

Coventry and Warwickshire Sub-Regional Joint Method Statement

**Housing and Economic Land
Availability Assessment -
Methodology**

September 2021

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1. Introduction

1.1 The National Planning Policy Framework (the “NPPF”) specifies that policy-making authorities should prepare strategic assessments of land availability for their areas. Arising from this assessment, strategic policies can be formulated to identify areas and locations for growth that can meet development need.

1.2 This joint statement has been prepared between the authorities that comprise the Coventry and Warwickshire sub-regional area and is an update from the Joint Statement published in May 2015 to ensure that it reflects the most up to date national guidance from Government.

1.3 In line with the recommendations of the Planning Practice Guidance (PPG)¹ the methodology is an agreed approach between the Local Planning Authorities (LPAs) that make up the Coventry and Warwickshire Housing Market Area (the HMA) and the Functional Economic Market Area (FEMA) where these two areas overlap. The LPAs are:

- Nuneaton and Bedworth Borough Council
- Coventry City Council
- Rugby Borough Council
- Warwick District Council
- Stratford on Avon District Council
- North Warwickshire Borough Council

1.4 Forming part of this update is a joint movement away from the original sole focus on housing land assessment, which was referenced as a Strategic Housing Land Availability Assessment (SHLAA) to a **Housing and Economic Land Availability Assessment (HELAA)**, which considers both housing and employment sites . This has been agreed by the LPAs to more appropriately reflect the updates made by the PPG in 2019:

“Plan-making authorities may carry out land availability assessments for housing and economic development as part of the same exercise, in order that sites may be identified for the use(s) that is most appropriate.”

1.5 It is not the objective of this joint methodology to standardise the methods made to assess land availability in each Local Authority, but rather provide a broad framework to ensure a consistent approach, which each Local Authority can then adapt to reflect their own local circumstances.

1.6 The detailed HELAA produced by each Local Authority should:

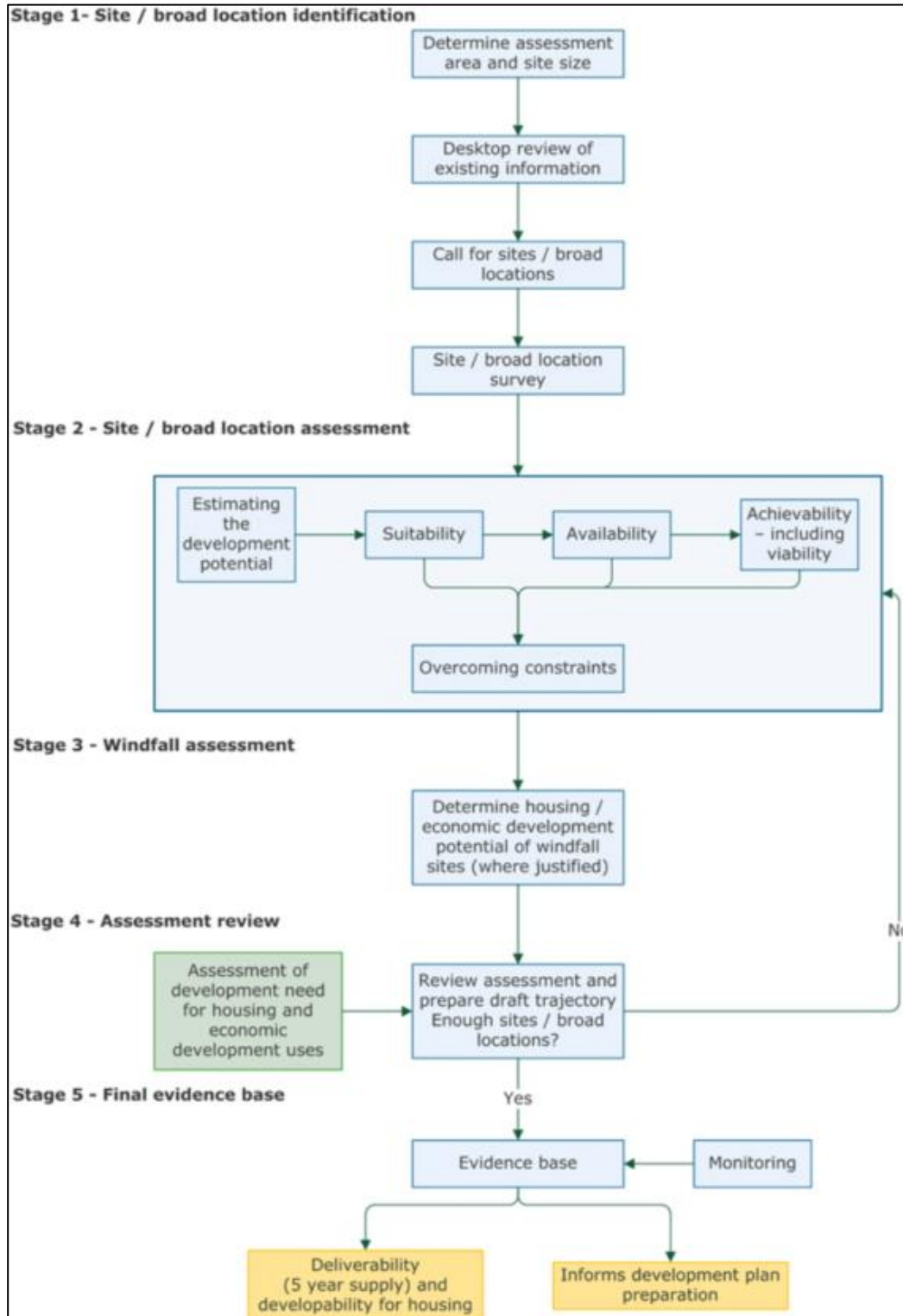
- Identify sites and broad locations with development potential (housing, economic or other);
- Assess their potential for development in terms of:
 - o their availability for development and whether they can be brought forward as locations for housing, economic or other form of development;

