

**Horsham District Council**

**Guide to the  
Strategic Housing Land Availability  
Assessment  
(SHLAA)**

January 2010

## **Introduction**

- 1.1 Horsham District Council published an Interim Report for the Strategic Housing Land Availability Assessment (SHLAA) in September 2009. The Interim Report was one of a number of background documents in support of the Core Strategy Review that the Council is currently undertaking and was published to provide additional information to inform comments made on the Consultation Document: *Leading Change in Partnership to 2026 and beyond*.
- 1.2 Primarily due to the Core Strategy Review Consultation Document, the SHLAA generated numerous enquiries and a significant number of representations were received regarding the Interim Report. In response to the questions raised, Horsham District Council has decided to publish a '*Horsham District Council SHLAA Guide*' to help explain the role and purpose of the SHLAA. This guide is not designed to answer detailed, technical questions or replace official guidance, but to clarify points and questions raised, to aid understanding of the aims of the SHLAA, and how it fits into Horsham District Council's planning policy work.

## **Background Documents and the Evidence Base**

- 2.1 Horsham District Council is currently reviewing the Core Strategy and is looking to cover the period to 2026 and beyond. When reviewing planning policy the Council must understand the current situation and consider any potential implications of any policy or combination of policies. To gain this understanding the Council completes an evidence base, or series of background documents, that provides information on a range of topics. The evidence base does not make any decisions but provides the necessary information to allow informed decisions to be taken. Before the Council can adopt the new Core Strategy it will be independently examined and the Council must justify any decisions. It can achieve this by presenting the evidence base and demonstrating that all viable alternatives have been thoroughly investigated and the proposals are the best for the District.
- 2.2 The evidence base is a series of studies that helps to inform different aspects of policy and each separate document must be considered with regards to

other studies; none can be considered in isolation. The SHLAA is one of the background documents that forms part of the evidence base and therefore it does not make decisions, but only provides information. It can not be considered by itself, but must be balanced with the other evidence available to inform the overall strategy for the District. As part of this process, it must provide information on all possible options to allow an informed decision to be made when balanced with the other evidence and the overall aims of Horsham District Council.

### **The Strategic Housing Land Availability Assessment and the Core Strategy Review**

- 3.1 The role of the SHLAA is to identify potential land suitable for residential development. As the SHLAA is a background document, it does not make the decision as to whether the land will be allocated for development – that is a decision for the Core Strategy (and any subsequent planning policy documents) and will be subject to full consultation with all interested parties, including local communities. As part of this process, the SHLAA has to identify any constraints linked to the possible site and the potential timeframe for overcoming the constraints. This provides an idea of the amount of land, and therefore potential housing, available in the District and over what timeframe. This can be compared to the housing numbers the District has to provide to demonstrate that the Council is able to meet its obligations.
  
- 3.2 There is no limit to the amount of land that can be included within the SHLAA and therefore the SHLAA should identify more land than required. It is the Core Strategy Review process that makes the decisions regarding the approach to housing within the District and the various options can be tested against the SHLAA to ensure the selected approach will meet the required target. In this way, the SHLAA acts as a portfolio of potential sites and the Core Strategy Review (*or other subsequent planning policy documents*) will select the most suitable for development, whilst having regard to the other background studies. The process of selection is therefore subject to full consultation and independent examination, allowing all interested parties and individuals to contribute to the decision making process.

