



DRAFT METHODOLOGY

Copeland Borough Council: Strategic Housing Land Availability Assessment

September 2019

BACKGROUND

The Council is producing a Strategic Housing Land Availability Assessment (SHLAA) to inform the emerging Local Plan (2017 to 2035).

The SHLAA will:

- Identify sites and broad locations with potential for development
- Assess their development potential
- Assess their suitability for housing and the likelihood of development coming forward over the plan period

The SHLAA does not state which sites should be allocated in a Local Plan and a site's inclusion in the SHLAA does not indicate that planning permission for housing would be granted. National Planning Practice Guidance (NPPG) (para 8) notes that *"the assessment needs to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land."*

The SHLAA is a high level assessment and it is for the Local Plan to determine the development strategy based on all the evidence available and consultee responses. The Council is developing a Methodology to carry out the assessment and would welcome your views so that the SHLAA is as effective and robust as possible.

Comments should be completed in this questionnaire and returned to the Council by no later than 18/10/2019 (See page 10 of this document for address return details)

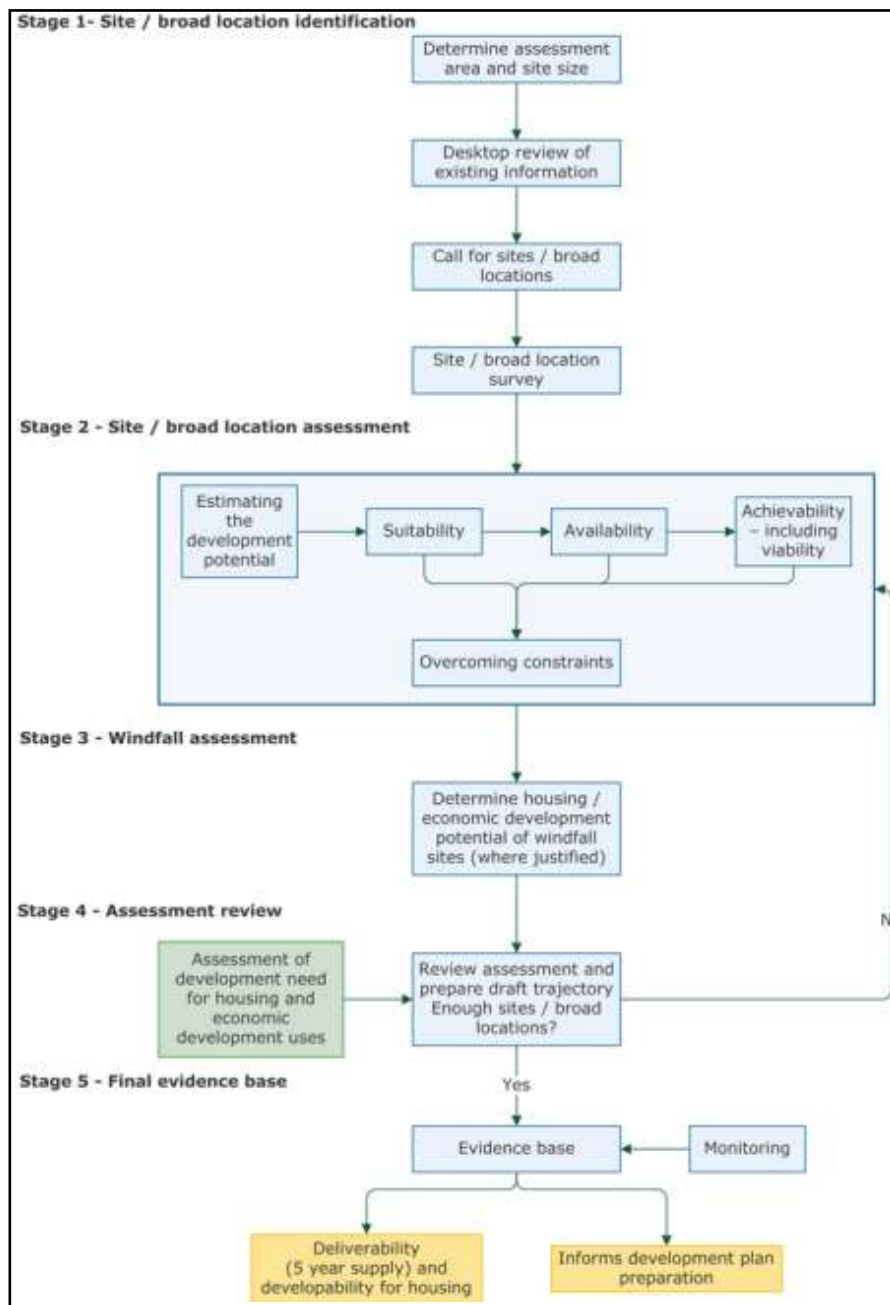
DRAFT METHODOLOGY

The draft methodology applies the advice of the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG). The guidance sets out the advantages of carrying out land assessments and states what inputs and processes should lead to a robust assessment. It also recommends that developers and other key stakeholders will be involved from the early stages. The guidance presents a clear methodology flowchart that the 2019 Copeland SHLAA applies.

The draft methodology sets out how the Council intends to identify sites, assess availability, suitability and achievability and to come to an agreed recommendation of overall site deliverability. Within each section a summary is provided setting out the methodology approaches. This is followed by a series of questions seeking your views on the Council's draft methodology and the opportunity to put forward any alternative approaches and reasons for this.

Diagram 1: Identification of sites and broad locations

Source: <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>



Area covered by the SHLAA

The SHLAA will cover the same area as the Copeland Local Plan (i.e. all of the Copeland Borough that lies outside the Lake District National Park)

Map 1: Copeland Borough Council Local Planning Authority Area

https://www.copeland.gov.uk/sites/default/files/attachments/copeland_local_plan_2013_2028.pdf



