the Metropolitan Green Belt.</p> <p>Central and regional Government policy dictates how far into the future LDFs (and SHLAAs) should look.</p> <p>Agreed. This will be a key strategic objective for the LDF.</p> <p>Agreed. However, the role of the SHLAA is <u>not</u> to determine which sites the Council will be allocating for future development. It is merely the assessment of all reasonable prospects for housing, against set criteria to determine their suitability, achievability and availability. Simply because a site or broad location is included in the SHLAA does <u>not</u> mean it will necessarily be allocated for housing in the Core Strategy or Site Allocations DPDs.</p> <p>Agreed. This will be the Council's aim.</p> <p>Noted. The Council received a significant number of objections to the</p>

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	<p>attempt to develop land identified in the St Albans Core Strategy DPD Issues and Options consultation document (July 2007) as Area of Search 8 (North of Harpenden), being prime Green Belt buffer between North Harpenden and the Bedfordshire boundary, important for its protection from coalescence with south Luton.</p>	<p>possible Areas of Search identified in the Core Strategy Issues & Options consultation document, particularly Nos. 1 and 8.</p>
<p>Shire Consulting (Paul Bloomfield)</p>	<p>We commend the thorough and comprehensive explanation of Government's new approach to assessing housing land availability in this document, together with an explanation of how the work will relate to similar exercises being carried out elsewhere in Hertfordshire.</p> <p>We are surprised by the suggestion that politicians might be included in a consultation panel. The benefit of a panel is in providing professional expertise as part of the assessment process, which should not be subject to political considerations.</p> <p>In paragraph 7.24, under the heading 'Land Already Used for Housing', the last 2 paragraphs suggest that the inclusion of an allowance for unidentified sites through infilling and redevelopment should not be considered 'windfall' since <i>'such an assessment will be based on proactive policy'</i>. This does not comply with Government guidance as the 'proactive policy' is not in place and the LDF is at too early a stage to put it in place. If such a policy is ultimately judged to be part of a sound DPD, it may be possible to take that view at a later review of the Assessment.</p> <p>At paragraph 7.28, tree preservation orders should be listed as policy, rather than physical constraints.</p> <p>In respect of on-site survey work, we draw your attention to the DCLG guidance which says that <i>'as a minimum, all sites identified by the desk top review should be visited.'</i></p>	<p>Support welcomed.</p> <p>Agreed. The word 'politicians' should be removed from the list of possible members of the consultation panel. Members will have the opportunity to comment on the draft SHLAA document, before it is published for stakeholder and community consultation in the summer.</p> <p>This approach follows recent guidance on SHLAAs that has been issued by the Planning Advisory Service (PAS). Whilst we are hoping to receive clarification on the approach advocated, Officers do not think it would be appropriate to propose any different approach at present. With regard to the proactive policy referred to in the guidance, it will be several years before any new policies are adopted as part of the LDF. However, Officers consider that saved policies 4 and 5 of the adopted Local Plan do already offer broad encouragement for housing development in existing residential areas and would constitute the proactive policy suggested in the guidance.</p> <p>Agreed. Tree preservation orders will be deleted from the list of examples in paragraph 7.29. It should be noted, however, that the presence of trees and vegetation on site can also be a physical constraint and will be included as such on the assessment forms.</p> <p>Agreed. All reasonable sites identified following the initial assessment stage (i.e. when sites are assessed against policy and physical constraints) will be visited.</p>

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	<p>We urge caution if commissioning consultants to undertake a Development Economics Study in respect of affordable housing. Some examples we have seen to date demonstrate the consultants' lack of understanding and expertise in the economics of development.</p> <p>Paragraph 7.56 recognises that no allowance should be made for windfall sites unless local authorities can provide robust evidence to justify it. However, the attempt at paragraphs 7.58 and 7.59 of the Methodology to justify a windfall allowance is neither robust nor does it demonstrate genuine local circumstances, as these could be claimed to apply elsewhere.</p>	<p>Noted. We will inform our colleagues in the Council's Housing department.</p> <p>As already stated above, it is the Council's intention to consider whether there are genuine local circumstances which could justify any reliance on windfall allowances, towards the end of the SHLAA process once all possible site opportunities have been explored. However, paragraphs 7.58 and 7.59 will be amended to ensure that they accurately reflect PPS3 and the Government guidance on undertaking SHLAAs.</p>
