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1

Introduction

This document sets out the draft methodology for the West Cumbrian Strategic Housing Land Availability Assessment (SHLAA). The methodology has been prepared following the publication of Government Practice Guidance on this topic. This will be a joint venture between Allerdale and Copeland Borough Councils

What is a SHLAA?

The Strategic Housing Land Availability Assessment is a study that will identify potential land for housing development within West Cumbria's towns and villages. Forming part of the evidence base for the Allerdale and Copeland Local Development Frameworks, it will assist planners in the production of the two Core Strategies and with locations for housing development within the Site Specific Allocations Development Plan Documents. It will also show us which settlements have issues with housing capacity, and therefore may need to be given the flexibility to expand under new policy. Please note, however, that all sites identified within the SHLAA will carry the following disclaimer:

The SHLAA will NOT make any formal planning decisions. It will NOT allocate new housing land. Sites identified in the SHLAA wont necessarily come forward for development under the emerging Local Development Framework. Identified sites will have no additional planning status and inclusion within the SHLAA by no means guarantees planning approval. This is purely an evidence gathering exercise and it is important that it is recognised as such.

The Draft Methodology

This document has 3 main purposes.

These are:

- To raise awareness that a SHLAA is to be undertaken and explain what its role and purpose is;
- To provide an overview of the proposed methodology of housing land identification and assessment, and;
- To invite comments on the proposed methodology

We will also be establishing a working group of experts to assist in site assessment. Details of this group will be outlined in this draft methodology. We will welcome any feed back you may have on this, or any other part of the proposed SHLAA process.

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Methodology: Site Identification

How have sites been identified?

The initial phase of the SHLAA process is to identify as many potential housing sites as possible within all the towns and suitable villages within the two boroughs.

This has been largely a desktop exercise, drawing upon the following land use databases and search methods:

- **Previous Urban Capacity Studies (UCS)** - These were the predecessors to the SHLAA. They only looked at the 14 main towns within West Cumbria, with only a limited assessment of site viability. Some of the sites identified in the UCS have since been developed. Suitable sites have, however, been included.
- **National Land Use Database (NLUD)** - A list of previously developed (brownfield) sites. Some sites included in NLUD are either too far removed from existing settlements or far too contaminated due to their industrial heritage to be considered suitable for housing. However, those that do have potential have been included in the SHLAA.
- **Surplus Employment Sector Land** - Allerdale and Copeland are currently undertaking a review of their employment land allocations. Part of this assessment will look at the suitability of residential development on land currently identified for employment use which has received no developer interest since it was allocated. These sites will feed into the SHLAA process.
- **Desktop Search** - A lot of potential sites within settlements, especially those in the smaller villages, which were not part of previous Urban Capacity Studies, have been identified through an extensive search of Ordnance Survey Maps and Aerial photography. This process has been particularly valuable in identifying possible infill sites within villages, as well helping to increase the robustness of land identified in the larger towns that may not have been considered in earlier capacity studies.
- **Previous Submissions for Settlement Extensions** - Since it became known that Councils were working on new development plans to replace old Local Plans, we have been welcoming submissions from people wishing to have their land included within development limits or to be considered as new

Methodology: Site Identification

allocations in the Local Development Framework. All sites received, some of which date back to 2002, have been included within the SHLAA process.

- **The ‘Call for Sites’** - In June 2008 Allerdale initiated the first phase of official consultation on the SHLAA, followed by Copeland in August 2008. This involved sending out a ‘Call for Sites’ in which we asked people to send us information on land they would like to be considered in the process. A number of different methods were used. These included:
 - Notification in the Local Press
 - Directly contacting all Parish Councils
 - Directly contacting architects, planning agents and other stake holders relevant to the planning process
 - Presenting information on the SHLAA at Allerdale’s agent’s forum meeting, organised by the Council’s Development Control team
 - Publishing information on the Councils’ websites
 - Informing all Allerdale and

Copeland Councillors

A form was produced to aid people in submitting information about their sites, with each submission being logged and fed in to the SHLAA process. The deadline on Copeland’s call for sites is the 15th September 2008..

