

STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA) AND ECONOMIC LAND AVAILABILITY ASSESSMENT (ELAA) - MAXIMISING SUPPLY

Planning Advisory Committee - 21 June 2016

Report of Chief Planning Officer

Status: For Consideration

Key Decision: No

Portfolio Holder Cllr Robert Piper

Contact Officer Emma Boshell, Senior Planning Officer, Ext.7358

Recommendation to Planning Advisory Committee: To note

- (a) the sites submitted in the recent call for sites (attached at Appendix B);
- (b) progress on the maximising supply exercise; and
- (c) the next steps in evidence gathering.

Reason for recommendation: In order to enable discussion and advice on progress with the Strategic Housing Land Availability Assessment (SHLAA) and the Economic Land Availability Assessment (ELAA).

Introduction and Background

- 1 Following consideration of the Strategic Housing Market Assessment (SHMA) by this committee on 13th October 2015, and by Cabinet on 5th November 2015, the evidence base study was approved. The SHMA is based on the Government's latest population and household projections and identifies the objectively assessed housing need across the District. However, the objectively assessed need is an **unconstrained figure** and is **not the District's housing target**. The SHMA will be used as a starting point for developing the new Local Plan for 2015-35.
- 2 Subsequently, there are a number of steps we must take to arrive at a robust and deliverable housing target for the District - these steps were discussed and agreed by this committee on 7th July 2015 (attached at Appendix A).
- 3 The second of these steps is to assess the supply of land in the District to establish how much of the identified need can be realistically delivered over the plan period 2015-35. This study is known as a Strategic Housing Land Availability Assessment (SHLAA). A similar process for employment land is also being undertaken, known as an Economic Land Availability Assessment

(ELAA). These technical studies are a requirement of the National Planning Policy Framework (paragraph 159).

Call for Sites

- 4 A call for sites was advertised in order to establish initial land availability for all types of development including housing, employment and retail. Local landowners, developers, businesses, Town and Parish Councils and other interested parties were invited to submit sites to the District Council. Two sessions were also held with the Developers Forum and the Rural Landowners Forum to promote and explain the process. The call for sites ran from September to November 2015 and approximately 250 sites were submitted across the District. The call for sites will remain an open process so as not to limit opportunities, however there is no guarantee that sites submitted after the November 2015 deadline will appear in the forthcoming iteration of the SHLAA and/or ELAA.
- 5 Officers visited the sites between January and April 2016 and initial site appraisals have been completed. These are attached at Appendix B. Each appraisal sets out a factual summary of the site including the land use and capacity submitted by the applicant, whether there are any constraints to consider such as Green Belt or Area of Outstanding Natural Beauty, along with the key issues to be addressed in assessing the site's suitability, and the evidence to be gathered to help in making that judgement. **It is important to note that sites could be found suitable in whole or in part, however there are no recommendations about the suitability of any of the sites at this stage.**
- 6 To ensure that the appraisals are robust officers are inviting comments on the accuracy of the information set out in the site appraisals. Ward members, Town and Parish Councils, residents, landowners, developers and agents are all invited to comment. This information will feed into the SHLAA and ELAA. Comments should be sent to sites@sevenoaks.gov.uk at the earliest opportunity. Please note that we are not inviting comments on the suitability of the sites at this stage.

Maximising Supply Exercise

- 7 In addition to the call for sites the District Council is required to explore other elements of supply in order to boost the supply of housing, in accordance with the Government's Planning Practice Guidance (PPG). Officers have been progressing this exercise over the last few months with the following results:
 - There are **18** existing housing and economic development allocation sites without detailed planning permission or with unimplemented planning permission. These sites will be re-appraised and included in the SHLAA.

- There are **31** sites that featured in the 2008/09 SHLAA that have not been resubmitted or gained planning permission since. These sites will be re-appraised and included in the SHLAA.
 - There are **30** sites with planning applications that have been refused or withdrawn that can accommodate 5 or more units. These sites will be appraised and included in the SHLAA.
 - There are **430** properties currently on the Empty Properties Register. These properties will be investigated further.
- 8 In addition to the above requirement and findings, the District Council has committed to explore some further elements of supply as set out in Step 2 of Appendix A. This exercise includes exploring potential for increased site densities, making the most of under-utilised employment land and assessing the potential contribution of windfalls. It is too early to report the results of this exercise until the findings of the Economic Needs Study are known and until the windfall contribution has been robustly analysed. These elements of supply will be included in the SHLAA.

Understanding the Shortfall

- 9 Given the very limited number of sites submitted within existing settlement boundaries, and the significant number of sites submitted subject to Green Belt and other constraints, it is apparent that there is a considerable gap between the identified unconstrained objectively assessed housing need and the supply of available land in the District. It is therefore required to undertake further evidence that will enable officers to make recommendations on the suitability of the sites. Referring back to the agreed process for addressing housing need in the Local Plan (Appendix A) this leads us to step 4 - the undertaking of a Green Belt Assessment.