<p>The Harpenden Society (Anthony Steele)</p>	<p>The list of stakeholders includes heavy representation from developers and housebuilders. We would welcome the opportunity to be a member of any Consultation Panel to represent local residents, particularly in the sieving process, to ensure that proper consideration is given to all relevant criteria when assessing specific sites.</p> <p><u>Windfall sites</u></p> <p>Windfall sites have been a very significant source of new housing over the last few years. We consider that this source of building land is likely to continue for some time. It is only the change in stated policy about the consideration of windfall sites in the first 10 years of the planning period that has led to the threat to the Green Belt. There seems to be a conflict with Government statements and RSS14 policy LA 1, that say that the Green Belt should be preserved. We therefore urge the District Council to argue strongly for windfall sites to be included in the calculation of housing site supply for the whole of the planning period, and to include windfall sites in their calculations.</p> <p><u>Broad Locations for Housing Development</u></p> <p>Paras 7.11 and 7.12 of the methodology statement state that Government guidance suggests identifying broad locations should be at</p>	<p>Noted. We will shortly be contacting those organisations who have expressed an interest in further involvement in the SHLAA.</p> <p>Views noted. [See response to Pegasus Planning Group r.e. possible reliance on windfall allowances.]</p> <p>The Council's housing capacity work to date suggests that it will not be possible to meet the District's housing requirement as set out in Policy</p>

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	<p>a late stage in the process, and only if insufficient sites are identified in the initial assessment. We are not convinced that the case for identifying broad locations in the Green Belt has been made. Windfall sites and possible empty properties, as well as sites within the built up area need to be taken into account before considering Green Belt locations. We are also concerned that the broad locations policy will blight sites for a long period, and may also encourage developers to try to get permission in these easier to develop areas.</p> <p><u>Green Belt Criteria</u></p> <p>Para 7.28 bullet point 3 says that avoiding coalescence should be considered for Green Belt sites. Other criteria in Government policy (PPG2) should also be considered e.g – to check sprawl, to safeguard countryside, to preserve the setting of historic towns and to assist urban regeneration. The last point is another reason for considering all other options before releasing sites from the Green Belt.</p> <p><u>Sustainability</u></p> <p>We would like to see that sustainability is always a consideration in planning matters. This again supports the view that housing should, if possible, be within the current envelope of towns and villages; ensuring that transport use is minimised.</p>	<p>H1 of RSS14 without some Green Belt release. Consequently, whilst a full assessment of all possible sources of housing sites within urban areas will be undertaken (e.g. garage courts, employment sites, derelict land etc), the SHLAA must also look at potential housing sites in the Green Belt (which could be small sites constituting minor adjustments to the the Green Belt boundary or larger broad locations with housing potential). Again, it must be reiterated that the identification of a site or broad location in the SHLAA does <u>not</u> necessarily mean that it will be identified for development in any of the Development Plan Documents.</p> <p>Agreed. The assessment form that has been developed for assessing the potential of sites in the Green Belt for housing includes reference to these other PPG2 criteria.</p> <p>Agreed. Sustainability criteria are also included in the assessment forms.</p>
Hallam Land Management	<p>The draft methodology diverges from the DCLG SHLAA Practice Guide (July 2007). A degree of caution should therefore be taken to ensure that this assessment meets all of the criteria set out in the Practice Guide and other relevant policy documents. The methodology is particularly vague in terms of developing the appropriate criteria to assess the individual sites and in terms of the decision making process throughout. It is also vague on the various expertise which will be required to complete the SHLAA, particularly in terms of assessing issues such as the economic viability of sites.</p> <p>Planning Policy Background</p>	<p>Officers will amend the methodology to explain how the assessment forms for urban and Green Belt sites have been developed and how other expertise will be brought in to help establish the achievability or viability of sites.</p>

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	<p>Para 3.4 and 3.10 omits to recognise that the housing targets referred to are, in fact, minimum thresholds.</p> <p>Para 3.8. The methodology should make provision for the existing housing allocations in the adopted Local Plan to be interrogated to determine why they have not been implemented. These allocations should only be retained if it can be satisfactorily demonstrated that they are deliverable.</p> <p>Adopting a Partnership Approach</p> <p>Partnerships are an essential part of the SHLAA process and every effort should be made to establish a dedicated consultation panel.</p> <p>Proposed Methodology</p> <p>Para 7.3. Sites included in the SHLAA should meet all three of the tests set out in paragraph 54 of PPS 3 i.e. they should be available, suitable and achievable.</p> <p>Para 7.10. Stage 3 should consider the source of material which will be used in identifying sites: e.g. aerial photography, maps, commercial property database, National Land Use Database etc.</p> <p>Para 7.17. Caution should be taken when determining sites to be excluded. Paragraph 21 of the Practice Guide states <i>'except for more clear-cut designations such as Sites of Special Scientific Interest, the scope of the Assessment should not be narrowed down by existing policies designed to constrain development ...'</i> In this respect we are particularly anxious to draw a distinction between Scheduled Ancient Monuments and sites of archaeological interest which may be developable and the Green Spaces referred to in bullet 5 (particularly as this information has yet to be published).</p>	<p>Agreed. Reference will be added to 'minimum' targets.