The Five Year Land Supply

In February and March 2008 Allerdale and Copeland published documents demonstrating their five year supply of deliverable housing sites for the period 2007/08—2012/13. The five year supply is constantly under review, with regular updates to be included in the Annual Monitoring Report of both Councils, published every December. Sites included in the five year supply will be subject to an assessment in terms of their deliverability in much the same way as SHLAA sites will be (as outlined in the next section of this document). It is intended that the process of identifying a five year supply will eventually be taken up by the SHLAA once the new development plans are adopted in 2011. Land for the five year supply was identified using the following sources:

- Sites with Planning Permission (Outstanding or partially

- implemented)
- Existing Housing Allocations in the current Local Plan
- Unallocated brownfield sites and buildings with development potential

Estimating Housing Capacity for Sites

For each site identified, a figure has been given in terms of the potential number of houses that could be provided on the site. Usually this figure has been worked out using a minimum density multiplier, unless a landowner/potential developer has provided a specific figure. These multipliers have been applied conservatively, using the national minimum standard of 30 dwellings per hectare.

Sites Outside Current Settlement Limits

As part of the SHLAA process, we will be looking at land near settlements that may be outside of development limits defined in current Local Plans. Sites with the greatest potential for housing are likely to border or be in close proximity to the existing development boundary. It is important to understand that the new Local Development Framework will be reviewing current development limits and therefore it will be necessary to identify sites

outside the current settlement limits at this evidence gathering stage. This will give us a more complete picture of a settlement's housing land availability, particularly around towns and villages that have limited space within their current boundaries. It should be noted that major urban extensions, growth points, new free-standing settlements and eco-towns are either not relevant to West Cumbria or unsuitable and will not be considered.

Next Steps: Site Assessment

In Allerdale, over 400 potential sites have been identified using the methods outlined in this section, while Copeland's call for sites is still ongoing. These sites need to be assessed in terms of deliverability and suitability in order to refine this list to produce something more manageable in terms of consultation. This process has been outlined in the next section.

Are there any aspects of site identification which you think could be improved upon? Are there, for example any alternative sources of potential housing land which you feel the Council should have considered?

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Methodology: Site Assessment

Site Deliverability/Developability

In Allerdale, the site identification stage of the SHLAA has been completed. All sites submitted (other than those which were specifically requested to remain confidential) are available for viewing on request. The Council must now work towards assessing the 'deliverability/developability' of each and every site against terms defined in Planning Policy Statement 3: Housing (PPS3) and the SHLAA guidance provided by the Department for Communities and Local Government (DCLG).

This section of the methodology will outline how each site is assessed in terms of the definition below to allow planners to judge whether a site is:

Deliverable/Developable - The site is available now, offers a suitable location for housing development and has a reasonable prospect of having housing delivered on site within 15 years of adoption of the development plan. It is an assessment of a site's suitability, availability and achievability, which are defined in PPS3 as:

- **Suitable** - The site offers a good location for development and would contribute towards the creation of a 'sustainable

community'.

- **Available** - The site is ready to be developed now.
- **Achievable** - There is reasonable prospect that the site will come forward for development within the plan period.

Assessing Site Suitability

This is the initial phase of site assessment, and is closely related to the old Urban Capacity Study methodology. Site suitability is assessed by looking at the following factors:

- **Policy Restrictions** - It may be that planning policy prevents the site from coming forward. This could be due to the presence of other designations such as employment or retail use, or for the protection of wildlife or habitat. It could also include sites which would be in direct opposition to national, regional and local policy, such as those that may come forward as isolated housing potential in the middle of open countryside.
- **Physical Problems or Limitations** - Are there any issues relating to site access, infrastructure (highways, utilities, public transport links, etc), floodrisk, hazardous risks (mine shafts, subsidence, etc), pollution, contamination or ground

conditions (relief, etc) which may prevent/restrict development on the land?

