

Strategic Housing Land Availability Assessment

Project Brief And Methodology

Horsham District Council

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1 Introduction

1.1 As part of the Local Development Framework (LDF), Horsham District Council is in the process of producing a Strategic Housing Land Availability Assessment (SHLAA). This, along with other documents, forms part of the background information and evidence base for the Local Development Framework. Horsham District Council is undertaking the assessment at this time so that it will help to inform the review of the Core Strategy, by providing an essential evidence base. The production of a Strategic Housing Land Availability Assessment is required by national planning policy, set out in 'Planning Policy Statement 3: Housing' (PPS3). Further details and guidance is contained with the 'Strategic Housing Land Availability Assessments Practice Guidance' published by the Department for Communities and Local Government, July 2007. The Practice Guidance document provides details on how to complete assessments to identify land for housing; including assessing the deliverability and developability of sites.

2 Background

2.1 This document forms the project brief and methodology that sets out the process for the completion of the Strategic Housing Land Availability Assessment for Horsham District Council. It derives from PPS3: Housing and the Strategic Housing Land Availability Assessment Practice Guidance as mentioned above. This document will provide a brief overview setting out the aims of SHLAA's and the process envisaged and promoted by Government before applying the guidance to Horsham's situation and providing an outline timetable.

3 Strategic Housing Land Availability Assessment

3.1 The Practice Guidance sets out the primary role of the Strategic Housing Land Availability Assessment:

- Identify sites with potential for housing

- Assess their housing potential
- Assess when they are likely to be developed

3.2 The SHLAA should identify housing sites for five, ten and fifteen year periods; thereby maintaining a demonstrated five year supply of deliverable sites. This fulfils the requirement within PPS3: Housing, which states *'Local Planning Authorities will need to... identify and maintain a rolling five-year supply of deliverable land for housing...'* (PPS3, para.7)

3.3 It is essential to understand that the SHLAA forms an important evidence source for potential housing sites, *'but does not in itself determine whether a site should be allocated for housing development'* (SHLAA Practice Guidance, para.8). Due to this the SHLAA will identify as many sites as possible to ensure a robust evidence base is produced and allow greater flexibility for the review of the Core Strategy. This is significant as the SHLAA incorporates sites which would not have previously been included within an Urban Capacity Study; such as rural sites and greenfield land. *'...the scope of the Assessment should not be narrowed down by existing policies designed to constrain development'* (SHLAA Practice Guidance, para.21).

