

Proposed Strategic Housing and Employment Land Availability Assessment (SHELAA) Methodology 2018

- 1.1 This section of the report sets out the methodology to be used in preparing the three South Worcestershire Councils' first SHELAA. The production of the former SHLAA documents has been broadly consistent in its approach since the first edition was published in 2007. The proposed methodology for the SHELAA 2018 builds on the initial methodology outlined in Appendix 14 of the previous SHLAA report and the revision made to the methodology in 2012. This approach included smaller sites, sites which comprise previously developed land (i.e. brownfield sites) and farm buildings abutting existing settlements. The reasons for ruling out sites from the SHLAA were also updated, and this is set out in the 2012 - 2015 methodology detailed in Appendix 15.

- 1.2 From 2018 Local Planning Authorities are required to include land that is available for employment development in the published SHELAA. It has been necessary to make a number of minor refinements to the methodology that have been made over time to ensure the SHELAA results reflect the draft revised National Planning Policy Framework (NPPF) and the latest Planning Practice Guidance (PPG). The approach set out in the PPG largely reflects the national guidance in 2007 set out on page (3) of the 2015 SHLAA main report and in Appendix 14 and 15. The NPPF recommends carrying out land assessments for housing and economic development simultaneously so that sites may be later allocated / retained for the use that is most appropriate. The SHELAA can also be used to provide neighbourhood forums and parish/town councils with background information to inform any allocations of land in their Neighbourhood Plans. The PPG requires the SHELAA to identify a potential future supply of land which may be suitable, available and achievable over the plan review period (For the SWDPR it's 2041). The key stages included in the PPG are summarised in the flow chart over the page and details how the SHELAA reflects this guidance.

Stage 1 – Site Identification / broad locations

- 1.3 The study area comprises the administrative areas of the three South Worcestershire Councils. The SHELAA uses the settlement hierarchy set out in policy SWDP 2B of the adopted South Worcestershire Development Plan and will eventually incorporate any subsequent amendments in line with the review of the VFRTS - set out in the main SHELAA report. For Worcester City, the administrative boundary area is used. At the SHELAA stage, no decision has been taken as to the quantum of development that could be assigned to different areas or settlements.
- 1.4 In terms of potential sources of housing supply the SHELAA will look at all sites / land. Previously only land that was within and adjacent to existing settlements was considered for an allocation but for the SWDPR a new settlement(s) may be part of the spatial development strategy mix. so large landholdings away from settlements will be considered.
- 1.5 A review of land available for economic development (informed by the Economic Development Needs Assessment (EDNA) is being undertaken alongside the Strategic Housing and Employment Land Availability Assessment and includes a reappraisal of the suitability of land previously allocated for , or in existing employment uses(NPPF, para161).
- 1.6 In order to be assessed in the SHELAA, housing sites of 0.16ha or above, or 5 dwellings and above are looked at; for economic sites, submissions should be a site area of 0.25ha or above. Economic sites include retail, leisure, cultural, office, warehousing etc. Further detail about the assessment area and review of existing information is detailed in Appendix 14 (original 2007 methodology).
- 1.7 In addition to the sources of information identified in Appendix 14, a "Call for Sites" exercise will take place from 21 May to 2 July 2018, as explained in the main SHELAA report.
- 1.8 A Desktop review and analysis of existing sites will be undertaken at the same time as the call for sites, assuming that landowners confirm that their sites are still available (otherwise sites will have to be removed as part of the update of personal information required through the new General Data Protection Regulations). The review will take account of
 - The range of sites / broad locations (including if sites that could be improved/ constraints resolved)
 - Sites with overall constraints and if these still remain

The following types of sites will be assessed: (PPG, DCLG, 2014, section 4, para 12):

Type of site	Potential data source
Existing SWDP housing and employment allocations which don't have planning permission	SWDP and neighbourhood plans; Planning applications records; Development briefs
Planning permissions for housing and economic development that are unimplemented	Planning application records; Development start and completion records, 5 Year Housing Land Supply reports
Planning applications that have been refused or withdrawn	Planning application records
Land in the local authority's ownership	Local authority property 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 providers, statutory undertakers
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 register; English House Condition Survey; National Land Use Database Commercial property databases (e.g. estate agents and property agents); Valuation Office database; Brownfield Register; Active engagement with public sector bodies - including consultation on methodology
Additional opportunities in established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps; Aerial photography; Planning applications Site surveys; liaison with registered providers.
Business requirements and aspirations	Enquiries received by local planning authority; Active engagement with sector ; EDNA

1.9 Following the call for sites / sites from other sources, an initial assessment of the constraints against national and local planning policy designations will be undertaken to establish potential for development and inclusion in the site survey. A site survey will ensure:

- Up to date information
- Identify appropriate type and scale of potential development
- Understand constraints to inform deliverability / viability
- Those sites considered most realistic will require further robust assessment

Stage 2 – Site Location Assessment

Site Assessment

1.10 In terms of estimating the development potential of a site, initially the SHELAA Sites are split into two levels: **Level 1** – sites unsuitable because of major planning/ physical constraints e.g. the land is in area of high flood risk; and **Level 2** – all other sites. If a site is a Level 1 site it will not be taken forward as a potential allocation

unless it can clearly be demonstrated that the constraint(s) can be overcome without jeopardising development viability or NPPF / strategic development plan policy. Level 2 sites will be assessed against a number of planning policy constraints. Based on the site area, and having regard to site constraints / surrounding land uses etc., the density based on the existing or emerging plan policy can be established. Further detail is explained in Appendix 14 and 15 of the SHLAA report 2015.

1.11 The PPG states that it is necessary to assess sites according to their:

- Availability (we may also consider the delivery record of developer/landowners/history of unimplemented permissions).
- Achievability (consider broad economic viability of site and capacity of developer to sell / let/ gain planning permission)
- Suitability for the proposed use
- Viability and any abnormal costs (on a broad level, not an individual viability assessment)
- Types of development for the needs of community

1.12 Since the publication of the original SHLAA methodology in 2007, the availability of sites is categorised in accordance with the Framework (2012) and PPG in that the site assessment form asks landowners/developers to stipulate whether their site could come forward now, within 5 years, within 6-10 years or 11 -15 years. This is detailed further in Appendix 14 and 15.

1.13 The NPPF review at para 68 states that strategic planning authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, **planning policies** should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

1.14 Assessing the suitability of sites or broad locations for development should be guided by (PPG, para 19):

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation, landscape character and sensitivity;
- appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighboring areas;

1.15 As well as guidance from the SWDP/ emerging SWDP (need to know the development strategy of the SWDP review) and national policy, consider market and industry requirements in the housing and economic area;

- A reappraisal of sites with p/p / allocated sites/ potential allocation for different uses for their suitability and appropriate use

- Where constraints have been identified that impact suitability, achievability, availability - what action is needed to remove these / how undertaken i.e. new infrastructure.
- Timescales / rate of development should be considered for each site including potential build out rates

1.16 A further addition to the methodology is with regard to assessing economic viability of those sites that were submitted as part of the Call for Sites exercise. In March/April 2014 the SWDP was still under examination and the new the Call for Sites needed to be carried out quickly and it was considered that setting up panels to assess land/sites were time-consuming and not always sufficiently informative.. The previous PPG suggested a panel approach to assist in the assessment of SHLAA sites, however this is now no longer recommended as part of the guidance. Therefore the SWCs consider that in terms of assessing potential viability the approach that includes a viability appraisal of available land by the local Valuation Office is both appropriate and fit for purpose.

Stage 3 – Windfall Assessment

Windfall Assessment

- 1.17 Windfall development is where it takes place on land not allocated sites in a Local Plan, have not been previously allocated or identified in the SHLAA. (NB the NPPF review no longer refers to windfall as being on previously developed land). Every year windfall housing development occurs and it is monitored in the SWC' Authority Monitoring Reports and in their Five Year Housing Supply reports. It is evident from housing land monitoring reports that in South Worcestershire windfall completions exceed the windfall allowances set out in SWDP3 Table 4d. The NPPF 2 consultation 2018 has changed the definition of a windfall site and it now excludes any reference to being to be a site that is on previously developed land.
- 1.18 Paragraph 71 of the NPPF Review 2018 refers to the ability of Local Planning Authorities to put forward a windfall allowance, as before. *“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”.*

Stage 4 – Assessment Review - Analysis of Housing Supply

- 1.19 Since the previous edition of the SHLAA, housing supply has seen a dramatic increase with a large number of sites gaining planning permission. A review of housing land supply is detailed in the Authorities' Monitoring Report 2018. This will be updated every year to take account of house completions and outstanding permissions at 1st April.

Stage 5 – Final Evidence Base

- 1.20 The information for each SHELAA site is recorded on a form, input onto the SHELAA database and linked to a map using the GIS system. The information requested is outlined in the example site appraisal sheet shown in Appendix 5 and 13 [NB, to be provided at a later date when methodology confirmed].