</p> <p>Agreed. This was always intended. The methodology will be amended at paragraph 7.20 to make this clear.</p> <p>Agreed. Interested parties are shortly to be contacted to discuss possible further involvement in the SHLAA.</p> <p>The tests in paragraph 54 of PPS3 actually refer only to the identification of specific deliverable sites to deliver housing in the first 5 years. However, the requirement for sites to be 'suitable' will be dealt with under a new section in the methodology.</p> <p>Source material is already referred to in paragraph 7.23 of the methodology document (our Stage 4).</p> <p>It is agreed that, whilst the presence of a Scheduled Ancient Monument would make a site unsuitable for development, sites of archaeological interest and Green Spaces could still have some development potential, depending on circumstances. The latter are included as physical constraints on the assessment forms and will be taken into account during the initial assessment of sites. However, given that the Green Spaces Strategy is not due for completion until May 2008, it will not be possible for decisions to be taken regarding whether to exclude particular green spaces from the SHLAA until then.</p>
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<p>Para 7.28. Bullet 2: Each site will inevitably have physical constraints although most can be accommodated within a development scheme. Constraints such as the presence of TPOs will not necessarily prohibit development.</p> <p>Bullet 6: Sites within existing built up areas should not have to demonstrate critical mass.</p> <p>Bullet 7: assessing the viability of a development will require specialist expertise.</p> <p>Para 7.32. Para 24 of the Practice Guide states '<i>as a minimum all sites identified by the desk-top review should be visited</i>' whereas the methodology proposes a less rigorous site investigation stage. The methodology is silent on who makes the decision as to whether the sites are 'reasonable candidates'.</p> <p>Para 7.39. There is no information as to how the Authority can ensure that the Sieving Process can be completed transparently and equitably and against what criteria the sites will be assessed during the sieving workshop.</p> <p>Para 7.45. The bullet points included in Para 7.45 are not sufficiently specific for this exercise. Paragraph 21 of the Practice Guidance is</p>	<p>Agreed. TPOs are included as a potential constraint in the assessment forms, but would not necessarily preclude development on all or part of a site.</p> <p>It is agreed that achieving critical mass to support new community facilities/public transport is more of an issue for sites outside existing built up areas, as urban sites tend to be in closer proximity to existing facilities and infrastructure and there is already a presumption in favour of development on previously developed land in the urban areas. In other words, whilst the issue of whether a site is large enough to achieve a critical mass to secure any community or infrastructure benefits is included in the assessment forms for both urban and Green Belt sites, we would not rule out urban sites for possible housing development, simply because they were not large. Officers consider that this is also true with regard to bullet 5 of paragraph 7.28 (i.e. the criteria assessing whether there is good accessibility and links to road/rail infrastructure and local services).</p> <p>Agreed. We will seek the specialist input of our Estates team (and will also seek help from stakeholders such as the Home Builders Federation and their members, local agents etc).</p> <p>Agreed. All reasonable candidate sites will be visited. Those organisations who have expressed interest in further involvement in the SHLAA will be invited to participate in a workshop session(s) to shortlist sites as reasonable candidates.</p> <p>See above. The criteria used during the 'sieving' workshop will be the same as those set out in the assessment forms. The draft forms will be circulated to participants in advance for their comments.</p> <p>The assessment forms for urban and Green Belt sites contain significantly more detail than set out in paragraph 7.45. Text will be</p>
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	<p>specific: the scope of the assessment should not be narrowed down by existing policies.</p> <p>Para 7.56 – 7.59. We are not satisfied that there are any genuine local circumstances which would justify the inclusion of a windfall allowance in the assessment. PPS3 sets a clear expectation that the supply of land for housing should be based upon specific sites and where necessary broad locations and this should be adhered to throughout this assessment.</p> <p>Para 8.1. As above the methodology is silent on how the criteria is agreed.</p>	<p>added to explain this (and to confirm that the assessment forms will be circulated to interested parties for comment).</p> <p>See the Council's response to Pegasus Planning Group r.e. reliance on windfall allowances.</p> <p>The assessment forms for urban and Green Belt sites contain the detailed criteria against which sites can be assessed.</p>
