

Yorkshire and Humber  
Assembly

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**Understanding  
Yorkshire and  
Humber's Strategic  
Housing Land  
Availability**

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Regional Practice Guide

ISSUE

ARUP



Yorkshire and Humber  
Assembly

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Humber's Strategic  
Housing Land  
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Regional Practice Guide

April 2008

**Ove Arup & Partners Ltd**  
Admiral House, Rose Wharf,  
78 East Street, Leeds LS9 8EE  
Tel +44 (0)113 2428498 Fax +44 (0)113 2428573  
[www.arup.com](http://www.arup.com)

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## Contents

	Page
Foreword	1
1 This Guide	3
1.1 Introduction	3
1.2 Aims and Objectives	3
1.3 The Role of the Document	3
1.4 Process of Delivering the Regional Practice Guide	4
1.5 Particular Issues Highlighted in the Region	4
2 Role and Status of the Strategic Housing Land Availability Assessment	5
2.1 Introduction	5
2.2 Considering the Objectives of Planning Policy Statement 3: Housing	5
2.3 Utilising the Existing Development Plan Framework	6
2.4 Where does the Strategic Housing Land Availability Assessment sit in the Local Development Framework Portfolio?	7
3 Basic Principles	9
3.1 Conceptualising the Strategic Housing Land Availability Assessment	9
3.2 Keep it Straightforward and Robust	11
3.3 One Part of the Evidence Base	11
3.4 Using Existing Evidence	11
3.5 Windfalls	12
4 Engaging Stakeholders	14
4.1 Introduction	14
4.2 The Role of Members	14
4.3 The Working Group	14
4.4 Alternative Methods of Stakeholder Engagement	15
4.5 Summary of Engaging Stakeholders	15
5 Populating the Strategic Housing Land Availability Assessment Database	16
5.1 Approaches to Developing a Methodology	16
5.2 Additional Points to Consider in the Methodology	16
5.3 Summary of Populating the Strategic Housing Land Availability Assessment Database	20
6 The Assessment	21
6.1 The PPS3 Tests	21
6.2 The Order of the Tests	21
6.3 Carrying out the Assessment	21
6.4 The Outcomes of the Assessment	21
6.5 The Suitability Test	22
6.6 The Availability Test	23

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6.7	The Achievability Test	23
6.8	Dealing with Unsuitable, Unachievable or Unavailable Sites	24
6.9	Summary of the Assessment	25
7	Using the Strategic Housing Land Availability Assessment	26
7.1	When to Assess	26
7.2	What the Assessment will Deliver	26
7.3	Relationship with the Annual Monitoring Report	27
7.4	Relationship with Development Plan Documents	27
7.5	Updating the Assessment Criteria	27
7.6	Summary of Using the Strategic Housing Land Availability Assessment	28
8	Specific Challenges and Issues	29
8.1	Introduction	29
8.2	Cross Boundary Working	29
8.3	Rural Areas	29
8.4	Flood Risk	30
8.5	Green Belt Sites	30
8.6	Developing a Strategic Housing and Employment Land Availability Assessment	31
8.7	The Role of the Strategic Housing Land Availability Assessment in the Absence of a Demonstrable 5-year Supply	31
9	Contacts and References	32
9.1	Lead Contacts at Local Planning Authorities	32
9.2	Contact for Home Builders' Federation	32
9.3	Yorkshire & Humber Assembly	32
9.4	Government Office for Yorkshire and the Humber	32

## Foreword

A robust evidence base is vital to inform sound planning policy. Planning Policy Statement 3 requires Local Planning Authorities to identify in their Local Development Frameworks an adequate supply of housing land that is suitable, available and achievable. To do so it is necessary to have assessed in a structured and robust way all sites and areas that could potentially contribute to future housing supply. This is the role of Strategic Housing Land Availability Assessments, which Government requires all Local Planning Authorities to undertake.

This aim of this guide produced by Arup for the Yorkshire and Humber Assembly is to add value to, not duplicate or challenge the official CLG advice on undertaking Strategic Housing Land Availability Assessments.

This guide has been informed by research involving discussions with each Local Planning Authority in the region. It seeks to address common problems and issues, as well as identifying good practice and transferable lessons. In doing so the intention has been to consider issues that are pertinent to this region; issues such as dealing with windfalls, or planned areas of regeneration and change.

A particular finding from the Arup research is that progress in the region in undertaking Strategic Housing Land Availability Assessments has been variable. This is a concern, given the importance of ensuring good progress with the production of Local Development Frameworks, and in particular Site Allocations Development Plan Documents. There is a need for a stronger evidence base in the region to inform planning for housing. A comprehensive set of Strategic Housing Land Availability Assessments undertaken on a fairly consistent basis is needed to inform regional policy making and monitoring. This is particularly important in light of the Regional Spatial Strategy partial review, where a consistent evidence base will inform decisions on housing policy and locations for growth.

It is vital that the Assessments are a means to facilitating plan-making, not a brake on progress. With this in mind, this guide makes an important point: that the Assessments should be approached as a technical exercise to provide the evidence base for policy making, they should not be a policy-making exercise in their own right. The guide also highlights, particularly in relation to dealing with windfalls, the importance of effective collection and use of monitoring information to keep policy up-to-date as part of the plan-monitor-manage approach. Of course Strategic Housing Land Availability Assessments are only one part of the evidence base for Local Development Frameworks; they will need to be considered alongside the results of other exercises such as Employment Land Reviews, Strategic Flood Risk Assessments, Sustainability Appraisal, and so on.

It is hoped this guide can help in demystifying issues associated with the Strategic Housing Land Availability Assessments, providing a clearer steer and reassurance on issues around which there is uncertainty, and practical advice on specific aspects of the process for undertaking the Assessments. A list is provided of useful contacts who can provide further advice, and can signpost to others with relevant hands-on experience.



# 1 This Guide

## 1.1 Introduction

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The guide has been commissioned by the Yorkshire & Humber Assembly, and produced by Arup. Discussions were held with all local planning authorities in the region during late 2007 and early 2008 to inform the production of this guide. This helped to frame an understanding of common issues and capture early examples of approaches to Strategic Housing Land Availability Assessments.

Given that practical experience of preparing Strategic Housing Land Availability Assessments is still limited in the Region, this guidance builds only on what experience currently exists, together with early experience captured from other parts of the country. In coming years, a more detailed picture of issues and solutions will emerge.

## 1.2 Aims and Objectives

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The guide is intended to add value at the regional level to the existing guidance. It is intended to:

- help provide an understanding of the Strategic Housing Land Availability Assessment process, role and purpose to empower local authorities to adopt the best approach to it;
- provide pointers to possible ways of undertaking a Strategic Housing Land Availability Assessment;
- provide practical assistance with common issues;
- identify regionally specific examples; and
- include common parameters to achieve a degree of regional consistency and ensure that the Assembly has consistent evidence to draw upon in the review of the Regional Spatial Strategy (RSS).

In achieving these objectives, the guide does not seek to:

- add to the 'guidance burden' of local authorities;
- present detailed 'best practice' information; and
- present confused messages with regard to other information sources.

Strategic Housing Land Availability Assessments are an important component of the 'bottom-up' evidence base for the Regional Spatial Strategy. There is therefore value in achieving a degree of consistency in the region's approach to Strategic Housing Land Availability Assessments.

## 1.3 The Role of the Document

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This guide supplements other sources of information on Strategic Housing Land Assessments. The primary advice is set out in PPS 3, and Communities and Local Government (CLG) has published the following guidance on practice:

- **Strategic Housing Land Availability Assessments – Practice Guidance**, Communities and Local Government, July 2007. Product code 07 HC 04748/c. Available online from:

<http://www.communities.gov.uk/publications/planningandbuilding/landavailabilityassessment>

In addition, Planning Advisory Service (PAS) has published guidance on Strategic Housing Land Availability Assessments with particular reference to the development plan making process, as set out below:

- **Strategic Housing Land Availability Assessment and Development Plan Document Preparation**, Planning Advisory Service, January 2008. Product code IDEa IDT 1303.  
Available online from: <http://www.pas.gov.uk/pas/core/page.do?pageld=54317>

#### **1.4 Process of Delivering the Regional Practice Guide**

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Between November 2007 and February 2008 meetings and discussions were had with each of the Local Planning Authorities within the region<sup>1</sup>. This initial contact was crucial in emphasising the importance of producing a Strategic Housing Land Availability Assessment. The meetings were an effective method of encouraging the Local Planning Authorities to start considering how to develop a Strategic Housing Land Availability Assessment, and also to work towards an integrated regional evidence base. It is hoped that this sharing of knowledge, understanding and current approaches amongst the different local authorities was as constructive as this guide.

The findings from these meetings have been debated amongst the Steering Group set up to assist the development of this guide. The most appropriate approaches to delivering a Strategic Housing Land Availability Assessment were agreed by the Steering Group and their comments are reflected in this guide.

#### **1.5 Particular Issues Highlighted in the Region**

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There have been a number of issues that have cropped up repeatedly in the discussions with local authorities in the region. These issues have helped to frame the emphasis of the advice set out in this guide. These issues include:

- how to deal with windfall sites;
- how to deal with planned areas of change;
- how to assess and incorporate the current pipeline of housing permissions;
- the inclusion and assessment of green belt sites;
- the implications of an absence of a 5 year supply;
- applying a site size threshold;
- the most appropriate way to deal with stakeholders;
- dealing with flood risk in the Strategic Housing Land Availability Assessment;
- the formulation of the suitability test; and
- how to deal with large brownfield sites that can be planned for.

