

Strategic Housing Land Availability Assessment (SHLAA)



**Nuneaton and Bedworth
Borough Council**

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1. Introduction

1.1 National Guidance

1.1.1 The National Planning Policy Framework (NPPF) was issued in March 2012 and requires Local Authorities to “prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period”. In March 2014, the Government published the National Planning Practice Guidance, including an updated section on producing SHLAAs. This new version of Nuneaton and Bedworth Borough Council’s (NBBC) SHLAA has regard to this guidance.

1.1.2 The NPPF says, ‘local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15; for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and set out their own approach to housing density to reflect local circumstances.’

1.1.3 The SHLAA will provide evidence on land availability for residential development. This work contributes to the overall evidence base for the Borough Plan. The guidance advises that in carrying out the SHLAA, “plan makers will be able to plan proactively by choosing sites to go forward into their development plan documents to meet objectively assessed needs”.

1.1.4 The SHLAA practice guidance indicates that sites which are deemed as deliverable have a reasonable prospect that they will be delivered in 5 years, taking account of suitability, availability and achievability criteria, which are set out below:

- Suitable – the site offers a suitable location for housing development and would contribute to the creation of sustainable mixed communities.
- Available – there is confidence that there are no legal or ownership problems and the landowner has expressed an intention to develop or sell.
- Achievable – there is a reasonable prospect that housing will be developed on the site at a particular point in time, in the case of a 5 year supply, 5 years. This can be affected by market, cost and delivery factors.

1.1.5 The study has been produced based on the best available information at the time of writing, drawing on the professional judgement of all those involved. The SHLAA is a strategic assessment of housing supply to be used for plan-making purposes. The level of information provided is appropriate to this purpose. Although the SHLAA determines the development potential of sites it does not in itself determine whether a site should be allocated for development. Furthermore, the SHLAA is not a substitute for a planning application and cannot, therefore, contain detailed information about a site or the definitive potential impacts of development. The SHLAA should be read and understood in this context.

1.1.6 In summary the guidance states that assessments of land availability should do the following:

- 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).

1.2 Coventry and Warwickshire Joint Method Statement and Coventry & Warwickshire Strategic Housing Market Assessment (SHMA)

1.2.1 The Council is preparing a new SHLAA to inform ongoing monitoring of its housing land supply and to provide evidence for the inclusion of site allocations in the Borough Plan. Previous SHLAAs were published by NBBC in 2011, 2012 and 2013. These were both written prior to the latest planning practice guidance being published and therefore it is necessary to ensure NBBC's latest SHLAA is fully compliant with national guidance to provide the up-to-date evidence in support of the Borough Plan.

1.2.2 In November 2014, the Coventry & Warwickshire Economic Prosperity Board agreed that a Joint SHLAA Methodology should be agreed by the Coventry & Warwickshire authorities in order to facilitate the provision of housing to meet the needs of the entire housing market area and assist each authority in meeting its obligations under the duty to co-operate.

1.2.3 The joint SHLAA Methodology report was finalised in May 2015.

1.2.4 The Coventry and Warwickshire Housing Market Area is well established and the strategic housing needs of the area identified with a Joint Strategic Housing Market Assessment (SHMA) in 2013, 2014, 2015 and 2016. Work is still ongoing at the sub-regional level to ensure the objectively assessed need for the entire housing market area is met, particularly in light of a shortfall in provision of Coventry's housing need and the likely distribution of this shortfall across the housing market area.

1.2.5 The Preferred Options document identified a housing target of 7,900 dwellings, however, in 2013 this figure was superseded by the findings of a joint Strategic Housing Market Assessment (SHMA) for Coventry and Warwickshire which informed the development of a housing target of 9,900 dwellings. This has been further superseded by an update to the SHMA to take account of new population projections, which generates an objectively assessed need of 10,040 dwellings for the Borough 2011-2031. updated report was undertaken in 2016 to analyse key data from the 2014 based ONS subnational population projections (SNPP) and CLG (2014-based) household projections with regard to housing need in the Coventry and Warwickshire Housing Market Area (HMA). The analysis built on information in the September 2015 Updated Assessment of Housing Need (UAoHN) which

used 2012-based projection data to underpin a number of demographic and economic scenarios – ultimately leading to conclusions about housing needs across the HMA.