Identifying Sites

To identify potential sites for housing, officers will undertake a desktop survey to draw on the numerous land use sources. Officers will consider:

- Previous submitted requests received since the Last Local Plan (2001 -2016) was adopted; either as new sites or settlement boundary extensions
- Suitable allocated sites that remain undeveloped
- Surplus employment land where there has been no developer interest
- Ordnance Survey (OS) mapping and aerial photography (desktop research)
- Planning Permissions for housing and economic development that are unimplemented or under construction
- Planning applications that have been refused or withdrawn
- Land in the local authority's ownership

- Surplus and likely to become surplus public sector land
- Vacant and derelict land and buildings (Including Brownfield Land Register)
- Under- utilised facilities such as garages
- Large scale redevelopment and redesign of existing residential or economic areas

A separate new site search was conducted in spring 2017 following the findings of a Housing Market Intelligence report commissioned in January 2017 and the subsequent announcement that the Council could not demonstrate a five –year supply of sites.

The focus when searching for sites will be within and adjacent to the settlement boundaries for the Principal Town, Key Service Centres and Local Centres. Consideration will be given to all land adjoining the existing settlements. The existing Settlement Hierarchy is defined in Policy ST2 of the Core Strategy and Development Management Policies DPD (2013 to 2028). As the existing hierarchy will be reviewed through the development of the new Local Plan, in addition to the above focus areas, the Council will also assess sites within or adjoining the following villages; Calder Bridge, Drigg/Holmrook, The Hill, The Green, Hallthwaites, Sandwith, Low Moresby, Howgate and Keekle. If other settlements are included in the settlement hierarchy, as the local plan develops the site selection process outlined above will also be applied to these villages.

Call for sites

Since 2008 the Council has issued three ‘Call for Sites’ requesting the submission of potential housing sites from landowners and property professionals in autumn 2008, summer 2009 and spring 2011. In addition there was an opportunity to submit new sites in response to the Site Allocation Policies Plan Preferred Options consultation in 2015.

New sites have continued to be submitted to the Council since the Copeland Local Plan Site Allocations and Policies Plan Preferred Options consultation, which took place between January and March 2015.

