Forest of Dean District Council
LOCAL PLAN

Strategic Housing and Economic Land Availability Assessment Methodology

1 Introduction

1.1   This Strategic Housing and Economic Land Availability Methodology 2025 updates the Strategic Housing Land Availability Assessment Methodology November 2007 <u>Strategic housing and economic land availability assessment - Forest of Dean District Council</u> The updates follow the publication of the revised National Planning Policy Framework (NPPF) 2024.

1.2   The purpose of this paper is to set out the methodology upon which the Council will carry out the Strategic Housing and Economic Land Availability Assessment (SHELAA), within the Forest of Dean District.

1.3   The main purpose of the Strategic Housing and Economic Land Availability Assessment (SHELAA) is to identify land that is potentially suitable, available and achievable for housing and economic development uses over the plan period. Through the SHELAA process the Council invites interested parties, landowners, and developers to inform them of sites that they consider suitable to be assessed for housing and economic development.

1.4   The Council's recommendations on site suitability and capacities are informed by evidence that is proportionate to the role of the SHELAA. The SHELAA's recommendations on site suitability and capacities may also change in light of more detailed evidence, produced as part of the plan making process.

Brownfield Land Register

1.5   The SHELAA can also inform as well as make use of sites in brownfield land registers. Brownfield land is defined by government in the NPPF glossary as "Previously developed land". The register contains all the information required by government legislation. Brownfield Land registers provide up to date and consistent information on sites that identify previously developed land suitable for residential development. It lists sites that are considered suitable, available and achievable for housing to encourage development on brownfield land. This is available on the Council's <u>website</u>.

1.6   As a technical document, the SHELAA is not subject to a formal consultation period, although the Council welcomes any additional site information that may affect the delivery of a site. Anyone wishing to make a formal representation about the suitability of sites for development has the opportunity to do so through the Local Plan consultation process.

2 Purpose of the Assessment

2.1   Each Local Planning Authority across England is responsible for evaluating land availability in their area. The SHELAA supports the Council's statutory duty to maintain an up-to-date evidence base for plan-making, in line with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). As part of this process the Council updates its evidence on housing and employment land availability annually through the SHELAA.

2.2   The Assessment forms part of the evidence base for the Forest of Dean's emerging Local Plan, it is not a decision-making document. Any assessment undertaken by the Council does not allocate the sites to be developed nor guarantee a site will be allocated in the future. The allocation of sites for future housing or employment development will be determined through the Local Plan process.

2.3   The inclusion of a site in the SHELAA does not mean that planning permission will be granted. Planning applications will be determined in accordance with the adopted Forest of Dean District Local Plan and made Neighbourhood Development Plans, unless material considerations indicate otherwise. The suitability of a site and its capacity will need to be fully tested through either the development management (planning application) or Local Plan process.

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

- identify sites and broad locations with potential for housing and employment development;
- assess their development potential, and
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

3 The Methodology

3.1   The SHELAA is prepared in accordance with the National Planning Policy Framework (Dec 2024) (NPPF) National Planning Policy Framework - GOV.UK and the Methodology recommended by the Planning Practice Guidance (PPG) Housing and economic land availability assessment - GOV.UK on 'housing and economic land availability assessment'.