- **Potential Impacts** - Will development on the site have any adverse effects upon natural landscape features or the built environment of a settlement (including its built heritage)?
- **Environmental Conditions** - What conditions would prospective residents be subject to on the site? This could include sites in or near to industrial areas or adjacent to other 'bad neighbour' developments.

Where potential problems are identified in terms of site suitability an assessment must be made to see how and when they could be overcome or mitigated against (if possible).

Assessing Site Availability

Essentially a site can be considered available when, based on the best information available, it can be demonstrated that there are no legal or ownership problems, such as multiple owners, ransom strips, tenancies or operational requirements of landowners.

Available sites include:

- Those controlled by a housing developer

who has expressed an interest to develop

- Those sites where the landowner has expressed an interest to develop (usually smaller sites than those controlled by a housing developer)
- Those sites where the land owner has expressed an intention to sell (to an interested developer)

Where potential problems are identified in terms of site availability/ownership constraints an assessment must be made to see how and when they could be overcome or mitigated against (if possible).

Assessing Site Achievability

- An assessment of achievability is essentially a judgement of a site's economic viability and of the ability for a developer to complete and sell the proposed housing within a given period. This phase of site assessment will rely heavily on the collaboration of those members of the proposed SHLAA working group (outlined in the next section of this document) directly involved in the property and housing development

Methodology: Site Assessment

sectors. It will involve an assessment of the following aspects of achievability:

- **Market Factors** - This includes the level of demand for housing in that area, projected rates of sales, the attractiveness of the locality, current land use adjacent to the site and the economic viability of existing, proposed and alternative uses in terms of land values.
- **Cost Factors** - This will involve an assessment of site preparation costs, particularly those relating to overcoming potential constraints identified in earlier parts of the site assessment, as well as the identification of possible funding or investment to address such constraints or to assist development generally. There will also be a need to look into any necessary exceptional works on site, as well as any relevant costs that would be incurred through planning standards or obligations.
- **Delivery Factors** - At this stage we will look at proposed phasing and realistic completion rates (including likely earliest and latest start and completion dates) on sites. Issues relating to the proposed developer(s) will also need to be

considered such as their size and capacity, as well as the number of interested developers with different proposals for the same site.

Are the methods of site assessment outlined above adequate enough to ensure a reliable indication of site deliverability/developability?

Site Assessment Phasing

By firstly looking at site suitability, then site availability and finally site achievability, we will be able to sieve out unrealistic sites prior to the more technical stages of assessing economic viability. All sites which are discarded during the various stages of assessment will still be logged, along with details justifying their rejection.

Phasing the assessment in this way will prevent any unnecessary consultation taking place, allowing us to contact and target specific consultees at the stages most relevant to them.

Initial Discarding of Unrealistic Sites

The site identification process outlined in the previous section of this document has thrown

up a large variety of sites some of which, at first glance, are obviously more developable than others. It is proposed that the Council undertakes an initial sieving of these sites, to identify and then discard those which would clearly be undeliverable under new emerging policy within the Local Development Framework.

This initial filtering of sites will look for land that is in direct opposition to current national policy, such as proposed sites located in the middle of open countryside, or sites associated with settlements that clearly have no service provision to support new housing.

It is understood that stakeholders and the working group may wish to see these discarded sites, and a record, available on request, will be kept for each one detailing why it was discounted. It is felt, however, that additional consultation on these sites will not be productive or necessary.

Is this proposed initial assessment acceptable? Do you think we should consult on even the most unrealistic sites?

Councils will not be commencing a full site

assessment until this draft methodology has been agreed by members of the proposed SHLAA working group, outlined in the next section.

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Involving Partners: Consultation & The SHLAA Working Group

Consultation on the SHLAA

A key component of the SHLAA, consultation is required at a number of different stages of the assessment and needs to take place with a broad range of stakeholders, as appropriate. It is important that the SHLAA process is made as transparent as possible for all involved. Robust assessment from planners, the housing sector and other relevant parties will ensure a final list of potential housing sites that are developable within the timeframe of the LDF plan period.