¹ Paragraph 007 Reference 3-007-20190722

- their suitability to accommodate development, taking into consideration their context, constraints and policy designations;
 - their achievability in terms of market desirability and viability for development.
- 1.7 Sites that are identified through the HELAA are assessed as to whether they could be developed. The assessment does not make a judgement whether they should be developed. **Assessment does not allocate land for development, nor does it determine the acceptability of development on any site.**
- 1.8 The HELAA will form a part of the Local Plan evidence base for each Local Authority, and sites identified as being developable will need to be considered further in the light of additional evidence.
- 1.9 It will also assist in the preparation of Local Plans by quantifying the availability of land for housing, economic and other development
- 1.10 In preparing the update to the joint methodology, the LPAs consider it to be good practice to publish a draft (this document) and invite feedback for a six-week consultation period to be held in Autumn 2022.
- 1.11 In terms of the further work which each Local Authority will undertake relating to their detailed Call for Sites and assessment processes, it will be the decision of individual Authorities to develop the detail and separately consult on this in a way in which they feel most appropriate within their local context.

2. Methodology

- 2.1 The methodology will establish the basis of the approach to site assessment, but will allow appropriate provisions for further detail to be made to reflect the individual contexts of each LPA area.
- 2.2 The Planning Practice Guidance provides the following flow chart which establishes the basis of the approach to site selection and assessment:



Stage 1: Identification of sites and broad locations

- 2.3 The PPG establishes that a geographical extent of site selection and assessment should be the plan-making area. This joint statement seeks to establish the basis of a consistent methodology between the parties involved to reflect the functionality of the HMA and FEMA and comply with the provisions of the Duty to Cooperate.
- 2.4 Guidance states that in the first instance, sites of a smaller size than 0.25ha, or with a capacity fewer than 5 dwellings, should not be considered as part of the HELAA process. The joint methodology will adopt this approach, but LPAs which comprise this joint method may individually opt to consider smaller sites where appropriate justification can be made.

Site Identification

- 2.5 National Guidance stipulates two primary sources in identifying sites:
- Desktop Review
 - Call for Sites Exercise
- 2.6 Active desktop review ensures that all suitable sites can be identified even in the case where they have not been submitted to an LPA for consideration.
- 2.7 A desktop review of sites may utilise, but not limited to, the following sources²:

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning application records Development briefs
Planning Permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completion records
Planning applications that have been refused or withdrawn	Planning application records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, central government, NHS, police, fire services, utilities services, statutory undertakers
Sites with permission in principle, and identified brownfield land	Brownfield land registers (parts 1 and 2) National Land Use Database

² Extracted from PPG Paragraph 011 ID: 3-011-20190722

	Valuation Office database Active engagement with sector
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, eg offices to residential)	Local Authority empty property register English Housing Survey National Land Use Database Commercial property databases (eg estate agents and property agents) Valuation Office database Active engagement with sector Brownfield land registers
Additional opportunities for un-established uses (eg making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector
Sites in rural locations	Local and neighbourhood plans
Large scale redevelopment and redesign of existing residential or economic areas	Planning applications Ordnance Survey maps
Sites in adjoining villages and rural exception sites	Aerial photography Site surveys
Potential urban extensions and new free-standing settlements	

2.8 In addition to a desktop review, a Call for Sites exercise can also enable third parties to promote sites to the LPAs for assessment. This ensures completeness in the HELAA process.