Core outputs required:

- Sites allocations / broad locations (including for potential urban extensions and new settlements) listed and linked to maps.
- Assessment of sites – suitable, available, achievable, initially viability and to determine whether the site is realistic for housing or employment prospects.
- More detail for those sites considered realistic (see reference to initial assessment of “level 1” or “level 2” sites, para 1.10).
- Consider the type and quantity of development that could be delivered on each site including potential build out rates and barriers to delivery where there is sufficient information to gauge this. Input to a trajectory of anticipated development sites / risks, as part of further assessment outside of the SHELAA

Appendix 14 – see SHLAA report 2015

Appendix 15

South Worcestershire Development Plan – Methodology for the SHLAA / SHELAA November 2012 and 2018 onwards

Introduction

The original methodology for the production of the SHLAA was set out in 2007 and is attached for information at Appendix 14 {To be attached at a later date}. There have been many changes in the planning legislative process and national policy guidance since 2007 but the guidance for the preparation of SHLAAs has remained broadly the same.

It is now necessary to make further minor refinements to the methodology to ensure the SHLAA results reflect the revised and changes to the most recent NPPF and PPG. The approach set out in the PPG largely reflects the national guidance in 2007 set out on page 3 and Appendix 14. The guidance states that the SHELAA should identify a future supply of housing and employment land which is suitable, available and achievable over the plan period. The key stages included in the PPG are summarised in the flow chart on page 12 of the main report. Based on the methodology recommended by the PPG, each stage of the process is summarised in page 12- 14 of this report.

IT SHOULD BE BOURNE INMIND THAT THE SHELAA PROVIDES BACKGROUND EVIDENCE OF POTENTIAL SITES AND IS NOT A SITE ALLOCATIONS DOCUMENT. FURTHER SITE ASSESSMENT WILL TAKE PLACE OUTSIDE OF THE SHELAA METHODOLOGY AS THE PLAN REVIEW PROGRESSES AND DEVELOPMENT OPTIONS ARE REFINED.

This 2018 review builds on the previous SHLAA work and takes account of new and amended sites submitted post April 2012 and those submitted as part of the Call for Sites exercise up to 2 April 2014, which informed the latest 2015 publication of the SHLAA. It was not possible to consider any new sites received post 2014 as potential allocations in the SWDP at this late stage in the progress towards the SWDP adoption.

Widening the search for Sites

During 2009, the search for sites was broadened to ensure a consistent approach, including smaller sites (i.e. those with a potential capacity of 5 - 9 dwellings) and previously developed land (i.e. brown field sites)

Criteria land / sites inclusion in the SHELAA

The criteria for including additional sites are set out below:

- Sites must be capable of development with 5 dwellings or more (or 0.16ha or more to equate to up to 30 dwellings per hectare); higher densities may be appropriate in the centre of larger settlements but the 30dph will be used as an initial benchmark for site inclusion.

- Previously developed land and buildings comprising land which is or was occupied by a permanent structure including the curtilage of the developed land and any associated fixed surface infrastructure, that can deliver 5 or more dwellings.
- Farm buildings abutting existing settlements;
- Other sites within or adjacent to existing settlements
- .Previously only land that was within and adjacent to existing settlements was considered for an allocation but for the SWDPR a new settlement(s) may be part of the spatial development strategy mix.so large landholdings away from settlements will be considered.

Updated reasons for ruling out sites from the SHLAA

The reasons for ruling out sites have been reviewed in accordance with the National Planning Policy Framework PPG and the list of reasons for ruling a site out will be included in an Appendix . There are a number of policy issues which have been considered during the evolution of the SHELAA document.

a) Garden Land

The National Planning Policy Framework, page 55 revised the status of garden land (formerly considered to be previously developed land). Sites affected by this change have been ruled out with the reason stated as 'PPS3', which referred to earlier government guidance. The notation has been amended to say "garden land" to be clearer.

b) Land Ownership

A number of the original SHELAA sites carried forward allocations from previous Local Plans and were sites promoted at previous Local Plan inquiries or were suggestions by parish councils. Further checks have subsequently been made as to whether these sites are still available. Where it has not been possible to establish that the site will be made available the site has been ruled out with the reason stated as: 'AVAILABILITY UNKNOWN'.

Sites included in the SHELAA but where the landowner has indicated that they will not make the land available for development has been ruled out with the reason stated as 'NOT AVAILABLE'.

c) Green Belt

In light of the Greenbelt Review, any site that is currently situated within the designated Greenbelt has been ruled out as a level 1 site, with the reason stated as 'GREENBELT'.

d) Built Out Sites

Those sites that have been built out (BUILT OUT) will be removed from the GIS mapping, but remain in a separate database. A list of these is shown within Appendix 1. {To be attached at a later date}

e) Village Categorisation

Sites will be reassessed to reflect any changes in the village categories informed by the review of the Village Facilities and Rural Transport Study. Initially those sites that are in settlements that are lower than a category 3 village (i.e. 4a and 4b) will not be assessed in detail and will be marked as 'CAT 4a' or 'CAT 4b', as these locations are considered, under the current strategy, to be unsustainable. However, these sites can be revisited, if policy changes at a later date suggest that sites in lower level

settlements may be appropriate to consider for housing or employment uses at the allocation stage.