

# **Adur & Worthing Councils**

## **Strategic Housing Land Availability Assessment (SHLAA) Methodology**

**Updated August 2020**



ADUR & WORTHING  
COUNCILS

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# 1. Introduction

- 1.1 The purpose of a Strategic Housing Land Availability Assessment (SHLAA) is to identify a future supply of land which is suitable, available and achievable for housing over the local plan period covered by each local authority. It also seeks to establish realistic assumptions about the development potential of the land identified and when development is likely to occur. **It is important to note that SHLAAs in themselves do not allocate sites for development.**
- 1.2 Previous SHLAAs published by both Adur District Council and Worthing Borough Council were based on a methodology that followed an approach set out in the SHLAA Practice Guidance (DCLG 2007) and took account of the provisions and requirements of the National Planning Policy Framework (NPPF) 2012, where relevant. At that time there were ten key stages established in the Guidance that needed to be followed. **These ten key stages in the methodology were subsequently reduced to five but the fundamental elements of the assessment did not change.**
- 1.3 Adur District Council and Worthing Borough Council are preparing individual SHLAAs for their respective local planning authority areas (parts of the district/borough that do not fall within the South Downs National Park). Adur District Council adopted its Local Plan in December 2017 and will be assessing the need to undertake a review in due course. Worthing Borough Council is currently preparing a new Local Plan which will replace the Core Strategy 2011. The SHLAAs will continue to form part of the respective evidence bases for these reviews.
- 1.4 The NPPF and National Planning Practice Guidance (NPPG) were both updated in 2019 and reiterate the requirement for local authorities to produce a SHLAA. Whilst the Councils are confident that the current approach to the Assessment is robust and relevant, it is considered appropriate to amend the SHLAA methodology to reflect the five stages as set out in the most recent guidance:

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

- 1.5 The methodology has been jointly prepared by both authorities and sets out the main stages of the Assessment that will be undertaken. Although the same methodology will be used, a separate SHLAA will be prepared and published by each Authority. Links to the current SHLAA's can be found here:

[Adur SHLAA 2019](#)

[Worthing SHLAA 2019](#)

Consultation on the methodology was undertaken between 24<sup>th</sup> February – 20<sup>th</sup> March 2020. Responses received as part of this consultation (and where relevant, changes made to the methodology) can be viewed in Appendix 1 of this document (Other changes are listed in Appendix 2). A 'Call for Sites' was undertaken simultaneously; responses are being assessed, and an updated SHLAA will be published in December 2020.

## 2. Background

### National Planning Policy Framework (NPPF)

2.1 The NPPF requires local planning authorities to have a clear understanding of the development land available in their area through the preparation of a Strategic Housing Land Availability Assessment (SHLAA). The NPPF requires Local Plans to identify a supply of specific, deliverable sites for years one to five of the plan period (with an additional buffer of 5% or 20%, moved forward from later in the plan period), and specific sites or 'broad locations' for years 6 to 10, and if possible for years 11-15. This five year housing land supply is set out in each Council's Annual Monitoring Report which is updated and published in December of each year, with a base date of 31st March:

[Adur District - Annual Monitoring Report](#)

[Worthing Borough - Annual Monitoring Report](#)

2.2 The NPPF acknowledges that Local Planning Authorities may need to make an allowance for windfall sites in the five year housing land supply if there is compelling evidence that such sites will continue to provide a reliable source of supply. Any windfall allowance should have regard to the SHLAA, historic windfall delivery rates and expected future trends, and should give consideration to policies to resist development of residential gardens.

### National Planning Practice Guidance

2.3 The Government's National Planning Practice Guidance (NPPG) - Housing and economic land availability assessment (July 2019), sets out how land availability assessments should be undertaken and states that they 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).

2.4 The SHLAAs will form an important piece of evidence to underpin work on the respective Local Plan reviews. They will provide a robust and up to date assessment of land with development potential in the district/borough.