3.4 Along with identifying the primary role of the SHLAA, core outputs are also included within the Practice Guidance:

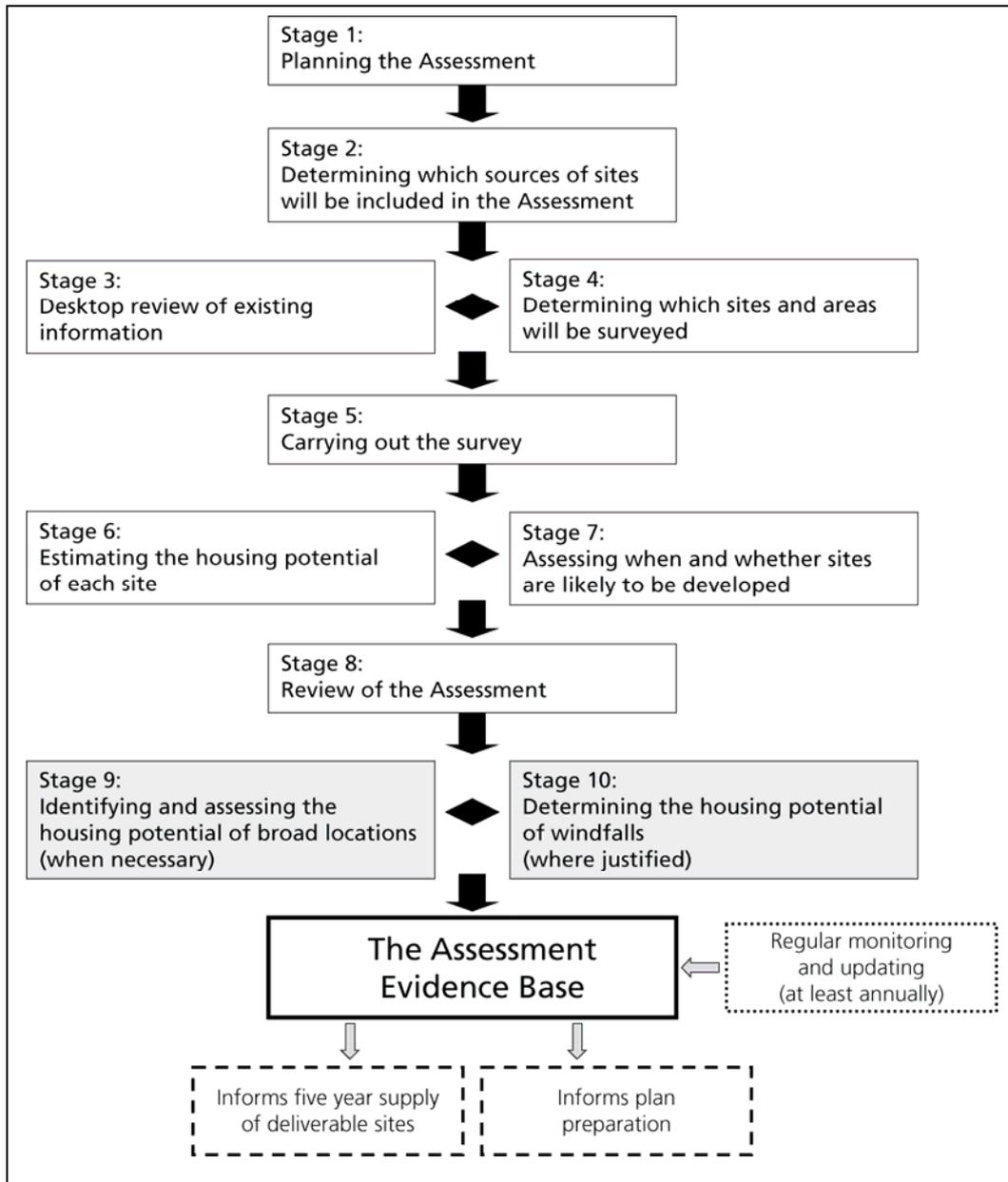
Table 1: Strategic Housing Land Availability Assessment: core outputs

1	A list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary)
2	Assessment of the deliverability/developability of each identified site (ie in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed
3	Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified)
4	Constraints on the delivery of identified sites
5	Recommendations on how these constraints could be overcome and when

3.5 In terms of methodology and processes, the Strategic Housing Land Availability Assessment has eight key stages which are identified within the Practice Guidance. This will form the basis of Horsham District Council's

approach thereby ensuring a robust and comprehensive assessment is undertaken. The guide states that where this methodology is used a local planning authority should not need to justify its approach. The table below is extracted from the Practice Guidance and illustrates the processes and outputs:

Table 2: Strategic Housing Land Availability Assessment: processes and outputs



4 Horsham District Council: Strategic Housing Land Availability Assessment

Stage 1: Planning the Assessment

- 4.1 It is recommended that assessments are undertaken at sub-regional level, for separate housing market areas. To achieve this, the Practice Guidance advocates regional planning bodies and local planning authorities work together in conjunction with key stakeholders where feasible.
- 4.2 However, within Horsham District there are separate identified housing markets; including the influence of Crawley and Gatwick in the northern part of the District and Brighton and the coast in the southern part. In addition, Horsham District Council has differing Local Development Framework timescales than adjacent local planning authorities and has therefore taken the decision to proceed with the Strategic Housing Land Availability Assessment at a District level.
- 4.3 Whilst Horsham District Council will conduct the Strategic Housing Land Availability Assessment as a District, the Council will promote the partnership and involvement of key stakeholders. This will include house builders and developers, local property agents, social landlords, local communities and other agencies, whose input can provide expertise and knowledge relating to the viability of specific sites and market conditions; thereby insuring a more joined-up and robust approach as encouraged within the SHLAA Practice Guidance.
- 4.4 Whilst it is not feasible to work jointly with neighbouring Local Planning Authorities in production of the SHLAA, as mentioned above, a Local Authority SHLAA Group has been formed to monitor the assessments. This consists of Horsham District Council, Mid Sussex District Council and Crawley Borough Council. Regular meetings and correspondence allows comparison of methodologies and a common approach to over-coming problems. In addition, the close working relationship between the authorities on the SHLAA compliments the joint work being undertaken by all local authorities in West Sussex for the Strategic Housing Market Assessment.

