

Strategic Housing Land Availability Assessment (SHLAA)

Worthing BC Project Brief / Methodology - April 2013

Introduction

The Strategic Housing Land Availability Assessment (SHLAA) is used as part of the evidence base to assess the availability, suitability and viability of land for housing to meet the demand for more homes within Worthing. Alongside other evidence documents (particularly the Strategic Housing Market Assessment) it is used to support the Council's housing delivery strategy which is currently set out within the adopted Core Strategy.

The aim of the SHLAA is to establish realistic assumptions about what level of housing is likely to be delivered over the plan period to help meet housing need. The National Planning Policy Framework (NPPF) requires local planning authorities to identify a supply of specific deliverable sites for the first five years of the plan period (including a relevant buffer) and identify a supply of specific developable sites or broad locations for growth for years 6-10, and where possible, for years 11-15.

The Council published a comprehensive SHLAA in 2009 which included a full survey of housing land availability following a review of all site information held and a 'Call for Sites'. This study was used to support the Council's Core Strategy which was adopted in 2011. The 2009 study has since been reviewed regularly within the Annual Monitoring Report and through residential land availability updates. However, given the changes to the planning system at the national level and the need to meet local housing needs it is considered that a 'full' review and update of the SHLAA is now required. A key objective of this work is to ensure that all data and assumptions on existing SHLAA sites are robust and up-to-date and that a consistent assessment approach is used to consider 'new' opportunities.

When finalised, this work, alongside other evidence (SHMA, landscape studies, Duty-to-Co-operate considerations etc) will help to inform whether a full or partial review of the Core Strategy is required or whether an additional Development Plan Document(s) should be programmed and advanced.

The 2013 SHLAA will build on the original study and related updates, revisit site conclusions in the light of new information, consider additional opportunities through another 'Call for Sites' and will review the approach to broad locations. The 2013 study will follow the methodology and approach set out in the SHLAA Practice Guidance (DCLG 2007) and will take account of the provisions and requirements of the NPPF where relevant.

As with all SHLAAs, it is very important to note that the identification of land with potential for housing does not imply that the Council will definitely grant planning permission for residential development on that land or allocate land for residential development through the Local Development Framework. All planning applications

will continue to be determined against the Development Plan and material planning considerations, including the NPPF. Similarly, the inclusion of land for residential development in the SHLAA does not preclude it being developed for uses other than residential. Furthermore, it is acknowledged that appropriate sites will continue to come forward as planning applications even if they have not been identified in the SHLAA. Therefore, the exclusion of sites from the SHLAA (either because they are discounted or not identified) does not preclude the possibility of planning permission being granted on those sites for residential development.

The designated site boundaries in the SHLAA, potential capacity and the determination of a site's deliverability and developability will be informed by the best information available at the time of study. A key objective is to use an agreed set of parameters to make this assessment to ensure sites are treated equally against consistent criteria.

Policy Context

National Context

The NPPF sets out the Government's planning policies for England. An overarching aim of the framework is that planning should contribute to achieving sustainable development. A key element of this objective is to ensure that sufficient developable land of the right type is available in the right place at the right time and that a supply of housing is delivered to meet the needs of present and future generations. In addition, the NPPF encourages the effective use of land by encouraging the reuse of sites that have been previously developed alongside active management of growth to ensure it is directed to sustainable locations.

Paragraph 159 of the NPPF requires local planning authorities to prepare a SHLAA to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet identified need for housing over the plan period. Linked to this objective, the practice guidance states that the primary role of the SHLAA is to identify as many sites with housing potential as possible with the aim of ensuring a more responsive approach to local land supply.

With regards to housing supply, which will be partly informed by the SHLAA, the NPPF recommends that local planning authorities should:

- Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements
- Identify a supply of specific developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.
- Include an additional buffer within the five year supply, the scale of which is dependent upon historic record in delivering housing.

It should be noted that the NPPF now permits the inclusion of a windfall allowance in the five year supply where there is compelling evidence that such sites have and will continue to form a reliable source of supply, but that this should not include residential gardens.

Local Policy

The Council's Core Strategy (2011) requires Worthing to deliver 4,000 dwellings in the period between 2006 and 2026 – this equates to a completion target of 200 dwellings a year. This figure, which was in conformity with the recently rescinded South East Plan, was considered to be the appropriate level of development within the Borough in that it took account of local constraints on land availability and balanced these against housing needs.

