Forest of Dean

Strategic Housing Land Availability Assessment: Draft Methodology Scoping Report

1   Purpose of this paper

1.1   The purpose of this paper is to set out a proposed methodology upon which to carry out a Strategic Housing Land Availability Assessment (SHLAA), within the Forest of Dean District.

1.2   This Assessment will form part of the evidence base for the Forest of Dean's Emerging Local Development Framework (LDF), replacing the existing Local Plan and help to guild the future housing development within the district. Each Local Authority across the country is responsible for evaluating land availability in their area.

1.3   Guidance has been published regarding the production of Housing Land Availability Assessments (HLAA's). Each Local Authority will be responsible for evaluating land availability in their area and meeting the community's needs for more homes.
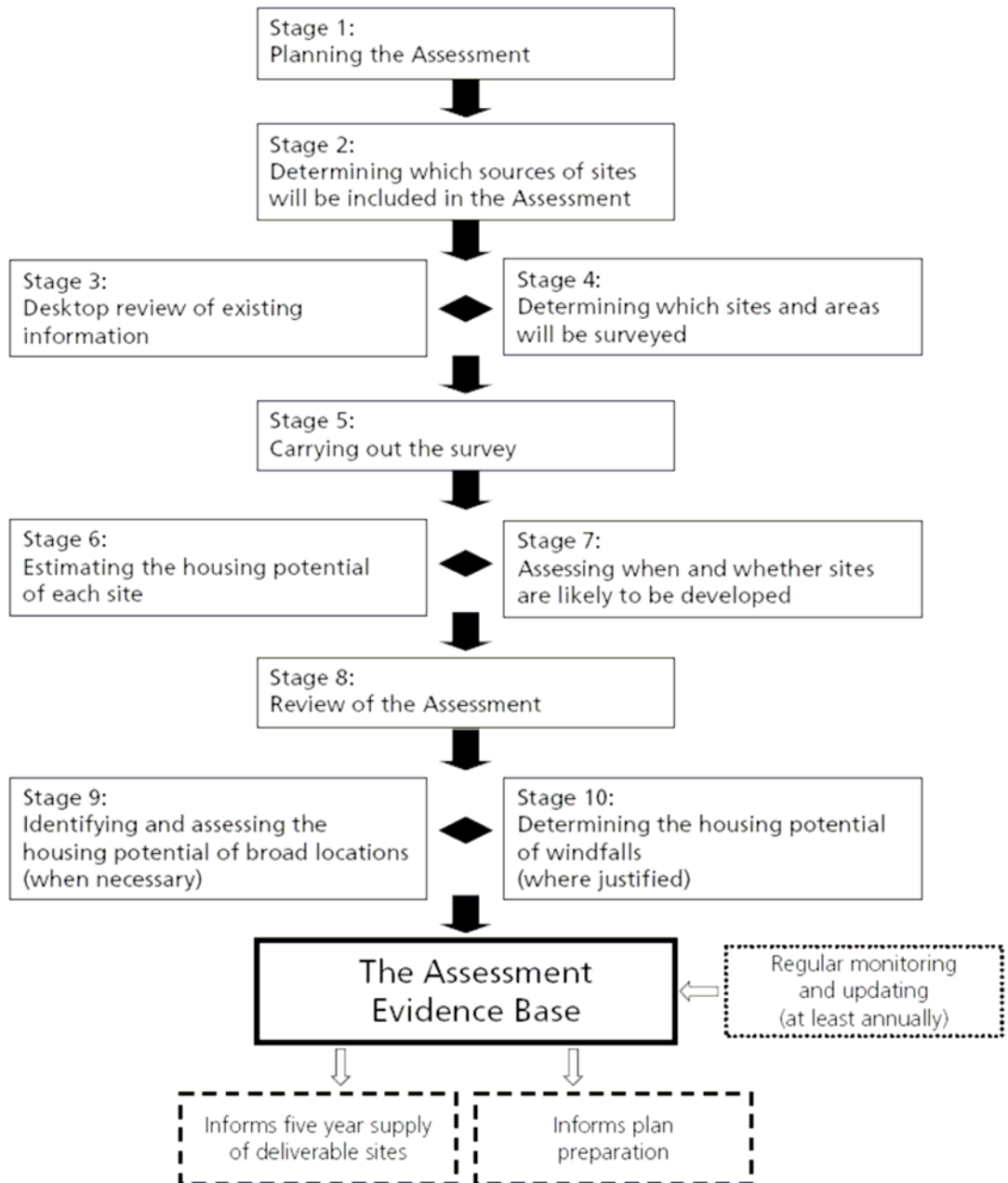
Planning Policy Statement 3 (PPS3) – Housing

1.4   Recent Government guidance PPS3, sets out the importance of housing and that Strategic Housing Land Availability Assessment are an important part of the policy process and provide part of the Housing Allocations and Policies Development Plan Document (DPD). This document can be viewed in full on the website of the Department of Communities and Local Government (DCLG) www.communities.gov.uk.