This has identified two housing market areas, one along the coast and a northern housing market which consists of these three local authority areas. The working relationship between the three authorities complements the identified housing market area and a common approach to presenting the SHLAA findings will ensure the three assessments can easily be compared and viewed in a wider regional context.

4.5 The Schedule of Changes for the South East Plan, published by the Secretary of State, provides the latest figures relating to housing numbers for the District. Whilst these figures are not finalised, they are unlikely to alter significantly for Horsham District and hence can be used as a guidance figure for the SHLAA. The level of housing provision for Horsham District is 650 per annum; providing a total of 13,000 over the plan period between 2006 and 2026. Whilst the SHLAA aims to identify as many sites as possibly and assess their deliverability and developability, these figures provide background information and an idea of the projected growth over the plan period. This target figure will allow decisions to be taken at the end of the assessment to determine if windfalls should be allowed for and / or broad locations need to be identified.

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

4.6 The Practice Guidance provides a list of the type of sites that should be included within the assessment:

Table 3: Sources of sites with potential for housing

Sites in the planning process
<ul style="list-style-type: none"> • land allocated (or with permission) for employment or other land uses which are no longer required for those uses • existing housing allocations and site development briefs • unimplemented/outstanding planning permissions for housing • planning permissions for housing that are under construction
Sites not currently in the planning process
Examples:

- 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 in rural settlements and rural exception sites
- urban extensions
- new free standing settlements

4.7 To assist with the identification and assessment of office accommodation, Horsham District Council will commission appropriate consultants to help identify surplus, potentially redundant, office space which could be suitable for redevelopment and conversion to residential. This will be in collaboration with various departments at Horsham District Council and will ensure that a professional and robust assessment is completed, allowing this element of the SHLAA to be incorporated with the other sites in the final report.

4.8 Along with Table 3 reproduced above, the Practice Guidance states that certain areas or types of land can be excluded from the assessment. Horsham District Council proposes to exclude the following designations and land areas from the assessment. Whilst these areas are explicitly excluded, any land included is not automatically deemed suitable for housing; the SHLAA represents an evidence base which will support the delivery of sufficient land for housing.

4.9 Areas of land to be excluded from the SHLAA:

- Sites of Special Scientific Interest
- Special Protection Areas
- Scheduled Ancient Monuments
- Historic Parks and Gardens
- RAMSAR sites

4.10 These excluded sites represent areas which are formally protected for national, regional or local environmental, nature conservation or historical reasons. These designations form only a small proportion of the total area of

the district (8.07%) and, therefore, it is envisaged that sufficient land can be included within the SHLAA capable of meeting the needs of the District without necessitating the inclusion of highly sensitive locations of this nature.

Table 4 below provides the area figures for the excluded designations.

Table 4: Excluded designations

Designation	Total Area (km ²)	Percentage of District Area ¹
Site of Special Scientific Interest (SSSI)	14.61	2.75
Special Protection Area (SPA)	5.30	1.0
Scheduled Ancient Monument (SAM)	1.55	0.29
Historic Park and Garden	21.38	4.03
RAMSAR site ²	5.30	1.0
TOTAL	42.84	8.07

4.11 In addition to the excluded areas, sites incorporating ‘Sites of Nature Conservation Importance’ will be assessed but this designation will be considered a severe constraint to the potential of the site.

4.12 If part of a large site contains a small area of the excluded land designations, the site will be permitted within the assessment. However, this will be counted as a constraint and subsequently reduce the potential housing capacity of the site. Only sites wholly within table 4 designations will be excluded from the SHLAA.

4.13 The SHLAA will set a threshold of six or more units per site to be included. Primarily this will help to keep the amount of sites to a manageable level and this is also in alignment with the annual Housing Land Supply Assessment undertaken with West Sussex County Council. This threshold has also been agreed in liaison with both Mid Sussex District Council and Crawley Borough Council, thereby ensuring a consistent approach to threshold levels over the whole housing market area.

¹ Total Area of HDC is 530.93km²

² In HDC the only RAMSAR site is also designated as an SPA. The figures in the RAMSAR category have not therefore been included when calculating the total areas / percentages, as to do so would constitute double counting.