Practical guidance on how to manage these issues in the Strategic Housing Land Availability Assessment process is noted within Sections 2 to 7. Further exploration of some of the more challenging issues can be found in Section 8 of this guide.

The guide has responded to these issues by both emphasising the relevant national messages where these exist, as well as building on the lessons already being learned in the region. These are areas where the guide goes into some detail.

The position taken on these issues was subject to debate between the consultant team, the Assembly and members of the Steering Group, which included local authority and other members from around the region. Their input into this document is gratefully acknowledged.

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<sup>1</sup> This included the National Park Authorities in the region. At present, due to the absence of Regional Spatial Strategy housing requirements, both Yorkshire Dales National Park Authority and North York Moors National Park Authority are not producing a Strategic Housing Land Availability Assessment. However, they are producing strategies to reflect and meet local housing needs.

## 2 Role and Status of the Strategic Housing Land Availability Assessment

### 2.1 Introduction

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A Strategic Housing Land Availability Assessment is a process that identifies housing land for future development. The assessment is different from Urban Capacity Studies (UCSs), which relied on identifying supply within a limited area and focused on identifying potential based on assumptions about the likelihood of sites coming forward for development. Even where there is a recent UCS in place, local authorities are required by Government to carry out a Strategic Housing Land Availability Assessment.

Ensuring an adequate supply of land for housing is a principal function of the planning system. An evidence-based policy approach is a key principle of PPS3. Strategic Housing Land Availability Assessments provide essential evidence for the preparation of Local Development Frameworks.

Strategic Housing Land Availability Assessments provide a robust method by which all *potential* housing sites within a defined area of search can be identified. Sites are then assessed on the basis of when and whether they are likely to be developed, meaning that, in principle, a continuous five year supply of housing and a forward trajectory of housing supply can be identified, as required by PPS3. The Strategic Housing Land Availability Assessment process will also highlight where a possible shortfall of housing land exists which will in turn require changes to policy, for example a Green Belt review or other changes.

There is an expectation by the Planning Inspectorate that the Local Planning Authority must provide a full and comprehensive evidence base with a submitted Development Plan Document, and that a failure to do so would result in the Development Plan Document failing the tests of soundness.

A robust Strategic Housing Land Availability Assessment is therefore a critical part of the evidence base necessary to support the production and adoption of Development Plan Documents.

### 2.2 Considering the Objectives of Planning Policy Statement 3: Housing

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Planning Policy Statement 3: Housing (November 2006)<sup>2</sup> identifies that a Strategic Housing Land Availability Assessment is one component of the overall evidence base, which should be used to identify specific deliverable sites to deliver housing. It goes on to highlight that each Local Planning Authority should look to demonstrate a deliverable 5 year supply in the first instance. To be considered **deliverable**, sites should, at the point of adoption of the relevant Local Development Document be:

- **Available** – the site is available now;
- **Suitable** – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities;
- **Achievable** – there is a reasonable prospect that housing will be delivered on the site within the timeframes identified.

To be considered **developable**, sites should be suitable and available, but may not be achievable within the next 5 years.

The objectives set out in PPS 3 should be seen as the overall guiding principles for the production of the Strategic Housing Land Availability Assessment. Indeed, even after the

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<sup>2</sup> <http://www.communities.gov.uk/publications/planningandbuilding/pps3housing>

initial assessment has been produced and sites have been identified; the supply of land should be managed in a way that ensures that a continuous five year supply of deliverable sites is maintained.

### **Box 2.1 Elements of the Strategic Housing Land Availability Assessment**

The main elements of undertaking a Strategic Housing Land Availability Assessment are as follows:

- assessing the likely level of housing that could be provided if unimplemented planning permissions were brought into development;
- assessing land availability by identifying buildings or areas of land (including previously developed land and greenfield) that have development potential for housing, including within mixed use developments;
- assessing the potential level of housing that can be provided on identified land;
- understanding past trends in windfalls coming forward and understanding where they will fit within housing supply;
- identifying constraints that might make a particular site unavailable and/or unviable for development;
- identifying sustainability issues and physical constraints that might make a site unsuitable for development; and
- identifying what action could be taken to overcome constraints on particular sites.

## **2.3 Utilising the Existing Development Plan Framework**

It is vital that the planning system delivers a flexible, responsive supply of land for housing. Local Planning Authorities and Regional Planning Bodies should develop policies and implementation strategies to ensure that sufficient, suitable land is available to achieve their housing and previously-developed land delivery objectives and requirements.

Local Planning Authorities should set out in Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years.

During the transitional period before adopting local Development Plan Documents, it should be noted that the regional component of the Development Plan (the RSS) remains in place, together with the national planning policy framework.

Paragraph 71 of PPS3 notes that where a Local Planning Authority is unable to demonstrate a flexible supply, and more importantly, where they are unable to demonstrate a robust 5 year supply<sup>3</sup>:

*“they should consider favourably planning applications for housing, having regard to the policies in this PPS including the considerations in paragraph 69”*

However paragraph 69 provides support to local authorities identifying that:

*“In general, in deciding planning applications, Local Planning Authorities should have regard to:*

<sup>3</sup> CLG guidance to PINS on a 5 year supply of deliverable sites, available at [http://www.planning-inspectorate.gov.uk/pins/advice\\_for\\_insp/advice\\_produced\\_by\\_dclg.htm](http://www.planning-inspectorate.gov.uk/pins/advice_for_insp/advice_produced_by_dclg.htm)

- *achieving high quality housing;*
- *ensuring developments achieve a good mix of housing reflecting the accommodation requirements of specific groups, in particular, families and older people;*
- *the suitability of a site for housing, including its environmental sustainability;*
- *using land effectively and efficiently; and*
- *ensuring the proposed development is in line with planning for housing objectives, reflecting the need and demand for housing in, and the spatial vision for, the area and does not undermine wider policy objectives e.g. addressing housing market renewal issues.*

Therefore local authorities unable to demonstrate a 5 year supply should still have regard to policy at the regional and national level in determining planning applications. Equally, it follows that even where a Local Planning Authority *can* demonstrate a 5-year supply of deliverable sites then they should consider planning applications having regard to PPS3, existing Development Plan policies as well as other material considerations.

#### **2.4 Where does the Strategic Housing Land Availability Assessment sit in the Local Development Framework Portfolio?**

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It is crucial that the Strategic Housing Land Availability Assessment is approached as a technical exercise which forms one component of the overall evidence base. The Strategic Housing Land Availability Assessment should be seen as a document which identifies potential supply and *does not* seek to make policy decisions on which sites should be developed, nor should it begin to formulate development plan policy in its own right.

The Strategic Housing Land Availability Assessment's role within the wider evidence base should be used in conjunction and alongside other evidence, for example, employment land reviews, strategic flood risk assessments, strategic housing market assessments, area-specific regeneration objectives and spatial priorities set out in the Sustainable Community Strategy. At the application stage, any evidence from the Strategic Housing Land Availability Assessment should be considered alongside all these other factors and information gathered during pre-application discussions.

Managing external stakeholders' expectations of the output from a Strategic Housing Land Availability Assessment is therefore crucial. It will help to emphasise the role of the Strategic Housing Land Availability Assessment as only a pool of *potential* housing sites against which other policy considerations will need to be balanced. It should be made clear that the Strategic Housing Land Availability Assessment is to be used to support decision-making and does not pre-judge the strategic approach that the Development Plan will eventually take.

## 2.5 Summary of the Role and Status of the Strategic Housing Land Availability Assessment

- the Strategic Housing Land Availability Assessment should identify all potential housing sites in an area of search;
- the assessment should work towards outlining a continuous, rolling five year supply of sites;
- the Strategic Housing Land Availability Assessment should be founded upon the main principles and tests within PPS 3: Housing – housing land should be available, suitable, and achievable;
- whilst undertaking a Strategic Housing Land Availability Assessment stakeholder expectations should be managed and emphasis put upon the Strategic Housing Land Availability Assessment being a database of potential sites; and
- the Strategic Housing Land Availability Assessment is a technical exercise which informs the evidence base to help formulate policy, it is not a primary policy making exercise in its own right.

### 3 Basic Principles

#### 3.1 Conceptualising the Strategic Housing Land Availability Assessment

Building on the information in Section 2, it is helpful to clearly conceptualise the Strategic Housing Land Availability Assessment to help frame an appropriate response and to communicate to stakeholders and Members the role, function and form of the Assessment.

