

### 1. Introduction

#### What is a SHELAA?

- 1.1 The Strategic Housing and Economic Land Availability Assessment (SHELAA) is a technical assessment of the amount of land that is available and suitable to meet the District's housing and employment needs. It is an important evidence base document that informs plan-making, but **it does not determine whether a site should be allocated for development in the future, nor does it influence the likelihood of gaining planning permission on a particular site.**
- 1.2 The process was formerly known as a Strategic Housing Land Availability Assessment (SHLAA) and Economic Land Availability Assessment (ELAA) but was renamed a SHELAA to bring sites with both housing and employment (and mixed use) potential together.
- 1.3 The SHELAA follows the methodology that to a great extent is prescribed in the government's Planning Practice Guidance (PPG) but also incorporates comments from the development industry. It was agreed via a Portfolio Holder Executive Decision in January 2016 and is included at Appendix A.

#### What is included in the SHELAA?

- 1.4 The SHELAA is a technical study that assesses the development potential of sites submitted to the District Council through the call for sites, a process whereby local landowners, developers, businesses, Town and Parish Councils and other interested parties are invited to submit sites to the District Council for assessment of their suitability for future development. Existing allocations are also considered in the SHELAA. The document includes:
  - A plan of each site showing the relevant constraints;
  - An assessment of the suitability, availability and achievability of each site; and
  - An estimated development capacity that could be delivered on each site assessed to be suitable.

#### How will the SHELAA be used?

- 1.5 The SHELAA, alongside other evidence base documents, will help to inform the development strategy for the new Sevenoaks District Local Plan 2015-35. The Strategic Housing Market Assessment (SHMA) was completed in September 2015 and identifies an objectively assessed need (OAN) of 12,400 new homes over the plan period. The OAN is an unconstrained figure and is not the District's housing target. Equally the Economic Needs Study (ENS) was completed in September 2016 and identifies a need for 11.6 hectares of B1-B8 employment floorspace over the plan period. The SHELAA identifies potential sites to address some of these needs.

### 2. Policy Context

#### National Policy and Guidance

- 2.1 The National Planning Policy Framework (NPPF) places great emphasis on boosting the supply of housing (para 47) and sets out that local authorities should 'prepare a

Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period' (para 159). Paragraph 161 sets out that 'reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land.' Assessing the development needs of the District and identifying specific and deliverable sites in order to facilitate development is a crucial aspect of the Local Plan process. Undertaking a SHELAA and reviewing housing and employment sites together ensures that sites are considered for the most appropriate use.

- 2.2 The Planning Practice Guidance (PPG) sets out a robust methodology for undertaking the SHELAA in the form of a flow chart and is set out in Figure 1:

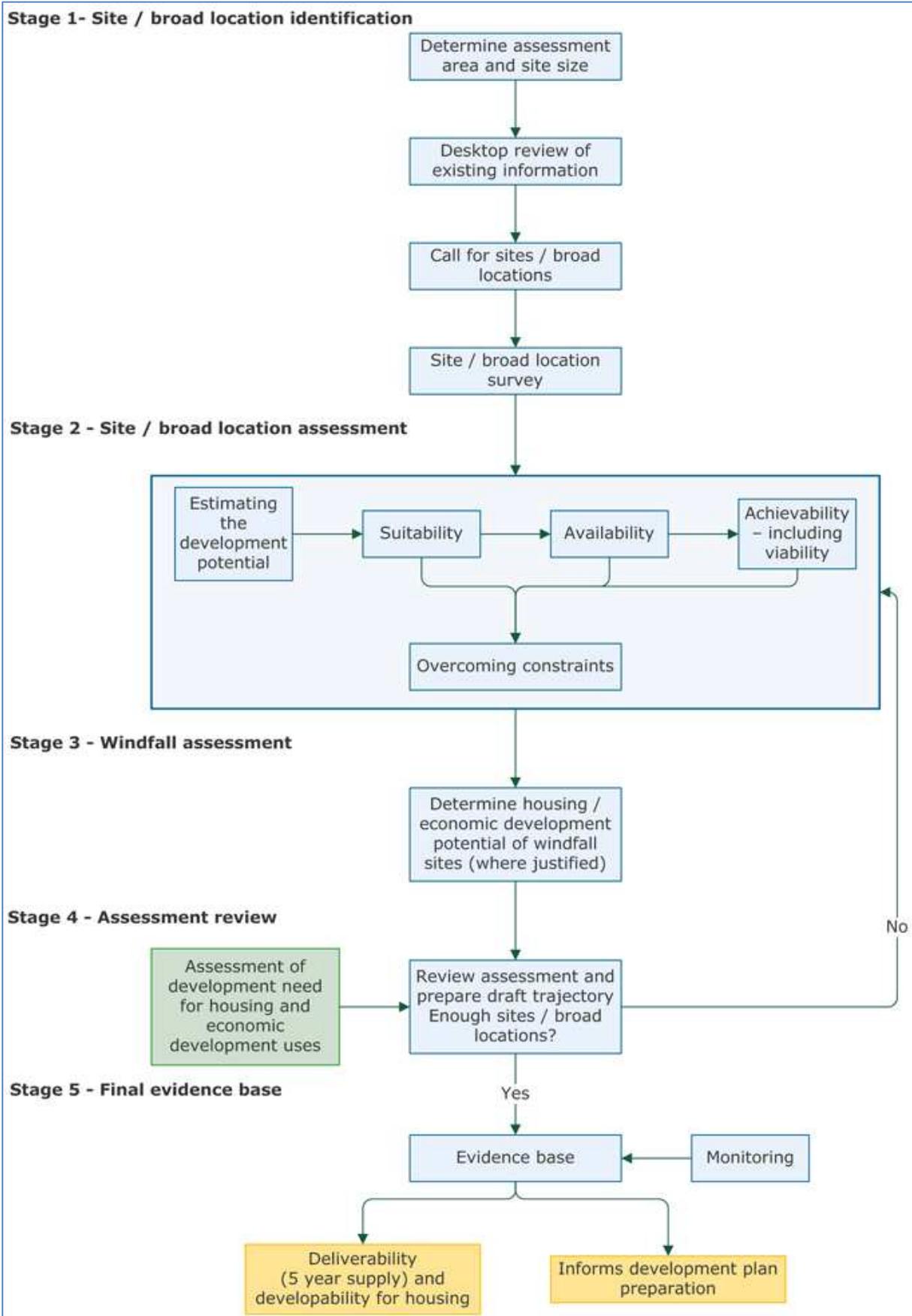


Figure 1: Housing and economic land availability methodology - flowchart  
 Source: Planning Practice Guidance (para 006)

2.3 The PPG suggests a five stage approach which, when followed, should lead to a robust assessment of land availability. The assessments should be thorough but proportionate. This advice was followed when setting the methodology and undertaking the site assessments.

### **Local Policy**

2.4 The Core Strategy (2011) and Allocations and Development Management Plan (ADMP) (2015) make up the development plan for Sevenoaks District. These documents continue to be used in determining planning applications.

2.5 The District Council is preparing a new Local Plan which will replace the Core Strategy and ADMP. The evidence base is still evolving, but the SHELAA will form a key part, identifying key available and suitable sites which will help to inform the future development strategy.

2.6 Sites assessed as part of the SHELAA process are done in a 'policy-neutral' manner in that they are not judged in detail against current local planning policies the way a planning application would be. Having said that, regard may be had to current policies to provide appropriate context e.g. if a site is already allocated for a particular use, and evidence indicates that use should be retained.

### **3. Methodology**

3.1 An initial draft methodology was prepared in September 2015 (then called 'Methodology for undertaking the Strategic Housing Land Availability Assessment (SHLAA) and Economic Land Availability Assessment (ELAA)') and was developed taking into account national policy and advice contained within the NPPF and PPG. The flowchart set out in Figure 1 outlines the basic approach. The PPG states that 'where this methodology is departed from, reasons should be provided to justify doing so' (para 005).

3.2 The District Council's interpretation of the methodology can be found at Appendix A. This was tested through the Developers Forum in October 2015, where comments from the Development Industry were taken on board. The methodology was then agreed through a Portfolio Holder Executive Decision in January 2016.

3.3 The SHELAA methodology has 7 steps:

1. Determine assessment area and site size;
2. Desktop review of existing information;
3. Call for sites;
4. Site survey;
5. Site assessment;
6. Windfall assessment; and
7. Assessment review.

3.4 This document includes steps 1-5. The windfall assessment and any non-implementation rates will be calculated in the coming months to take account of the latest and most recent completion data and new planning permissions for the

monitoring year 2016-17. It is intended that this information will be reported to the Planning Advisory Committee via a Local Plan update.