1.5   The purpose of this Scoping Report is to form one part of the first key stage of the SHLAA establishing the process with partners, and its objectives to deliver sustainable and viable sites. The SHLAA should aim to identify specific sites for at least 10 years of a plan if not longer.

1.6   HLAA provides information on opportunities that exist to meet housing needs within the planning area. The HLAA is a key component of the evidence base to support the delivery of sufficient land for housing to meet the community's need for more homes. It will inform the Core Strategy Development Plan Document (DPD), which sets out the key elements of the planning framework for Forest of Dean District.

1.7   PPS3 requires local planning authorities to:

- **Identify specific, deliverable sites for the first five years of a plan that are ready for development**, and to keep this topped up over time in response to market information;

- **Identify specific, developable sites for years 6-10**, and ideally years 11-15, in plans to enable the five year supply to be topped up where it is not possible to identify specific sites for years 11-15 of the plan, **indicate broad locations for future growth**; and,
- **Not include an allowance for windfalls in the first 10 years of the plan** unless there are justifiable local circumstances that prevent specific sites being identified.

2   Purpose of Assessment

2.1   The purpose of this scoping report is to set out the proposed scope and methodology of an HLAA to be prepared by Forest of Dean District Council in support of its emerging LDF. This document should not be confused with a full HLAA. This is simply a scoping report and will be developed into a full HLAA following stakeholder consultation.

2.2   The primary role of the Strategic Housing Land Availability Assessment is to:

- identify sites with potential for housing
- assess their housing potential, and;
- assess when they are likely to be developed.

2.3   It should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area. It should aim to identify sufficient specific sites for at least the first 10 years of a plan and ideally for longer than 15-years.

2.4   Where it is not possible to identify specific sites, it should provide the evidence base to support judgements around whether broad locations should be identified, and whether a windfall allowance may be justified in the first 10 years of the plan.

2.5   The Assessment does not determine whether a site should be allocated for housing development. The assessment findings will identify:

- the recent pattern of housing development;
- the choices available to meet the need and demand for more housing and provide a basis for making decisions about how to shape places in the future;
- whether action would need to be taken to ensure sites will become deliverable (including infrastructure investment) or whether plan policies need to be reviewed to enable identified sites to be developed for housing.

2.6   The Strategic Housing Land Availability Assessment has eight main stages, with two further optional stages, covering broad locations and windfalls. This is illustrated in Figure 1 below. The stages should generally be carried out in order, however, Stages 3 and 4, 6 and 7, and 9 and 10, may be carried out in parallel

Figure 2.1: *The Strategic Housing Land Availability Assessment process and outputs*

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┌─────────────────────────────────┐
│ Stage 1:                        │
│ Planning the Assessment         │
└─────────────────────────────────┘
                 ▼
┌─────────────────────────────────┐
│ Stage 2:                        │
│ Determining which sources of    │
│ sites will be included in the   │
│ Assessment                      │
└─────────────────────────────────┘
                 ▼
┌───────────────────────┐  ◆  ┌───────────────────────┐
│ Stage 3:              │     │ Stage 4:              │
│ Desktop review of     │     │ Determining which     │
│ existing information   │     │ sites and areas       │
│                       │     │ will be surveyed      │
└───────────────────────┘     └───────────────────────┘
                 ▼
┌─────────────────────────────────┐
│ Stage 5:                        │
│ Carrying out the survey         │
└─────────────────────────────────┘
                 ▼
┌───────────────────────┐  ◆  ┌───────────────────────┐
│ Stage 6:              │     │ Stage 7:              │
│ Estimating the        │     │ Assessing when and    │
│ housing potential     │     │ whether sites are     │
│ of each site          │     │ likely to be developed│
└───────────────────────┘     └───────────────────────┘
                 ▼
┌─────────────────────────────────┐
│ Stage 8:                        │
│ Review of the Assessment        │
└─────────────────────────────────┘
                 ▼
┌───────────────────────┐  ◆  ┌───────────────────────┐
│ Stage 9:              │     │ Stage 10:             │
│ Identifying and       │     │ Determining the       │
│ assessing the housing │     │ housing potential     │
│ potential of broad    │     │ of windfalls          │
│ locations             │     │ (where justified)     │
│ (when necessary)      │     │                       │
└───────────────────────┘     └───────────────────────┘
                 ▼
┌─────────────────────────────────┐    ┌ ─ ─ ─ ─ ─ ─ ─ ─ ┐
│     The Assessment              │ ⇐  │ Regular monitoring│
│     Evidence Base               │    │ and updating     │
└─────────────────────────────────┘    │ (at least annually)│
         ⇓              ⇓               └ ─ ─ ─ ─ ─ ─ ─ ─ ┘
┌ ─ ─ ─ ─ ─ ─ ─ ┐  ┌ ─ ─ ─ ─ ─ ─ ┐
│ Informs five   │  │ Informs plan │
│ year supply of │  │ preparation  │
│ deliverable    │  │              │
│ sites          │  │              │
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3   Partnership Approach