A cut- off date for sites to be considered as part of the 2019 SHLAA process is proposed at the end of Preferred Options Consultation Stage. We may however carry out future SHLAAs for the Local Plan and any future review.

METHODOLOGY QUESTIONNAIRE

Q1: Are there any other sources of sites which should be considered? (Please tick appropriate box)

Yes No

If you consider additional sources of sites should be considered please provide details in the box below

Q2: Do you agree with the proposed cut-off date for site submissions? (Please tick appropriate box)

Yes No

If you do not agree please set out reasons in the box below and indicate your alternative date

Excluded Sites

We propose that the following sites should be excluded from the SHLAA assessment:

- Sites below a 0.25ha threshold (HELAA Assessment -Paragraph 010 –NPPG)
- Sites where a minimum of 50% falls within flood zones 2/3 (with the exclusion of town centre regeneration sites that may be acceptable through appropriate design)
- Sites within a SSSI, SPA, SAC, Ramsar
- Sites within an unsustainable and isolated location away from key services, (a development would be contrary to Section 29 of the Planning and Compulsory Purchase Act which states that authorities preparing plans must do so “with the objective of contributing to the achievement of sustainable development” and National Planning Policy.)

Sites which fall below the size threshold and those within flood zone 2 may be reconsidered at a later stage should the assessments result in fewer sites being suitable than anticipated.

A number of information sources will be used to help assess the sustainability of locations. Two documents produced by the Chartered Institute of Highways and Transport (CIHT) that provide advice on what are acceptable walking distances to schools suggest:

Providing for Journeys on Foot (2000)

	Distance (metres)
Desirable	500
Acceptable	1000
Preferred Maximum	2000

The 2015 ‘Planning for Walking’ document advises that most people will only walk if their destination is less than a mile away (1.6km), however people are more likely to walk if the distance is around 800m or a 10minute walk.

The Council has completed a 2019 Villages Survey study to identify distances to services from settlements. The search will identify a 1km distance from settlements to the following services:

- Places of worship
- Post offices
- Convenience stores (selling bread and milk)
- Infant and junior schools
- Community Provision

Taking into account the above recommendations the Council considers that 1km from services is an appropriate distance when considering sustainability.

Q3 Do you agree with the reasons for excluding certain sites from further assessment? (Please tick appropriate box)

Yes No

Please set out reasons in the box below

Q4 Should any other types of sites be excluded and why? (Please tick appropriate box)

Yes No

Please give reasons and/or any additional types of site be excluded in the box below.

Q5 Do you agree that 1km from services is an appropriate distance when considering sustainability? (Please tick appropriate box)

Yes No

If you do not agree with a 1km threshold, what threshold should be used in terms of distances from services, what are the reasons Please provide your response in the box below.

Q6 Should the same distance be used for all services? (Please tick appropriate box)

Yes No

Please explain your reasons in the box below

Assessing Availability

Landowners will be contacted to ensure their sites are still available given that some will have been put forward for consideration some time ago. Consideration will also be given to the presence of any legal or ownership impediments to development e.g. ransom strips etc. which may affect the availability of a site. Sites which are unavailable will be categorised as being undeliverable. The presence of a planning permission for an alternative use does not automatically render the site unavailable.

Q7 Do you agree with this approach to assessing availability? (Please tick appropriate box)

Yes No

Please provide further details and/or any alternative approach that should be considered in the box below

Assessing Suitability

Paragraph 18 of the NPPG states that “A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against the relevant constraints and their potential to be mitigated.” It also states that sites should be assessed against current (depending on how up to date they are) and emerging plan policy (depending upon how likely these are to change).

Constraints to delivery will be assessed through a desk top study and site visits to determine suitability. Information on the following will be gathered and recorded in a SHLAA database.