Stage 3: Desktop review of existing information

4.14 To identify suitable sites, a desktop study will be undertaken based upon the sources of information included within the Practice Guidance. In addition to sites in the planning process, there are also existing documents and sources which will contribute to the review:

- Site allocations not yet the subject of planning permission
- Site specific development briefs
- Planning application refusals – particularly those applications refused on grounds of prematurity
- Urban Housing Potential Study 2004 – 2018
- Site Specific Allocations of Land (2007)
- National Land Use Database
- Reserve Housing Sites
- Employment Land Review
- Sites submitted by stakeholders via the SHLAA consultation process
- Ordnance Survey maps / GIS plans

4.15 All potential sites will be collated via a Site Assessment Form, which will include site specific information and the contact details of land owners and / or developers. In addition, each site will be mapped at a suitable scale, preferably on a 1:1250 map base, for the site surveys.

Stage 4: Determining which sites and areas will be surveyed

4.16 All of the sites submitted to the Council for inclusion within the SHLAA will be visited to complete a site assessment. All sites will have a Site Assessment Form completed which will identify various specific details including constraints and opportunities for the site.

4.17 The Site Assessment Form, which will be completed for all sites, will be split into three main sections. Part A: General information; filled in by the developer / owner (blank copies of this form will be available on the website and sent out to relevant parties during the site submission stage). Part B: The

additional details completed during the site visits / survey (see stage 5). Part C: OS based map or maps of the site. This will then provide each site with a complete set, providing all required information allowing the following stages of the assessment to take place.

Stage 5: Carrying out the survey

4.18 Following the desktop study, the identified sites will be surveyed and the site characteristics recorded in accordance with the Practice Guidance. This process will include:

- Site size
- Site boundaries
- Current use
- Surrounding land use
- Character of surrounding area
- Physical constraints (including; access, topography, potential for flooding, natural features of significance, location of pylons)
- Development progress (eg: ground works completed, number of homes started, number of homes completed)
- Initial assessment of whether the site is suitable for housing or housing as part of a mixed-use development

4.19 The initial assessment of the site relating to housing or mixed use will provide a preliminary guide which can be refined later if required. For the assessment, this judgment will be based upon criteria such as; size of site, knowledge of other needs, sustainability of location, existing services, existing or previous land use, protection of retail frontage.

Stage 6: Estimating the housing potential of each site

4.20 The housing potential for each site will be assessed in accordance with the Practice Guidance which recommends the potential for each site should be guided by existing or emerging plan policy. The density of each site will be based upon guidance provided in Planning Policy Statement 3, and Policy

DC18 of the General Development Control Policies (2007); each site will also be assessed taking account of individual constraints and the surrounding area.

- 4.21 The initial figure for each site will be based upon a density of 40dph. This clear, concise figure will allow easy comparisons between all sites, regardless of any site specific constraints. The second figure will be based upon the information gathered regarding the site and increase or decrease the housing potential for the site subject to site specific criteria. For instance, if the site is purely residential and within a built-up high density existing residential area then it may be suitable to increase the density. If the site has constraints such as Tree Preservation Order's (TPO's) and is a mixed use scheme in a lower density area, then the second figure will be lower to reflect these individual characteristics. The second figure could be a range or indication of density rather than a specific figure, as exact numbers would obviously be subject to further detailed site and design work. However, it will provide an indication of the housing capacity of the site.

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

- 4.22 Assessing when sites might be developed is split into three main stages; suitability, availability and achievability. A separate fourth stage is overcoming any identified constraints. Assessing the sites against these main criteria will provide information allowing the judgement as to whether a site can be considered deliverable, developable or not currently developable for housing. The Practice Guidance provides the following definitions for deliverable and developable:

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 (paragraph 54 PPS3)

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 (paragraph 56 PPS3)

- 4.23 If it is unknown when a site could be developed, then it will be regarded as not currently developable, this could be because of severe constraints and not knowing when they might be overcome. The assessment of sites will be the degree of availability and achievability, and when known constraints can realistically be overcome. The assessment of deliverability / developability will be completed for all sites and irrespective of the level of housing provision required over the plan period.

Stage 7a: Assessing suitability for housing

- 4.24 The Practice Guidance emphasises that a site suitable for housing ‘offers a suitable location for development and would contribute to the creation of sustainable, mixed communities.’ To assess suitability, sites will be considered against the following criteria:

- **Policy restrictions** – such as designations, protected areas, existing planning policy and corporate, or community strategy policy
- **Physical problems or limitations** – such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination
- **Potential impacts** – including effect upon landscape features and conservation
- **Environmental conditions** – which would be experienced by prospective residents

- 4.25 Also cultural heritage and future sustainability issues will be taken into account when assessing the suitability.