Green Belt Assessment

- 10 A detailed assessment of the District's Green Belt serves two purposes. First it will help to identify if there are any areas of land that could be considered further for potential development as part of the new Local Plan. This can apply equally to sites submitted via the call for sites and other areas/sites not put forward. Secondly, and importantly, it will provide strong evidence for justifying the retention of well-performing Green Belt in the longer term.
- 11 Consultants will be commissioned to undertake the Assessment, where parcels of land will be assessed against the five purposes of the Green Belt, as set out in paragraph 80 of the NPPF:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;

- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Other Evidence

- 12 Running parallel but separate to the Green Belt Assessment will be evidence on landscape character, landscape capacity and on agricultural land quality. This study will focus on identifying the differing characteristics of the landscape across the District, and will go on to identify the capability of the landscape to accommodate change through the form of new development. Many of the sites submitted through the call for sites are currently in agricultural use, so the quality of arable land is also an important consideration.
- 13 Other constraints such as flood risk, ancient woodland and wildlife designations have already been considered as part of the appraisal work already undertaken on submitted sites and will be taken into account on any additional sites identified for further consideration.
- 14 Once these further pieces of evidence are complete, they will provide additional detail to the initial site appraisals. This will then enable officers to make recommendations on the suitability of the sites.

Timescales

- 15 The Forward Plan for the Local Plan evidence base was considered by this committee on 19th April 2016. It sets out the work programme for preparing and approving evidence for the financial year 2016-17. It is anticipated that both the Green Belt Assessment and the Landscape Character and Capacity Study will be brought to this committee on 17th January 2017.
- 16 Referring back to the agreed process for addressing housing need in the Local Plan (Appendix A), at this stage the Local Plan evidence base should be well advanced allowing options for a housing target to be identified through the first stage of Local Plan consultation (issues and options) timetabled for late Spring 2017.

Other Options Considered and/or Rejected

The preparation of a Strategic Housing Land Availability Assessment (SHLAA) and Economic Land Availability Assessment (ELAA) is required by Government and provide key evidence to support the new Local Plan. Not preparing these studies would risk the Local Plan being found unsound at examination and is not recommended.

Key Implications

Financial

The preparation of the SHLAA and ELAA will be funded from the LDF budget.

Legal Implications and Risk Assessment Statement

Preparation of a Local Plan is a statutory requirement. There are defined legal requirements that must be met in plan making which are considered when the plan is examined by a Government Planning Inspector. Risks associated with local plan making are set out in the Local Development Scheme.

Equality Assessment

The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

Appendices

Appendix A - Agreed process for addressing housing need in the Local Plan

Appendix B - Site appraisals

Background Papers:

[Report to Planning Advisory Committee - 7 July 2015 - Local Plan work programme](#)

[Report to Planning Advisory Committee - 19 April 2015 - Local Plan work programme](#)

Richard Morris
Chief Planning Officer

Appendix A

Agreed process for addressing housing need in the Local Plan

<p>Step 1 Understanding Need</p> <p>Undertake Strategic Housing Market Assessment with Tunbridge Wells BC (SHMA)</p> <p>Understand other adjacent authorities need via Duty to Cooperate discussions</p>	
<p>Step 2 Maximising supply</p> <p>Undertake Strategic Housing Land Availability Assessment (SHLAA) including a call for Sites*</p> <p>Explore potential for increased site densities</p> <p>Explore potential for focussed increased site densities such as near railway stations</p> <p>Assess quantum of under-utilised employment land</p> <p>Assess potential contribution of windfalls</p> <p>Assess potential contribution of empty properties</p> <p>Assess potential contribution of office conversions</p> <p>Discuss supply options in other authority areas under the Duty to Cooperate</p>	
<p>Step 3 Understanding shortfall</p> <p>Match steps 1 and 2 findings for need and supply to understand level of any shortfall</p>	
<p>Step 4 Assessment of Green Belt Options</p> <p>Undertake full Green Belt Review of the District- assess parcels of land against the five purposes of Green Belt designation. Undertake detailed assessment at settlement boundaries and broad level assessment elsewhere</p>	
<p>Step 5 Other considerations</p> <p>Assess potential land options against other criteria, including:</p> <p>Category 1 constraints (national/international) e.g. Green Belt, AONB, flood risk</p> <p>Category 2 constraints (county/district) e.g. Conservation area, local wildlife sites</p> <p>Landscape Character</p> <p>Assessments undertaken in neighbouring authorities</p>	
<p>Step 6 Identification of land options for further consideration</p>	
<p>Step 7 Housing target identified</p>	

*note at 1 April 2014 total housing supply for the current Core Strategy plan period 2006-26 was 4,732 (including 450 at Fort Halstead)