3.1   Government Guidance advocates that regional planning bodies and local planning authorities work together, and with key stakeholders, to ensure a joined-up and robust approach. Key stakeholders should be involved from the outset to help shape the approach. Housebuilders and local property agents should be used to provide expertise and knowledge to assist with views on deliverability

and developability of sites and how market conditions may affect economic viability.

4   Core Requirements

4.1   The HLAA should provide these 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 establish when an identified site may realistically be expected to be developed;
3. Potential quantity of housing that could be delivered in each identified site or within each identified broad location (where necessary) or on windfall sites (where justified);
4. Constraints on the delivery of identified sites; and,
5. Recommendations on how these constraints could be overcome and when.

4.2   The assessment should meet the requirements of the following process checklist:

1. Involve key stakeholders including house builders, social landlords, local property agents and local communities. Other relevant agencies may include the Housing Corporation and English Partnerships (a requirement in areas where they are particularly active).

2. The methods, assumptions, judgements and findings should be discussed and agreed upon throughout the process in an open and transparent way, and explained in the Assessment report. The report should include an explanation as to why particular sites or areas have been excluded from the Assessment.

4.3   In following the methodology set out in the Practice Guidance, the Forest of Dean District Council will meet the requirements of Assessment.

5   Keeping the Assessment up- to-date

5.1   It should be noted that this assessment once completed is not a one off study and therefore should be an integral part of the Council's Annual Monitoring Report and kept up to date to support the housing trajectory and the five-year supply of specific deliverable sites. Information to be recorded will include whether:

*   sites under-construction have been completed, or whether individual stages have been developed;
*   sites with planning permission are under-construction and what progress has been made;
*   planning applications have been submitted or approved on sites and broad locations;
*   identified by the Assessment;

- progress has been made in removing constraints on development and whether a site is now considered to be deliverable or developable;
- unforeseen constraints have emerged which now mean a site is no longer deliverable or developable, and how these could be addressed; and,
- the windfall allowance (where justified) is coming forward as expected, or may need to be adjusted.

6   The Methodology

6.1   The Strategic Housing Land Availability Assessment has eight main stages, with two further optional stages covering broad locations and windfalls. Guidance states that stages 3 and 4, 6 and 7 and 9 and 10 may be carried out in parallel.

Stage 1: Planning the Assessment

6.2   In order to carry out the Assessment the Council are working closely with the other authorities in the County. The working group have agreed methodology criteria, areas of search thresholds and on going quality of the project. A working group are engaging with Home Builders Federation (HBF) as well as Government Office for the South West. The DCLG Guidance raises management issues that should be addressed in the assessment.

6.3   The work is to be carried out by Forest of Dean District Council, utilising the resources of Development Services and knowledge available, as well as those of local developers, land owners and agents. The Assessment timetable needs to complement the Core Strategy in order to be a useful evidence base to inform decisions.

6.4   Resources, in terms of the officer's time for making the assessments and the production of a set of maps, will be provided by the Council. It is hoped that all members of the wider stakeholder partnership will contribute towards assessing the identified sites.

6.5   Most of the skills required to produce the Assessment are available within the Council, however, the input of local agents and developers will be important in identifying suitable sites, assessing constraints and market factors.

6.6   The Assessment will be prepared by the Council, with the draft assessment to be agreed through the partnership approach. The process of assessing individual sites will be standardised to achieve a consistency of analysis.