The Core Strategy also sets the strategic approach to the allocation of development across the borough. The table below demonstrates that for the first six years of the allocation period 1,542 net additional dwellings were completed in Worthing, equating to a 'surplus' of 342 dwellings. Therefore, there is currently a residual requirement of 2,458 dwellings for the final 14 years of the Plan period, equating to a required delivery of 176 dwellings per annum.

Core Strategy requirement	Completions 2006-2012	Residual requirement to 2026	Residual annual requirement
4,000	1,542	2,458	176

Despite these seemingly 'healthy' delivery rates it should be noted that there has never been any intention that the 200 dwelling / year target should be seen as a 'ceiling' and that, as such, appropriate and sustainable development within the Borough should be seen as a welcome addition to the housing stock.

In line with the original Strategic Housing Market Assessment (SHMA), the recently published SHMA update has again concluded that the objectively assessed local housing needs within the Borough are significantly higher than the current 200 dwelling a year target. However, the SHMA also confirms that the previous development constraints (that informed the levels of growth proposed within the South East Plan and the Core Strategy) still apply and that it is highly unlikely that housing provision in the Borough can match local need.

As previously mentioned, the South East Plan, which helped to set the housing requirement for the region and the Borough, has now been rescinded. At the national level the NPPF now provides the policy framework against which local plan documents need to conform. To significantly boost the supply of housing, the NPPF now requires local planning authorities to use their evidence base to ensure that their Local Plans meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as this is consistent with other policies.

This update, along with other evidence, will help to determine whether the current housing delivery strategy set out in the Core Strategy meets with the provisions and expectations of the NPPF or whether a different approach is required.

Methodology

The primary role of the Assessment is to:

- Identify sites with the potential for housing
- Assess their housing potential
- Assess when they are likely to be developed.

The methodology set out here is based on the Practice Guidance adapted to local circumstances and changes to the planning system since the Practice Guidance was published. The ten key stages of this work established in the Guidance are set out below along with key issues at each identified stage and an explanation as to how existing information on sites will be reviewed and how new sites / details will be incorporated.

Stage 1: Planning the Assessment

The 2009 SHLAA was progressed by Baker Associates. Despite using planning consultants, planning officers were involved at each stage of the work and supplied much of the information that informed the study. For this reason, this full review is being undertaken 'in-house' but with external input and guidance at appropriate stages. This is also the approach that has been taken by other local planning authorities within the sub-region in recent years.

The Practice Guidance advocates a partnership approach, working with key stakeholders, such as house builders, social landlords, local property agents and the local community. To meet this objective the Council is committed to consulting and involving stakeholders at key stages in the Assessment work. This includes: consulting on this methodology; inviting stakeholders to put forward land during the 'Call for Sites' stage and requesting feedback on the study outcomes, particularly the assessment of developability and deliverability.

Although it is considered appropriate that SHLAAs and Employment Land Assessments are undertaken separately it would be preferable if they were undertaken as parallel studies. There may be scope to progress an employment land review update alongside this study but if this is not possible the most up-to-date information available on employment land should be used to help inform the assessment of housing sites.

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

It is accepted that all areas of the Borough should be considered as a starting point in searching for sites. However, in line with guidance there are particular types of land or areas which should be excluded from the assessment (see table below). All sites previously considered, including those that were previously scoped out of the study, will be 're-visited' to ensure that previous assumptions were correct and / or that circumstances have not changed.

Examples of Sites / Areas to be Excluded from the Assessment

- Ancient woodland
- Areas within Flood Risk zone 3
- Local Nature Reserves
- Sites of Special Scientific Interest (SSSI)
- Sites of Nature Conservation Interest (SNCI)
- Historic parks and gardens
- Sites detached from the Worthing Built-Up-Area Boundary
- Areas of open space identified as being of high value in the Councils Open Space Assessment

In addition to the list above land within Worthing that lies within the South Downs National Park will also be excluded from this Assessment. Not only are development options in these areas extremely limited but the National Park Authority are the relevant planning authority for the South Downs and they are progressing their own SHLAA. See their website for details:

<http://www.southdowns.gov.uk/planning/planning-policy/local-development-framework/strategic-housing-land-availability-assessment>

Sources of Sites with Housing Potential

Sites Within the Planning Process: Commitments

- existing housing allocations and site development briefs
- land allocated (or with permission) for employment or other land uses which may no longer be required for those uses
- unimplemented / outstanding planning permissions for housing
- planning permissions for housing that are under construction (but not completed)