<p>Sport England East Region (Roy Warren)</p>	<p>Stage 4: Identifying Sites with Potential for Housing</p> <p>It is noted that the Council will take on board the findings of the Council's Green Spaces Strategy when making decisions about including open space sites which is welcomed. In Sport England's experience, SHLAAs usually identify existing or former outdoor sports facilities as potential housing sites, particularly playing fields. If existing or former outdoor sports facilities (including educational and private sites) are to be included in the assessment, Sport England would expect the Council to use the findings of the Council's 2005 Playing Pitch Strategy and Sport and Recreation Strategy, which I understand form part of the Green Spaces Strategy, to inform decisions about whether to take forward such sites as housing allocations.</p> <p>I would advise that Sport England would object to any proposal in the emerging Core Strategy or Site Allocations DPDs which allocated any existing or former outdoor sports facilities for housing development unless these strategies (or any updates to them) clearly identified a surplus of such facilities and then it could be demonstrated to our satisfaction that the sites could not be used for meeting any other outdoor sports facility deficiency. This approach would accord with the guidance in paragraphs 10-15 of PPG17. Alternatively, if there was not a surplus of facility provision, Sport England would not object in</p>	<p>Support welcomed. The Council will indeed use the findings of the Council's 2005 Playing Pitch Strategy and Sport and Recreation Strategies, to inform decisions about whether to take forward such sites as housing allocations in the Site Allocations DPD.</p> <p>Comments noted.</p>

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	<p>principle if an appropriate replacement facility provision was made through a linked site allocation in the relevant DPD. In some instances (e.g. former playing fields which may be difficult to bring back into use) a financial contribution towards local outdoor sports facility projects may be an appropriate form of replacement provision. Whichever approach is taken, this would need to be made clear in the relevant DPD.</p> <p>The Council will be aware of Sport England's role as a statutory consultee on planning applications affecting playing fields. To avoid potential objections and delays at a later date if any existing or former playing field sites are identified through the assessment and subsequently proposed as housing allocations, it is advised that discussions take place with Sport England at an early stage if any such sites are progressed by the Council as housing allocations.</p> <p>If any indoor sports facilities such as sports halls, swimming pools etc are considered as potential allocations, the same advice would apply. This is usually pertinent in relation to education sites that are proposed for disposal because sports halls and swimming pools on such sites often meet the wider community's needs if they are operated on a dual use basis. The Council's Sport and Recreation Strategy should be used for informing needs if any indoor sports facilities are considered as housing allocations.</p>	<p>Comments noted. The Council will contact Sport England if it is proposing to allocate any existing or former playing field site for housing development.</p> <p>See comments above.</p>
<p>CPRE – The Hertfordshire Society</p>	<p>The proposed consultation panel appears to be drawn predominantly from the developer sector, with limited environmental input and no apparent social input. This could result in unbalanced assessments of suitable sites, particularly during the 'sieving' process.</p> <p>(Para 7.10) We consider that all foreseeable conversions (including those resulting in less than 5 dwellings) should not be classed as windfall, which by definition is unforeseeable. Such conversions provide viable housing which, under PPS3, would be excluded from the calculations if classed as windfall. We do not see the logic of placing conversions in a land use category relating to their existing use before</p>	<p>As already mentioned, all those who have expressed an interest in further involvement in the SHLAA will be contacted shortly.</p> <p>Agreed. Foreseeable conversions (i.e. those already with planning permission and any other other known sites with potential for conversion to housing) will be included in the SHLAA. Paragraph 7.10 requires amendment to remove reference to a windfall allowance for conversions resulting in less than 5 dwellings. Placing conversions in a land use category relating to their existing use is useful for monitoring sources of housing land (e.g. it allows monitoring of changes of use</p>

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<p>conversion (eg, converted offices being counted as 'employment use').</p> <p>Para 7.10, Previously Developed Sites - First bullet point: We consider it inappropriate for 'building on garden land' to be specified here. Although such development does take place, it should not be encouraged or permitted unless it fits in with the character of the local area.</p> <p>Para 7.17 (Sites to be excluded from the SHLAA) - Empty homes are clearly immediately available as a source of housing and should not be excluded from the SHLAA. Aggregated together, these may well impact on overall figures and hence the required land take for new build.</p> <p>Para 7.17 - Similarly, conversions should not be classed as windfall where their potential can be foreseen (eg, office conversions, housing within retail development, etc).</p> <p>Para 7.54 - We do not consider it appropriate for the SHLAA to be considering 'amending planning policy' to overcome site constraints such as Green Belt, landscape character, high quality agricultural land or sites with social or community value (all scheduled as potential Policy Constraints on the Site Identification Form).</p>	<p>from employment to housing etc).</p> <p>Government guidance on SHLAAs requires local planning authorities to examine the possibility of housing development on all types of land, including garden land. Nevertheless, simply because a site is included as a possible housing site in the SHLAA does not mean that the Council will wish to identify it for such development in its Site Allocations DPD.