

Strategic Housing Land Availability Assessment

Coastal West Sussex Districts Methodology/Project Brief

Introduction

- 1.1 The purpose of this project brief is to provide a common methodology to be used by the Coastal West Sussex Districts when undertaking Strategic Housing Land Availability Assessments (SHLAAs). The Coastal West Sussex Districts comprise Adur DC, Arun DC, Chichester DC and Worthing BC. The four Councils are intending to undertake separate SHLAAs for their respective local authority areas, but wish to adopt a common methodology and to work jointly on certain aspects of the project, particularly where it may be necessary to commission external work from consultants.
- 1.2 The requirement to undertake SHLAAs is set out in PPS3 'Housing' which states that these studies should be undertaken as a key source of evidence to inform development plans and support the delivery of sufficient housing land to meet identified requirements. Detailed guidance on how to undertake SHLAAs is set out in a Practice Guidance publication accompanying PPS3. The methodology set out here is based on the Practice Guidance adapted to local circumstances, following discussion between the four Coastal Districts.

Purpose of Assessment

- 2.1 The overall purpose of SHLAA is set out in the Practice Guidance:
 - (i) to identify sites with potential for housing;
 - (ii) to assess their housing potential; and
 - (iii) to assess when they are likely to be developed.
- 2.2 It should be emphasised that the four Councils consider the SHLAA work to be a technical study and not a policy document. The studies will identify possible housing sites and assess overall housing potential, but ultimately decisions on which sites should be brought forward for development will be determined through the LDF process.
- 2.3 The joint methodology follows the step by step approach set out in the Practice Guidance, highlighting the key issues at each identified stage.

Stage 1: Planning the Assessment

- 3.1 Each of the four Councils will be undertaking their own separate SHLAA and will make their own arrangements with regard to management and resources for the work. However, as it is envisaged that certain tasks will be undertaken or commissioned jointly, there will be a need for regular liaison regarding progress and timetabling.
- 3.2 It would therefore be helpful if each Council circulates its SHLAA work programme and timetable when agreed. In addition, regular meetings will be arranged between the four Councils to monitor progress and discuss any issues or problems encountered.

- 3.3 The Practice Guidance advocates a partnership approach at the sub-regional level, working with key stakeholders, such as house builders, social landlords, local property agents, local communities and other agencies such as English Partnerships. It also mentions using housing market partnerships where they exist.
- 3.4 The view of the partner Councils is that there would be little benefit from setting up a regular project working party involving stakeholders. It is considered more important to consult and involve stakeholders at key stages in the Assessment work.
- i) Methodology: The Councils' will consult key stakeholders on the methodology to be used and the proposed scope of their SHLAA. Consultees will include GOSE, SEERA, SEEDA, West Sussex County Council, Home Builders Federation (HBF) and Campaign to Protect Rural England (CPRE). Each Council will also consult other relevant local stakeholders (e.g through LSP, housing partnerships etc) as appropriate and/or make the methodology available for comment on the Council's website.
 - ii) Site identification: Local landowners, developers, agents, statutory undertakers, parish and town councils will be contacted and requested to suggest sites to be considered in the Assessment. It may also be appropriate to provide a Site Identification Proforma on the Councils' websites.
 - iii) Assessment of developability and deliverability: This will involve assessment of the local housing market, development costs and viability. It will be important to get views and inputs from local house builders and property agents on these issues both in terms of the general market situation across the sub-region (the proposed West Sussex Strategic Housing Market Assessment (SHMA) will also be useful here) and in terms of the assumptions made regarding individual sites.
 - iv) Study outcomes: Draft SHLAA findings will be circulated to the key consultees identified in (i) for comment. In addition, the final SHLAA results should be reported to Members and the LSP and made publicly available to interested stakeholders, and on Council websites. It may be helpful to undertake presentations for Members and key stakeholders.
- 3.5 The possibility of integrating housing land and employment land assessments has been considered by the four Councils. It was agreed that there would be benefits from integrating the search for potential sites, but that the respective methodologies for assessing site suitability would be different. Therefore, it is considered appropriate that SHLAAs and Employment Land Assessments are undertaken separately, but if possible as parallel studies.