## 4. Potential Sites

### Step 1 – Determine Assessment Area and Site Size

- 4.1 The extent of the assessment area is the District Council boundaries. Whilst the housing market area extends to the Tonbridge part of Tonbridge and Malling Borough Council and into Tunbridge Wells Borough Council area, it was deemed that keeping the assessment to the geography of the District boundaries represents the most pragmatic approach. Both Tonbridge and Malling Borough Council and Tunbridge Wells Borough Council have undertaken or are in the process of undertaking their own SHELAA's, and the three documents can be used to understand the overall potential supply of land by housing market area (HMA) and by functional economic market area (FEMA).
- 4.2 With regard to site size, the PPG states that 'the assessment should consider all sites and broad locations capable of delivering 5 or more dwellings or economic development on sites of 0.25 hectares (or 500sqm of floorspace) and above' (para 010). The District Council adopted this approach.

### Step 2 – Desktop Review of Existing Information and Maximising Supply

- 4.3 The SHELAA considers current allocated sites in the ADMP for housing, mixed use and employment development. A review of each site (where planning permission has not yet been sought) has been undertaken to determine whether the site remains available, suitable and achievable in the context of the increased housing and employment needs. These assessments are included at Appendix D.
- 4.4 The District Council also made a commitment to explore other elements of supply in order to boost the supply of housing in accordance with the PPG. These sources of information and relevant findings are set out below:
- 2008/09 SHLAA sites – 31 sites that featured in the 2008/09 SHLAA have been re-appraised. Whilst a number of these sites could be suitable, updated information on land availability needs to be established. It is intended that landowners will be written to as part of the upcoming public consultation on the Local Plan Issues and Options.
  - Refused/withdrawn planning applications – 30 sites that can accommodate 5 or more units had planning permission refused or their application withdrawn within the last five years. These sites were investigated but it was deemed that none were suitable.
  - Empty properties register – there are approximately 400 homes on the empty properties register. The District Council has a strategy for bringing these back into use which is ongoing and regularly monitored.
  - Exploring potential for increased site densities – in some locations there is potential for increasing site densities. These have been explored on a site by site basis and are included in the individual site assessments where relevant.

### Step 3 – Call for Sites

- 4.5 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 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. An additional 50 sites were then submitted between November 2015 and August 2016.
- 4.6 The call for sites remains an open process so as not to limit opportunities, however only the sites submitted by August 2016 appear in this version of the SHELAA. Sites submitted after this date will appear in a SHELAA update next year.

#### **Step 4 – Site Survey**

- 4.7 All submitted sites underwent an initial site survey and these were presented to the Planning Advisory Committee in June 2016. Using information and constraint data from the District Council's in-house GIS system, information provided by the application on the submission form, and information from relevant planning applications, the surveys set out the key issues for each site and what further consideration they required in advance of the full site assessment.
- 4.8 All submitted sites were visited by officers to verify information gathered through the above desktop exercise. Site visits also enabled officers to establish whether there were any additional uses and/or constraints present on the site which had not been picked up in the desktop exercise. In the vast majority of cases site visits were unaccompanied but on rare occasions, either for safety or access reasons, officers were accompanied by site promoters and/or landowners. Photographs were taken on each site.
- 4.9 Following the desktop exercise, sites were placed into one of five categories:
- Category 1 – sites within identified settlements
  - Category 2 – 100% brownfield sites in the Green Belt
  - Category 3 – Partial brownfield sites in the Green Belt
  - Category 4 – Greenfield sites in the Green Belt adjacent to identified settlements
  - Category 5 – Greenfield sites in the Green Belt in rural locations
- 4.10 These categories represent a priority order for sites to be assessed with category 1 usually representing the most sustainable sites, and category 5 representing the least sustainable. Sustainability is measured in two ways, taking account of locational sustainability but also looking at the sustainable use of land i.e. brownfield sites.
- 4.11 Brownfield land was considered in the wider sense to include agricultural and horticultural buildings and quarries. It was considered that many of these sites were unlikely to return to being a 'green field' and future development that is of high quality design would therefore, in many cases, represent a sustainable reuse of the land whilst at the same time allowing the undeveloped Green Belt to continue to be protected.