2.9 A Call for Sites conducted independently by each LPA (or LPAs where a joint plan is being prepared) will ensure that sites suitable for all land uses can be submitted for assessment. Submissions can be from any third party, with information stored to comply with data protection regulations.

2.10 A proforma, a copy of which can be seen at **Appendix 1**, will be provided to third parties to provide site submissions to the LPAs. This will provide as much information as possible, including the following details:

- Site location
- Suggested potential type of development
- Scale of development
- Constraints to development

2.11 In respect of constraints, the proforma at Appendix 1 has been developed to

allow submissions to establish any mitigations possible to overcome identified constraints. This is to “front-load” site assessment as far as possible and assist in the overall assessment process. This will ensure a more comprehensive assessment of proposed broad locations and potential sites as established in the PPG. It could also help identify potential new broad locations where development may be suitable, such as clusters of individual sites for example where cumulatively they could provide suitable infrastructure to deliver growth in a sustainable way.

- 2.12 Significant constraints should be considered at this stage where they will affect the assessment of broad locations and sites. This is to ensure that they are appropriately assessed before the detailed assessment stage. The joint statement allows provisions for LPAs to decide on what designations / limitations / constraints might result in site omission at this stage, given the unique contexts of each administrative area.

Stage 2: Site/broad location assessment

- 2.13 The PPG outlines that at this stage site assessments should analyse sites for their capacity, developability, suitability and achievability.
- 2.14 *Capacity* should be determined by adopted and/or emerging policy determining appropriate densities, in the context of the National Planning Policy Framework in achieving efficient use of land. This should also take into consideration viability, given the quantum may affect viability and therefore, achievability and so inform developability within 5 years or beyond.
- 2.15 *Suitability* should be assessed against locational factors, identifiable constraints, their potential for mitigation as well as balancing on their potential impacts as a result of their development. Relevant information to inform this assessment may include:
- National (and local) policy designations
 - Appropriateness and likely market desirability of potential development
 - Contribution towards regeneration areas and priorities
 - Potential impacts on landscape, natural and heritage designations
- 2.16 Assessment should take into consideration existing Local Plans, but also emerging policy as well as the principle of development established by planning permissions or permissions in principle.
- 2.17 *Availability* can be assessed on the best information obtainable by the LPAs. This can be confirmed through submissions via Call for Sites by agents, landowners and/or promoters. Extant or expired planning permission can also inform availability and will establish 5-year timeframes, or beyond, of developability.
- 2.18 *Achievability* is assessed through best judgement on the economic viability of a site and its desirability to be delivered within particular market conditions.

This can also be informed via submissions by third parties, where indication can be made of the potential type of development and how this will influence viability/desirability.

- 2.19 Assessment of overall developability should take into consideration any constraints and how they may influence the suitability of the site and its achievability. Desktop review will take this into account but this will need to draw on various sources of information to make an appropriate best judgement. In the case of a submission via a Call for Sites, front-loading information will be vital in identifying constraints and establishing mitigation. This will provide evidence in presenting the overall developability of a site.
- 2.20 When taking all of the above into account, the LPAs will be able to identify a timescale and rate of development that could be realised on those sites determined as deliverable and developable (suitable, available and achievable). This will take into account size, scale and quantum of development, which in turn should take into consideration lead-in times and build-out rates.
- 2.21 Whilst best judgement by the LPAs can guide these timescales and development rates, advice will also be sort from developers and other third parties submitting sites for assessment.

Stage 3: Windfall assessment

- 2.22 Development sites that come forward outside of identification through the HELAA (or any other Planning Authority spatial assessment) are defined as windfall sites.
- 2.23 The PPG outlines that an allowance of windfall sites may be included within the land supply identified through the HELAA, but must be appropriately justified as established at Paragraph 71 of the National Planning Policy Framework (July 2021);

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

- 2.24 It is not the objective of this joint statement to establish windfall allowances for each LPA. The windfall allowance is specific to each Local Authority area and the local evidence base for each will be used to inform this work and decide the extent to which windfall development should be considered in the HELAA process. An explanation of this assessment, with justification of conclusions will be provided by each LPA individually.