3.2   The Assessment follows the process identified in the following flow diagram shown:
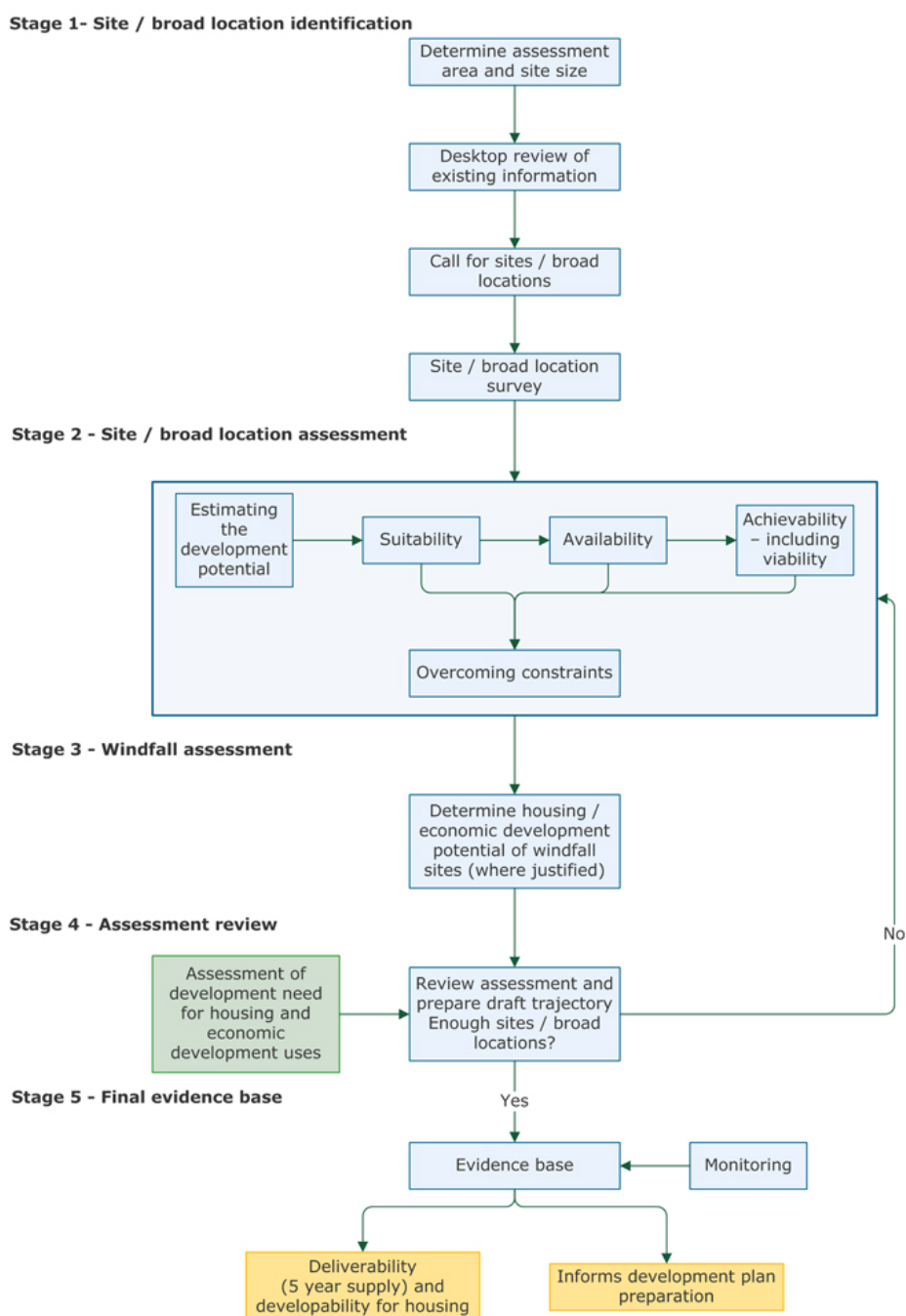
Source MHCLG housing and Economic Land Availability assessment guidance

a) Call for Sites

3.3　The 'Call for Sites' is aimed at as wide an audience as practicable. Every year the Council invites any interested parties; local communities; Parish and Town Councils, individuals, landowners and promoters; developers; and local property agents to inform the District Council of sites within the District, that they would like to be considered for inclusion within the SHELAA. The SHELAA 'Call for Sites' is promoted on the Council's website and although sites may be submitted throughout the year, an email reminder is sent to consultees on the Councils Local Plan database every February and a public notice is included in local newspapers to advise that the Call for Sites closes on 31March. Any applications after this date will be considered in the following years SHELAA.

3.4　An interested party can be added to the Council's circulation list by contacting localplans@fdean.gov.uk

3.5　To submit a potential housing or employment sites for consideration, a SHELAA form must be completed, either online or by downloading a form from the website and returning to the Planning Policy team by email localplans@fdean.gov.uk or post to Forest of Dean District Council, Council Offices, High Street, Coleford, Glos. GL16 8HG. The submission form must be accompanied by a site location plan showing the boundary to a recognised scale, ideally at a scale of 1:1250.

b) Identification of Sites

3.6　A minimum size threshold of 0.2ha or larger (equivalent to 5 or more dwellings) is required for a site to be considered through the SHELAA process. Smaller sites are generally not considered for Local Plan allocations. Each year the SHELAA builds on previous assessments of land availability in the Forest of Dean District. Yearly reports are published on the Council website. Sites that have previously been submitted do not need to be re-submitted, unless changes are made to the site or the request is to remove the site from the assessment, as past sites will be carried forward.