2.5 **It is important to note that SHLAAs do not allocate sites for residential uses, and the identification of sites within SHLAAs does not infer that planning permission will be granted by the Council.**

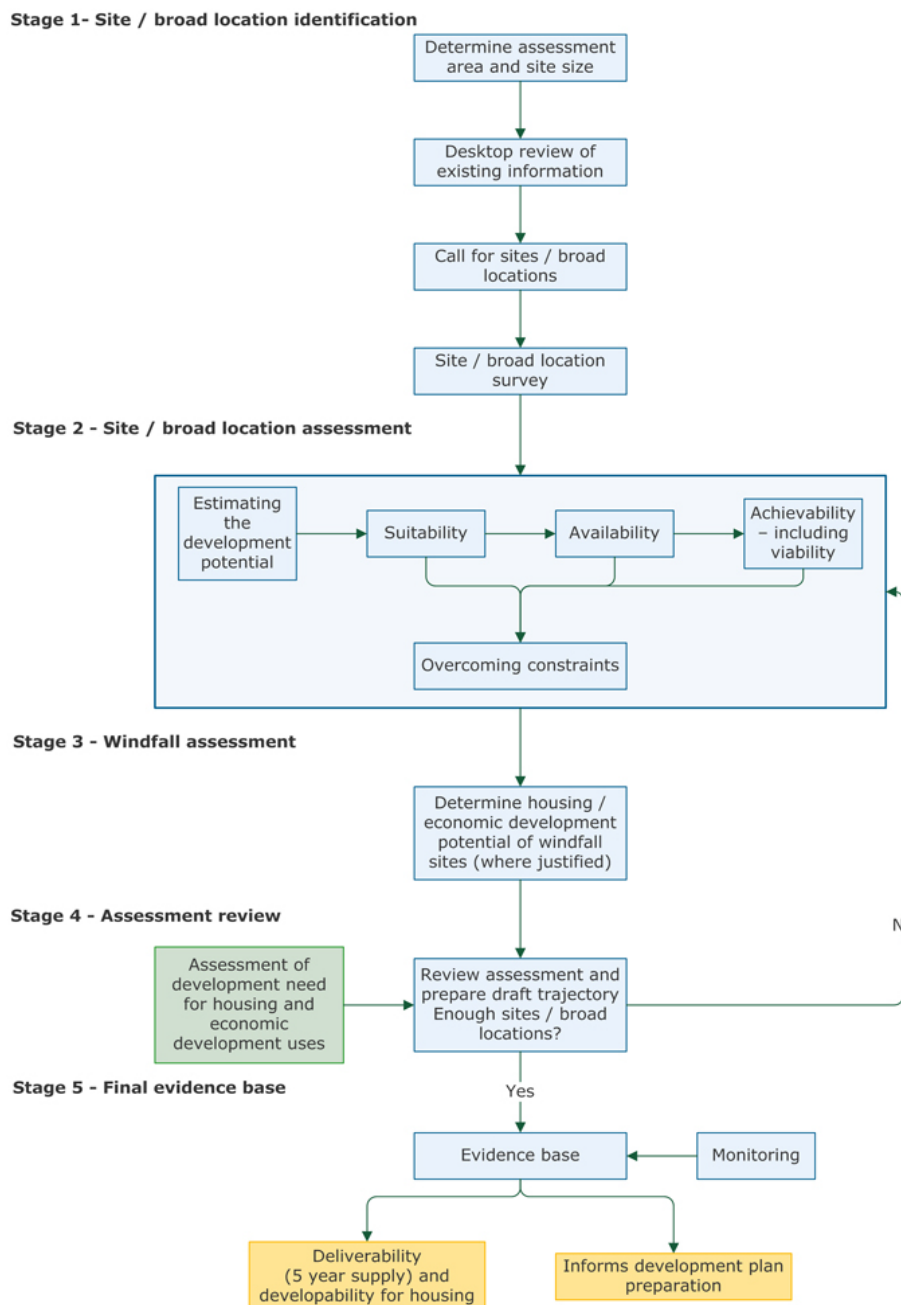
2.6 The assessment is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.