#### **Step 5 – Site Assessment**

## **Suitability Assessment**

- 4.12 Suitability is a high level assumption about whether a site could be developed, not whether a site should or will be developed. The suitability of a site is one, albeit crucial, aspect of the SHELAA assessment. Determining a site's suitability is done by taking into account the information available to the District Council to help build up a picture and general understanding of the site in relation to its development potential.
- 4.13 Consideration was given to the suitability of all sites within categories 1-4. A judgement was made that if a greenfield site was not within or immediately adjacent to an identified settlement, then it would not be a suitable location for development at this point in time. The exception to this was if a SHELAA site, when combined with another SHELAA site, would be adjacent to an identified settlement. In this context, the Green Belt boundaries were used to define whether a settlement was sustainable or not, as these boundaries define the larger settlements in accordance with the Settlement Hierarchy. Therefore, category 5 sites were considered locationally unsustainable and therefore unsuitable and given no further assessment.
- 4.14 For sites within categories 1-4 both environmental and physical constraints were given consideration, and where sites were found unsuitable due to issues such as flooding, ancient woodland, impact on the AONB, unsuitable access or topography, the reasons are clearly set out in the site assessment. If sites had no known constraints or limitations that would prevent development, then sites were viewed as being suitable.
- 4.15 Generally, and unless otherwise stated in the assessment, brownfield sites were found suitable. Many of these sites are run down and not fit for purpose. If they are not redeveloped they will become ever more redundant, unsafe, and will impact negatively on the character of the area. In many cases redevelopment would help improve the character of the area.
- 4.16 It is important to note that existing policy constraints such as the Green Belt were not considered to prevent the site from being assessed to be suitable, but would rely on other evidence e.g. the Green Belt Assessment to assess whether that designation should change through the Local Plan process. The District Council has made a commitment to explore the reuse of brownfield land in the Green Belt. The remaining Green Belt sites submitted through the call for sites process are not likely to be considered further unless an 'exceptional circumstances' case can be made.
- 4.17 Finally, as part of the suitability assessment and in accordance with the PPG and the agreed methodology, the SHELAA only considers sites capable of delivering 5 or more dwellings or economic development on sites of 0.25 hectares (or 500sqm of floorspace) and above. However, because this document does not include a windfall assessment, and not to limit opportunities, smaller sites have been included for the purposes of land supply. When a windfall assessment is undertaken in the coming months, these smaller sites will not be included in order to prevent double counting.

## **Availability Assessment**

- 4.18 Availability helps to establish whether a site is a valid option for consideration and relates to a landowner's willingness to see a site developed. Given the role of the

SHELAA in enabling the District Council to establish a land supply for future development, if there is an element of doubt over whether a site will come forward or that certain constraints prevent it from being considered available then it cannot realistically be included as a potential option.

4.19 Applicants were asked, when submitting their sites, to indicate the following:

- Details of land ownership/land interests;
- Whether all of the owners/those with a land interest are aware of the submission;
- Whether there are any known ownership issues;
- Whether any work has been undertaken on the promotion of the site;
- Whether any services/utilities are available on or to the site;
- Details of when they expect the site to become available for development.

A judgement was then made based on the information submitted by the applicant as to whether the site was available, and when it is likely to come forward.

4.20 Sites put forward that are already allocated for a specific use were found not to be available if there is evidence indicating that particular use should be retained. Where this is the case the reason is clearly set out in the assessment.

### **Achievability Assessment**

4.21 The PPG states that 'a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time' (para 021). It goes on to explain that 'this is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period'.

4.22 Assessing achievability requires specialist knowledge and an understanding of market factors, cost issues and delivery of development. A viability assessment on the full Local Plan will be undertaken further down the line, but for the purposes of the SHELAA a judgement was made in each assessment as to whether there is likely to be any abnormal costs associated with developing the site.

### **Site Capacities**

4.23 In order to estimate the potential capacity of a site the developable area is multiplied by the appropriate density. For the sites that have been assessed as 'suitable', an estimated yield has been provided.

### **Developable Areas**

4.24 The developable area is not always the same as the gross area of the site. This can be due to issues such as (but not limited to) constraints that cannot be overcome e.g. flooding or ancient woodland, the requirement for new infrastructure on the site, topography or potential land contamination. Where this is the case the justification is clearly set out in the assessment.

4.25 Where sites contain a mix of brownfield and greenfield land (category 3), it was assumed that the brownfield part of the site was suitable, and in these cases the developable area has been reduced to reflect this.

### Density

4.26 The PPG states that ‘the estimation of the development potential of each identified site should be guided by the existing or emerging plan policy including determined policies on density’ (para 017). Policy SP7 in the Core Strategy sets out the adopted densities for new housing development across the District. These vary between 75 dwellings per hectare in the town centres down to 30 dwellings per hectare in more rural areas. Given the increased need for housing it is considered that densities could be increased to ensure land is used in the most efficient way. Therefore, whilst the densities set out in Core Strategy Policy SP7 have been used to provide a baseline, the assessments also include a site capacity based on a higher, but still realistic, density. This approach is supported by the Government’s direction of travel towards higher densities in the recently published Housing White Paper.