**Diagram 3.1 The Strategic Housing Land Availability Assessment**

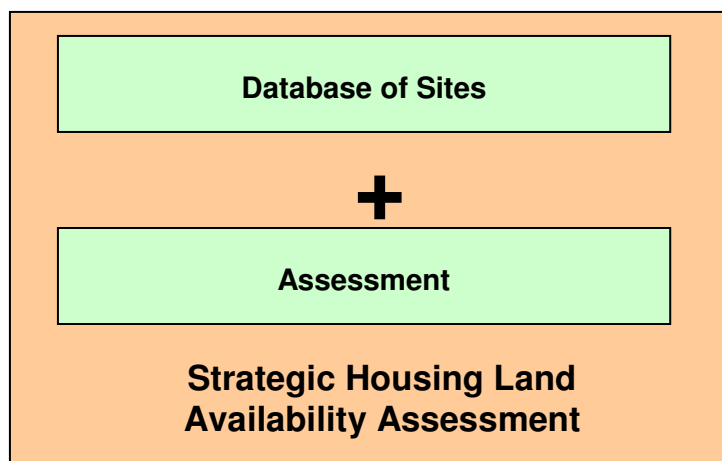


Diagram 3.1 simplifies the basic elements of the Strategic Housing Land Availability Assessment; i.e. a database of sites and associated information against which an assessment is run.

A useful way to understand how the Strategic Housing Land Availability Assessment fits into the overall housing supply picture is to conceptualise the housing supply as a 'Conveyor Belt', as set out in Box 3.1 overleaf.

This helps to provide an understanding of why it is unnecessary to consider windfalls and very small sites as part of the Strategic Housing Land Availability Assessment process. As set out later in this guidance, doing so is likely to result in the basis of the Strategic Housing Land Availability Assessment being challenged and to consume disproportionately large amounts of resources in the process.

An important objective of the Strategic Housing Land Availability Assessment is to identify sites which *may* in due course be considered suitable to be identified as allocations in a development plan, and which make a significant contribution to housing supply. This should be seen as a guiding principle for the type of sites that will feature in a Strategic Housing Land Availability Assessment.

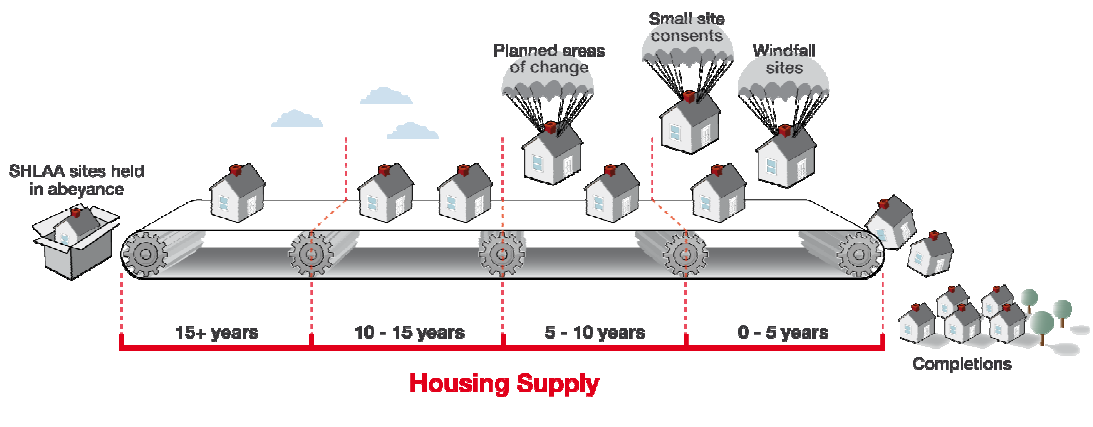
**Box 3.1 Housing Supply as a Conveyor Belt**

The Strategic Housing Land Availability Assessment is an important part of identifying the continuous 5-year supply of housing and land-supply beyond that. A useful way of conceptualising this is to see housing supply as a conveyor belt.

The conveyor belt produces housing supply (in the form of completions). At the very front of the conveyor are the housing sites under construction. Beyond those, and next in line, are those sites with planning consent which are considered likely to be delivered within the 5-year supply timeframe. This will include windfall sites and small sites, which have not been planned for as part of the supply, but are nonetheless forming part of the supply. In effect, they have 'dropped-in' to the supply identified in the Strategic Housing Land Availability Assessment, pushing everything else back.

Beyond this is the current phase of allocated housing land. Beyond that are later phases, or sites with planning consent which are likely to be delivered in the medium term. And so the picture builds with later phases of allocated housing land and then unallocated sites identified in the Strategic Housing Land Availability Assessment forming the start of the conveyor. Planned areas of change and regeneration are likely to appear on the conveyor as part of the medium-term supply, where these are being pro-actively planned for.

This principle is useful in demonstrating how windfalls and small sites are still considered as part of the supply, but which 'fall-in' near the end of the conveyor, effectively 'pushing-back' the rest of the supply.



PPS 3 identifies the need for a continuous 5-year supply of housing and land-supply beyond that so as to enable continuous delivery of housing for at least 15 years. In conceptualising the Strategic Housing Land Availability Assessment and for use in carrying out the Assessment (see Section 6) it is useful to consider the Strategic Housing Land Availability Assessment in 5 year phases.

For the first phase (years 1 to 5), it is necessary to consider deliverable sites which adhere to the three tests set out in PPS 3 and Section 2.2 above. As decisions are made over short, medium and longer term deliverability and developability sites would naturally position themselves in later phases: year 5 to year 10 (short to medium term); year 10 to year 15 (medium to long term) and year 15 onwards (long term). Where possible (subject to having a recently issued Regional Spatial Strategy) the phases of the Strategic Housing Land Availability Assessment could be linked to the phasing of the housing requirements within RSS.

The start date for the Strategic Housing Land Availability Assessment is important when thinking of a phased supply. CLG guidance (paragraph 7) states that the Strategic Housing Land Availability Assessment should identify land on the basis of the anticipated adoption date of the relevant plan. Given the progress of Core Strategy DPDs within the region (currently only one has been adopted) it is sensible to produce a Strategic Housing Land Availability Assessment which phases sites to provide something approaching a 7 year, 12

year and 17 year supply of deliverable and developable sites, rather than just 5, 10 and 15 years, to ensure that on adoption, the evidence base supports a 5 year supply.

### **3.2 Keep it Straightforward and Robust**

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The Assessment element of the Strategic Housing Land Availability Assessment is considered in detail in Section 6. However, there are some basic principles worth considering as part of conceptualising the Strategic Housing Land Availability Assessment:

- the assessment should be kept as straightforward as possible, focusing on the three PPS3 principles of 'suitable', 'available' and 'achievable';
- the assessment of these three principles should be as straightforward and objective in nature as possible;
- the 'suitable' test should not seek to create local policy in its own right, but defer to national and up-to-date regional policy tests; and
- make as much use of existing data collection as possible as a starting point.

The more the Strategic Housing Land Availability Assessment process is complicated with sophisticated assessment criteria, the more resources it will require to compete, the easier it will be to challenge and the more it is likely to prejudice subsequent policy choices better resolved through the creation of Development Plan Documents.

The Strategic Housing Land Availability Assessment is in many ways an evolution of the approach which is already familiar to policy planners for identifying land supply.

### **3.3 One Part of the Evidence Base**

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It is useful to remember that the Strategic Housing Land Availability Assessment is only one component of the evidence base for making development plan policy and specifically for allocating sites.

The Strategic Housing Land Availability Assessment will provide a pool of suitable, available and achievable housing sites against which other parts of the evidence base and policy choices can be applied, for example, issues such as regeneration priorities, and PPS25 sequential testing. This underlines the importance of keeping the assessment element straightforward.

Given the comprehensive nature of the Strategic Housing Land Availability Assessment, particularly in relation to sites and the associated database with GIS information, it may be worth integrating the database element with other parts of the evidence base on employment land and open space, for example. There is particular merit in undertaking the Strategic Housing Land Availability Assessment in parallel with an employment land study where local circumstances permit. This is considered in more detail in Section 8.6 of this guide.

### **3.4 Using Existing Evidence**

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The Strategic Housing Land Availability Assessment, particularly the database element is an evolution of the kind of evidence that Local Planning Authorities would in any event be gathering as part of the development plan making process. By adopting a common sense approach reflecting relevant local circumstances, it is perfectly acceptable to start populating the Strategic Housing Land Availability Assessment database with data already held on sites in the area that has resulted from previous site related fieldwork or previous 'call for sites' information; many authorities in the region are in this position.

This data may however require backfilling to ensure a robust assessment of suitability, availability and achievability can be undertaken.

The main message is to build on existing evidence where possible, without necessarily starting from scratch.

### **3.5 Windfalls**

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Windfalls are a particular issue in Yorkshire & the Humber, with significant components of recent housing supply in West and South Yorkshire urban areas as well as key towns such as Harrogate coming forward as windfalls. For example, in 2006/2007, 81% of housing development across the region was completed on windfall sites. This, in part, has been the result of previous national planning policy and the investor-led market for city centre apartments.

The CLG guidance, PPS3 itself and other policy and advice make it clear that local authorities, in planning for housing land, should not plan for a set level of windfalls, except in the most exceptional of circumstances. A windfall allowance should therefore not generally be considered as a component of a Strategic Housing Land Availability Assessment. CLG has not categorically defined 'exceptional circumstances', but reasonably this might be thought of as an area which is almost entirely built-up to the district boundaries, within which there is no reasonable prospect of identifying at least a 15 year supply of housing land. Within the region, Hull is the only authority which comes close to this definition.