- 2.7 The inclusion of sites within SHLAAs does not preclude them from being developed for alternative suitable uses. Any planning applications will be treated on their own merits and assessed against the development plan and other material considerations. The exclusion of sites from SHLAAs (either because they have not been identified or have been assessed and discounted) does not preclude the possibility of planning consent being granted in the future.
- 2.8 The previous NPPF (2012) also required local planning authorities to assess the existing and future supply of land available for economic development, and suggested combining this exercise with the SHLAA, but this requirement does not feature in the revised NPPF (2019). However, the online National Planning Practice Guidance: Housing and economic land availability assessment, does state that local authorities may carry out land availability assessments for housing and economic development as part of the same exercise.
- 2.9 As such, and given the local context, it has been decided that this SHLAA will only include residential and mixed use sites. The assessment of need for other land uses and identification of sites to meet that need (including land/floorspace for employment uses) will be considered through other studies, for example the respective Employment Land Reviews.

### 3. Proposed Methodology

3.1 The Government’s National Planning Practice Guidance advises on the methodology that should be followed in preparing a SHLAA. It breaks the process into five broad stages and summarises these using the flowchart below. The intention is to adopt this broad methodology and the following sections describe how each stage of the Assessment will be undertaken.

**Figure 1: National Planning Practice Guidance - Methodology Flowchart**



## **Stage 1: Site/Broad Location Identification**

### **Determine the assessment area**

- 3.2 The National Planning Practice Guidance (NPPG) advises that the area covered by a SHLAA should reflect the housing market area (HMA) and functional economic area (FEMA), and can cover one or more local planning authority areas. In this case, the relevant HMA and FEMAs are sub-regional and the local authorities defined within the HMA and FEMA are at different stages of their local plan preparation. It is therefore not practical at this stage to undertake a sub-regional SHLAA. However, there is a clear benefit in Adur and Worthing Councils undertaking this methodology review at the same time given their shared officer structure (although the results of the assessments will be published separately).
- 3.3 For Adur the SHLAA will therefore consider land availability within the Adur Local Plan area, covering the District outside the South Downs National Park (SDNP), including designated Neighbourhood Areas. For Worthing the SHLAA will consider land availability within the Worthing Local Plan area, covering the Borough outside the SDNP.

### **Site Size Threshold**

- 3.4 The NPPG states that it may be appropriate for assessments to consider all sites and broad locations capable of delivering 5 or more dwellings. The PPG allows for alternative site size thresholds where appropriate. In previous SHLAAs it was considered that only sites capable of accommodating 6 or more dwellings should be identified and assessed as part of the SHLAA process. The use of a 6 site threshold reflected the division between large and small sites threshold used by West Sussex County Council (WSCC) for their monitoring purposes. However, WSCC has now revised their threshold to 5 dwellings in line with guidance and the Councils will now use this threshold for their assessments. This also aligns with the threshold for Brownfield Land Registers.

### **The Identification of Sites and Broad Locations**

- 3.5 Plan makers should be proactive in identifying as wide a range as possible of sites and broad locations for development, and the NPPG advises that authorities should not just rely on sites already known to them, and should seek to identify new opportunities through land availability assessments.
- 3.6 The role of the SHLAA is to ensure that local planning authorities have a robust understanding of the amount of land with potential for housing within their area. All new sites identified during the relevant monitoring period will be assessed against the methodology. In addition, all sites previously considered, including those that were

previously scoped out of the study, will be 're-visited' to ensure that assumptions made were correct and / or that circumstances have not changed.

3.7 In order to ensure that all development opportunities are captured the following sources of data have been considered:

**Table 1: Sources of potential sites**

Type of Site	Potential Data Source
Existing housing and economic development allocations and site development briefs not yet with planning permission	<ul style="list-style-type: none"> <li>● Local Plans</li> <li>● Development/Planning Briefs</li> <li>● Neighbourhood Plans</li> <li>● Planning application records</li> </ul>
Planning permissions for housing development that are unimplemented or under construction	<ul style="list-style-type: none"> <li>● West Sussex County Council monitoring data (including annual Housing and Residential Land Availability Survey (RLA))</li> <li>● Planning application records</li> </ul>
Planning applications that have been refused/withdrawn/expired	<ul style="list-style-type: none"> <li>● Planning application records</li> </ul>
Land in the local authority's ownership	<ul style="list-style-type: none"> <li>● Local Authority land ownership records/GIS layer</li> <li>● Estates Team - Review of Council Assets</li> </ul>
Surplus and likely to become surplus public sector land	<ul style="list-style-type: none"> <li>● National Register of Public Sector Land</li> <li>● Strategic Plans of other public sector bodies/utility providers</li> <li>● Engagement with other public sector bodies/utility providers</li> </ul>
Sites with permission in principle and identified brownfield land	<ul style="list-style-type: none"> <li>● Local authority Brownfield Land Register</li> <li>● National Land Use Database</li> </ul>
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes e.g. offices to residential)	<ul style="list-style-type: none"> <li>● Local authority Empty Property Register</li> <li>● English House Condition Survey</li> <li>● National Land Use Database</li> <li>● Commercial Property databases (Adur and Worthing Business Partnership)</li> <li>● Valuation Office database</li> </ul>
Under-utilised facilities such as garage blocks	<ul style="list-style-type: none"> <li>● Local Authority records</li> <li>● Site visits</li> </ul>