## **The Strategic Housing Land Availability Assessment: Sites**

- 4.1 Sites within the SHLAA can come from a variety of sources. The Council can include sites which have been allocated previously or considered historically and rejected. This allows changing circumstances to be taken into account and an up-to-date assessment to be made, again, demonstrating that the Council has considered all viable alternatives; even if arriving at the same decision. Sites can also be included that have previously had planning permission refused, because it might be possible to overcome the reasons for refusal. The reasons do not have to be easy or quick to overcome, the SHLAA is considering potential sites for the future so the site may be suitable in 15 years time, although it is currently unacceptable.
- 4.2 In addition, sites can be submitted to the Council for inclusion within the assessment. Originally, as this is the first time Horsham District Council has carried out a SHLAA, a 'call-for-sites' exercise was undertaken and any individual or company could submit land for inclusion within the assessment. Any sites which are submitted to the Council are incorporated within the SHLAA. However, there may be some sites which are patent non-runners and, with these, the Council can concisely identify the reasons and list them as they do not have to be assessed further within the SHLAA.
- 4.3 The SHLAA is a 'live' document and therefore the Council can update it as new information becomes available. This can include adding new sites that the Council becomes aware of and removing sites that have subsequently been developed. It is therefore possible to submit any potential sites to the Council, at any time, and they will be added to the SHLAA at the earliest opportunity. The advantage of a 'live' document also means that a site, with previously unidentified constraints, can be reassessed as information becomes available. Alternatively, if it can be demonstrated that a previously identified constraint could be overcome then a site could be updated to reflect this.
- 4.4 As the SHLAA does not make decisions or rank the sites in order of preference, any sites (excluding patent non-runners) will be included and, therefore, the SHLAA must show both greenfield and brownfield (previously

developed land) sites. It will then be the decisions made through the Core Strategy process that determines how the Council proceeds and the approach to housing in the future. Whilst the Council will look to make optimal use of brownfield sites, given the predominantly rural nature of the District and the number of houses the Council has to provide, it will not be possible to only utilise previously developed land. Therefore, there will need to be some greenfield sites used for housing; although the Core Strategy Review (or other site allocation document), not the SHLAA, will decide which actual sites.

4.5 The approach of including all the options within the SHLAA and the Core Strategy Review making the decisions, is also reflected in the inclusion of sites within or adjacent to Category 2 settlements. The current adopted Core Strategy (2007) contains a list of settlements (Policy CP5) that are either designated as Category 1 or Category 2. The lists are based on the sustainability of the settlement; with Category 1 being the larger settlements within the District and Category 2 being slightly smaller. Current policy encourages development within Category 1 settlements, whilst Category 2 settlements have to demonstrate a local need. As the Council is reviewing the Core Strategy, this includes the approach to Category 1 and Category 2 settlements, as set out within the *Core Strategy Review Consultation Document, Issue 15*.

4.6 As the SHLAA does not make the decision regarding the treatment of Category 1 and Category 2 settlements, it has to include potential sites within, or adjacent to, both settlement hierarchies. This does not mean that all the sites shown will be built on, just that it is one of the issues identified for consultation through the Core Strategy Review.

### **The Housing Market Partnership**

5.1 The Housing Market Partnership is a partnership between Horsham District Council, Mid-Sussex District Council, Crawley Borough Council and a selection of experts who are involved with the housing industry. The idea behind the partnership is that the involvement of industry experts will add significant technical knowledge to the SHLAA and increase the strength of the site assessments. The industry experts will be able to complement the

assessments undertaken by the Council by providing more information on areas where the local authority might not have the same level of technical knowledge. For instance, this could include comments regarding viability and the costs of overcoming identified constraints.

- 5.2 The Housing Market Partnership seeks to agree an overall approach to the assessments and all members can comment; thereby minimising the opportunity for developers to promote their own sites. The information provided must be presented objectively, helping to inform the SHLAA, and not subjectively ranking or promoting certain sites. The SHLAA is designed to collect information and it does not make decisions, the Core Strategy Review process allows for consultation and provides the opportunity for anyone, including developers, to comment.

## **Conclusion and Next Steps**

- 6.1 The SHLAA is continually updated and the Council is able to add more sites or review existing site assessments as new information becomes available. The SHLAA aims to provide the Council with the required information to make decisions through full consultation and the Core Strategy process. The SHLAA itself does not make decisions, rank or allocate sites.
- 6.2 The Core Strategy Review and any decisions made are informed by a number of studies and background documents. The SHLAA is only one of these documents and any decisions regarding planning policy must have regard to all the relevant studies and comments received during consultation.
- 6.3 The Council is continuing to work on the SHLAA and is looking to publish the 'final' report in Spring 2010. However, the SHLAA is subject to reviews and will be updated.