Stage 4: Review of the assessment

- 2.25 Following assessment of sites and broad locations, an indicative trajectory will be produced. This will express the development quantum potentially available in terms of housing numbers and employment land and potentially the amount of other land uses that have been identified.
- 2.26 The trajectory will outline the forecasted delivery of development in three increments; 1 to 5 years, 6 to 10 years and 11 years and beyond. A risk assessment will accompany any trajectory, explaining specific issues to delivery which may impact on the trajectory.
- 2.27 At this stage, an LPA may identify a shortfall in supply to meet the needs of the plan area. The PPG advises that a Local Authority should re-visit their assessment, including enhancing or changing site capacities and densities in line with the NPPF's promotion of efficient use of land.
- 2.28 If evidence shows that a shortfall in provision continues to exist, LPAs should consider continued cross-boundary provisions in accordance with the statutory Duty to Co-operate. This will enable the necessary Statements of Common Ground and other joint agreements to be formulated as Local Plan work progresses, helping to achieve sound Local Plans.

Stage 5: Final evidence base

- 2.29 The final HELAA report for each Local Authority (or Authorities where a joint plan is being prepared) will establish the approaches taken and identify the deliverable and developable sites and show a clear supply trajectory. All sites will be cross-referenced with location maps and their site assessments. The final report should also include sites that have been omitted from the supply, with reasons why.
- 2.30 The HELAA will be used by the Local Authorities to demonstrate a 5-year housing land supply position, as well as informing other spatially strategic policies within the plan preparation process.
- 2.31 A final report with appendices where appropriate and relevant will be published on each Authority's website for public view.

3. Implementation

- 3.1 This statement establishes the joint methodology in implementing a HELAA across the Coventry and Warwickshire sub-region.
- 3.2 The Planning Practice Guidance determines how housing and economic land assessment should be conducted and this has been closely woven into the joint methodology.
- 3.3 How this is implemented in practical terms is dependent on the local context. As such, this joint methodology references the functional relationships of the HMA and FEMA, whilst also providing sufficient flexibility for assessing sites in a range of contexts.
- 3.4 For example, the LPAs have agreed the importance of “front loading” information as far as possible. Previous experience has identified issues with understanding constraints and how they can be mitigated. The model Call for Sites proforma (Appendix 1) has therefore been updated from the previous version, allowing for additional information to be submitted, and each LPA can adapt this as it sees fit. This will assist in the site assessment stage.
- 3.5 Understanding the broader context of promoted sites is helpful and this is also reflected in the model proforma, where promoters are encouraged to indicate land for assessment (red line), and other land under the same ownership (blue outline). This provides additional flexibility in site assessment, especially in the case where the ‘red-line’ areas may be particularly constrained, but the additional ‘blue-line’ land may be available for mitigation purposes.
- 3.6 Although a detailed approach to assessment is not specified in this joint statement, to allow for flexibility for each individual LPA, it is expected that final assessments will produce conclusive commentary as to how sites have been assessed in either narrative or pictorial form, or both.
- 3.7 To illustrate this point, an example is set out below. In this instance, a ‘red-amber/yellow -green’ approach (RAG) has been used. Sites would be scored using particular suitability, achievability and availability considerations. Those sites for which constraints are absolute and cannot be mitigated would be scored red. Amber sites would have the potential to be mitigated and could be ‘upgraded’ to yellow depending on the level of information supplied which could demonstrate this mitigation. Green sites would have no constraints and could readily form part of the short-term supply.

Figure1: Example of a site assessment matrix (illustrative: each LPA would develop its own methodology for this level of detail)

		Availability & Achievability		
		Red	Orange	Green
Suitability	Red	Red	Red	Red
	Orange	Orange	Orange	Yellow
	Green	Orange	Yellow	Green

3.8 To summarise: this document has been prepared jointly to ensure a consistent shared approach to identifying and assessing sites for housing and employment uses, which will be used by each Local Authority (or alliance of Local Authorities where shared plans are developed) as the framework within which they will develop their detailed assessment and selection processes.

Appendix 1 Example Call for Sites Proforma

Housing and Economic Land Availability Assessment (HELAA)

Call for Sites Proforma

- Please complete this form if you would like to suggest proposals for future land use and development within XX Council on sites capable of delivery 5 or more homes, or sites larger than 0.25ha.
- The sites will be assessed as part of the HELAA and used as an evidence base document for the Local Plan preparation process.
- Please complete a separate form for each site. Complete each section clearly and legibly to the best of your knowledge. If you require more space, please use Section 9, or append additional pages.
- You must attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site and details of site ownership.