Sites not currently in the Planning Process

- vacant and derelict land and buildings
- surplus public sector land
- land in non-residential use which may be suitable for re-development for housing
- additional housing opportunities in established residential areas
- large scale redevelopment and re-design of existing residential areas
- urban extensions (the adjoin the existing settlement boundary)

Stage 3: Desktop review of existing information

Closely informed by the practice guidance, and using the 2009 SHLAA and recent updates as a base, a variety of sources will be used to identify potential housing sites. All sites recorded in recent years will be reviewed and this will be supplemented with any additional or more recent information. In particular, this will include a review of: all planning permissions (extant or otherwise); planning refusals; awareness of developer interest / pre-application discussions; the

National Land Use Database (NLUD) returns; commercial land availability register and a comprehensive 'Call for Sites'.

As already emphasised, a key role of this assessment is to ensure that existing information on sites is robust and up-to-date. A new/updated database is to be created and a thorough review will be undertaken of all opportunities that have either been scoped out or included during previous assessments. As set out within the study timetable (see Appendix 3) a period of time has been set aside to undertake this initial review work so that the Council's internal processes are robust before considering any additional sites.

In line with the above, sites / opportunities within the Borough will be broken down into four main groups and reviewed and reported accordingly:

Set	Description	Action
1	Sites included within the 2009 SHLAA but that are now completed	To avoid double counting - ensure that all sites previously identified within the SHLAA and that are now complete are removed. List to be listed and delivery rates reported.
2	Sites that were considered but not included in 2009.	Reconsider these sites that were scoped out and verify that this is still the correct position / conclusion (if not, add to set 3).
3	Sites included within the 2009 SHLAA that are still 'live'	Endorse or revise assumptions. It is likely that most of these will stay 'live' and form a source of potential housing. However, it is possible that some may now go into group '2'.
4	Review of 'new' sites / opportunities	Review these. Sites will then either slot into set '2' or '3' above.

As suggested in the table above, it is expected that the suitability of sites already assessed and included in the 2009 study will remain unchanged in most cases. However, in order for this full update to be robust it is important that all sites are reconsidered to ensure that suitability and capacity assumptions are consistent, particularly given the policy changes at the national level.

Stage 4: Determining which sites and areas should be surveyed

The Practice Guidance states that surveys should aim to identify as many sites with housing potential in and around as many settlements as possible. In line with the previous study, it is proposed 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. The use of a 6 site threshold also reflects the division between large and small sites used by West Sussex County Council for their monitoring purposes. Obvious 'non-runners' may be identified but these will not be surveyed in any detail.

In terms of geographical coverage, the survey will seek to identify all potential sites and opportunities within the existing built-up area boundary (as set out on the Core Strategy Proposals Map). In addition, given the nature of the Borough, all sites outside (but adjoining) the built up area boundary that are identified during Stage 3 (see above) will be subject to detailed evaluation.

Greenfield sites will be included as the aim is to provide a rounded assessment of all potential sources of supply. Strategic choices are more complex than simply filling up urban areas first as there is always need to allow for other types of land use (other than residential) which will often be better located within existing settlement limits. Although brownfield land will, in general, be given priority it is possible that, for Worthing, the best solution may be to bring forward some greenfield land.

Stage 5: Carrying out the survey

A consistent approach will be used in surveying and evaluating sites and a standard proforma setting out standardised evaluation criteria will be used. To improve the robustness of the study the existing proforma is currently being enhanced using best practice examples from across the region. This will be made available to view on the Council's website when it is finalised. Three planning officers will be involved in the survey work and, to ensure consistency, it is proposed that two of these officers will be involved in the assessment of each individual site. A map (1:1250) of each opportunity will be logged and photographs will be taken of each site.

Key aspects to record / check initially will include: site area and boundaries; current use(s); surrounding land use(s); obvious physical constraints; any site access considerations (Appendix 1 provides an indicative list of the potential development constraints that will be considered).

Stage 6: Estimating the housing potential of each site

The potential for housing for each identified site will take account of a number of factors: including: physical constraints; policy constraints; design issues; accessibility to facilities; density; and neighbouring uses / character etc. The potential site yield will be determined from existing evidence such as extant permissions or through discussions with the site proponent. Where there is no such evidence, policy officers will apply an estimate that takes relevant planning policies and specific characteristics and constraints of the site and its surrounding area into account. Broad density assumptions (dwellings per hectare):

- Lower – 30 dph
- Medium – 40 dph
- High – 50 dph
- Flatted – 60+ dph

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

All potential housing sites will need to be assessed in terms of whether they meet the tests set out in the NPPF:

- 'To be considered deliverable, sites 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 and in particular that the development is viable.'
- 'To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably development at the envisaged point.'