It is likely that windfalls will continue to come forward at a significant rate in many parts of the region. If this proves to be the case, then delivery of windfall sites will keep 'pushing back' the planned supply of housing land, so that land initially identified in the 10-15 year supply may not be required for housing until later a later date. In effect, windfalls will 'drop in' near the front end of the conveyor (see Box 3.1), pushing everything else back. To this effect, local authorities should still seek to understand past trends of windfall sites and the likelihood of future sites coming forward as windfalls to continue to inform the position at a regional level. This information is pertinent to the overall housing supply situation within the region and will continue to inform the regional evidence base and inform future RSS policy revision.

Large areas of brownfield land not currently identified for housing are also a significant feature of housing supply within Yorkshire & the Humber. Many of these areas are known to be available for housing. Where this is the case, and where they are considered to be deliverable in the short term or developable in the longer term, then it is reasonable to consider them as part of the Strategic Housing Land Availability Assessment. These areas can be identified as sites or broad locations within the Strategic Housing Land Availability Assessment and so by definition these areas are not windfalls. Subject to timing they should be suitable for housing allocations in Development Plan Documents. Broad locations or 'areas of change' are discussed in more detail in Section 5.2.

The purpose of the PPS3 approach is to ensure a forward supply of housing land is identified in the absence of windfalls. In delivering the Local Development Framework, in particular when developing Core Strategy and Site Allocations DPDs, Local Planning Authorities should use the 'plan, monitor and manage' approach to ensure a phased approach to the release of housing land according to the level of windfalls actually occurring.

In practice, this means that Local Planning Authorities may identify possible housing land in the Strategic Housing Land Availability Assessment and subsequently in site allocations which may not actually be required for housing for many years beyond the period anticipated if housing on windfall sites continues to be delivered in significant numbers in the Region.

### 3.6 Summary of the Basic Principles

- the Strategic Housing Land Availability Assessment should be seen as the creation of a database to then run an assessment against to determine potential housing supply;
- conceptualising the housing supply as a 'conveyor belt' should help emphasise the overall make-up of housing supply, incorporating existing permissions, future supply, and windfall sites;
- considering the Strategic Housing Land Availability Assessment and housing supply as a conveyor belt helps work towards conceptualising a rolling 5 year supply, and delivering a phased approach to housing supply and delivery;
- due to the progress in producing LDF DPDs within the region, the Strategic Housing Land Availability Assessment should consider identifying 17 years of supply to ensure requisite housing supply on adoption of Core Strategy DPD;
- the Strategic Housing Land Availability Assessment should be a straightforward and efficient process, using existing information and data collection as a starting point;
- the Strategic Housing Land Availability Assessment should be seen as just one component of the Local Planning Authority's evidence base to inform policy making;
- when considering windfalls it is clear that a 'windfall allowance' will only be acceptable in exceptional circumstances;
- identifying large brownfield sites in the Strategic Housing Land Availability Assessment is acceptable, and where these can be planned for they are not considered as windfalls; and
- windfalls will continue to constitute delivered housing supply and if they continue to come forward in significant numbers will effectively 'push back' the delivery timeframe of later phases of land identified in the Site Allocation Development Plan Document through the plan, monitor and manage process.

## 4 Engaging Stakeholders

### 4.1 Introduction

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The CLG guidance advocates a 'partnership approach' and outlines the possible role of housing partnerships as a stakeholder group for use during the preparation of the Strategic Housing Land Availability Assessment.

This is one method of engaging stakeholders in the process. In deciding on an appropriate approach it is worth considering the main reasons for engaging stakeholders, which include:

- 'front loading' – engaging stakeholders and establishing common ground at the outset to avoid unnecessary conflict at later stages of the process (Development Plan Document making and determining applications); and
- to engage external intelligence on matters relating to the housing market.

Perhaps one of the most important things is to get buy-in from stakeholders to the methodology for the assessment criteria.

### 4.2 The Role of Members

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As set out in Section 2, fundamentally the Strategic Housing Land Availability Assessment should be seen as a part of the technical evidence base. As such, the management of stakeholder's expectation as to the content within the Strategic Housing Land Availability Assessment is important to maintain it as a technical database. On that basis there is no clear evident need to engage Members, whose interests lie most obviously in the policy-making aspects and in determining planning applications; processes which are informed by the evidence contained in the Strategic Housing Land Availability Assessment (amongst other information).

Notwithstanding this advice, individual local authorities may consider Member engagement in the process is appropriate on the basis of particular local circumstances. It is likely that officers will find it useful to brief members of the role, purpose and outcomes of the Strategic Housing Land Availability Assessment.

### 4.3 The Working Group

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The Working Group (which goes by a number of different names in different authorities) is a good method of engaging stakeholders. CLG's guidance suggests extending the role of the (assumed to be) established Housing Market Partnership set up as part of the Strategic Housing Market Assessment. This is an obvious choice.

Where no existing suitable partnership exists, there may be other similar partnerships to utilise or establish. The CLG guidance offers good advice on the range of interests this might need to include.

Local Planning Authority officers should exercise their own judgement and understanding of the local market (including local landowners, developers, agents, Registered Social Landlords (RSLs) and others) to ensure a reasonable spread of interests. Additionally the Home Builders' Federation is taking a pro-active role in the region to engage in these groups. This includes marshalling local interests to try to ensure a pragmatic and common-sense approach to potentially competing sites is established.

Within the region there are also groupings such as the West Yorkshire Housing Market Partnership and the Housing Market Renewal Partnerships (Transform South Yorkshire and Gateway for Hull and East Riding). West Yorkshire Housing Market Partnership's forum is open to a wide range of housing or related organisations across the sub-region, including tenants' and residents' federations; local authority housing, regeneration and planning departments; housing associations; estate agents; developers; lenders; voluntary and community agencies; Primary Care Trusts and the Police. This is likely to be a valuable

source of contacts for the West Yorkshire authorities. Transform South Yorkshire and Gateway are similarly likely to be a useful source of contacts to the South Yorkshire authorities and Hull and East Riding respectively.

As a body, the Working Group represents an ideal forum through which to link the objectives of the Strategic Housing Land Availability Assessment with the wider aims of the Local Authority. Issues formalised within Corporate Plans and work streams being actively pursued by Local Strategic Partnerships should be aligned, particularly relating to affordable housing delivery, current and future funding vehicles and any wider goals surrounding New Growth Points status and eco-towns proposals.

In process terms, it is likely that the stakeholder group needs only meet in full a handful of times in the first Strategic Housing Land Availability Assessment process, with other information distributed through correspondence, email forums and any consultation software system in use by the Local Planning Authority.

Depending on the scope of the Working Group, specific workshops may also be a useful tool for capturing the input of agents, utility providers and others on the information necessary to carry out a robust assessment of sites.

#### **4.4 Alternative Methods of Stakeholder Engagement**

The Working Group is only one way to establish stakeholder engagement. In areas of high market pressure with complex assessment issues, then a Working Group is likely to be the most effective method of engagement.

However, the same outcomes could be achieved by alternative methods including correspondence with a group of stakeholders similar to that described above, effectively consulting externally on each stage. An alternative method is the 'Limehouse' stakeholder engagement tool, and Barnsley, for example, is pursuing this approach.

Local Planning Authorities should take the approach which most suits their particular local circumstances, but which fulfils the outcomes suggested above and which satisfies the core objectives set out in PPS3.

#### **4.5 Summary of Engaging Stakeholders**

- stakeholders should be an integral part of the process - establishing and agreeing the core principles of the assessment with a Working Group at the outset is important;
- external stakeholders will be able to provide added information on vital issues such as market conditions, willingness of developers, and certainty of existing permissions;
- Working Groups should build upon existing relationships with stakeholders and adapt existing groups where applicable;
- where Housing Market Partnerships have been established as part of Strategic Housing Market Assessment work, these should be used;
- existing sub-region partnerships, and/or those partnerships set up as part of Housing Market Renewal Partnerships should be used as a source of contact where they exist; and
- stakeholder engagement can be achieved via alternative methods - correspondence via electronic format using the 'Limehouse' tool could be appropriate to capture external views and information.

## 5 Populating the Strategic Housing Land Availability Assessment Database

### 5.1 Approaches to Developing a Methodology

In developing a methodological approach, the guidance identified within Section 2 of the CLG guidance offers one method which allows a Local Planning Authority to meet the required outputs as defined within PPS3. The CLG guidance identifies just one methodology with which to follow (as set out in paragraph 15 of the CLG guidance). It is for the Local Planning Authority to determine the most appropriate method depending upon specific local circumstance, existing evidence base, current position in developing its Local Development Framework and overall strategic approach.

Decisions on the methodological approach taken should be agreed via the Working Group so that the assumptions and variables which define the extent and intensity of the survey have consensus.

Table 5.1 below outlines 5 core outputs which are defined in the CLG guidance. Through discussion with local authorities and gaining an understanding of the Strategic Housing Land Availability Assessments, these represent a useful starting point for considering the make-up of the Strategic Housing Land Availability Assessment.

**Table 5.1 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 (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed.
3	Potential quantity (informed by judgements on type, range and quality) of housing that could be delivered on each identified site or within each identified broad location (where necessary).
4	Constraints on the delivery of identified sites.
5	Recommendations on how these constraints could be overcome and when.

Where possible local authorities should look to enhance the information gained through matching site data to polygon shape files and associated GIS map files, to ensure the data collected can form an integrated part of the evidence base.

As a guide, the North East Assembly Strategic Housing Land Availability Assessment Implementation Guide<sup>4</sup> includes a model database at Appendix 3, which could prove helpful in thinking through the scope of the Strategic Housing Land Availability Assessment database.