</p> <p>Officers concur with the view of the Home Builders Federation that empty homes should not be counted for the purpose of housing land supply calculations. This is primarily because empty homes are not net additions to the overall dwelling stock and have already been counted as dwellings when originally constructed. Consequently, there would be double counting. There are also practical and definition problems associated with empty homes (e.g. how long does a home have to be empty; how many times could the same dwelling be counted; how are new dwellings that have been unoccupied for long periods handled; how is 'empty' defined?). Furthermore, in St Albans District there are no areas with high residential vacancies and very few long term vacant properties.</p> <p>The last bullet point in paragraph 7.17 requires amendment to better reflect the Council's intentions regarding assessment of conversions.</p> <p>Paragraph 42 of the Government guidance on SHLAAs states that: <i>'Where constraints have been identified, the Assessment should consider what action would be needed to remove them. Actions might include the need for investment in new infrastructure, dealing with fragmented ownership, environmental improvement, or a need to amend planning policy which is currently constraining housing development'</i>.</p>
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<p>PPML Consulting Ltd (Pravin Patel)</p>	<p>Paragraph 3.2 of the draft methodology should make paragraph 3.3 a bullet point regarding windfall sites as that is the way it is set out the DCLG guidance document.</p> <p>The first bullet point of 3.2 should be amended to add the following at the end of the sentence – ‘ and keep this topped up over time in response to market information’.</p> <p>At paragraph 4.2 add a further bullet point as follows ‘ It should aim to identify as many sites with housing potential as possible’.</p> <p>With respect to ‘windfall’ sites, no reference should be made in the methodology assessment as to any possible reliance on such sites. It is noted that at paragraph 7.58 of the draft methodology statement there is reference that the Council may need to devise specific windfall allowances. PPS3 and both guidance documents make plain that allowances from windfall sites can only be justified if ‘genuine local circumstances’ are proven. Paragraph 52 of the DCLG guidance note states that ‘ <i>Coming to an informed view on a windfall allowance means reflecting how comprehensive and intensive the survey (SHLAA) has been in identifying sites and broad locations for future growth, and the extent to which the Assessment has been informed by industry and by market intelligence</i>’. Paragraph 7.58 should be reworded accordingly and reference to ‘the significance of windfall development over recent years and inappropriateness of trying to forecast where all small housing sites will be across the District’ should be deleted.</p>	<p>Agreed. Methodology will be amended to make this clear.</p> <p>Agreed. The first bullet of paragraph 3.2 will be amended to reflect paragraph 5 of the Government guidance on SHLAAs.</p> <p>Paragraph 4.2 reflects Government guidance verbatim. However, paragraph 4.7 already confirms that the SHLAA will identify as many sites with housing potential as possible.</p> <p>See the Council’s response to Pegasus Planning Group r.e. reliance on windfall allowances. The methodology at paragraph 7.58 will, however, be amended to better reflect Government policy guidance.</p>
<p>The Harpenden Green Belt Association (Richard Thomas)</p>	<p>We urge you to:</p> <ol style="list-style-type: none"> 1) include windfall allowances in your planned sources of supply; 2) plan for no longer than the minimum period, because of the likelihood that Green Belt land will be needed over a longer period; 	<p>See the Council’s response to Pegasus Planning Group r.e. reliance on windfall allowances.</p> <p>Central and regional Government policy dictates how far into the future LDFs (and SHLAAs) should look.</p>

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	<p>3) include empty houses as a source of supply (Council Tax records will show how many there are);</p> <p>4) adopt a stated policy of utilising brownfield land first (even small sites can make a useful contribution and are often in sustainable locations);</p> <p>5) retain sustainability as the key criterion when sieving proposed land sites;</p> <p>6) release Green Belt land only as a last resort;</p> <p>7) give greater emphasis to the need for affordable housing in the District; and</p> <p>8) require developers who submit sites for your consideration to notify you of the size of their land bank in the District.</p> <p>We recognise the difficulties you are under in this process. We assure you of our support as you continue the responsible approach to planning and the Green Belt that you have shown so far.</p> <p>Other comments are as follows:</p> <p>(Para 3.2) We encourage you not to allocate specific sites to be allocated for years 11-15 of the Plan, to avoid the danger of blighting.</p> <p>(Para 7.10) You should not include foreseeable conversions as windfall, which is by definition unforeseeable.</p> <p>(Para 7.12) We support your proposal to identify broad locations earlier than the Guidance suggests.</p> <p>(Para 7.17) You should not include conversions (eg offices, housing within retail development etc) as windfall where their potential can be foreseen.</p>	<p>See response to the CPRE above r.e. empty homes.</p> <p>Agreed. This will be a key strategic objective for the LDF.</p> <p>The assessment forms include criteria for assessing the sustainability of possible sites.</p> <p>This is Council policy.</p> <p>This will be a key issue for the LDF (rather than the SHLAA).</p> <p>Concerns noted. However, this not a matter for the SHLAA.</p> <p>Support welcomed.</p> <p>Central and regional Government policy dictates how far into the future LDFs (and SHLAAs) should look.</p> <p>Agreed. Forseeable conversions will be included as housing sites (under their existing land use).</p> <p>Support welcomed.</p> <p>See comments on paragraph 7.10.</p>