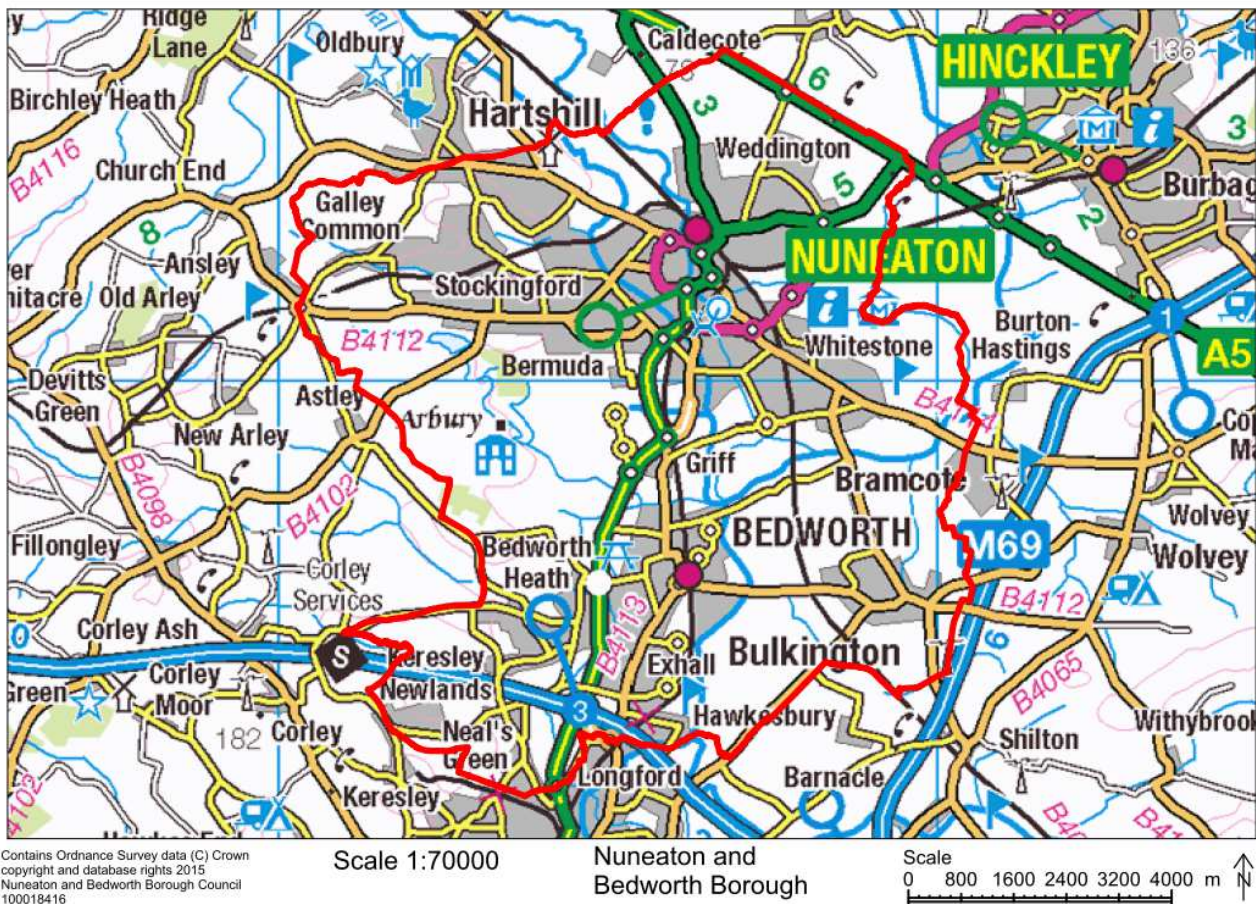
1.2.6 The 2016 report concluded that overall, when considered on the same basis as the UAoHN, the objectively assessed need in the HMA should be for 4,237 dwellings per annum (2011-31) – this is 35 fewer than was shown in the UAoHN. This updated analysis, taking account of more recent published data, does not suggest any fundamental differences from the analysis and conclusions as set out in the UAoHN of September 2015. Whilst some figures for individual local authorities changed slightly 32, the report concluded that, at the HMA level the assessed level of need in the UAoHN (and linked to 2012-based data) remains sound. It was therefore decided as a sub region and through recommendations in the study to stick with the targets figures from the 2015 UAoHN. The study concluded that:

- “The analysis shows across the HMA that the more up-to-date information suggests a virtually identical level of housing need (4,237 per annum compared with 4,272 previously). There are
- however differences for individual areas, with Coventry showing a notably higher level of OAN – this is due to higher need within the demographic projections. The affordability uplift is also virtually identical but with a slightly different distribution.
- Planning Practice Guidance indicates that wherever possible local housing needs assessments should be informed by the latest information; but does outline that this does not automatically mean that housing assessments (and by implication OAN figures) are rendered out-of-date every time new projections are issued. Overall, this updated analysis, taking account of more recent published data, does not suggest any fundamental differences from the analysis and conclusions as set out in the UAoHN of September 2015. These therefore remain a robust basis for forward planning.”

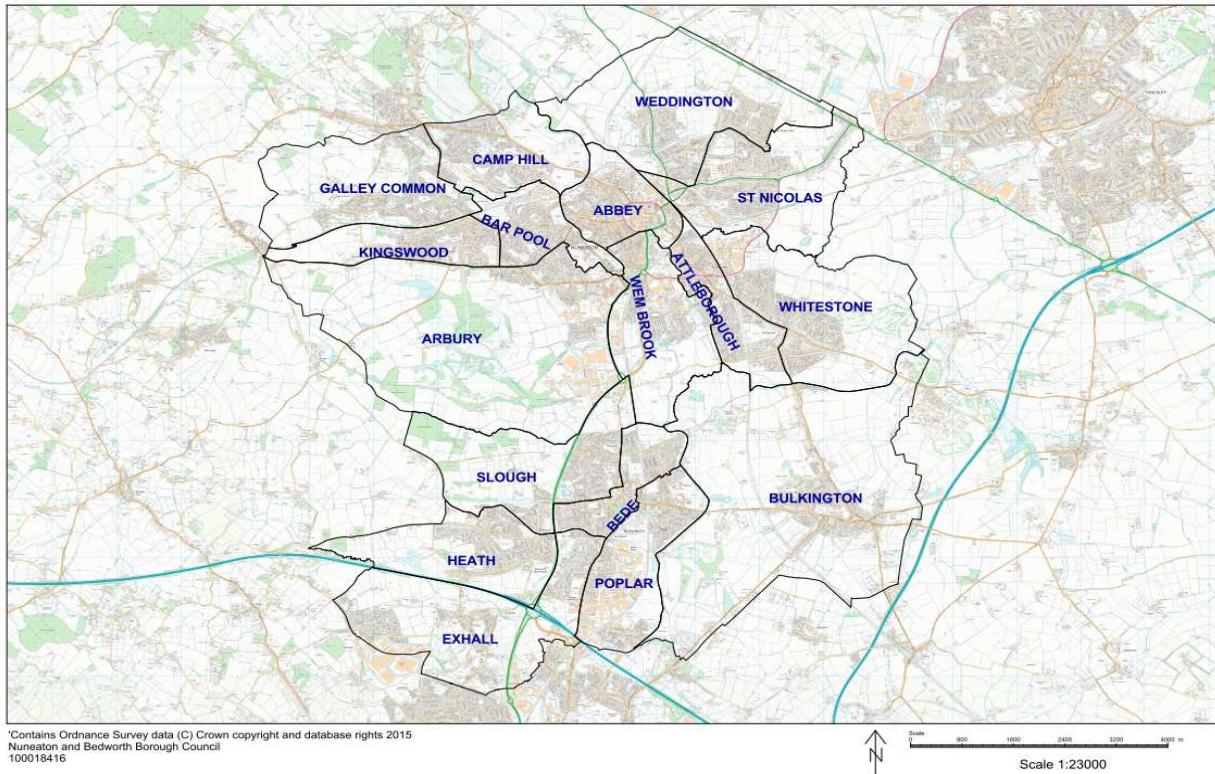
2. Methodology

2.1 Stage 1: Site Identification

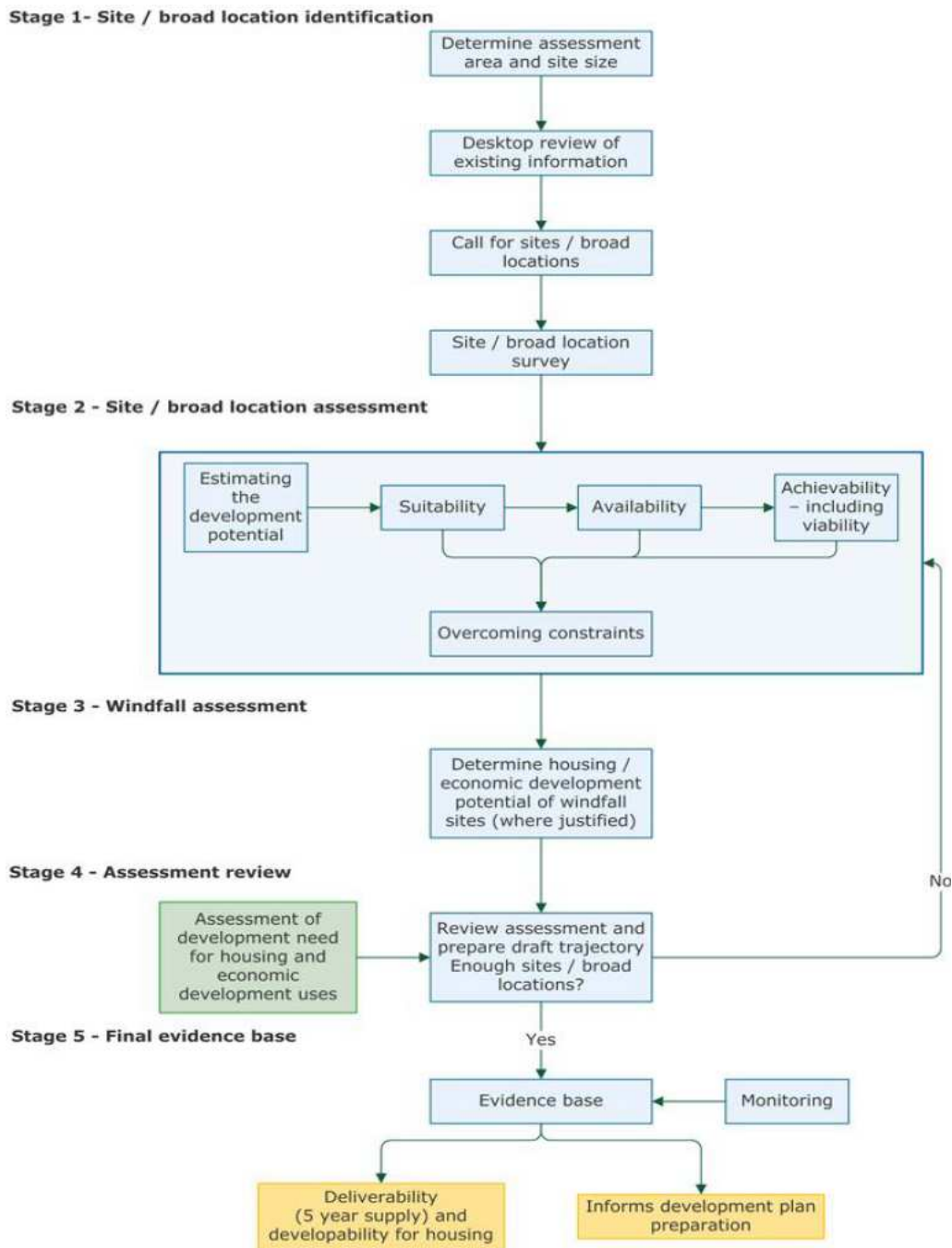
2.1.1 As a starting point, the area within which potential residential sites will be assessed needs to be determined. The extent of the study area is straightforward as it continues on from previous SHLAAs in assessing sites within NBBC's administrative boundary. The location of Nuneaton and Bedworth Borough in relation to other local settlement is shown on the map below.