4.27 As the Local Plan progresses further work will be undertaken on characterisation, which may influence and adjust the densities set out in the SHELAA on a site by site basis.

### Timing Assessment

#### Deliverable Sites

4.28 Paragraph 47 of the NPPF requires local authorities to identify deliverable sites. ‘To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years’ (footnote 11).

4.29 For the purpose of the SHELAA the availability of each site has been determined using information provided by the landowner or promoter in their submission form. Applicants were requested to indicate a broad time frame that they anticipated the site would become available. Sites were considered deliverable if they were found suitable, achievable, and if it was anticipated that the site would come forward within 1-5 years, unless there was other specific information to suggest that the site would not be available within 5 years.

4.30 Figure 2 below sets out, by category, the number of deliverable sites, and the potential number of units these sites could yield. The individual site assessments can be found at Appendix B.

	No. deliverable sites	Potential no. units
Category 1	16	139 - 184
Category 2	26	375 - 506
Category 3	52	621 - 847
Category 4	35	1,910 - 2,547
Category 5	N/A	N/A

Figure 2: Sites considered deliverable

### Developable Sites

- 4.31 Paragraph 47 of the NPPF requires local authorities to identify developable sites. 'To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged' (footnote 12).
- 4.32 The availability of each site has been determined as per paragraph 4.29 above. Sites were considered developable if they were found suitable, achievable, and if the landowner or promoter anticipated that the site would come forward during years 5-10 or years 10-15.
- 4.33 Figure 3 below sets out, by category, the number of developable sites, and the potential number of units these sites could yield. The individual site assessments can be found at Appendix B.

	No. developable sites	Potential no. units
<b>Category 1</b>	4	121 - 160
<b>Category 2</b>	2	16 - 22
<b>Category 3</b>	4	214 - 286
<b>Category 4</b>	12	2,608 - 3,478
<b>Category 5</b>	N/A	N/A

Figure 3: Sites considered developable

### 5. Employment Sites

- 5.1 The Economic Needs Study (ENS) was completed in September 2016 and identified a need for 11.6 hectares of B1-B8 employment floorspace over the plan period 2015-35, of which 7.2 hectares should be suitable for office (B1a/b) use, 1.1 hectares for industrial (B1c/B2) use and 3.3 hectares suitable for warehouse and storage (B8) use. The existing commercial sites and land in the District were analysed and it was found that the majority of these sites were performing well. None were performing poorly.
- 5.2 The ENS recommended that the District Council considers the expansion of some of the existing employment sites as well as looking at new sites in order to meet the identified need.
- 5.3 A total of 14 sites were submitted through the call for sites process for employment use. These were a mix of existing sites put forward to be expanded, and new sites on greenfield land. The sites were assessed in exactly the same way as the housing and mixed use sites. The individual site assessments can be found at Appendix B.
- 5.4 12 of the 14 sites have been assessed as being suitable, in addition to 10 mixed use sites that have been considered suitable for employment only development. In addition, and based on the recommendation to retain existing sites based on their satisfactory performance, all current employment allocations were re-appraised, and these can be found at Appendix D.
- 5.5 These sites that have been assessed as suitable, available and achievable will be analysed further in the coming months to establish (based on the standards set out in

the ENS) how much of the identified need they can accommodate. This analysis will also take into account the latest and most recent completion data and new planning permissions for the monitoring year 2016-17 as well as any employment floorspace that may be lost as a result of prior approval applications.

## 6. Next Steps and Future Updates

- 6.1 The SHELAA is an iterative process and as such, any future reviews will incorporate any new information put forward to the District Council. This will include any new sites and any additional information about the identified sites. Further consideration will also be given to windfalls and non-implementation rates in the coming months, as well as revising site capacities and developable areas in cooperation with the relevant landowners or site promoters.
- 6.2 It is intended that the SHELAA will be updated annually to take account of these variables. Given that new and additional information may be submitted to, and considered by, the District Council at any time, **conclusions on the suitability, availability and achievability of the identified sites can change, as can assumptions on whether sites are deliverable or developable.**

### Appendices hosted online only:

Appendix 1 – SHELAA Methodology

Appendix 2 – Site assessments by Category 1-5

Appendix 3 – Sites with existing permissions

Appendix 4 – Review of ADMP allocations