## **Frequently asked questions**

### **Why do we have to produce a SHLAA?**

*The production of a SHLAA is required by national planning policy as set out within Planning Policy Statement 3: Housing (PPS3). The SHLAA provides information which allows the Council to ensure the planning and delivery of new homes to meet our housing needs, to support the growth of sustainable communities and to support the economy.*

### **What is a SHLAA?**

*The primary role of the SHLAA is to identify sites with potential for housing; assess their housing potential; and assess when they are likely to be developed. The SHLAA is an evidence base document to help inform the Core Strategy Review and therefore does not create policy. The SHLAA does not in itself determine whether a particular site should be allocated for housing development. This will be considered as part of the Local Development Framework (LDF) process, and in consultation with all interested parties, including local communities.*

### **How does the SHLAA relate to or influence planning applications? Can I make a planning application if the site is not identified within the SHLAA?**

*Any planning application is determined with regards to relevant planning policy. Horsham District Council has an adopted Core Strategy (2007) and subsequent planning documents and therefore any application will be decided in accordance with the adopted policies. The SHLAA is not planning policy, it is an evidence base document and, therefore, it does not influence planning application decisions.*

*Anybody can make a planning application at anytime. A site does not have to be included within the SHLAA before an application can be made, similarly, if it is within the SHLAA an application could still be made at any time.*

**A site identified in the SHLAA includes various constraints, including trees which have existing Tree Preservation Orders (TPOs) on them, how does this affect the site assessment? Does the SHLAA override, replace or disregard existing designations?**

*No, the SHLAA records the information and does not disregard or override existing land designations. When the sites were assessed, any constraints or land designation were noted including site specific information, such as Tree Preservation Orders (TPOs), flooding, access and transport issues. Where possible, suggestions for overcoming the identified constraints have been made or it is recorded that these require further investigation. Any decisions taken regarding allocating a site for housing (or any other use) will be part of the Core Strategy Review process (or other subsequent planning policy documents) and subject to consultation.*

**I own some land, can I submit it to the Council for inclusion within the SHLAA? What are the benefits of submitting my site? Does submitting a site commit me to anything?**

*Yes, the Council welcomes sites submitted for inclusion within the SHLAA. All potential sites submitted to the Council for consideration as housing sites are contained in the SHLAA. The SHLAA is a 'live' document and is subject to reviews and updating to ensure it remains a valid and robust evidence base; therefore the Council will endeavour to include any submissions at the earliest opportunity. Detail of how and what to submit can be found on the Council's website or by contacting the Strategic Planning Team.*

*There is no commitment by submitting a site, the SHLAA does not make any decisions regarding allocation it just records the information. Whether land will be allocated for development is a decision for the Core Strategy (and any other subsequent planning policy documents) and will be subject to full consultation with all interested parties, including local communities.*

**Why are some sites excluded from the SHLAA? Are all sites assessed?**

*All sites are recorded, but some can be excluded from further assessment. Local Authorities have been advised to sieve out any sites which are patently unsuitable for housing, for example sites with a poor relationship to any built up area boundary or sites below the Council's SHLAA threshold of 6 units (as set out in the methodology). Any patent non-runners are recorded and listed with concise reasoning as to why they have not been assessed further within the SHLAA.*

### **Does the SHLAA score or rank sites?**

*No, the SHLAA does not score or rank sites, as that would mean the SHLAA report is going beyond saying that (effectively) sites are suitable for consideration, to beginning to make judgements about which sites are best and may be more appropriate. These decisions are plan-making judgements and will be made through the Core Strategy Review (or other subsequent planning policy documents) rather than the SHLAA.*

### **Can I comment on SHLAA sites? How do I get involved in the process?**

*Whilst the SHLAA itself is not up for formal consultation, as it does not actually make any decisions, the Core Strategy Review is subject to full consultation and any views would be welcomed by the Council. Details on the latest stage of the Core Strategy Review can be found on the Council's website at [www.horshamdistrictldf.info](http://www.horshamdistrictldf.info)*

### **Where can I find out more information about the SHLAA and the Core Strategy Review?**

*Information about the SHLAA and the Core Strategy Review, along with any other planning policy information, can be found on the Council website at [www.horshamdistrictldf.info](http://www.horshamdistrictldf.info)*