Stage 2: Determining which sources of sites will be included in the Assessment

- 4.1 The partner Councils have agreed that all areas of each District should be considered as a starting point in searching for sites. Where particular areas or

types of land are regarded as unsuitable for major (or any) housing development, this should be made explicit in the respective Assessments and the reasons set out. It may be appropriate to define areas to be excluded in the methodology so that this will be subject to wider consultation.

Stage 3: Desktop review of existing information

- 5.1 Based on the Practice Guidance and previous housing land studies, it was agreed that the following sources of information should be used to identify potential housing sites:
- Sites proposed in response to recent development plans (e.g LDF documents or Local Plan)
 - Other sites promoted by landowners/developers
 - Sites identified in previous UHPS, including rejected sites
 - National Land Use Database (NLUD)
 - Register of Surplus Public Land
 - Valuation office database (large empty properties)
 - Council land ownership portfolio
 - Unimplemented planning permissions
 - Planning application refusals (within past c3 years), particularly where housing development was considered acceptable in principle
 - Request letter to all known landowner/developer contacts (Site Identification Survey)
 - Request form on Council websites (Site Identification Survey)
 - Discussions with Development Control officers
 - Email/contact other relevant LA officers
 - Any other sites noted during site visits

Stage 4: Determining which sites and areas should be surveyed

- 6.1 The geographical coverage of the Assessment survey work is one of the most critical issues. The Practice Guidance states that surveys should aim to identify as many sites with housing potential in and around as many settlements as possible. It suggests that this will depend on a number of factors, such as the scale of housing requirements, the nature of the area, and the resources available. This still leaves room for interpretation, particularly outside existing settlement boundaries.
- 6.2 The partner Councils have agreed that only sites capable of accommodating 6 or more dwellings should be identified and assessed as part of the SHLAA process. It is considered that insufficient time and resources exist to identify and evaluate smaller development opportunities. In any case, it would be impractical to allocate small sites of less than 6 dwellings in development plans, which would be necessary for them to be included in the identified 10-year housing supply. Applying a 6 dwelling threshold would also be consistent with the site size threshold used by Baker Associates in their previous Urban Housing Potential Studies for Adur, Arun and Worthing, reflecting the division between large and small sites used by West Sussex County Council for monitoring purposes.
- 6.3 In terms of geographical coverage, the Councils agreed that the survey should seek to identify and survey all potential sites and opportunities within existing

Built-Up Area Boundaries (BUABs)/Settlement Policy Areas (SPAs), thereby updating previous urban housing potential studies. Outside existing BUABs/SPAs, it is open to interpretation what should be defined as a clearly identifiable site as opposed to a 'broad location' for development. It was agreed that this distinction should be based on a number of factors, including the scale of the development opportunity and whether there are clearly defined site boundaries (e.g brownfield sites). All sites suggested for development in response to the Site Identification Survey (see Stage 3) should be subject to detailed evaluation.

Stage 5: Carrying out the survey

- 7.1 A consistent approach needs to be used in surveying and evaluating sites. It was agreed to produce a standard assessment proforma for each site, setting out standardised evaluation criteria. A copy of the proposed Site Assessment Form is appended to this methodology note.
- 7.2 Key aspects to record initially include:
- Site area and boundaries
 - Current use(s)
 - Surrounding land use(s)
 - Obvious physical constraints
 - Any site access considerations
- 7.3 More detailed site evaluation will be undertaken in Stage 6 below.

Stage 6: Estimating the housing potential of each site

- 8.1 The potential housing yield for each identified site will take account of a number of factors:
- Physical constraints
 - Major policy constraints
 - Design issues
 - Accessibility to facilities
 - Density issues
 - Development standards/requirements
 - Neighbouring uses/area character etc
- 8.2 It should be possible to undertake this stage of the work in-house. This is likely to involve discussions with Development Control officers and may require some specialist design advice for some sites. Design input may be aided by the use of standard design templates. Where sites have been proposed in response to the site request letter, it may be appropriate to base the housing assumptions on details supplied by the relevant site promoter (assuming these conform with density requirements and are acceptable in terms of development constraints etc).
- 8.3 It will be important to assess constraints, standards and requirements in terms of likely future as well as present circumstances.