	<ul style="list-style-type: none"> <li>● OS maps/aerial photography</li> <li>● Planning applications</li> </ul>
Large scale redevelopment and redesign of existing residential areas	<ul style="list-style-type: none"> <li>● Local Plans/Housing Delivery Strategy</li> <li>● Planning applications</li> <li>● OS maps and aerial photography</li> <li>● Site surveys</li> </ul>
Sites previously included or rejected in the SHLAA process	<ul style="list-style-type: none"> <li>● Urban Capacity Studies</li> <li>● SHLAA Reports</li> <li>● Adur Urban Fringe Study</li> <li>● Worthing Appraisal of Greenfield Sites</li> <li>● Landscape Studies</li> <li>● Open Space, Leisure and Built Facilities Studies</li> <li>● Employment Land Review Studies</li> <li>● Retail Studies</li> <li>● Shoreham Harbour Joint Area Action Plan</li> </ul>

## Call for sites / broad locations

- 3.8 In addition to the sites identified in the process above, a 'Call for Sites' is used to identify development sites that are not currently within the planning process and to provide updated information on sites that have previously been identified. The Councils have undertaken a number of 'Call for Sites' exercises since the first SHLAA were produced in 2013.
- 3.9 There are so few options for growth and redevelopment that the Councils must take every opportunity to explore the potential of sites that we may not be aware of. As such, the Councils will undertake a 'Call for Sites' exercise alongside this consultation. A guidance note will be published alongside the 'Call for Sites' to provide the context and background information for anyone intending to submit a site.
- 3.10 Respondents are requested to complete a pro-forma to provide some initial details about each site, including the following information:
- Site address and an OS plan showing site boundaries;
  - Contact details;
  - Type and scale of development suggested;
  - Site ownership;
  - Current use of the site;
  - Potential development timeframe/phasing;
  - Known site constraints; and
  - Other information, including the potential for alternative land uses.

- 3.11 The onus will be on site promoters to provide robust information to demonstrate that sites can be realistically developed.
- 3.12 The cut-off date for new sites to be submitted to the Councils is 31st March of the relevant monitoring year. However, given the lack of potential sites and the overarching high levels of development needs the Councils want to ensure that the 'door is always open' for anyone who may want to promote a site. As such, any information on new sites which is received outside of this 'formal' call for sites period will not be disregarded - the details will be kept on file and reviewed as part of the next annual update of the SHLAA.
- 3.13 All the sites identified in both the desktop review and 'Call for Sites' will be included in a comprehensive list of sites, and information about them will be recorded in the SHLAA database.

## Desktop Review/Exclusion Criteria

- 3.14 Having collated all sites identified from all the various sources outlined above the next step is to undertake an initial sift to exclude sites that are not considered to have any reasonable development potential, having regard to national and local policies and designations.
- 3.15 The following sites will also be excluded:

**Table 2: Sites to be excluded**

Category	Reason for exclusion
Sites with existing planning permission or under construction	Sites with extant planning permission or those under construction are generally considered to be suitable for development. Any dwellings delivered will be accounted for through other monitoring processes.
Sites allocated in the Local Plan and Neighbourhood Plans	Sites allocated for development within the Development Plan are generally considered to be suitable for development.
Sites of less than 5 dwellings	Fall below the threshold for the Assessment.
<b>Environmental constraints</b>	
Sites within the functional floodplain (Flood Zone 3b)	National Planning Policy Guidance advises that only water compatible development should be permitted within the functional flood plain. Most forms of residential development do not meet this requirement.