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	<p>(Para 7.28) The third bullet point is too limited for considering Green Belt sites. It should be expanded to include all five purposes underlying the Green Belt (i.e. Checking urban sprawl; preventing coalescence; safeguarding the countryside from encroachment; preserving the character and setting of towns, and assisting in urban regeneration).</p> <p>We urge you not to release land from Green Belt unless you can demonstrate that it no longer fulfils all the above five purposes.</p> <p>(Para 7.54) You should not consider amending planning policy to overcome site constraints such as Green Belt, landscape character, high quality agricultural land or sites with social or community value, all specified as potential policy constraints on the Site Identification Form.</p> <p>We urge you to apply to the District for enough resource for you to be able to sanction developers who gain priority in site allocations by being over-optimistic about the speed at which their developments can be implemented.</p> <p>We also urge you to police more vigorously the kind of housing that is built on land that is approved by you, so that the District's inadequate supply of affordable housing can be increased from its current level.</p>	<p>Agreed. The assessment form that has been developed for assessing the potential of sites in the Green Belt for housing includes these other PPG2 criteria.</p> <p>Notwithstanding the Council's current policy on protection of the Green Belt, it is likely that the SHLAA will confirm the need for some Green Belt releases to meet the District's housing requirements as set out in RSS14. The SHLAA assessment forms include detailed criteria for assessing sites, which include the main purposes of defining Green Belt (as per PPG2). It is possible, however, that some land currently designated as Green Belt may never have fulfilled these purposes and the assessment of sites might conclude that there are exceptional circumstances which justify release of Green Belt land for housing development. Again, it must be reiterated that simply because a site has been included in the SHLAA as having the 'potential' for housing development, does not necessarily mean that the Council will identify it for such development in its Site Allocations DPD.</p> <p>Paragraph 42 of the Government guidance on SHLAAs states that: <i>'Where constraints have been identified, the Assessment should consider what action would be needed to remove them. Actions might include the need for investment in new infrastructure, dealing with fragmented ownership, environmental improvement, or a need to amend planning policy which is currently constraining housing development'</i>.</p> <p>Comments noted. The Council will seek expertise from local agents, the Home Builders Federation etc to determine whether developers' projected timescales for implementation of proposed schemes are realistic.</p> <p>Affordable housing provision will be a key strategic matter for the Council's Core Strategy DPD. Furthermore, the Strategic Housing Market Assessment currently being undertaken on a sub-regional basis</p>
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	<p>You already have power to do this by imposing Section 106 planning obligations on developers, and by requiring in the LDF a particular mix of dwellings.</p> <p>We strongly advise that, in your collation of proposed sites, you make a clear distinction between 'previously developed sites' and the green field/Green Belt category, perhaps going as far as inviting suggestions separately and at intervals. Furthermore, we suggest that, along with brownfield possibilities, such elements as windfall, empty houses and conversions must be factored in at this stage. We feel it is important that, before the usage of green field and Green Belt land is even mooted, there should be a full and detailed audit of the options within the district as currently shaped.</p>	<p>will provide more detailed information on housing needs in the District.</p> <p>Officers have developed two separate assessment forms for urban and Green Belt sites. Whilst the Site Allocations DPD will seek to allocate previously developed sites in urban areas before considering possible greenfield or Green Belt development, Government guidance makes it clear that SHLAAs should examine the housing potential of all types of site, whether brownfield, greenfield or Green Belt.</p> <p>See the Council's response to Pegasus Planning Group r.e. possible reliance on windfall allowances.</p> <p>See response to the CPRE r.e. empty homes.</p>
<p>Home Builders Federation (Paul Cronk)</p>	<p>The SHLAA will need to take full account of the advice produced by the DCLG in relation to 'demonstrating a 5 year supply of deliverable sites' when assessing deliverability.</p> <p>(Para 3.8) Local Plan housing allocations and outstanding planning permissions will need to be reconsidered as part of the SHLAA.</p> <p>(Para 4.4) It is not fully apparent why the SHLAA cannot be undertaken along with the same neighbouring Authorities involved in the production of the forthcoming SHMA, even though it is appreciated that the local authorities are at different stages of DPD production.</p> <p>(Para 4.5) National planning guidance cautions with regard to the involvement of consultants in relation to SHLAA and SHMA production and makes it clear that whilst they can provide important assistance in respect of certain parts of Assessments, it is inappropriate to seek to delegate most of the workload for Assessments to consultants as they are supposed to be agreed and produced by key stakeholders in order to ensure buy in and a sense of ownership amongst stakeholders within the Partnership.</p>	<p>Comments noted.</p> <p>Agreed. This is confirmed in paragraphs 7.19 and 7.20 of the methodology statement.</p> <p>All the other five local authorities (working together on the Strategic Housing Market Assessment) have already begun, or have now completed, their SHLAAs.</p> <p>Paragraph 4.5 refers to the consultants employed to carry out the SHLAAs for Dacorum, Three Rivers & Watford and also for Welwyn Hatfield. The St Albans District SHLAA is being carried out by a sole practitioner (who formerly worked for the Council), in consultation with the planning policy team. The Council also intends to seek the expertise of other internal departments and external stakeholders at appropriate stages in the SHLAA process.</p>