2.1.2 Within the Nuneaton and Bedworth boundary there are 17 wards as identified in the map overleaf:



2.1.3 As referred to in the introduction to this report, NBBC agreed to work with neighbouring local authorities in Coventry and Warwickshire to ensure consistency of approach in carrying out SHLAAs. The joint SHLAA Methodology is an initial step in this ongoing process, as each of the local authorities is at different stages of plan-making for their areas. The overall methodology followed by each local authority will follow the approach as reflected by the diagram below, which is taken directly from the planning practice guidance and also reproduced in the joint Coventry and Warwickshire Methodology document.



2.2 Desktop Review

2.2.1 Planning practice guidance suggests that local authorities should identify as wide a range of sites as possible for inclusion within a SHLAA. The Council has undertaken a desktop review of various sources of information to identify where land could be deemed suitable for residential development and thus included within this SHLAA. The figure below identifies the different sources of potential sites and separates these sources into those sites that are already in the planning process from sites or land that have no current planning status.

Sites in the planning process

- **Land allocated for employment or other land uses, which are no longer required for those uses**
- **Existing housing allocations**
- **Extant planning permissions for housing**
- **Planning permissions that are under construction**
- **Lapsed planning permissions**

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, such as commercial buildings or car parks, including as part of mixed-use development**
- **Additional housing opportunities in established residential areas, such as under-used garage blocks**
- **Large scale redevelopment and re-design of existing residential areas**
- **Sites adjoining larger rural settlements**
- **Urban extension**

2.2.2 Sites from the above list of sources have been identified in a range of ways, including:

- Existing officer knowledge (including site visits and desktop research) from different departments of the local authority, such as planning, housing and corporate property services;
- Collation of monitoring data and planning application records; and,
- Review of land-use audits and local plan evidence base studies, such as the Employment Land Review and Open Space Audit.

2.2.3 For some of the site source categories, sites may have already been identified through ongoing dialogue with land owners and developers, especially those sites on the edge of the existing urban areas and around larger settlements which have been submitted to recent call for sites in the last few years.

2.2.4 Sites that are already in the planning process for residential use, e.g. extant planning

permissions, schemes under construction, and existing housing allocations, are considered to have already been assessed suitable, available and achievable for residential development. It will therefore not be necessary to assess these sites in the same way as land identified via other desktop research or submitted to the Council through a call for sites process, i.e. those sites not currently in the planning process.

- 2.2.5 The exception to this concerns lapsed residential permissions, which will be reviewed as to why the permission may have lapsed and whether the site can still be deemed deliverable for residential development.

2.3 Call for sites

- 2.3.1 NBBC produced a SHLAA in 2013 which was informed by a call for sites inviting landowners to submit land for consideration in the Council's emerging Borough Plan. Following the production of revised evidence on the housing market area contained in the Coventry & Warwickshire SHMA (2013, 2013 and 2015) a further call for sites was carried out in 2014 and alongside the submission version of the Borough Plan in 2015. All submissions to the Council in the call for sites have been recorded and considered for assessment in this latest SHLAA.

2.4 Stage 2: Site Assessment

- 2.4.1 Following the identification of sites as explained in Stage 1 of the methodology, Stage 2 deals with the assessment of sites based on their suitability as potential housing sites, their availability for development, and the likely achievability of the development.