### 5.2 Additional Points to Consider in the Methodology

#### 5.2.1 A 'call for sites'

Carrying out a 'call for sites' represents a quick and efficient mechanism by which to gather possible sites to be included within the Strategic Housing Land Availability Assessment database.

<sup>4</sup> The North East Assembly (NEA) has produced the *North East England Regional Implementation Guide for Strategic Housing Land Availability Assessment*. This includes a detailed step-by-step methodology for undertaking Strategic Housing Land Availability Assessments which is significantly different in emphasis to this guide. The NEA implementation guide is a further source of material for determining an appropriate method.

This 'call for sites' could be sent out to local stakeholders and partners, prominent developers and house builders with whom the Local Planning Authority already has contact through previous work, as well as a general advertisement. The extent of coverage to which the 'call for sites' relates should be agreed with the Working Group, although a 'blanket' call for sites might be more useful. The Strategic Housing Land Availability Assessment 'call for sites' also provides an opportunity to seek out new stakeholders and engage them within the process.

A two-stage approach to a call for sites might be helpful. The first stage to alert stakeholders that the Strategic Housing Land Availability Assessment process is about to begin, so that mobilisation can start, and the second which requests details of sites. It will help improve consistency in populating the database, allow consistent GIS datasets to be established and assist the assessment of sites, if the Local Planning Authority sets out a standard pro-forma and requests a site map with the call for sites. Some thought therefore should have been given to the likely form of the Assessment to inform the scope of quarters on the pro-forma.

All information received from the call for sites should be recorded in the sites database. It is then for the Assessment to deal with 'maverick' sites which are evidently unsuitable. This 'all in' approach supports the notion of the Strategic Housing Land Availability Assessment as a technical tool. Furthermore, in establishing the Strategic Housing Land Availability Assessment as a robust database it is vital that it does not reject sites from the potential supply, but merely allows them to be tested against criteria to determine their position within the supply.

Depending upon progress in developing the Local Development Framework, Local Planning Authorities may have already carried out a 'call for sites'. If so then these sites should be included in the Strategic Housing Land Availability Assessment database as well as within the Development Plan Document creation. This re-emphasises the points made in Section 3.4 about building on existing evidence already collected.

### **5.2.2 Assessing Existing Planning Permissions**

In an uncertain market, with changes in the make-up of housing delivery, it is important that local authorities adopt a realistic approach to including existing planning permissions within their supply. At present, this appears to be more of an acute problem within larger urban areas with a recent history of delivering smaller units through flats and apartments. Sheffield and Leeds in particular expressed concerns over the realism of existing permissions and the continuation of the current scale of delivery. As part of their assessment Sheffield City Council is writing to all developers who have existing planning permissions over 2 years old to better understand the likelihood of them being carried out.

Another approach is to agree a discounting rate by which to determine whether the pipeline of consents is realistic. This approach is being pursued by a number of authorities within the region, Scarborough Borough Council, for example, are assessing their current permissions using a discounting rate of 15%, based on previous local trends and circumstance.

### **5.2.3 Filling in the Gaps**

After receiving information through the 'call for sites' and depending upon the geographical extent of the assessment it may be necessary to further populate the Strategic Housing Land Availability Assessment database. This gap filling exercise will seek to provide additional information for sites that have been gathered as part of the call for sites. This gap filling should be guided by criteria agreed with the Working Group, particularly that relating to the 'suitability' test, whilst being mindful of local housing delivery pressures.

### **5.2.4 Site Size Thresholds**

Whilst the Strategic Housing Land Availability Assessment should not reject or discount sites which are proposed, there is merit in adopting a minimum and (subject to local circumstances) maximum site size threshold.

Thresholds should be defined and agreed via the Working Group to reflect local specific housing pressures and quantum of past delivery. It should be noted that the CLG advice to the Planning Inspectorate<sup>5</sup> indicates that sites should not be included unless they can “**make a significant contribution to the delivery of housing**”. Best practice from the Urban Capacity Study work showed that 0.4 hectares (or 10 units, respecting differing density assumptions) represented a suitable minimum.

A maximum threshold (on the basis that very large sites are subdivided) may be of value to increase time and resource efficiency, and should help reinforce the agreed geographical extent of the survey work to be carried out. A maximum threshold has particular relevance in rural parts of the region where land owners with large estates may put forward sites which as a singular entity may be deemed unsuitable, but where smaller components of the site might be suitable. This issue is discussed in more detail in Section 8 of this guide.

### **5.2.5 Determining Site Density**

In line with many of the criteria used to shape the Strategic Housing Land Availability Assessment, there is no general rule or factor with which to determine density and housing numbers upon sites identified. As with site size threshold, agreeing the assumption to be used with the Working Group is important.

The assumption may be based upon historic local trends. A range of localised site density figures varying to reflect past densities in a given area would represent a suitable guide.

Where a Local Planning Authority has developed, defined and formalised a local density policy through the provisions of PPS3 it would be appropriate to apply these figures. Defining a local threshold should allow the Local Planning Authority to balance overall capacity and supply with the need to deliver a range, type and quality of housing required to facilitate a higher quality residential offer. Where there is a lack of local density figures, best practice within previous Urban Capacity Study work could act as a guide. The main issue is to ensure robust and defensible assumptions are in place.

With the justification of development plan policy indicating that a site may be of strategic importance to the Local Planning Authority, there may be merit in undertaking a masterplanning exercise to specifically address the individual site characteristics and so determine the most appropriate density and site potential. In some circumstances it may be beneficial to carrying out informal planning ‘Concept Statements’<sup>6</sup> which could provide localised information on site density. This is also likely to be the case for ‘planned areas of change’ such as housing market renewal areas and large, plan-led remodelling schemes such as East and South East Leeds (EASEL), considered in greater detail below.

Whilst determining potential densities for site, it is important to consider the type, range and quality of housing to be delivered on sites. The Working Group should use evidence from the Strategic Housing Market Assessment to understand what sites can achieve both in terms of number of dwellings and in terms of housing type, mix and quality.

### **5.2.6 Dealing with Areas of Change that can Deliver Housing Growth**

The overall strategic direction the Local Planning Authority wishes to progress their area will inform the need to include ‘areas of change’ in the Strategic Housing Land Availability Assessment database.

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<sup>5</sup> CLG guidance to PINS on a 5 year supply of deliverable sites, available at [http://www.planning-inspectorate.gov.uk/pins/advice\\_for\\_insp/advice\\_produced\\_by\\_dclg.htm](http://www.planning-inspectorate.gov.uk/pins/advice_for_insp/advice_produced_by_dclg.htm)

<sup>6</sup> A Concept Statement consists of a simple brief statement setting out how the development of a site will contribute to a Local Planning Authority’s vision. Although local planning authorities will often take the lead in producing the concept statement, they may also be prepared by developers, development trusts or community groups. They are suitable for all types of location including town centres, suburban areas, the urban fringe, as well as new greenfield development sites. Concept statements are not intended to be a definitive solution, but a starting point for more detailed design. The aim is to ensure that all new development is well designed to fit and enhance its context, as well as being locally distinctive, environmentally efficient and valued by the community as a beneficial addition to the local environment. They can provide a particularly useful opportunity for considering landscape and biodiversity interests and planning for sustainable design methods.

These 'areas of change' may be defined as formal Housing Market Renewal (HMR) areas, or they may be identified but not yet formalised regeneration areas which are currently undergoing significant economic restructuring. In this region there are a number of potential examples of 'areas of change' which should be considered as part of Strategic Housing Land Availability Assessments. Examples include:

- Bradford – Shipley Corridor – Bradford Metropolitan District Council – this area is identified as an 'area of change' in line with current proposals within the Bradford Metropolitan District Council's Bradford Canal and the Canal Road Corridor Masterplan document, with a commitment to develop this into proposals as part of an Area Action Plan which will deliver housing growth;
- South Yorkshire Market Renewal / Hull Gateway – there are a number of masterplans for remodelling in areas of identified market weakness, some of which include housing growth; and
- East and South East Leeds (EASEL) – Leeds City Council – a major regeneration programme of stock replacement and remodelling in a large part of Leeds, which will include some housing growth; an Area Action Plan is being produced for the area.

Because the Strategic Housing Land Availability Assessment as a continuous, updateable database of supply, it is appropriate to include sites which are located in these 'areas of change' even if (and perhaps because) in some cases they are currently employment sites. It might even be possible to include them as a single entry in the database where there is no value in identifying specific sites, and this is an area where a common 'sites database' would help with both Strategic Housing Land Availability Assessments and Employment Land Reviews.

However, in including these 'areas of change' sites the Local Planning Authority must recognise the timescales associated with bringing forward the associated housing growth, and to assess them accordingly. Many areas of change have a number of ownership and infrastructure constraints for example. As the strategic vision for the Local Planning Authority is formalised in the Core Strategy and associated Development Plan Documents, these sites may become crucial to achieving this vision. As such, policy decisions may seek to lever in funding to overcome infrastructure constraints, making the sites more achievable and thus enable the sites to move forward within the Strategic Housing Land Availability Assessment conveyor belt of supply. This is likely to apply to a number of areas subject to New Growth Points bids in Leeds City Region and South Yorkshire, and includes the Bradford – Shipley Corridor example set out above.