- 4.26 The sites will be assessed against these criteria via the desktop study and the site visits, from earlier stages.

Stage 7b: Assessing availability for housing

4.27 The availability of a site relates to ownership, legal issues and establishing if there are any problems which would restrict development. The status of the majority of sites will be established by contacting the developers / owners and the Site Assessment Form will also seek to clarify the legal status. Where problems are identified an assessment will be made as to how and when they can be realistically overcome. This will be based upon details provided from the land owner(s), further contact with the owner(s) previous history and on the basis of local knowledge.

Stage 7c: Assessing achievability for housing

4.28 The achievability of the site is a judgement about the economic viability and the capability of the developer to complete the scheme over a certain time period. The Practice Guidance provides three factors which influence the achievability:

- **Market Factors** – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and projected rate of sales (particularly important for larger sites).
- **Cost Factors** – including site preparation costs relating to any physical constraints, any exceptional works necessary, relevant planning standards or obligations, prospect of funding or investment to address identified constraints or assist development.
- **Delivery Factors** – including the developer's own phasing, the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates), whether there is a single developer or several developers offering different housing products, and the size and capacity of the developer.

4.29 The views of local property agents and developers will be sought to supply information regarding the economic viability of individual sites. This will include invitations to key stakeholders who have indicated a willingness to participate in the process via their representations made on the draft

methodology. The information gained from this process, in conjunction with Horsham District Council, will help ensure the achievability of sites is fully considered in the SHLAA process.

Stage 7d: Overcoming constraints

- 4.30 Where constraints have been identified, the SHLAA will consider what actions will be necessary to overcome them. Stakeholder involvement will form a core basis in helping to identify constraints and determine any actions required. The Practice Guidance suggests actions might include; investment in infrastructure, dealing with fragmented land ownership, environmental improvement and amending planning policy.

Stage 8: Review of the Assessment

- 4.31 Following the survey identifying sites and the assessment of their deliverability / developability, an indicative housing trajectory will be produced to determine when and how much housing can be provided. If the trajectory ascertains a shortfall in the number of sites identified, then a review of the assumptions made during the assessment will undertaken to establish if the shortfall can be addressed.
- 4.32 This section of the SHLAA will also incorporate a risk assessment to establish if the sites will come forward as anticipated.
- 4.33 An interim report will be produced to establish the findings of the Strategic Housing Land Availability Assessment and will consider the necessity of Stages 9 and 10. If required, the report will refer to broad locations and windfall sites as detailed below.

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

- 4.34 The Practice Guidance describes 'broad locations' as areas where housing development is considered feasible and will be encouraged, but where

specific sites cannot yet be identified. This is deemed a proactive approach and provides two major benefits: communities will be clear about where future development will be directed and it provides greater certainty for developers. Examples of broad locations indicated in the Practice Guidance include:

- **Within and adjoining settlements** – for example, areas where housing development is or could be encouraged, and small extensions to settlements.
- **Outside settlements** – for example, major urban extensions, growth points, growth areas, new free-standing settlements and eco-towns. The need to explore these will usually be signalled by the Regional Spatial Strategy.

4.35 In the case of Horsham District, the identification of broad locations will be drawn from examination of the principles and policies of the South East Plan, the current LDF Core Strategy vision and spatial objectives, and from the understanding of the characteristics of the District.

4.36 In accordance with the above guidelines, where broad locations have been identified as required, estimates of the housing potential will be included within the SHLAA. This will be in the form of an approximate amount of land needed to meet housing targets for the District. To inform the potential housing supply regard will be given to:

- Any evidence underpinning the Regional Spatial Strategy.
- The nature and scale of potential opportunities within the broad location.
- Market conditions.

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

4.37 PPS3 anticipates that the supply of land for housing will be based upon specific sites, and where necessary broad locations. Consideration regarding the inclusion and justification of a windfall allowance will be determined later in the process, once the initial housing trajectory has been completed.

5 Timescale

Table 5: Outline timetable

Stages of SHLAA	Timetable
Planning the Assessment	February – March 2008
Stakeholder consultation: methodology and suggested sites	April – May 2008
Desktop review and determining surveying of submitted sites	May – June 2008
Carrying out the survey of submitted sites	July – September 2008
Inclusion and assessment of previous and existing allocations	October 2008
Review of Assessment; including stakeholder viability	November – December 2008
Finalisation and publishing of Interim Report	January – February 2009
Updating of report and further inclusion of new sites	End 2009 / Beginning 2010