Sites within Historic Parks and Gardens	Protected by legislation.
Sites within or outside a Site of Special Scientific Interest (SSSI)	Legislation and the NPPF advise that planning permission should not normally be granted for development that is likely to have an adverse effect on an SSSI.
Scheduled Monuments	NPPF states that substantial harm to or loss of designated heritage assets, including Scheduled Monuments, should be wholly exceptional.
Ancient Woodland	The NPPF states that development resulting in the loss or deterioration of irreplaceable habitats such as Ancient woodland and ancient/veteran trees should be refused unless there are wholly exceptional reasons.
Local Green Space	Local Green Space designations are areas of special protection which rule out new development other than in very special circumstances.

3.16 Where site surveys have been undertaken the following characteristics listed below have been considered for each site (or checked if they have been previously identified through other sources):

- Site size, boundaries, and location;
- Current land use and character;
- Land uses and character of surrounding area;
- Physical constraints (e.g. access, contamination and hazards, steep slopes, ground conditions flooding, natural features of significance, location of infrastructure/utilities);
- Potential environmental constraints;
- Consistency with the development plan's policies;
- Proximity to services and other infrastructure such as public transport and walking/cycling routes;
- Where relevant, development progress (e.g. ground works completed, number of units started, number of units completed);
- Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.

## Stage 2: Site/Broad Location Assessment

3.17 Stage 2 of the SHLAA will assess the suitability, availability and achievability of sites and assess their development potential and the timescale in which they may be expected to be delivered. Sites or part of a site which are not sieved out in the process identified above will continue through to a more detailed assessment. Information from various sources and stakeholders is used, including details such as size, current use, boundary, the area's characteristics and its surroundings, physical constraints and any potential barriers to deliverability. The information collected for each site is compiled on a SHLAA database. This information will help to assess the deliverability and developability of sites, including site constraints.

3.18 In summary, the assessment will categorise the sites as follows:

**Table 3: SHLAA status**

SHLAA Status	Definition
Potential Site	A site that has been assessed as being suitable, available and achievable for residential development.
Rejected Site - Monitor	A site that has been assessed as being potentially suitable/ not currently available for development but where there is evidence that any identified issues/constraints can be overcome i.e. there is some indication that the site could become available once constraints have been mitigated/land ownership issues resolved etc. The site will be monitored closely and reassessed annually.
Rejected Site	A site that has been assessed as not being suitable for residential development.
Committed Site	A site that now has planning permission is under construction or development has been completed.

### Assessing Suitability

3.19 The NPPG indicates that a site/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. As well as information collected as

part of the initial site survey, the NPPG advises that the assessment of a site's suitability should be guided by:

- The development plan, emerging plan policy and national policy;
- 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;
- 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 neighbouring areas.

3.20 Knowledge of the local environment contributes to the understanding of a site and enables officers to build up a picture of what impact, if any, development may have on the natural and built environment. It is therefore an important part of determining suitability.

3.21 The first factors that will be assessed are general suitability factors such as planning policy and physical site constraints.

3.22 It is for the Local Plan Review process to identify how these constraints are addressed when identifying and allocating sites. Sites with planning permission will generally be considered suitable for development, and will therefore not be considered further in the assessment. However, there may be a few instances where it is necessary to assess whether circumstances have changed which would alter their suitability.

3.23 The following constraints (set out in table 4 below) will be carefully considered. Development may be suitable in these locations depending on the size of the site and the extent to which the constraint covers a site and its potential impact. These constraints are likely to have an impact on the capacity of a site (e.g. affect design and layout) and also the timing of when development may take place.