- Site size, boundaries and location
- Current land use and character
- Land uses and character of surrounding area
- Physical constraints (eg access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure/utilities)
- Potential environmental constraints including potential habitats
- Where relevant, development progress (eg ground works completed, number of units started, number of units completed)

As part of this exercise, the following information sources will be considered:

Information sources

- Draft Strategic Flood Risk Assessment (2018)
- Copeland Open Space Study (2019)
- Copeland Landscape Character Assessment (2019)
- EA Flood Maps
- Previous Statutory Consultee Comments

Site Visits

It is proposed that site visits will be completed by the Development Management and Strategic Planning Planners. In the first instance two site visits, carried out by individual officers, will be completed for each settlement and followed up with internal workshops. Sites considered wholly unsuitable for housing development will be categorised as unsuitable for the following reasons:

- The site is severely constrained by utility concerns
- The site has unsuitable topography or is otherwise considered totally inappropriate by planning officers in accordance with national policy (NPPF) in terms of sustainability.
- The site would have a detrimental impact upon a listed building, scheduled ancient monument, landscape, protected or potentially protected open space
- Housing would be incompatible with surrounding uses
- Sites may also be excluded due to access, drainage and other constraints and capacity issues. (through stakeholder consultation more detailed information will become available)

Where opinions differ or where surveys and workshops are not conclusive further visits will be completed by two officers, one from each team.

A site survey sheet (Appendix 01) will be completed for each site visit that records on site constraints and checks/updates previously identified data from the desktop study.

Stakeholder Views

It is proposed that relevant council officers and external organisations will be informally consulted to gain an understanding around infrastructure constraints and other issues that may affect the suitability and achievability of a particular site. This will be an iterative process to inform site allocations.

- Copeland Flood and Coastal Defence Engineer (Flooding issues)
- Copeland Scientific Officer (Contamination/mining constraints)
- Copeland Planning Manager (Development management constraints)
- Cumbria County Council Highways (Access/highway capacity)
- Cumbria County Council Lead Flood Authority (Flood issues)
- Cumbria County Council Archaeology
- Cumbria County Council Education (Primary and Secondary education provision and/or education requirements identified if the Infrastructure Delivery Plan (IDP))
- Environment agency (Flood issues)
- Utility companies (Gas/water/drainage, electricity/sewage constraints)

Q8 Is there any other information which should be considered when assessing suitability? (Please tick appropriate box)

Yes No

Please provide further details in the box below

Assessing Achievability

Paragraph 20 of the NPPG states that “A site is considered achievable for development where there is a **reasonable prospect** that the particular type of development will be developed on the site at a particular point in time” (emphasis added). A broad judgement can be made taking into account the constraints identified, any mitigation measures required and the attractiveness of the site following development. The viability of a development will be considered in greater detail during the Local Plan production through a specific viability assessment.

Calculating development potential

Paragraph 16 of the NPPG states that “the estimation of the development potential of each identified site can be guided by the existing or emerging plan policy including locally determined policies on density...plan makers should seek to make the most efficient use of land in line with policies set out in the NPPF”

When determining a deliverable/developable site’s housing yield consideration will therefore be given to local and national planning policy and guidance as well as the prevailing character of the area. Where a site has planning permission, the number of dwellings approved will be used. Density will be assumed at 25/hectare of the gross site area unless planning permission is already in place that provides density data. A density of 25/hectare has been selected, as traditionally development is delivered at a lower density in Copeland. This is however an indicative figure and other criterion will be considered.

Q9 Do you agree with an assumed density of 25/hectare? (Please tick appropriate box)

Yes No

If you have further comments on how to apply a site density please provide details in the box below

Approach to Broad Locations

Broad locations are larger areas of land adjacent to or outside existing settlements where significant new infrastructure would be required to support housing development. Broad locations differs from specific sites as they have no defined boundaries. National planning guidance does not define broad locations but paragraph 67 of the NPPF states that “*planning policies should identify a supply of...specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*”

This suggests that it is for the local planning authority, through consultation, to determine whether the housing requirement is met in years 6+ through the delivery of specific sites **or** broad locations (emphasis added). This decision is for the Local Plan process, not the SHLAA process.

The Council is considering whether to identify any individual piece of land put forward over 10 hectares as a broad location.

Q10 Do you agree with the proposed approach to broad locations? (Please tick appropriate box)

Yes No

Please explain your reasons and/or alternatives in the box below.