6.7   The work programme and project milestones are shown in the table below, these take into account resources, timings of the relevant plans or assessments of five years supply of specific deliverable sites, or other evidence gathering exercises.

Table 6.1: Schedule of Work Programmed

	November				December				January				February			
Planning the Assessment	■	■	■	■												
Methodology Consultation				■	■	■										
Initial Site Identification				■	■	■										
Desktop Review of Existing Information					■	■	■	■								
Determining Areas & Sites to be Surveyed		■	■	■	■											
Carry out Survey						■	■	■	■							
Estimating Housing Potential of Each Site					■	■	■	■	■	■	■					
Assessing when and where sites likely to be developed											■	■	■			
Review Assessment													■	■	■	
Agreement of SHLAA																■

Stage 2: Determining sources of sites

6.8   In accordance with the Practice Guidance the types of sites that will be covered by the Assessment are outlined in the table below.

Table 6.2: Sources of sites with potential for housing

Sites in the planning process
• Land allocated (or with permission) for employment or other land uses which may no longer be required for those uses.
• Existing housing allocations and site development briefs.
• Unimplemented planning permissions for housing.
• Planning permissions for housing that are under construction.
Sites not currently in the planning process
• Vacant and derelict land and buildings..
• Surplus public sector land.
• Land in non-residential use which may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of mixed-use development.
• Additional housing opportunities in established residential areas, such as under-used garage blocks.
• Large scale redevelopment and re-design of existing residential areas.
• Sites in rural settlements and rural exception sites.
• Greenfield urban / village extensions.
• New free standing settlements.

6.9 The Practice Guidance states that particular types of land or areas may be excluded from the Assessment, provided that reasons for doing so are justified and agreed by members of the partnership.

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6.10 Practice Guidance further states that the scope of the Assessment should not be narrowed down by existing policies designed to constrain development, so that the local planning authority is in the best possible position when it comes to decide its strategy for delivering its housing objectives.

6.11 Sources of supply are illustrated further in the table below, this includes urban capacity, as well as greenfield capacity categories.

Table 6.3: Sources of sites with potential for housing

Source of Housing Supply	Survey Approach	Assessing Yield
Sub-division of existing dwellings	Analysis of past trends.	Analysis of past yield from housing supply database
Flats over shops	Analysis of past rates, potential sources are relatively small, difficult to determine likely yield from survey.	Analysis of past yield from housing supply database.
Empty homes	Analysis of past rates	Analysis of past yield
Previously developed vacant and derelict land & buildings	National Land Use Database return. Survey based search for land and buildings not used, through GIS and databases to ensure no double counting.	Yield will be assessed using density assumptions, or existing design input if available.
Intensification of existing areas	Map based exercise. Survey based search to identify areas with potential, such as large gardens.	Assess using density assumptions, taking account of location (e.g. gardens. town centre, edge of village etc) and policy objectives (e.g. near transport nodes).
Redevelopment of existing housing	Analysis of past trends. Consider programmes of Housing Associations, Housing Strategy and stock Redevelopment programmes.	Assess yields as above for intensification.
Redevelopment of car parks	Map based identification and survey.	Few, if any, sites expected.

Source of Housing Supply	Survey Approach	Assessing Yield
Conversion of commercial buildings	Include those where aware of current proposals or know premises are underused.	Utilise any existing design information and comparative schemes.
Review of existing housing allocations in Plans	Consider all allocations without detailed planning permission	Consider yield through density assumptions on size of site.
Review of other existing allocations in Plans	Consider all allocations without detailed planning permission.	Consider yield through density assumptions on size of site.
Vacant land not previously used	GIS map based and aerial photography to identify possible sites. Utilise knowledge of Development Control Officers.	Apply density assumptions to size of site
Redevelopment of existing employment and other uses	Consider sites in conjunction with employment land review, use Local Plan protection sites.	Consider yield through density assumptions on size of site.
Unimplemented / outstanding planning permissions	Analysis of housing and employment databases. Assess likelihood of sites being developed through consultation with landowner / agent.	Assess yield through existing designs.
Sites outside existing settlements	Invite submissions from development industry.	Consider yield through density assumptions or design exercise applied to size of site.

Stage 3: Desktop review of existing information

6.12   The Guidance sets out data sources that can be used to identify sites with potential for housing and relevant information they might provide, such as on constraints.