Data Protection Disclaimer

Details submitted to the Council as part of a Call for Sites will help inform the HELAA and assist in identifying land for development to contribute to a land supply to meet local need. The submitted information will not be confidential as it will be published as part of a comprehensive land assessment via published reports available for public consumption. This information will also be shared with other parties, including employees of the Council, other Council departments and third parties, such as the Planning Inspectorate and other Local Planning Authorities.

Details provided in Section 1 will be kept and stored confidentially by the Council. Details in Section 2, the names of which should match those provided in Section 1, will be made publicly available as established above. As such, only names of organisations/agents/applications will be made public where it has been clearly declared through this submission form. No other details, such as addresses or contact information, will be made available.

By submitting this form to the Council, you are providing consent for us to retain your details on our Planning Policy as part of the Call for Sites process, the HELAA and to enter your details to our consultation database so that we may contact you in future to advise on the Local Plan preparation process.

1. Your Confidentially Held Details

Title		Name	
Organisation (if relevant)			Representing
Address			
Postcode		Telephone	
Email			
Signature			
Date			

2. Your Publicly Viewable Details	
Name/Organisation	
Status in relation to site	
Representing (if applicable)	

3. Site Location			
Site Name			
Site address (inc. postcode if known)			
OS Grid Easting		OS Grid Northing	
Total Site Area		Developable Area	
<p>Please attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site. The area of the site you wish to be formally assessed should be enclosed by a red line. Any other relevant land under your ownership should be enclosed by a blue line</p>			

4. Site ownership (please mark as appropriate and/or provide details)				
Do you own the site?	Yes – sole owner	Yes – part owner	Yes – acting on behalf of the owner(s)	No
Is the site available?	Yes – immediately	Yes – In 5-10 years	Yes – 11+ years	No
Have you notified the landowner/other landowners that you have submitted the site?			Yes	No

5. Site Constraints (on site or at boundary – please mark as appropriate and/or provide details)					
Current/previous use					
Adjacent land uses					
Planning History					
Existing Infrastructure	Electricity	Gas	Mains Sewer	Mains Water	Telecoms
Access from Highway	Yes – Classified Road		Yes – Unclassified Road		No
Highway Works					
Ransom Strips					
Legal Issues					
Existing Occupiers					
Public Access/Rights of Way					
Wildlife Designations	Yes – Details:		Reports/Mitigation Strategy:		No
Ecology Designations	Yes – Details:		Reports/Mitigation Strategy:		No

Unexploded Ordnance	Yes – Details:	Reports/Mitigation Strategy:	No
Land Contamination	Yes – Details:	Reports/Mitigation Strategy:	No
Heritage Designations	Yes – Details:	Reports/Mitigation Strategy:	No
Other Physical Constraints (flooding, topography)	Yes – Details:	Reports/Mitigation Strategy:	No
Infrastructure Constraints (pylons, gas mains)	Yes – Details:	Reports/Mitigation Strategy:	No
Other Knowns Issues/Constraints			

6. Site Accessibility (please provide distance as measured from the middle of the site “as the crow flies” and utilise journey planner to determine walking time)			
Distance to closest bus stop (m/km)		Walking time to closest bus stop (mins)	
Distance to closest amenities (m/km)		Walking time to closest amenities (mins)	
Distance to closest rail station (m/km)		Walking time to closest rail station (mins)	

7. Previous site promotional work (please cross reference with Section 5 where relevant)		
Has any work been undertaken to promote the site and/or to overcome constraints?	Yes	No
If yes, please provide more details and copies of reports where available:		
Have any viability appraisals been undertaken?	Yes	No
If yes, please provide more details and provide copies of reports where available:		
Are there any specific or immediate intentions to start development?	Yes	No
If yes, please provide more details (such as Pre-application discussions)		

8. Proposal Details (please mark as appropriate and/or provide details)					
Description of Proposed Development					
Proposed Land Use	Residential	Employment	Retail	Mixed	Other
Site capacity/density (homes/floor space)			Details of mixed/other land uses		
Potential Development	For sale/marketed for development		Negotiations with developer	In control of developer	Ready for release by owner
Development time scales	Short term (within 5 years)		Medium term (6-10 years)	Long term (11-15 years)	Beyond (16+ years)
Development Timescale/Phasing (incl. build-out rates)					

9. Additional information