- 8.4 All identified sites will be assessed against the criteria set out in Stages 5 and 6. Following this initial assessment, sites which are considered suitable locations for housing will be subjected to more detailed evaluation in Stage 7.

Stage 7: Assessing when and whether sites are likely to be developed

- 9.1 All potential housing sites will need to be assessed in terms of whether they meet the PPS3 tests of deliverability and developability – i.e that sites should be suitable, available and achievable now, or that there is a reasonable prospect of this in the future.
- Suitability – Requires assessment against physical and policy criteria as identified in Stages 5 and 6 above.
 - Availability – Requires information on site ownership, tenancies and the operational requirements of landowners. This level of detail potentially goes further than that previously gathered for housing potential studies and may be difficult to obtain. Such details will be requested from promoters filling in Site Identification Survey. However, where this information is not known and has not been provided, it may be necessary to contact the Land Registry or request further details from persons/organisations known to have an interest in the site.
 - Achievability – Requires assessment of economic viability and likelihood of development drawing from information on i) marketability; ii) potential development costs; and iii) delivery factors relating to development. The assessment of marketability will require the views of house builders and local property agents. Specialist input will also be required to undertake site viability assessment. There is scope for a joint approach by the four Councils to commission such work.
- 9.2 Assessment of sites will consider whether identified development constraints can be overcome and what action would be needed to achieve this, e.g infrastructure, investment, use of Compulsory Purchase Orders etc.

Stage 8: Review of the Assessment

- 10.1 In the Practice Guidance, this stage is seen as pulling together the results of the Assessment to produce an indicative housing trajectory that sets out how much housing can be provided from identified sites and at what point in the future. The Guidance indicates that this work should include a risk assessment as to whether sites will come forward as anticipated.
- 10.2 The housing trajectory will indicate whether there are sufficient identified sites to meet the minimum 10 year housing supply required in PPS3. If there is a shortfall, the Guidance indicates that LPAs should move on to look at broad locations (Stage 9) or the use of a windfall allowance (Stage 10).

Stage 9: Identifying and assessing the housing potential of broad locations (where necessary)

- 11.1 The Practice Guidance defines 'broad locations' as areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. The Guidance indicates this will include:
- i) Broad areas within or outside settlements where housing could be encouraged, e.g small extensions to settlements;
 - ii) Strategic locations outside settlements, e.g major urban extensions, growth points, or new free-standing settlements.
- 11.2 As noted above, the Practice Guidance sees broad locations as a fallback which should only be considered if insufficient specific sites can be identified.
- 11.3 As noted previously, the Guidance does not define a clear distinction between broad locations and specific sites. This is therefore left to local studies to define. The factors discussed in reference to Stage 4 above can be used to provide some help, but, in many cases, this will depend on a subjective judgment by the relevant Council undertaking the SHLAA.
- 11.4 Because of the potentially wide geographical coverage of SHLAAs, it may be desirable to define some potential opportunities outside existing BUABs/SPAs as 'broad locations', unless the sites in question have clearly defined boundaries (e.g a brownfield site) or have been previously identified or specifically put forward for consideration in response to the Site Identification Survey (see Stage 3). However, within BUABs/SPAs, potential development opportunities would normally be classified as specific sites, unless there are exceptional circumstances (e.g at Shoreham Harbour due to the potential scale of the opportunity).
- 11.5 There is scope for re-using previous LDF background work as source material to help in the identification and assessment of potential 'broad locations'. However, the identification process should not be restricted by this. Similarly, all locations identified should be objectively re-assessed in the context of the SHLAA work.
- 11.6 The Practice Guidance doesn't give any specific guidance on how to assess broad locations as opposed to sites. Presumably, it is intended that, in terms of potential scope for housing, they should be subject to a similar type of assessment, though less detailed. However, the choice of which broad locations are most suitable to be taken forward into development plans will also depend on the comparative assessment of alternative spatial options as part of the LDF process.

Stage 10: Determining the housing potential of windfall (where justified)

- 12.1 The Practice Guidance follows the approach in PPS3, where the use of windfall allowances should only be considered as a last resort. Therefore, they should only be used if the previous SHLAA work has provided insufficient potential sites and/or broad locations to meet housing requirements.