6.13   The table below sets out some of the data sources that will be used to identify sites with potential for housing:

Table 6.4: Sources of information

Sites in Planning Process	Purpose
Site allocations not yet the subject of planning permission	To identify sites
Planning permission / sites under construction (particularly those being developed in phases)	To identify sites
Sites in Planning Process	**Purpose**
Site specific development briefs	To identify sites and any constraints to delivery
Planning application refusals	To identify sites - particularly those applications rejected on grounds of prematurity
Dwelling starts and completion records	To identify the current development progress on sites with planning permission
Other sources of information that may help to identify sites	
Local planning authority Urban Capacity Study	To identify buildings and land, and any constraints to delivery
Local planning authority Empty Property Register	To identify vacant buildings
English House condition Survey (Communities To identify buildings and Local Government)	To identify buildings
National Land Use Database (English Partnerships)	To identify buildings and land, and any constraints to delivery
Register of Surplus Public Sector Land (English Partnerships)	To identify buildings and land
Local planning authority Employment Land Review	To identify surplus employment buildings and land
Valuation Office database	To identify vacant buildings
Local planning authority vacant property registers(industrial and commercial)	To identify vacant buildings
Commercial property databases, e.g. estate agents and property agents	To identify vacant buildings and land
Ordnance Survey maps	To identify land
Aerial photography	To identify land

6.14 Once the list of sites and information gathered on each site is assembled, duplications will be removed and sites will be mapped.

Stage 4: Determining sites and areas to survey

6.15   The Core Strategy and Site Allocations Development Plan Documents will need to plan for large numbers of housing to be in accordance with the South West Regional Spatial Strategy.

6.16   All sites identified by the desk-top review should be visited in order to get an up-to-date view on development progress and to identify any possible constraints to development. The site survey will be used to identify further sites with potential for housing development, which were not identified by the desktop review.

6.17   As stated in the guidance, mapping development hotspots, town centres, principal public transport corridors, specific locations within settlements and specific locations outside settlements will help to identify which geographic areas could be covered by the survey.

6.18   Factors to take into account in determining how comprehensive and intensive the survey needs to be include:

- **The nature of the housing challenge** - more comprehensive and intensive where existing or emerging housing provision targets in the study area are high or where there is worsening affordability, reflecting the need to identify more sites for housing;
- **The nature of the area** - areas dominated by smaller settlements may find it necessary to identify all the sites with potential for housing;
- **The nature of land supply** - where a large proportion of housing is expected to be delivered on small sites this may mean that the survey needs to identify smaller sites than would be necessary in an area where larger sites are likely to make up the bulk of supply; and,
- **The resources available to the partnership** - which can be brought together for best effect and, should reflect the scale of the task.

Stage 5: Carrying out the survey

6.19   Sites identified from the desktop review will be visited following a brief to ensure consistent practice in identifying sites and recording information, handling enquires from members to minimise misinformed speculation.

6.20   The following characteristics will be recorded, or checked that they were supplied by the desktop review:

- site size;
- site boundaries;
- current use(s);
- surrounding land use(s);
- character of surrounding area;
- physical constraints, e.g. access, steep slopes, potential for flooding, natural features of significance and location of pylons;
- development progress, e.g. ground works completed, number of homes started and completed; and,

- initial assessment of whether the site is suitable for housing mixed-use development.

6.21 A checklist for sites is contained in Appendix A 'Checklist of Site Details'.

Stage 6: Estimating housing potential of each site

6.22 The housing potential of each identified site should be guided by the existing plan policy, particularly the approach to housing densities at the local level. The Forest of Dean District Local Plan was adopted in November 2005 and remains the current Plan for the District.

6.23 Alternative approaches to estimating potential are to sketch a scheme from scratch, or use relevant existing schemes as the basis for an outline scheme adjusted for individual site characteristics and physical constraints. A further method is to compare the site with a sample scheme, which represents the form of development considered desirable in a particular area.

6.24 Housing potential is a significant factor that affects economic viability. The guidance states that Stage 6 and 7 of the Assessment can be carried out in parallel to ensure that the housing potential for each site is guided both by the plan and economic viability.

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

6.25 Assessing the suitability, availability and achievability of a site will provide the information as to whether a site can be considered deliverable, developable or not currently developable.

6.26 Where a site has severe constraints, which have no immediate solutions the site, should be regarded as not currently developable.

6.27 This stage of the Assessment is divided into four steps outlined below.

Stage 7a: Assessing suitability for housing

6.28 A site is suitable if it offers a suitable location for development and would contribute to the creation of sustainable mixed communities. Site allocations in existing plans for housing or with planning permission for housing will generally be considered suitable however this is not set in stone.