In considering proactively these 'areas of change' within Strategic Housing Land Availability Assessments, local authorities will help boost opportunities to deliver the current housing growth agenda within the region, and will inform the evidence to support the ongoing mini-review of the Regional Spatial Strategy (2008).

### 5.3 Summary of Populating the Strategic Housing Land Availability Assessment Database

- the methodological approach to undertaking the Strategic Housing Land Availability Assessment should be agreed with the Working Group;
- information gathered whilst creating the overall Strategic Housing Land Availability Assessment database should be linked to GIS maps and shape files;
- carrying out a 'call for sites' amongst local stakeholders should identify viable sites and will highlight sites which developers and landowners have willingness to bring forward – indicating a degree of availability;
- an assessment of existing planning permissions should be undertaken to determine deliverability of existing consents – this will provide a more realistic supply figure;
- having issued a 'call for sites' authorities should identify gaps in information and populate the database further as necessary;
- to ensure that sites make a significant contribution to delivery, a site size threshold should be agreed and adopted via the Working Group – best practice currently indicates a 0.4hectare threshold;
- site density assumptions should also be agreed via the Working Group – this should be based upon historic trends, and should incorporate any local density policies where defined;
- Strategic Housing Land Availability Assessment should reflect planned 'areas of change' where they are defined within an authority's overall strategic direction; and
- the timescales and phasing required delivering these 'areas of change' and their overall achievability should also be reflected within their position in the Strategic Housing Land Availability Assessment database.

## 6 The Assessment

### 6.1 The PPS3 Tests

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In line with the message set out in Section 2, the approach to the Strategic Housing Land Availability Assessment must relate back to the objectives set out in PPS3, and in particular the three deliverability tests set out in Paragraph 54 of PPS3, namely suitability, availability and achievability.

PPS3 and the CLG guidance offer good advice on defining these tests.

### 6.2 The Order of the Tests

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In terms of effective use of resources, it would seem to be sensible to carry out the assessment in this order:

**1 – Suitable**



**2 – Available**



**3 – Achievable**

This ensures that unnecessary resources are not engaged assessing the availability and achievability of sites which are deemed in any event unsuitable. The same principle then applies to the available test prior to assessing achievability.

### 6.3 Carrying out the Assessment

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As set out previously, it will be helpful to keep the assessment straightforward, and this includes the scoring mechanism. It is unhelpful to score the assessment numerically, since this introduces the desire to consider the scores across the three tests as an average, which is inappropriate. Instead, the most sensible approach that has emerged is to score on a three point scale against each test along the lines of 'positive', 'neutral' and 'negative'.

The exact nature of these scoring definitions and the criteria that lay below these headlines will need to be defined locally and agreed with stakeholders as necessary. However, this should provide a useful conceptual starting point.

Box 6.1 overleaf illustrates this broad principle.


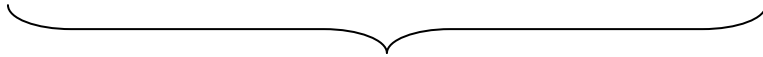

### 6.4 The Outcomes of the Assessment

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Ideally, as set out in Section 5, sites should not be entirely discounted by the assessment, but rather held back in abeyance for future rounds of assessment. Instead, the primary role of the assessment should be seen as informing the position sites on the 'conveyor' of housing supply and developing robust Development Plan Document policies and allocations. This is informed by the final overall assessment suggested in Box 6.1 overleaf.

Sites considered 'unsuitable' at the point of the assessment or whose availability or achievability tests suggest timing beyond 20 years should be 'held in abeyance' for consideration as part of future assessments.

**Box 6.1 Conceptualising the Assessment**

<b>AN INITIAL ASSESSMENT OF THE THREE PPS3 DELIVERABILITY TESTS:</b>			
	<b>POSITIVE</b>	<b>NEUTRAL</b>	<b>NEGATIVE</b>
<b>Suitable</b>	The site is considered suitable in accordance with current national policy and up-to-date regional policy.	The site is considered to be of marginal suitability in relation to current national policy and up-to-date regional policy.	The site is considered unsuitable in accordance with current national policy and up-to-date regional policy.
<b>Available</b>	The site is currently available.	The site is not currently available, but should realistically become available in the short to medium term.	The site is not realistically considered to become available within the next 15 years.
<b>Achievable</b>	The site is currently considered to be commercially and physically viable.	It is considered that the site will become commercially and physically viable in the short to medium term.	The site is not considered to be commercially and physically viable, even in the longer term.
			
<b>LEADING TO AN OVERALL ASSESSMENT RESULTING IN:</b>			
Short-term deliverable site.	Medium-term deliverable site.	Long-term deliverable site.	Currently unsuitable, and / or unavailable, and /or unachievable, even in the long term.
			
Site considered as part of the conveyor for consideration as part of the supply at the appropriate timeframe / consideration as part of the Development Plan Document preparation process.			Sites held in abeyance until next assessment.

In considering the longer term deliverability of sites, the assessment of whether a site is achievable may be highly complex, particularly given fluctuations in the housing market. Nevertheless, these sites should still be considered developable if there is a reasonable prospect that the site is available for housing, and could be developed at the point envisaged. Longer term developable sites, which at present are undeliverable are unlikely to be phased within the first five years and should sit within the 5-10 or 10-15 year phases.

**6.5 The Suitability Test**

The suitability test is potentially the most difficult of the tests. There has been significant debate between partners during the production of the guide about the extent to which the suitability test should incorporate local policy objectives. The main issues can be summarised as follows:

- existing local policy (with the current (Spring 2008) exception of Hambleton) is likely to be some years old, and therefore be subject to forthcoming change as part of the LDF;

- emerging LDF policy might be subject to change prior to adoption; and
- importantly the Strategic Housing Land Availability Assessment is not intended to be a tool to apply local policy, but a tool to inform local policy making.

Paragraph 21 of the CLG guide reaffirms this point, stating that except for clear-cut designations such as Sites of Special Scientific Interest, the scope of the Assessment should not be narrowed down by existing policies designed to constrain development. This is to ensure that the authority is in the best position when it comes to decide its strategy for delivering housing objectives.

On the basis of the above, particularly in the short term when there is so little adopted Core Strategy policy in the region, it seems inappropriate to incorporate local policy in the suitability test. PPS3 makes it clear that the main objective of the suitability test is to assess the general suitability of the sites for housing against national policy. It also seems reasonable to include up-to-date regional policy in this test, and once issued (expected to be in May 2008), the new RSS for Yorkshire & the Humber will fulfil this role.

## 6.6 The Availability Test

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Paragraph 39 of the CLG guidance is specific about the information which should be pursued as part of determining availability of sites within the overall assessment.

It deems that a site is considered available for development, when:

*“on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This means that it is controlled by a housing developer who has expressed an intention to develop, or the land owner has expressed an intention to sell”.*

Where problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome.

The information collected as part of a call for sites will be useful for considering availability, not least in terms of ownership information, and the intentions of owners. Intelligence from agents, officers from other parts of the local authority and others can help inform these judgements.

## 6.7 The Achievability Test

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A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and sell the housing over a certain period. It will be affected by:

- **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; and
- **delivery factors** – such as accessibility, physical aspects of the site, as well as including the developer's own intentions for the site any concept of 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.

There are a number of residual valuation models available to help determine whether housing is an economically viable prospect for a particular site. In addition, the views of

housebuilders and local property agents for example will also be useful where a more scientific approach is not considered necessary.

Sites included within development briefs, masterplans and development programmes, may have a pre-determined timeline for delivery and so their achievability rating should fit accordingly within the overall supply pipeline.

This region has numerous sites and broad areas which, either through market failure or opportunities for growth have already been defined in masterplans or development briefs. It is appropriate that the Strategic Housing Land Availability Assessment recognises this when considering short, medium and longer term achievability.

Proposals for the phasing of development within a Local Planning Authority should also be considered at this stage. Methods of phasing the release of sites, established under the previous planning system can be found within Leeds and Wakefield Unitary Development Plans. Overall this has proved a successful approach to delivering the right type, quality and mix of housing within these areas. Using this approach within the Strategic Housing Land Availability Assessment, local authorities should consider the growth agenda within the RSS and reflect issues surrounding infrastructure provision and environmental protection as well as economic viability within phasing of sites.

## **6.8 Dealing with Unsuitable, Unachievable or Unavailable Sites**

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### **6.8.1 Sites to be Held in Abeyance**

It is reasonable for outright 'unsuitable', 'unavailable', or 'unachievable' sites to be held in abeyance (not considered as 'on the conveyor') for the purposes of the outcome of a particular round of assessment.

However, to 'delete' sites from the database is to create unnecessary work re-entering sites for future assessments, which are likely to be subject to updated deliverability tests. The information gathered through the assessment will help inform future decisions on interventions which could address particularly suitable sites, which are currently deemed unavailable or unsuitable. Over time, a local authority may wish to change its strategic approach which may result in a revised Core Strategy and/or Allocations DPDs, sites held in abeyance, and not deleted could be re-considered and aid the decision-making process. In this way the Strategic Housing Land Availability Assessment can help provide a wider evidence base for other strategic approaches.