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	<p>(Para 4.7) It is not apparent as to what precisely is meant with regard to the identification of as many sites as possible within and around as many settlements as possible within this defined study area (where is it defined?).</p> <p>The Guidance makes it clear that the SHLAA should specifically set out which areas or categories of land are being excluded from the Assessment and on what basis. There needs to be a comprehensive and clear approach to the Assessment methodology.</p> <p>(Para 5.2) The HBF appreciates the Council's intention to include the involvement of key stakeholders including the HBF and its Members within the Partnership.</p> <p>(Para 5.3) The HBF is happy to help assist with any workshop sessions with key stakeholders to consider sites, and will seek to promote attendance at these by its membership. This is something that the HBF has undertaken elsewhere with other Authorities.</p> <p>(Para 5.6) It is stated that a draft document will be submitted to Council's Members prior to consulting key stakeholders during August/September 2008. It is very important that key stakeholders are fully involved in the Assessment prior to the submission of the document to Members, and that the whole process is open and transparent throughout. Any suggestion that it could be subject to political interference or manipulation must be avoided. It must be recognised that it will be a document produced by a Partnership rather than just by the Council on its own. Of course, it will be down to the Council to make subsequent decisions in relation to the actual designation of individual housing sites within its DPD documents.</p> <p>Any public consultation during August/September 2008 must recognise that this is the peak holiday period, and therefore allow a reasonably</p>	<p>The defined study area is described in paragraph 4.4 as the District's administrative boundary.</p> <p>Paragraph 7.17 sets out which areas of land or categories of land are to be excluded from the SHLAA. In addition, the assessment forms are divided into 2 stages, with a section at the end of Stage 1 which provides Officers with an opportunity to make preliminary conclusions as to whether there are physical or policy constraints which render a site unsuitable for further consideration as a possible housing site.</p> <p>Support welcomed.</p> <p>Support welcomed. The Council will shortly be contacting those organisations who have expressed interest in further involvement in the SHLAA process.</p> <p>Agreed. The Council envisages full involvement in the SHLAA by stakeholders, particularly during the shortlisting of sites and when collecting information on the achievability and viability of sites.</p> <p>The methodology statement will be amended to reflect the Council's thoughts on how to involve stakeholders throughout the process. In particular, reference to political involvement in paragraph 7.4 will be deleted. Members will have the opportunity to comment on the draft SHLAA, before it is published for consultation in summer 2008.</p> <p>Comments noted. Additional time will be given for responses to take account of the holiday period.</p>
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<p>long time for responses to be submitted.</p> <p>(Para 6.1) The sites that are identified to come forward will need to be separately identified between the 5, 10 and 15 year housing supply components.</p> <p>(Paras 7.10 & 7.56-7.59) With regard to the various categories of potential development sites being assessed, please see pages 13 to 15 of my attached response to the Dacorum, Watford & Three Rivers SHLAA which covers the majority of categories that you have listed. The same comments on behalf of the HBF will be applicable.</p> <p>The HBF believes that there has been a general misinterpretation of the recent guidance document produced by PAS with regard to windfalls. The HBF understands that it did not intend to somehow give the impression that general windfalls could now be counted towards early supply. Indeed to do so, would be to seek to undermine the content of PPS3. The text is poorly worded, it seems to relate to situations where there are specific planning policies in place to bring about redevelopment in a particular locality (e.g. regeneration areas).</p> <p>Clearly normal unidentified infilling and redevelopment cannot be regarded as anything other than 'windfall' as that is what it is. The situation remains the same, windfalls should not be counted in the first 10 year's land supply unless an Authority can demonstrate exceptional circumstances to justify it. In reality, this is likely to be very rare. It is not acceptable to just set out figures for past categories of windfalls and project them forward. The whole point of SHLAAs is to create more certainty by identifying sufficient sites that are suitable, developable and deliverable.</p> <p>However, windfalls will of course eventually be counted as part of the supply once they have become completions. The Council will then be able to reduce the overall future housing requirement figure accordingly.</p>	<p>Agreed. Whilst the Core Outputs included in the table at para 6.1 were copied verbatim from Government guidance, Officers agree that the suggested text could usefully be added.</p> <p>Officers have read the HBF's comments to Dacorum, Watford & Three Rivers regarding their proposed sources of housing sites and will take these on board when undertaking the SHLAA. However, no changes to the SHLAA methodology are deemed necessary.</p> <p>It is agreed that the recent guidance document produced by PAS is rather confusing with regard to its advice on identifying housing potential on 'land already in residential use'. The Council intends to seek further clarification from PAS (and possibly Go-East) on this matter.</p> <p>See Council's response to Pegasus Planning Group r.e. possible reliance on windfall allowances.</p> <p>Comments noted.</p>