Suitability

- 2.4.2 The SHLAA assessment will initially assess sites against a number of criteria that determine how suitable a site is for residential development. Criteria will mainly cover physical and environmental considerations that could act as a significant constraint on the delivery of residential development.
- 2.4.3 Actions for overcoming constraints, including through development funded mitigation, will be considered when assessing a site's suitability. Where it is believed that a particular constraint would be difficult to mitigate entirely, the criteria will be given a 'Red' rating in the Red-Amber-Green (RAG) assessment. The existence of a red rating for any of the criteria does not however mean a site is automatically considered to be not deliverable.
- 2.4.4 As referred to in the Introduction section of this report, a joint Coventry and Warwickshire SHLAA Methodology has been produced to ensure consistency between local authorities across the sub-region in assessing the potential of land to deliver new residential development.

Availability

- 2.4.5 Following the assessment of the suitability of all sites, the SHLAA will move on to assessing sites based on their availability for residential development. This part of the RAG assessment has much less criteria than the suitability category, and is principally concerned with whether a site is free from legal or land ownership constraints and how advanced it is in terms of site promotion, i.e. whether it is owned

or under option to a housing developer or whether the site is still being speculatively promoted by the land owner(s).

- 2.4.6 Sites in active current use, or designations where current evidence recommends their retention in that specified use such as for open space or employment land, will be considered to be not available.

Achievability

- 2.4.7 Only where a site is deemed to have met both of these criteria, will it then be assessed on its achievability and a summary commentary written to conclude on this part of the assessment criteria.
- 2.4.8 The RAG assessment here is intended to highlight where certain difficulties or constraints exist which may affect the financial viability of a proposed site, and where these exist whether they are likely to affect the achievability of development on a site. However, the appraisal of a site's viability for a residential land use is a detailed process and is carried out at the stage of applying for planning permission for a residential scheme on a site. Therefore unless the Council have specific site information which suggests a site may incur abnormal site set-up costs or is within a locality experiencing unusually poor market conditions, it is assumed that sites submitted to the Council will be viable for residential development.

Estimating the Housing Potential (Capacity) of Sites

- 2.4.9 In order to estimate how many dwellings could be expected to be provided on each site deemed suitable and available through the SHLAA process, it will be necessary to calculate a site's capacity. This will involve measuring the overall site area (in hectares), then calculating the net developable area for residential development, once land has been deducted from the total site area to account for provision of other land uses, infrastructure provision, and constraints mitigation.
- 2.4.10 Once the net developable area is known then a housing density can be applied to estimate how many dwellings could be provided on a particular size of site. NBBC will use housing monitoring data to provide a sample of residential planning permissions to enable calculation of an average net developable area and an average density figure for the borough. The assumptions used are shown below:

On PDL Sites:
<1ha 103 per ha
1-1.99ha 56 per ha
2 - 3.99ha 63 per ha
> 4ha 38 per ha
On GF Sites:
<1ha 61 per ha
1 - 1.99ha 41 per ha
2 - 3.99ha 48 per ha
> 4 28ha per ha

- 2.4.11 It is important to note however that the capacity of a site at this stage is a guideline figure only and will be subject to review, especially where more detailed information becomes available for a specific site. The use of a sample of existing residential permissions, and allowance for a different net developable area for

site submissions, is seen as the most pragmatic way of assessing capacity for the SHLAA for such a large number and range of sites at this level of assessment.

2.5 Assessing Deliverability

2.5.1 Having assessed all sites for suitability, availability and achievability, and having estimated the potential capacity of each site, the SHLAA will conclude on the overall deliverability of sites. This means any site not excluded from the SHLAA for any reason will be considered to be either deliverable (1-5 years) or developable (6-10 or 11-15 years). These terms are defined in the planning practice guidance as follows:

- Deliverable – a site is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within five years from the date of adoption of the plan. It is considered that generally such an assessment can be made for sites currently within the planning process.
- Developable – a site should be in a suitable location for housing development, and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time. It is considered that generally such an assessment can be made for sites currently within the planning process.