### **6.8.2 Addressing Constraints**

The Strategic Housing Land Availability Assessment is likely to identify some sites that are particularly suitable for housing but which require intervention to address issues of availability or suitability. This is a potentially valuable wider-outcome of the Strategic Housing Land Availability Assessment process, and should be captured to help inform wider investment strategies. In particular, the new Homes and Communities Agency in partnership with local authorities will have a pro-active role in intervening in such sites in the region.

Where constraints have been identified, the Assessment should consider what action would be needed to remove them. Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to amend planning policy which is currently constraining housing development.

## 6.9 Summary of the Assessment

- the Strategic Housing Land Availability Assessment should align with the PPS3 tests of deliverability of sites - suitable, available and achievable;
- it is clear that sites should not be discounted from the process, and that sites which score negatively against the criteria of suitable, available and achievable merely move to the back of the conveyor belt, or pipeline of sites;
- the suitability test is the most complex of tests within the Strategic Housing Land Availability Assessment - however, it is clear that suitability should be tested via high level, national and up to date regional policy only;
- the availability test should be determined upon issues of ownership, legal parameters, and whether there is an expressed intention to develop and/or sell a site;
- the achievability test should be determined upon issues of market forces, including current land values and overall economic viability of delivering housing on the site - achievability is also influenced by the certainty of sites within masterplans, development briefs or development programmes; and
- sites which are considered unsuitable over beyond the 20 year timeframe should be held in abeyance for consideration as part of future assessments.

## 7 Using the Strategic Housing Land Availability Assessment

### 7.1 When to Assess

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Section 3 of this guide outlines how the Strategic Housing Land Availability Assessment is a database against which an assessment is run. There is a clear national drive to complete the first Strategic Housing Land Availability Assessment exercise as soon as possible to meet Planning and Housing Delivery Grant criteria and to inform the creation of Development Plan Documents. At the regional level, evidence from the Strategic Housing Land Availability Assessments will feed directly into the RSS partial review, and be a key component of a future Single Regional Strategy. There is a clear imperative therefore to commence the first Strategic Housing Land Availability Assessment as soon as possible.

The Strategic Housing Land Availability Assessment can and should be used to support the production of both Core Strategy and any Site Allocations Development Plan Documents. Recent examinations by the Planning Inspectorate have demonstrated that Core Strategy policy should be supported by evidence of sufficient land supply and should have a more 'spatial' emphasis and look to detail broad locations for development where applicable. A Strategic Housing Land Availability Assessment has a clear role therefore in the evidence base to support submission and examination of DPDs.

There is also a need to have an up to date Strategic Housing Land Availability Assessment completed where there is a limited supply of available housing land.

However, it is useful to ensure that the Strategic Housing Land Availability Assessment is not seen as a once-only process, but an ongoing and evolving component of the local evidence base.

It is for each Local Planning Authority to judge the most appropriate approach to timescales, but the following principles should assist:

- the underlying database should ideally be a 'live' document that is continually populated and updated whenever new information comes to hand by whatever source, including ensuring data on consents and completions are recorded;
- there is an evident link with understanding the housing consents pipeline (including windfalls) and the 5-year housing supply; and
- a recent assessment of the database is likely to provide a useful monitoring tool.

The degree to which the Strategic Housing Land Availability Assessment database 'expands' to become a general sites database that tracks other land uses, consents and completions is a matter for each authority to consider, but there are clear advantages to having a single dataset.

### 7.2 What the Assessment will Deliver

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In understanding the use of the Strategic Housing Land Availability Assessment it is useful consider what it delivers. The Strategic Housing Land Availability Assessment process should result in:

- a pool of deliverable housing sites to accommodate at least 15 years of housing supply (at the time the parallel Development Plan Document is adopted), which generally accord with high-level planning policy; and
- a degree of prioritisation, based on likely time periods for delivery.

The Strategic Housing Land Availability Assessment should not result in or seek to deliver anything more sophisticated than this. This reaffirms that the Strategic Housing Land Availability Assessment should ideally avoid incorporating local policy, as by doing so it

becomes a tool for applying local policy, when it should be a tool to inform the creation of local policy.

### **7.3 Relationship with the Annual Monitoring Report**

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There is an obvious connection between having an up-to-date assessment of the database so as to inform the Annual Monitoring Report (AMR). With increasing emphasis on the plan, monitor and manage approach and the increasing use of 'phased' housing land allocations, it is likely that an up-to-date assessment will add value to the AMR process which is central to this. Once in place, the assessment can be used to provide data to support the housing trajectory produced as part of Core Output Indicator 2a<sup>7</sup>, and indeed help provide added detail to the overall 'pipeline' for delivery and give a more accurate, year-on-year indication of the likely timing of sites in the database which form part of the allocated housing land.

### **7.4 Relationship with Development Plan Documents**

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The Strategic Housing Land Availability Assessment is an important component of the evidence base for making Development Plan Document policy, particularly Site Allocation Development Plan Document and Area Action Plans. As noted in Section 5.2 of this guide, those sites identified as broad locations or 'areas of change' may become formally identified in Area Action Plans as part of the Local Development Framework. The Strategic Housing Land Availability Assessment is one part of the technical evidence base to be reconciled through policy-making with other elements of the evidence base.

The PAS Guide referred to in Section 1 explores in detail the relationship between the Strategic Housing Land Availability Assessment and the process of creating Development Plan Documents.

### **7.5 Updating the Assessment Criteria**

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Government is incentivising the production of Strategic Housing Land Availability Assessments through the Planning and Housing Delivery Grant (PHDG).

The timing of the completion of a Local Planning Authority's Strategic Housing Land Availability Assessment will affect the number of years it will need to identify as potential deliverable sites. As outlined in Section 3.1, if a Local Planning Authority finalises their Strategic Housing Land Availability Assessment during 2008, but does not adopt their Core Strategy Development Plan Document until 2010, the Strategic Housing Land Availability Assessment in 2008 will need to identify 7 years worth of deliverable sites.

Once the first round of the Strategic Housing Land Availability Assessment is completed, running subsequent assessments and updates of the underlying database should be relatively straightforward. This is because the methodological approach to considering sites will already have been agreed via the Working Group, and site information should have been captured and saved within a GIS linked database. As noted in Section 7.3, running a partial review of the assessment within the Strategic Housing Land Availability Assessment database on an annual basis, linking the findings to the Annual Monitoring Report seems to be a logical approach.

This will allow for:

- updates of information regarding sites where new or additional information has come to light; and
- updating the assessment tests in accordance with new high-level policy (for the suitability test) or market conditions (for the achievability test), for example.

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<sup>7</sup> Local Development Framework, Core Output Indicators, Update 1/2005 – ODPM (October 2005)

Changes in the criteria for testing should be verified by stakeholders, together with the outcomes of the assessment. Subject to local circumstances and the pointers in Section 4, this need not be as detailed as the approach used for the initial Strategic Housing Land Availability Assessment exercise.

Where the CLG guidance notes that Local Planning Authorities need to have a Strategic Housing Land Availability Assessment in place for the Independent Examination of Development Plan Documents it is advised that a more robust review of the Strategic Housing Land Availability Assessment database be carried out. It is also likely that a more-robust approach will be necessary ahead of a major Development Plan Document revision (post adoption) or if local circumstances (e.g. spatial strategy) have changed significantly, which includes revised RSS strategy and / or housing figures.

## **7.6 Summary of Using the Strategic Housing Land Availability Assessment**

- the first Strategic Housing Land Availability Assessment should be completed as soon as practically possible to assist Development Plan Document production, contribute to the regional evidence base for the RSS partial review, and to also facilitate Planning and Housing Delivery Grant payments;
- the Strategic Housing Land Availability Assessment is a key component of the evidence base to support local policy making - it should be used to support the development and Independent Examination of Core Strategy and Site Allocations DPDs;
- the Strategic Housing Land Availability Assessment should not be seen as a one off process - the database should be updated annually and linked directly to the Annual Monitoring Report requirements;
- information and data taken from the Strategic Housing Land Availability Assessment database should also be used to inform Local Planning Authority housing trajectories which can subsequently feed into the delivery targets of the RSS;
- broad locations or 'areas of change' if identified via the Strategic Housing Land Availability Assessment can be formally identified via Site Allocation DPDs or Area Action Plans DPDs;
- given that the methodological approach to considering sites will already have been approved by the Working Group, annual updates to the Strategic Housing Land Availability Assessment may just involve adding newly acquired additional site information; and
- any fundamental update of the Strategic Housing Land Availability Assessment methodology should involve recognising recently adopted national and regional policy and should also once again be agreed by the Working Group.

## 8 Specific Challenges and Issues

### 8.1 Introduction

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Based on the experiences of local authorities in the region, and other experience in the Regional Assembly and the consultancy team, a series of common challenges and issues have been identified, together with guidance on dealing with these. Some common regional challenges (e.g. windfalls, areas of change, the suitability test) are explored in the earlier process parts of the document, and are not further elaborated on here.

### 8.2 Cross Boundary Working

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The government aspires to the development of housing policy at the level of housing market areas. This also requires a common approach to the evidence base at the housing market area level too, including the Strategic Housing Land Availability Assessment.

Currently there are no firm proposals to develop cross boundary Development Plan Documents in relation to housing policy or site allocations. On this basis, it follows that there is no requirement to undertake formal joint Strategic Housing Land Availability Assessments.