**Table 4: Potential constraints**

Factor	Assessment Conclusion
<p><b>Sustainable Location of Site</b></p> <ul style="list-style-type: none"> <li>● Land use category</li> <li>● Location of site</li> <li>● Distance from local service</li> <li>● Accessibility to public transport</li> </ul> <p>Is the site in a sustainable location and would it reduce the need to travel?</p> <p>Does the site have good access to a range of facilities and services either by active travel (walking/cycling) or public transport?</p>	<p><b>Suitable:</b> The site would help sustain or create sustainable communities.</p> <p><b>Potentially suitable:</b> The site would generally support sustainable communities but may not perform well on all the factors.</p> <p><b>Not suitable:</b> The site would <b>significantly</b> undermine the principles of sustainable communities.</p>
<p><b>Policy Restrictions</b></p> <p>Is the principle of development on the site in broad conformity with Adur /Worthing Local Plan policy and national policy?</p> <p>Current national guidance and the following existing policy designations will be taken into account when assessing the suitability of a site for development:</p> <ul style="list-style-type: none"> <li>● Designated retail area</li> <li>● Designated office location</li> <li>● Designated industrial estates and business parks</li> <li>● Allocated for non-housing use</li> <li>● Loss of community facility</li> <li>● Loss of playing pitches or open space</li> <li>● Landscape</li> </ul>	<p><b>Suitable:</b> The development of the site for the proposed use would be in accordance with the development plan, emerging policy and national policy.</p> <p><b>Potentially suitable:</b> It is not clear at this stage that the development of the site would be in accordance with existing or emerging policy, or it is partly in accordance.</p> <p><b>Not suitable:</b> The development of the site for the proposed use would clearly be contrary to the existing development plan, emerging policy or national policy.</p>
<p><b>Physical Constraints</b></p> <p>General physical issues could present either a temporary or permanent constraint to development and may prevent a site from being found 'suitable' for development or constrained to the type and/or level of development which could take place. For</p>	<p><b>Suitable:</b> There are no constraints that would affect the sites viable development.</p> <p><b>Potentially suitable:</b> There are some physical constraints, land use conflicts or infrastructure capacity issues affecting the</p>

<p>example:</p> <ul style="list-style-type: none"> <li>● Means of access - Does the site have, or can it be provided with safe highway access?</li> <li>● Ground conditions- Does the site/is it likely to have challenging ground conditions?</li> <li>● Contaminated land -Could the site be contaminated?</li> <li>● Flood risk -Is the site at risk of flooding from any sources, or could it be at risk in the future? Could development of the site make flood risk worse elsewhere? Could development of the site result in adverse water quality impacts?</li> <li>● Noise</li> <li>● Neighbouring land use -Would the development of the site be compatible with existing neighbouring land uses?</li> <li>● Are there major infrastructure features on/under the site (e.g. pylons, utilities)?</li> </ul>	<p>site but these could reasonably be mitigated against or resolved, without severely undermining the viability of the site.</p> <p><b>Not suitable:</b> There are severe physical constraints, land use conflicts or infrastructure capacity issues affecting the site that are unlikely to be able to be mitigated without undermining the viability of the site.</p>
<p><b>Potential Impact of Development</b></p> <p>Development may be suitable in the following locations depending on the size of the site and the extent to which the constraint covers the site. However, these constraints may have an impact on the capacity of a site in terms of design and layout. “Any conflict with relevant national and Local Plan policies will be taken into account when considering the impact of the following constraints:</p> <ul style="list-style-type: none"> <li>● Conservation areas</li> <li>● Environmental areas of special character</li> <li>● Listed buildings</li> <li>● Locally listed buildings</li> <li>● Local green gap</li> <li>● Nature conservation</li> <li>● Local nature reserve</li> <li>● Ancient woodland</li> <li>● Tree Preservation Order</li> </ul>	<p>Please note that impact on settings of heritage assets will also be taken into account</p> <p><b>Suitable:</b> Development of the site would result in no loss/disturbance/harm to heritage. There would be no loss or disturbance of wildlife habitat or species.</p> <p><b>Potentially suitable:</b> Development of the site would result in some loss/disturbance/harm to heritage assets or their settings but could be sufficiently mitigated. There would be some loss or disturbance of wildlife habitat or species that could potentially be mitigated.</p> <p><b>Not suitable:</b> Development of the site would result in unacceptable loss/disturbance/harm to heritage assets or their settings that could not be satisfactorily mitigated. There would be unacceptable loss or disturbance of significant wildlife</p>

<ul style="list-style-type: none"> <li>● Scheduled Monuments and their setting</li> <li>● Registered Historic Parks and Gardens</li> <li>● Archaeological importance</li> <li>● Local Wildlife Site</li> <li>● Landscape impact</li> </ul>	<p>habitat or species.</p>
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3.24 Based on the assessment of all the factors officers then make a judgement as to a site's overall suitability for residential development.