2.5.2 In general terms, where a site has few, if any, significant constraints to development and is already owned or under the control of a residential developer, then it will be considered available immediately and thus deliverable in the 1-5 years range. Where a site has more complex constraints that will need to be overcome, or is not immediately available due to land ownership constraints, such as ongoing negotiations between a landowner and a developer, it will be considered in either the 6-10 years or 11-15 years timeframe.

3. Results

3.1 Site Identification Results

- 3.1.1 Sites identified by the Council as part of the desktop review of the study area are shown in Appendix 2. These include sites both in and out of the planning system at present, and are split by the categories referred to earlier in this report.
- 3.1.2 A number of fields of information were collected on each site. Much of this information was requested on call for sites forms; an example form is included in Appendix 1. Additional information was collected through methods such as reviewing the planning history of a site, reviewing aerial photography and GIS mapping, or requesting further information from landowners or agents where necessary.
- 3.1.3 The full list of recorded information on each site can be seen in Appendix 3, including how individual criteria has been rated using the Red-Amber-Green (RAG) approach.

3.2 Suitability and Availability Results

- 3.2.1 Following the collation of sites, including exclusion of those deemed too small, a complete list of sites was taken forward to the site assessment stage where sites were assessed for both their suitability and availability.
- 3.2.2 As already outlined in this report, sites that were rated 'Red' for certain criteria, or a combination of criteria, were not automatically deemed not suitable or not available for development. This was because many of the constraints found to be present on sites, could reasonably be considered capable of being mitigated as part of a residential development scheme.

3.3 Achievability Results

- 3.3.1 Only those sites that are both suitable and available have subsequently been considered based on their achievability for delivering residential development. However, unless the Council found, or were sent, specific site information which suggested a site would incur abnormal site assembly costs or was within a locality experiencing unusually poor market conditions, it would be assumed that the site in question would be viable for residential development.

3.4 Deliverable Sites

- 3.4.1 Sites considered to be deliverable are believed to be capable of being built out within five years. They are considered to be available for development now because these are sites either owned by a developer or under option to a developer. They are also considered to be in a potentially suitable location for development, dependent on policy decisions on certain sites such as those within the Green Belt, and are viable prospects for development in the short term.

3.5 Developable Sites

- 3.5.1 Of the remaining SHLAA sites, which are not considered to be deliverable within 1-5 years, all are considered to be developable, at least in part, in either 6-10 years or 11-15 years. These sites will not come forward in the first five years of a new plan being adopted but

could be developed within the remainder of the plan period. They are considered to be in a suitable location for development, again subject to emerging evidence and subsequent policy decisions, with a reasonable prospect that they will be available for development and a viable option at some point in the 6-15 year period.

- 3.5.2 However, with regards to large sites, only a proportion of the entire site capacity would be developable within the plan period. This is due to the likely build out rates of certain sites as a result of the number of sales points (how many housebuilders may be building on a site simultaneously) available.

4. Assessment Review

- 4.1 The results of this assessment will be made available on the Council's website. It will also be consulted upon as part of the Council's background evidence base for the Borough Plan. The SHLAA will continue to be updated each year as more information becomes available and to review sites that might come through the planning application process.
- 4.2 As outlined in the planning practice guidance, assessments of housing (and economic development) land availability should produce the following outputs as standard:
- 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 including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when;
 - contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
 - 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;
 - an indicative trajectory of anticipated development and consideration of associated risks.
- 4.3 This SHLAA report has dealt with the first four of the above bullet points, including consideration of a large number of criteria for all sites being assessed for their suitability and availability. Capacity has been estimated for each site deemed to be suitable, available and achievable for residential development, and each of these sites has been placed within an indicative timeframe depending on whether the site is considered to be either deliverable or developable. The final bullet point in the list of outputs above, will be delivered in the Borough Plan and accompanying AMR. This will contain an indicative trajectory of residential developments across the plan period and what is being achieved each year in completions.