6.29 The following factors should be considered to assess a site's suitability for housing both now and in the future:

- **Policy restrictions** - designations, protected areas, existing planning policy and corporate or community strategy policy;
- **Physical problems or limitations** - such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;

- **Potential impacts** - including effect upon landscape features and conservation; and,
- **Environmental conditions** - which would be experienced by prospective residents.

Stage 7b: Assessing availability for housing

6.30   A site is considered available for development when there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips (a piece of land that typically provides access to a site which is held back by the vendor therefore holding the development to ransom), by tenancies or operational requirements of landowners. Therefore, land is considered available when a housing developer who has expressed an intention to develop controls it or the landowner has expressed an intention to sell.

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

Stage 7c: Assessing achievability for housing

6.32   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;
- cost factors; and,
- and/or delivery factors.

6.33   The views of house builders and local property agents will be considered in order to make a residential valuation on sites to determine whether housing is an economically viable prospect for a particular site.

Stage 7d: Overcoming constraints

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

Stage 8: Review of the Assessment

6.35   The initial survey and assessment of sites will enable the production of an indicative housing trajectory that sets out how much housing can be provided and at what point in the future. Guidance recommends that an overall risk assessment be made as to whether sites will come forward as anticipated. At this stage it may be concluded that insufficient sites have been identified, further

sites may need to be sought or assumptions made, for example on the housing potential of particular sites, need to be revisited.

6.36 Following this assessment if there are still insufficient sites shown then it will be necessary to identify broad locations for future housing growth (both within and outside settlements) and to use a windfall allowance (refer to stages 9 and 10).

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

6.37 This stage of the Assessment is optional, as described above. Broad locations are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. By identifying broad locations communities have a better understanding about where future development will be directed and there will be greater certainty for developers about where development will be encouraged. It is a proactive approach to planning that reflects positive choices about the direction of future housing development within the district.

6.38 Examples of broad locations include:

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

6.39 The search for potential housing can be focused by establishing a set of criteria, such as direct development into areas where significant infrastructure exists or is planned, or to avoid the coalescence of settlements.

6.40 Where broad locations have been identified estimates of potential housing supply should be developed having regard to:

- any evidence underpinning the Regional Spatial Strategy;
- the nature and scale of potential opportunities within the broad location;
- market conditions.

6.41 Guidance suggests housing potential for broad locations outside settlements can be calculated by using the residential density of an existing area that works well (dividing the total area by the number of homes) and applying this calculation to the broad location. However, the density will be lower as it will contain land that will need to be provided for other uses such as shops, offices and schools.

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

6.42 PPS 3 expects the supply of land for housing to be based upon specific sites and, where necessary, broad locations. However, it is recognised that there may be genuine local circumstances where a windfall allowance is justified.

6.43   Where a windfall allowance can be justified this should be based on an estimate of the amount of housing that could be delivered in the area on land that has not been identified in the list of sites. One way of determining the allowance is to estimate the housing potential from each likely source of housing, by calculating the average completion rate from each source. This can be done from the Council's Housing Land Availability database. This can help in coming to an informed review as to:

- whether the annual rate is likely to increase or decrease;
- whether the pattern of redevelopment is likely to remain the same, increase or decrease;
- whether current market conditions are likely to stay the same, worsen or improve in the future

Appendix A Checklist of Site Details

Site Characteristics		
Site Size (or range if appropriate)		
Current Land Use(s)		
Surrounding Land Use(s)		
Greenfield / Brownfield		
Current Policy / Physical Constraints		
	Yes	No
Do you consider the site to be within an Urban Area?		
Does the site fall within the Flood Plain? (Zone 1, 2, 3)		
Does the site fall within an Area of Outstanding Natural Beauty?		
Does the site fall within a Special Landscape Area?		
Does the site fall within a Site of Special Scientific Interest?		
Does the site impact on cultural heritage? (e.g. Listed Buildings, Area)		
Is there any known contamination on site?		
Accessibility		
Public transport accessibility (e.g. range of means of transport and frequency of service)		
Access to Primary Services, Facilities & Jobs (e.g. employment, retail, leisure)		
Access to Key Local Services & Facilities (e.g. Post Office, health, primary school, village hall, pub, general store)		
Infrastructure		
Water Supply		
Drainage		
Electricity		

School Places		
Strategic transport		
Infrastructure		

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