3.7　The call for sites form requires the following information:

- Site address and location;
- Location plan;
- Developable area of site in hectares;
- Current land use;
- Suggested potential type of development;
- Scale of development;
- How access could be achieved
- Availability, is the site available for immediate development
- Constraints to development.

c) Desktop Study of Existing Information

3.8   All sites, upon receipt are plotted on the Council's GIS and given a reference number. A desktop assessment using the Council's GIS and other online resources is undertaken. The aim of the desk-top study is to review the sites against information held on the Councils GIS to identify constraints and designations affecting the site. Information received through the Call for Sites is cross-checked by the desk top assessment:

- Site size, boundaries and location;
- Site type; e.g. housing employment or combination
- Capacity; potential number of houses or employment units
- Surrounding land use(s) if relevant;
- Character of surrounding area;
- Physical constraints, e.g. access, contamination, steep slopes, potential for flooding, natural feature of significance;
- Potential environmental constraints;
- Planning policy and Local Plan allocations and designations;
- National and local designations;
- Initial assessment of whether the site is suitable for a particular type of use;
- Planning history.

d) Panel

3.9   Following the desktop assessment of the submitted sites, a SHELAA Panel is convened by Forest of Dean District Council to provide expert advice and local insight into the assessment of sites submitted for housing and employment development. Local insight provides a balanced and realistic assessment of the site, local knowledge of legal or ownership issues, current use of land, economic viability, delivery timetable, developer interest, the number of dwellings a site could accommodate and infrastructure requirements. The panel is made up of interested parties who have technical knowledge or information that they can share related to their expertise on the suitability, availability achievability and deliverability of the site. The panel is provided, in advance with a list of new site submissions with hyperlinks to an online map showing the location of the new sites and supporting information to review prior to the meeting.

3.10   SHELAA panel attendees that have submitted a SHELAA site as part of that years SHELAA assessments, are requested not to evaluate their own sites to avoid a conflict of interests.

3.11   A list of attendees for the Panel is recorded.

3.12   At the panel, a digital map is displayed, a verbal report of each site given, and notes taken at the meeting to inform the final report. The objective of the SHELAA panel is to assist in the assessment of submitted sites for inclusion in the SHELAA, by providing:

- Market intelligence on site deliverability and viability within the Forest of Dean context.
- Local or working knowledge of constraints to development
- A sense check on the findings of the desk-top assessment
- Support the identification of potential allocations for the Local Plan

(i) Panel Composition

3.13 Representatives from the following organisations are invited to attend the panel:

Panel representor	Knowledge/Input into SHELAA process
Local Plan Team, Development Management Officers	Detailed local knowledge of area; Knowledge of site history; Knowledge of local constraints based on previous experience.
Conservation Officer/Sustainability Ecology Officer/Housing Strategy & Enabling Officer	Specialist knowledge of Conservation Ecology and Housing.
Registered Providers active in Gloucestershire	Specialist knowledge of Affordable Housing need and delivery
Local and regional developers and housebuilders	Technical knowledge of how sites could be delivered and the mitigations of any constraints needed to enable delivery. Knowledge of lead-in times for delivery Knowledge of build-out rates Knowledge of wider constraints to delivery such as sourcing of materials/labour.
Agents with interests in the district	Local knowledge of site availability
Planning consultants with experience in Forest of Dean	Detailed knowledge of what is needed to demonstrate a site meets the definitions of deliverable/developable
Infrastructure providers (e.g. Highways)	Specialist knowledge of infrastructure provision
Economic development and regeneration officers	Specialist knowledge of economy and regeneration
Environmental bodies (e.g. GWT)	Specialist knowledge of environmental factors

Table showing composition of panel members

3.14 In producing the SHELAA and throughout the Local Plan process, the Council works with Duty to Cooperate partners; landowners and promoters; local property agents; developers; local communities; Local Enterprise Partnerships; businesses and their local representative organisations; parish and town councils.

3.15 The SHELAA is subject to review, and the Council will continue to work with stakeholders to help identify development constraints, solutions to overcome constraints. This engagement process also

helps to make estimations of lead-in times and build-out rates, as well as the final conclusions on the deliverability and capacities of sites.