To make this assessment the tests included within the Practice Guidance will be used:

Suitability - The suitability of sites will consider: policy restrictions; physical problems or limitations; potential impacts; and environmental conditions. The Worthing Core Strategy and the NPPF provide the policy position against which sites will be assessed.

Availability – For 'new' or existing SHLAA sites landowners/developers/agents will be contacted in order to confirm the availability (or continued availability) of the site for development. For the reasons of practicality, and in line with the definition contained in the NPPF, extant planning permissions will be considered to be deliverable unless there is clear intelligence that such permissions will not be implemented within 5 years.

Achievability – The planning system now places greater emphasis on the need to demonstrate that sites identified as having development potential are viable. Given this need to assess the economic viability of newly identified sites as well as updating existing appraisals to reflect any changes in circumstances / assumptions it is deemed appropriate to reassess the general viability of all sites. The assessment of economic will be informed by information on marketability, potential development costs and delivery factors relating to development. The assessment of achievability also considers what actions, if any, could be required to overcome constraints to development and how the timescale for overcoming such constraints might upon delivery.

Rather than undertake a comprehensive assessment of all individual sites a typical selection of development sites within the Borough will be tested. The Council's Project Surveyor will assist in this assessment and the recently published Viability Assessment (produced to inform the setting of a Community Infrastructure Levy in the Borough) will also be used.

Stage 7 Summary

Informed by the more detailed site assessment sheets a summary table will be provided within the final report which will provide an overview of the decisions made on each site (see Appendix 2). This will include a map showing the site boundary and a detailed breakdown of the assumptions on suitability, availability, achievability and overcoming constraints. In the event where it is unknown when a site could be developed, the site is regarded as 'not currently developable'. This may be, for example, because one of the constraints to development is severe, and it is not known when it might be overcome.

In some cases, sites may be identified as 'potentially suitable'. This classification will recognise that the site could offer a suitable and sustainable location for development but that further work will be required to establish whether current restrictions can be overcome. Where a site is identified as 'potentially suitable' or where there are currently unresolved issues and constraints relating to availability or achievability, the site is considered to be not currently developable.

Sites that have been included in the SHLAA as part of the housing land supply will not be ranked or scored as this would make it difficult to persuade readers that the SHLAA merely provides information about possible sites as it could be seen that through scoring a decision has started to be made.

Stage 8: Review of the Assessment

This stage will be used to pull 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 they are likely to be delivered. This work will include a risk assessment as to whether sites will come forward as anticipated.

It should be remembered that the inclusion of a site in the Assessment does not imply that it will definitely be made available for housing. The SHLAA is a technical study and not a policy document. It identifies possible housing sites and assesses overall housing potential. Ultimately decisions on which sites should be brought forward for development will be determined through the Local Development Framework / planning application process.

The study findings will be published in draft form to allow for external scrutiny and consideration. If necessary, it might be appropriate to engage the services of specialists (local agents and builders / quantity surveyor) to check and endorse the findings of the study and the conclusions reached.

Under the provisions the Practice Guidance the housing trajectory incorporating the SHLAA sites would then be used to indicate whether there are sufficient identified sites to meet the minimum 10 year housing supply required (by the South East Plan / Core Strategy). If there was a shortfall, the Guidance indicated that local planning authorities should then move on to look at broad locations (Stage 9) or the use of a windfall allowance (Stage 10).

The 2009 SHLAA identified a more than adequate potential supply of housing to meet both the emerging South East Plan requirement to 2026 and more immediately the five year supply of deliverable sites. Under those circumstances, there was no requirement for the Council to look at broad locations (stage 9) or determine the housing potential of windfall (Stage 10).

However, as already explained, the demise of the South East Plan and the emergence of the NPPF means that in many respects the 'goal posts' for assessing the appropriate housing targets have been moved. Rather than working towards a 'fixed' target, as was the case with the 2009 study, there is now less certainty in this regard given that the NPPF requires planning authorities to work towards meeting objectively assessed local housing needs.