3.25 It is important to note that the SHLAA cannot itself be expected to undertake the level of detailed assessment of sites that would be expected through the development management process, for example in Flood Risk Assessments, Habitats Surveys, Transport Assessments, Landscape and Visual Assessments etc. Its role is more confined to highlighting major constraints and making judgements on the best available information at this time.

## Assessing Availability

3.26 To establish whether a site is 'available', guidance in the NPPG will be followed. It states that a site is considered available for development, when, on the best information available (confirmed by the 'Call for Sites' and information from land owners), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell.

3.27 Where planning permission exists it will normally mean that the site is available; however, there may be instances where this is not the case. Where potential difficulties are identified, an assessment will be made as to how and when such issues can realistically be overcome. NPPG advises that consideration should also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.

3.28 In assessing the availability of a site the SHLAA will take account of:

- Ownership constraints
- Legal constraints such as covenants on land
- Planning Status

3.29 Following assessment each site will be assessed as being 'available', or 'not available'.



## **Assessing Achievability**

- 3.30 To establish whether a site is 'achievable' guidance in the NPPG will be followed which states 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.
- 3.31 The Council will only undertake achievability and deliverability assessments on sites which are deemed to be 'suitable' and 'available'. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.
- 3.32 It is considered impractical to do detailed viability assessments of all sites and broad locations. A more general assessment approach will therefore be undertaken, considering the general marketability of the site, potential abnormal development costs, and any land ownership issues which may constrain deliverability.
- 3.33 The assessment of each site will be classified into 'achievable' or 'unachievable'.

## **Estimating the Development Potential**

- 3.34 As an overarching principle, sites should aim to make the best use of land. Every site has its own characteristics and specific set of circumstances that may influence the net developable area and density.
- 3.35 Given the land constraints of the District/Borough and the limited options for development, the majority of the sites included in the SHLAA are not 'new' sites. They are usually familiar to the Council and a site capacity may have already been established through masterplan work or the preparation of a planning application. This will be taken into account when estimating the development potential of a site. Equally, where the site capacity is known or provided by the landowner / developer those figures will be used.
- 3.36 As such, no specific density assumptions have been included in this methodology and the development capacity of each site will be assessed on its own merits.

## **Estimating the Timescale and Rate of Development**

- 3.37 Once the suitability, availability and achievability of sites have been assessed, and any constraints identified, the likely timescale and rate of development for each site will be assessed. This will be continuously updated throughout the Local Plan Review process, with advice being sought from developers on likely timetables, progress made, and any further constraints which may arise.
- 3.38 For sites in the SHLAA that are considered to have development potential, a judgement will be made on when they are likely to be capable of being delivered. It is

proposed that information on sites' suitability, availability and achievability will be used to make a judgement on when sites are likely to be brought forward.

- 3.39 It is proposed that information on indicative lead in times and build out rates will be gathered from a range of sources, including knowledge of recent development sites in the district/borough, information provided by developers and landowners and engagement with stakeholders.
- 3.40 Sites will be categorised as **deliverable** if there is a realistic prospect of them being delivered within 5 years or **developable** if they are considered to be longer term sites (6 to 15 years).
- 3.41 The SHLAA uses the NPPF definitions of 'deliverable' and 'developable', as follows:

**Deliverable** - "To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

**Developable** - "To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

### Stage 3: Windfall Assessment

- 3.42 Para 70 of the NPPF advises that a windfall allowance may be justified in the five year supply if a local planning authority has compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. It adds that such an allowance should be realistic, having regard to the SHLAA, historic delivery rates and expected future trends, and should not include residential gardens.
- 3.43 In both Local Plan areas a significant level of housing development has historically come forward on small sites of under 5 dwellings, which fall below the defined SHLAA site size threshold. Such developments have mainly been small infill sites,

changes of use and conversions. A windfall allowance has therefore been included for smaller developments falling below the defined SHLAA threshold of 5 dwellings.