Nonetheless, there is value in a degree of joint working, and this may take a number of forms:

- officer representation on Strategic Housing Land Availability Assessment working groups in adjacent authority areas;
- making a joint call-for-sites with common criteria to assist in receiving thorough and consistent responses; and
- joint working on methodological approaches.

The most appropriate mix depends on local circumstances, and in particular timetables. There is evident value in two adjacent urban authorities running a joint call-for-sites if the timing coincides. This would assist the (what is likely to be a largely common) development community of agents, consultants and landowners in preparing good responses against a common set of criteria. It may also be appropriate to have a joint Working Group in such circumstances to minimise the burden on external stakeholders and secure good-quality inputs, particularly from the home-building sector. Within the region, Sheffield and Rotherham have successfully facilitated a joint Working Group to minimise duplication and share resources.

Should a particular commitment arise to develop joint housing policies, then more formal joint working arrangements would be necessary.

### 8.3 Rural Areas

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Rural areas face a particular set of issues in relation to preparing and maintaining a Strategic Housing Land Availability Assessment. Rural authorities have to reconcile a smaller net additional dwelling allocation via the Regional Spatial Strategy, against the potential for numerous identifiable, available sites adjacent to and within current small settlements. Some 'urban' authorities such as Doncaster and Calderdale also have significant rural areas where many of these issues will also apply.

The lower site-size threshold might be reasonably set marginally lower than the 10 dwellings / 0.4 ha dwellings suggested earlier, especially where the housing requirement is relatively low and smaller sites could still be considered as making a 'significant contribution'. A good acid test is still 'would the site justify a site allocation in a development plan?', and in all cases, the threshold should be verified with the Working Group.

Considering a maximum site size threshold on sites identified adjacent to smaller, more unsustainable settlements, would allow the Local Planning Authority to consider the scale of delivery in a more logical and sequential manner and thus deliberate the scale of potential supply as evidence with which to inform future policy making. The principle should apply where maximum site size thresholds are specified, that large sizes are subdivided.

#### **8.4 Flood Risk**

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PPS25: Development and Flood Risk sets out a sequential approach to allocating sites as part of development plan policy based on the evidence of Strategic Flood Risk Assessments. PPS25 presents a presumption against any housing development in Flood Risk Zone 3b. It is therefore likely to be reasonable for most authorities in the region to consider Flood Risk Zone 3b as part of the 'suitability' test.

However, the sequential test is intended to balance flood risk against other policy objectives. The Strategic Housing Land Availability Assessment should therefore not have regard to any other flood risk zones as part of the assessment (although it would be useful to record the identified flood risk zone in the sites database). To consider other flood risk zones in the assessment would prejudice the subsequent sequential test that will need to balance a range of policy priorities as part of the Development Plan Document making process. It is more appropriate that a full assessment of flood risk should take place within a Site Allocations DPD, and/or any Area Action Plan DPDs.

In some circumstances, for example in Hull and other locations close to the Humber Estuary, local planning authorities might want to include even Flood Risk Zone 3b sites as part of the supply. If local circumstances mean this is desirable then that would be acceptable, on the basis that the subsequent PPS25 sequential assessment would deal with the issues this raises.

The issue of flood risk is a good one for illustrating how an overly-detailed Strategic Housing Land Availability Assessment could prejudice subsequent stages of the plan-making process, making pro-active policy choices based on regeneration objectives (for example) difficult.

#### **8.5 Green Belt Sites**

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Green Belt is a strongly defined policy tool, and one which attracts significant interest from stakeholders, Members and the public. However, the Strategic Housing Land Availability Assessment is intended to inform evidence in the long-term, which is likely to be beyond the life of existing Green Belt boundaries. This is particularly the case in West Yorkshire, Harrogate and Selby, where the Secretary of State has indicated the likely need for a review of the West Yorkshire Green Belt.

For this reason there would need to be a robust reason to exclude Green Belt sites from the Assessment. One potential reason for excluding Green Belt sites within the overall Strategic Housing Land Availability Assessment would be on the basis that the Local Planning Authority could demonstrate a deliverable and developable supply of housing land for at least 20 years.

Green Belt boundaries are intended to have a life in excess of the plan period, as set out in PPG2. It has been some time since any of the three Green Belts in this region (West Yorkshire, South Yorkshire and York) has been the subject of detailed assessment, at a time when the housing requirements have risen significantly. Therefore, unless there are good local reasons to suggest otherwise, Green Belt sites should not be specifically excluded from the Strategic Housing Land Availability Assessment.

The issues that including Green Belt sites might subsequently raise can then be resolved through the policy-making process, and Green Belt status will be useful to include in the assessment criteria.

## **8.6 Developing a Strategic Housing and Employment Land Availability Assessment**

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In developing a methodology and carrying out survey work to determine potential sites, there may be efficiency benefits in also considering employment sites. The region is undergoing economic restructuring and a joined up approach provides for a more robust assessment, which should provide added clarity to decision making on the need, quality and type of housing and employment sites, and inform any future de-allocations and/or re-allocations of sites within Development Plan Documents.

Carrying out a joined up approach to surveying and assessing sites in a Local Planning Authority area may manifest itself in a Strategic Housing and Employment Land Availability Assessment (SHELAA) but this is by no means a necessity, nor should it detract from the primary purpose of Strategic Housing Land Availability Assessments.

The most obvious resource efficiency of considering employment land and housing land data together is the collection of a common set of data, reducing the need for double assessments and making 'call for sites' exercises more productive. Again, the advantages of an integrated 'sites database' become apparent.

## **8.7 The Role of the Strategic Housing Land Availability Assessment in the Absence of a Demonstrable 5-year Supply**

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It is not the role of this guide to create additional policy or practice in relation to this point. The CLG advice to PINS<sup>8</sup> is the starting point on this issue, together with Ministerial advice and information in PPS3.

However, the elevated status given to Strategic Housing Land Availability Assessments in the absence of a demonstrable 5-year supply of housing land is a cause for concern to many authorities in the region.

The first important point is that in the absence of relevant and up-to-date local development plan policy, regional and national policy still applies. This includes the core approach set out in the RSS and the basic principles of PPS1, PPS3 and PPG13; this means that even without a demonstrable 5-year supply of housing land and without an up-to-date Strategic Housing Land Availability Assessment that there is still a robust case to refuse housing proposals that are plainly unsuitable in planning terms.

The second point is that the Strategic Housing Land Availability Assessment is essentially a tool which identifies those sites which are generally currently suitable for housing, and identifies those which are achievable and available. In essence this helps to provide the evidence base to support refusals on unsuitable proposals.

Finally, it underlines the importance of establishing local policies. The Strategic Housing Land Availability Assessment will identify broadly suitable housing sites; it will be policy in Development Plan Documents to consider the most appropriate phasing and spatial priorities for housing development as part of locally defined policy approaches.

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<sup>8</sup> CLG guidance to PINS on a 5 year supply of deliverable sites, available at [http://www.planning-inspectorate.gov.uk/pins/advice\\_for\\_insp/advice\\_produced\\_by\\_dclg.htm](http://www.planning-inspectorate.gov.uk/pins/advice_for_insp/advice_produced_by_dclg.htm)

## 9 Contacts and References

### 9.1 Lead Contacts at Local Planning Authorities

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In developing this regional practice guide, all local authorities were contacted and valuable discussions held with all. In addition the Steering Group was a useful forum to test approaches and principles included in the guide. The Steering Group included sub-regional local authority representatives, whose details are below:

- John Craig – Humber – [john.craig@eastriding.gov.uk](mailto:john.craig@eastriding.gov.uk)
- Simon Vincent – South Yorkshire – [simon.vincent@sheffield.gov.uk](mailto:simon.vincent@sheffield.gov.uk)
- Daniel Wheelwright – North Yorkshire – [daniel.wheelwright@ryedale.gov.uk](mailto:daniel.wheelwright@ryedale.gov.uk)
- Robin Coghlan – West Yorkshire – [robin.coghlan@leeds.gov.uk](mailto:robin.coghlan@leeds.gov.uk)

### 9.2 Contact for Home Builders' Federation

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The Home Builders' Federation has committed to engaging proactively in the Strategic Housing Land Availability Assessment process. The relevant regional contact point at the Home Builders' Federation is:

- Carole McCann – Home Builders' Federation – [carol.mccann@hbf.co.uk](mailto:carol.mccann@hbf.co.uk)

### 9.3 Yorkshire & Humber Assembly

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This guide was commissioned by the Yorkshire and Humber Assembly. Relevant officer contacts at the Assembly listed below.

For information relating to Strategic Housing Land Availability Assessments:

- Harriet Fisher – [harriet.fisher@yhassembly.gov.uk](mailto:harriet.fisher@yhassembly.gov.uk)

For information relating to the RSS partial review:

- Richard Wood – [richard.wood@yhassembly.gov.uk](mailto:richard.wood@yhassembly.gov.uk)

### 9.4 Government Office for Yorkshire and the Humber

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Also present at the Steering Group meetings was a representative from the Government Office for Yorkshire and the Humber:

- Geoff Dibb – [geoff.dibb@goyh.gsi.gov.uk](mailto:geoff.dibb@goyh.gsi.gov.uk)

Admiral House, Rose Wharf  
78 East Street, Leeds LS9 8EE  
Tel +44 (0)113 2428498  
Fax +44 (0)113 2428573