It is possible that the findings of this SHLAA update may indicate a higher level of housing land supply (on previously developed sites) than was envisaged in the previous study. Despite this, there is no expectation that this would wholly meet the local identified housing needs (the figures for which are emerging and will be available to inform this study). As such, it is proposed that SHLAA Guidance is adapted to meet local circumstances so that stage 9 and 10 form part of the study regardless of the conclusions reached within stage 8.

It should be noted that the assessment and consideration of broad locations (stage 9 – see below) does not necessarily mean that this would be a suitable or sustainable approach given potential infrastructure constraints and environmental capacity. However, given the changes in planning policy at the national level, it is important that all opportunities for housing delivery are explored.

Stage 9: Identifying and assessing the housing potential of broad locations

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. They should only be considered as a fallback if insufficient specific sites can be identified. In the context of Worthing, and given limited land availability, this will include areas outside the settlement boundary where housing could be encouraged.

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

In line with the NPPF, local planning authorities may only make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens. This update will consider whether there is evidence to support the inclusion of windfalls.

Consideration of SHLAA outcomes and next steps

When finalised, the SHLAA update will form an important piece of evidence as the Council considers its approach to housing delivery in the Borough over the next fifteen years. However, it must be remembered that the Assessment is a capacity exercise only that demonstrates the location and level of available housing land in Worthing. On its own the Assessment does not change Council policy. However, this work, alongside other evidence (SHMA, landscape studies, Duty-to-Co-operate considerations etc) will then help to inform what actions may be required.

As a separate exercise, the findings reached within the SHLAA 2013 will be considered and assessed against the following housing 'targets':

- The current Core Strategy requirement
- The estimated 'maximum achievable' housing supply level (Duty-to-Cooperate study)
- The objectively assessed housing requirement (SHMA update)

One conclusion may be that, with regards to housing delivery, the Core Strategy remains 'fit for purpose' but that in order to maximise the delivery of sustainable housing greater assistance may be required to help deliver sites. This may be through the production of Development Briefs, the facilitating of discussions or through minor amendments to policy / guidance. Alternatively, and depending on the outcomes of all studies, to meet with the requirements of the NPPF the Council may need to consider whether a full or partial review of the Core Strategy is required or whether an additional Development Plan Document(s) should be programmed and advanced.

The SHLAA is a 'living document' and the Council will continue to update the study and the housing trajectory and report on it annually through the Annual Monitoring Report Process.

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Appendix 1 – Types of Constraints

Policy	Physical
Outside BUAB South Downs National Park Designated nature conservation area Designated archaeological site Landscape area Listed building Conservation Area Environmental Area Special Character Protected industrial estates and business park Key office location Retail centre Recreation site Designated for non housing use Loss of tourist accommodation Loss of community facility TPOs	Access Steep slopes Flood risk Natural features Pylons Contamination Ground conditions Infrastructure Hazardous risks Biodiversity
Potential impacts on	Environmental conditions for occupants
Landscape Conservation (built) Conservation (natural) Neighbouring uses	Noise from neighbouring uses Pollution from neighbouring uses Lack of amenity space Lack of daylight

Appendix 2 – Site Assessment Summary Template

Site ref		Ward	
Location	<i>Address / description</i>		
Current Use(s)			
Gross site area	<i>Ha</i>		
Planning Status			
Site Suitable	✓ / x		
Site Available	✓ / x		
Site Achievable	✓ / x		
Constraints / action required			
Net Developable Area	<i>Ha</i>		
Proposed density	<i>Lower / Medium / High or Flatted</i>		
Deliverable (1-5 yrs)	✓ / x	<i>Number of dwellings</i>	
Developable (6-10 yrs)	✓ / x	<i>Number of dwellings</i>	
Developable (11 yrs+)	✓ / x	<i>Number of dwellings</i>	
Overall Conclusion			

Appendix 3 – Proposed Timetable

Date	Stage	Description
March 2013	1	Planning the Assessment
April	2	Determining which sources of sites will be included in the assessment
April – May	3	Desktop review of existing information – including thorough review of all sites previously considered and a 'Call for Sites'.
April - May	4	Determining which sites and areas will be surveyed
June – Aug	5	Carrying out the survey
Aug – Sep	6	Estimating the housing potential
Sep	7	Assessing when and whether sites are likely to be developed
Sept – Oct	8	Review of the Assessment (External scrutiny may be required at this point)
Sep – Oct	9	Identifying and assessing the housing potential of broad locations
Sep – Oct	10	Determining the housing potential of windfalls (where justified)
Nov		Publish
On-going		Regular monitoring and updating