There will be three levels of consultation on this document, which will be employed at appropriate stages of the assessment:

- **General Consultation** - This is an untargeted consultation. Notification will be sent out through the press to alert those who may have an interest to send in submissions for the SHLAA. This type of consultation was used mainly for the initial 'call for sites'. It may be of less use in terms of site assessment and agreeing the methodology, which will require a more informed and objective assessment of site suitability.
- **Targeted Consultation** - For the initial identification of sites, developers, planning

consultants/agents and landowners with interests in West Cumbria were contacted directly. These people will also be given the option to be involved in later stages of the SHLAA, largely in terms of agreeing the methodology. Further to this, a number of housing and building professionals will make up a SHLAA working group (detailed below) to allow for a greater understanding and assessment of market conditions. Targeted consultation will also be used to involve other specialists, both internal and external to the Council, in terms of site assessment. These will include:

- English Heritage (Historical Impacts)
- English Nature (Landscape Impacts)
- Environment Agency (Flood Risk)
- Cumbria Highways (Highway Issues)
- United Utilities (Infrastructure Constraints)
- West Cumbrian Development Control Teams (Planning Constraints)

These specialists will provide invaluable insight into the developability of potential housing sites, and will be contacted individually in due course.

- The SHLAA Working Group** - To ensure a robustness of site assessment that goes beyond the traditional scope of previous urban capacity studies, the Council intends to secure the participation of organisations with a direct role in delivering new housing, to ensure that the sites that are identified meet the criteria of being suitable, available and achievable, as outlined in the previous section. To do this, we will establish an active working panel to assist in site assessment, and approve the final list of potential housing sites. It is hoped that this panel will meet at least three times throughout the course of the SHLAA process. These meetings will be:

 - To approve the final SHLAA methodology
 - To assist in the assessment of an initial shortlist of sites
 - To approve the final draft of the SHLAA

Invitations to join the working group will be sent with this draft methodology. The first meeting of this group is proposed to take place shortly after the consultation period on this methodology has ended. This will give

members time to read and analyse its contents. In addition to key Council Officers the working group members will include:

- Major House Builders/Developers
- Regional Social Landlords
- The Home Builder's Federation
- West Cumbrian Council Housing Departments
- Chartered Surveyors
- Estate Agents

A time table for proposed meetings and consultations and for the SHLAA process in general is included in the next section.

Do you have any comments regarding proposed consultation methods?

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A Timetable for SHLAA Production

SHLAA Timetable

The SHLAA will progress through a number of distinct stages, the time table for which has been detailed below:

- **August 2008:**
 - Completion of site identification (Allerdale)
 - Commencement of consultation on SHLAA methodology (28th/29th August)
 - Invitations for working group sent out (28th/29th August)
- **September 2008:**
 - First meeting of working group (26th September)
 - Initial discounting of unrealistic sites (on going)
 - Commencement of initial site assessment (Post 26th September)
- **October 2008:**
 - On going site assessment
 - Consultation with specialist consultees (to be agreed)
- Working group meeting on site assessment (to be agreed at September meeting)
- **November 2008:**
 - On going/final site assessment
 - Drafting of final SHLAA document
- **December 2008:**
 - Panel meeting to approve final site list and SHLAA document (to be agreed)
 - Publication of SHLAA document (Mid—late December)
- **2009 Onwards:**
 - Annual SHLAA updates (subject to Panel approval) to be included within Annual Monitoring Reports published by LDF teams every December.

Is the proposed timetable realistic/ achievable? Do you feel anything else should be included or extra time allowed?

Consulting on the Methodology

This methodology is currently open to consultation until the 26th September 2008.

Please direct any comments, in writing, to:

(For Allerdale)

**The LDF Team, Allerdale House,
Workington, Cumbria, CA14 3YJ**

Tel: 01900 702768

(For Copeland)

**The Planning Policy Team, The Copeland
Centre, Catherine Street, Whitehaven,
Cumbria, CA28 7SJ**

Tel: 01946 598439

Once agreed and approved by the working group, the methods presented in this methodology will be used to implement and conduct the SHLAA process.