(ii) Panel Operation

- Meeting Schedule: The panel will meet following the close of the site submission period and prior to publication of draft SHELAA report. Meetings are usually be held in person at the Forest of Dean District Council Offices in Coleford. In exceptional circumstances the panel may be held online.
- Pre-Meeting Preparation: Site information submitted along with location plans and hyperlink to online maps, will be circulated in advance. Panel members are expected to review materials in order to provide informed feedback.
- Confidentiality: All personal information will be redacted. All members must respect the confidentiality of site promoters and commercially sensitive information. A confidentiality agreement may be required.
- The panel discuss each of the new site submissions and any amended sites that have been submitted in previous years. They consider as a group the suitability of each submitted site for accommodating future housing and employment uses.

(iii) Site Assessment Criteria

3.16   The PPG Planning Practice Guidance (PPG) on housing and economic land availability assessment recommends that site surveys should be proportionate to the detail required for a robust appraisal and that more detail should be provided for sites that are considered to be realistic candidates for development. Site assessments must also be undertaken with a 'policy on' approach so that the assessment conclusions are realistic and robust.

3.17   Panel members will be invited to comment on each site, drawing on their professional expertise and knowledge of the Forest of Dean District. Key questions will be identified to consider for each site. Technical knowledge will be sought about the site/surroundings/constraints. Specialist knowledge about viability considerations and the length of time it may take to develop a site may also be requested.

3.18   Sites will be assessed using a consistent framework based on:

- **Suitability:** Planning policy alignment in context of existing Local Plan, emerging plan policy and national policy, environmental constraints (e.g. AONB, flood risk, contamination, nature or heritage conservation impacts), access to services, and infrastructure capacity, landscape, amenity impact. Assessment of relevant planning history.
- **Availability:** Ownership, developer interest, legal constraints, and willingness to develop.
- **Achievability:** Market demand, viability, infrastructure requirements, and estimated delivery timescales.

3.19   The Council also considers as part of this process deliverability:

- **Deliverability:** Whether the site could be considered to meet the definition of deliverable, and whether there is a real possibility the site could be delivered within 5 years, if it were to be allocated.

Assessing Suitability

3.20   A site is suitable if it offers a suitable location for development and would contribute to the creation of sustainable mixed communities.

3.21   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. 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; (see footnote 7 of NPPF 2024)
- Physical constraints - such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination.
- Potential impacts of development - including effect upon landscape features and conservation; and,
- Impact on amenity of future residents.

Assessing Availability

3.22   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 developer who has expressed an intention to develop controls it or the landowner 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.

Assessing Achievability

3.23   A site is considered achievable for development where there is a reasonable prospect that housing/employment 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/employment development over a certain period. It will be affected by:

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

3.24   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.

Assessing Deliverability

3.25   To be considered deliverable, sites for housing and employment should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing/ employment will be delivered on the site within five years. In particular:

i.   sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

ii.   where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

e) Overcoming Constraints

3.26   Where constraints have been identified, the assessment will need to consider what action could be taken to overcome them, such as flood mitigation for example.

f) Recording and Reporting

- A summary of panel discussions will be recorded by the Planning Policy Team.
- Comments will be anonymised and incorporated into the SHELAA site assessments.

g) Governance and Transparency

- The panel is advisory; final decisions rest with Forest of Dean District Council.
- The methodology and panel membership will be published as part of the SHELAA documentation.
- Conflicts of interest must be declared and managed appropriately. Panel members with a financial interest in a site will not participate in its assessment.

h) Review and Updates

3.27   The Assessment needs to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land. The process of the assessment will, provide the information to enable an identification of sites and locations that are most suitable for the level of development required.

3.28   This methodology will be undertaken and reviewed to identify any issues or in response to changes in national planning guidance or Local Plan requirements.

i) SHELAA Report

3.29   A final report is drafted and published on the Council's <u>web site</u> in an accessible form. The report includes hyperlinks to a SHELAA layer on the Council's online GIS.

3.30   The final report consists of:

- An analysis of the submissions and process for that year
- Members of the stakeholder panel for that year
- Summary of housing supply and planning policy
- A list of all sites or broad locations considered in that years panel, cross-referenced by hyperlink to their locations on the Council's GIS;
- An assessment of each site or broad location, including:
  - where these have been discounted, evidence justifying reasons given;
  - where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
- Updates for sites submitted in previous years confirmed to still be available.

3.31   The assessment will be made publicly available on the Council website in an accessible form. An email will be sent to everyone who has submitted a site to let them know the report is on the Council <u>website.</u>