Q11 Capacity in which you are responding (Please tick the appropriate box)

Developer	<input type="checkbox"/>	Local Authority	<input type="checkbox"/>	Business Owner	<input type="checkbox"/>
Land Owner	<input type="checkbox"/>	County Council	<input type="checkbox"/>	Member of the Public	<input type="checkbox"/>
Agent	<input type="checkbox"/>	House Builder Federation	<input type="checkbox"/>	Other (Please state)	<input type="checkbox"/>

Please complete and return this form by post to the address below by 18/10/2019

Strategic Planning
Copeland Borough Council
Market Hall
Market Place
Whitehaven
Cumbria
CA28 7JG

For internal use:

Response No.

Date Received.

Or by email to: ldf@copeland.gov.uk

SHLAA Site Profile -2019 – Survey Sheet

Date of Survey: Officers Initial:

Title	Site Visit Notes	Terminology (Circle all those that apply)
Site Reference		
Site Name		
Site Area		
Settlement		
Existing/Most Recent Use		
Proposed Use		Housing; Employment; Greenspace
Land Classification		Greenfield; Brownfield; Mixed
Planning History		
Relationship to Existing Settlement/ Built Form		Principal Town; Key Service Centre; Local Centre; Outside Settlement Boundaries; Other Village; Edge of settlement; Detached from settlement
Character of Area		Urban; Suburban; Rural Employment Development; (small, medium or large scale) Residential (low, medium or high density) Mixed Use
Compatibility of Proposed use with existing uses in the area. (Environmental Issues)		None identified; Noise; Smell; Other Hazard
Access to Site (Highways)		Main Road Frontage: Yes; No, Speed Limit, Visibility Splays Achievable, Potential Ransom Strips
Topography of Site		Flat; Undulating; Sloping; Steep Sloping; Different Levels
Ground Conditions/Contamination		None Identified; Mining; Other Potential Hazard; British Coal Standing Advice; British Coal Referral Area

Potential Physical Constraints		Pylons; Substations; Watercourse; Trees; Vegetation; Public footpath; Building; Other
Flood Risk and Drainage		FZ1; FZ2; FZ3; FZ3a: FZ3b; Surface Water Drainage Issues
Accessibility to Services		<p>Less than 1km to: Primary School; Secondary School; Convenience Store; Community Hall; Employment; GP Surgery/Medical Centre; Hospital; Play Provision; Sports Provision; Place of Worship; Public Transport.</p> <p>Less than 1.5km to: Primary School; Secondary School; Convenience Store; Community Hall; Employment; GP Surgery/Medical Centre; Hospital; Play Provision; Sports Provision; Place of Worship; Public Transport.</p> <p>More than 1.5km to: Primary School; Secondary School; Convenience Store; Community Hall; Employment; GP Surgery/Medical Centre; Hospital; Play Provision; Sports Provision; Place of Worship; Public Transport Provision.</p> <p>More than 2km to: Primary School; Secondary School; Convenience Store; Community Hall; Employment; GP Surgery/Medical Centre; Hospital; Play Provision; Sports Provision; Place of Worship; Public Transport Provision.</p>
Proximity to Protected Sites and any Potential Impact		<p>Site within Protected Area: LNR; SSSI; SAC; SPA; Ramsar ; TPO; Ancient Hedgerow; Other Protection</p> <p>Site in close proximity to Protected Area: LNR; SSSI; SAC; SPA; Ramsar ; TPO; Ancient Hedgerow; Other Protection</p>
Ecological Features		Waterbody; Wet or Marshy Grassland; Bushes/Scrub; Flowery Meadows/Grassland; Existing Derelict Buildings; Woodland; Mature Trees; Coastal Features; Hedgerow; Orchard

Proximity To Heritage Assets and any Potential Impact		Conservation Area: Site within CA; Site Adjacent to CA Listed Building Within Site; Adjacent to Site Scheduled Ancient Monument: Within Site; Adjacent to Site
Landscape, Townscape; Character and Visual Amenity		Feature (s):
Site Visit Conclusion		