- 3.44 The annual windfall allowance will be determined by applying a trend-based approach based on an analysis of completions over a period of 10 years. Completions will comprise developments of 1-4 net additional homes but will exclude development on residential gardens, allocated sites and rural exception sites. A windfall allowance will be made from year 4 onwards in the housing trajectory. This is to avoid double counting against existing unimplemented planning permissions, which are normally valid for 3 years and therefore likely to be completed within this time.
- 3.45 It is not considered justifiable to include a windfall allowance for larger housing sites since developable sites of 5 or more dwellings will be identified in the SHLAA (or in future annual updates) leading to a risk of double counting. In addition, it would be difficult to predict the amount of housing likely to be delivered on any larger unidentified sites that may come forward.
- 3.46 The methodology for calculating housing windfalls is consistent with the approach used for both Local Plans. The Council's consider that the resulting allowance for windfalls is robust and realistic. It was endorsed at the Adur Local Plan examination in 2017.

## Stage 4 - Assessment Review

- 3.47 The SHLAA provides a key part of the evidence base for the Local Plan Reviews. Stage 4 requires the development of a draft housing trajectory based upon the detailed assessments undertaken at stages 1-3.
- 3.48 Following the assessment of all sites, an indicative housing trajectory will be produced setting out how much housing can be provided across each of the Plan areas and at what point in the future it could be delivered. The trajectory will be used to determine whether sufficient sites have been identified to meet the objectively assessed need for each authority using the Standard Methodology. This includes a five year supply of 'deliverable' sites, and whether this can be maintained on a rolling basis, and sufficient 'developable' sites for years 6 to 15. **The final trajectory is included in the Annual Monitoring Report for each authority.**
- 3.49 If insufficient sites have been identified to meet the development needs of the Plan areas, the site assessments within Stages 1 to 3 will be revisited to review the development potential assumptions on particular sites. This may include, for example, discussions with landowners/agents, reviewing density assumptions, and further research on identifying sites and overcoming constraints.
- 3.50 Following the review process, if there are still insufficient sites, then it will be necessary to investigate how this shortfall should be addressed.

3.51 The NPPG allows for the investigation of potential broad locations where identifiable sites will not provide sufficient land for housing to meet the land supply requirement for 15 years (or more). Identification of broad locations for housing development is supported by the NPPF (paragraph 67).

## **Stage 5 - Final Evidence Base**

3.52 In line with the NPPG we propose to publish the following outputs for the SHLAA:

- a list of all sites or broad locations considered, cross-referenced to their locations on maps;
- an assessment of each site or broad location, in terms of its suitability for development, availability and achievability to determine whether a site is realistically expected to be developed and when;
- an assessment of the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
- a list of discounted sites with clearly evidenced and justified reasons.

## **Data Outputs of Adur District and Worthing Borough Council's SHLAAs**

3.53 The Final SHLAA report contains the following information:

- Individual maps showing the location of sites deemed potentially suitable, available and achievable - 'Potential'
- A Map and List identifying sites that have been assessed as 'Rejected - Monitor'.
- A Map and List identifying sites that have been assessed as 'Rejected'.
- A Map and List identifying sites that have been assessed as 'Committed Sites'
- A detailed assessment of those sites considered to be 'Potential' for development in terms of suitability, availability and achievability, including the types and quantities of development that may be delivered on each site ;
- A report setting out the conclusion of the assessment process for all 'Rejected - Monitor' sites.
- A report setting out the conclusion of the assessment process for all 'Rejected' sites.
- A report setting out the conclusion of the assessment process for all "Committed Sites"

## Monitoring

- 3.54 The NPPG indicates that the assessment of sites should be kept up-to-date as part of the annual monitoring process. Each Council will publish an update of the SHLAA by December of each year.

## SHLAA Reviews

- 3.55 The SHLAA will be regularly reviewed and published on the Councils' website. It will be necessary to undertake a full review of sites when development plans are reviewed.
- 3.56 The Councils will continue to accept new sites for the SHLAA throughout the assessment process. **However, any new sites received after 31 March each year will be taken into account in the next annual review.**