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	<p>(Para 7.27) It is stated that the Council will develop separate assessment forms in respect of urban or Green Belt sites. The HBF strongly opposes the use of separate assessment forms. The national guidance makes it clear that all sites should be assessed in the same way. Indeed, this is the whole point of SHLAA's, in that all sites are treated equally in terms of the Assessment.</p> <p>(Para 7.28) It will need to be identified for each site, whether there are likely to be abnormal costs relating to infrastructure, and what requirements may exist for the provision of affordable housing, open space and other community facilities or biodiversity considerations to make development acceptable in sustainability terms. The HBF considers that all likely requirements need to be eventually set out in every instance in order to assess whether or not a site is likely to be deliverable or not in terms of viability.</p> <p>Therefore, an additional factor that has to be incorporated in to the assessment of achievability in terms of cost factors is the Council's own policy requirements be they for very high (and so expensive to implement) levels of the Code for Sustainable Homes, very high affordable housing requirements and/or the overall planning obligation requirement imposed by the Council on new development. The costs of delivering these planning obligation requirements, in association with all the other market and site specific factors and constraints identified in the methodology, must be factored in to assessments of whether or not sites are likely to be viable and so come forward for development.</p> <p>(Para 7.35) The HBF welcomes the fact that regard will be had to local market conditions. This is important as it is unrealistic to assume (as some other local authorities seem to do) that nearly all town centre sites are capable of being built as high-rise, high-density developments.</p> <p>Furthermore, in relation to assessing housing sites it is important that other land uses are factored in on sites that are likely to be required to deliver mixed use developments.</p>	<p>Whilst the Council has developed separate assessment forms for urban and Green Belt sites, these contain identical criteria, so that sites can be assessed in the same way. The only difference is that the Green Belt form includes some additional criteria for assessing possible sites against the main purposes of including land in the Green Belt, as set out in PPG2.</p> <p>Agreed. The Council envisages that these considerations will be included in Stage 9 of the SHLAA process, when assessing whether a site is achievable for housing development (i.e. there is reasonable prospect that housing will be developed on the site, taking into account market factors, cost factors and delivery factors.). The Hertfordshire Investment and Infrastructure Strategy currently being developed by consultants will also provide useful information for some of the larger sites and broad locations being considered as part of the SHLAA.</p> <p>Agreed. Paragraph 7.50 of the methodology statement will need amendment to include the considerations mentioned.</p> <p>Support welcomed.</p> <p>Agreed. This will be explored in Stage 9 of the SHLAA process.</p>
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	<p>Consultation:</p> <p>The HBF believes that its Members will be able to provide a useful insight with regard to potential development opportunities. A realistic assessment of sites will of course necessitate the participation of and proper involvement of the property industry (including HBF Members). The HBF is willing to help with the organisation of a meeting including yourselves and its members in order to provide information and advice in relation to the likelihood and timescale of individual study sites coming forward.</p>	<p>Support welcomed.</p>
<p>Bidwells (Richard Oakley)</p>	<p>We do not have any specific comments on the methodology proposed for the SHLAA as it seems to broadly comply with the DCLG guidance. We welcome the open approach being adopted by the Council and would be pleased to join the Consultation Panel.</p>	<p>Support welcomed.</p>
<p>Wheathampstead Parish Council</p>	<p>Whilst finding it extremely informative, this Council does not have any land itself which could be used for housing.</p> <p>The Parish Council feels that the village has already contributed to Central Government's demand for more houses (e.g. Murphys Chemicals site, Helmets site and the forthcoming estate on the former Wheathampstead School site).</p> <p>Before building more houses, the District Council should ensure that there is adequate schooling and medical facilities for those already within the area.</p>	<p>Comments noted. The SHLAA will examine issues in relation to future infrastructure needs resulting from new housing development.</p>
<p>Redbourn Parish Council</p>	<p>The Parish Council is in the process of looking at a village plan with the specific purpose of identifying possible areas for the development of affordable housing for people living in the village. However, this may not be possible because the village is surrounded by Green Belt. Unfortunately, an opportunity to provide a sufficient amount of affordable housing was lost in recent developments in Redbourn i.e. Cumberland House, Brooke Bond and most recently, Meadow View.</p>	<p>Comments noted. No changes to the methodology proposed.</p>