

**Stratford-on-Avon  
District Council**

**Strategic Housing Land  
Availability Assessment  
Review 2009**

**Final Report**

July 2009



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# 1 Introduction

## 1.1 Background

- 1.1.1 This draft report provides the initial findings of the first review of the Stratford-on-Avon Strategic Housing Land Availability Assessment (SHLAA).
- 1.1.2 The original SHLAA was produced from mid 2007 by Baker Associates on behalf of the Council. A final version of the document was issued in February 2008 (The 2008 SHLAA). However, the need for the updating of the SHLAA “at least annually” is set out in Strategic Housing Land Availability Assessment Practice Guidance (CLG July 2007) and therefore the Council commissioned Baker Associates to undertake the work to update the study.
- 1.1.3 In considering the SHLAA update discussions were held regarding the extent of the original study and also the emerging background position with regard to the Local Development Framework (LDF) and the Regional Spatial Strategy (RSS).
- 1.1.4 The full West Midlands Regional Spatial Strategy (formerly RPG 11) was initially published by ODPM in June 2004. Following the publication of the Phase One Revision in respect of the Black Country sub-region by CLG a revised WMRSS was issued in January 2008 and forms the basis of the Development Plan at present.
- 1.1.5 However, work continues on the RSS Phase Two, which was subject to consultation at the end of 2008 and an Examination in Public is currently underway and will continue until Mid May.
- 1.1.6 The emerging RSS indicated a requirement of 5,600 dwellings to be provided in Stratford-on-Avon District Council in the period 2006 – 2026 (equivalent to 280 per annum). This has however been subject of further study and a study on behalf of GOWM (by Nathaniel Lichfield and Partners) potentially increases this figure further.
- 1.1.7 The actual housing target will not be known until early 2010 when the Phase Two Revision is published, by which time the Phase Three revision will have also been launched.
- 1.1.8 Within this context the District Council produced (October 2008) a Draft Core Strategy (DCS) for consultation which considered the opportunities for the provision of housing, based in part on the evidence emerging from the 2008 SHLAA. This consultation document included draft policies relating to housing provision and also identified potential locations for housing (and other) growth.
- 1.1.9 The SHLAA methodology to be followed for the update has been required to consider the extent and findings of the 2008 SHLAA and recognize the evolving policy background, as well as the changing status of the sites previously considered as part of the 2008 SHLAA.

- 1.1.10 A steering group, including a range of stakeholders such as HBF, developers, County Council, Government Office and CPRE, was set up at the outset of the study in order to consider all of these issues and guide the SHLAA process.
- 1.1.11 An initial methodology for the study was tabled in early November 2008 and agreed following a meeting on the 19<sup>th</sup> November 2008. A copy of the agreed methodology is included as Appendix A of this document and a brief description of the main elements are set out in Section 2.
- 1.1.12 The following sections then detail the findings of this study;
- 1.1.13 Section 3 provides figures for the completion of dwellings since 2006, which may be set against the emerging RSS housing requirement for the District.
- 1.1.14 Section 4 indicates the number of dwellings currently identified as being available with planning permission on the established base date for this study, which is 1<sup>st</sup> April 2008.
- 1.1.15 Section 5 considers all other sites brought to the attention of this study from a range of sources. It identifies those sites where it is considered that the principle of development is accepted and that the sites meet the key SHLAA tests of being Suitable, Available and Achievable.
- 1.1.16 This section includes an assessment of sites on the edge of the main settlements where the 2008 SHLAA identified broad locations for development. These sites are identified separately from those which are within settlements, where current planning policy would support their development.
- 1.1.17 Sites outside of the Built up Area Boundaries of settlements, as defined in the Adopted Local Plan, will require allocation through the LDF process if they are to be "Suitable" for development as per the SHLAA Practice Guidance. Therefore, they cannot be relied upon as "Deliverable" at present but may be considered "Developable" in the future as they may provide a source of future housing land within the terms of the SHLAA. Sites promoted to the study (therefore are Available) which are considered practical to develop economically (they are Achievable) but which are subject to current policy constraints and are therefore not Suitable at present, are identified separately in this section.
- 1.1.18 Sites which are currently identified as being potentially deliverable through Adopted Local Plan policy COM.1, have also been identified in this section. However, in line with the agreed methodology, no widespread search for new sites in these locations has been undertaken.
- 1.1.19 Section 6 draws together the findings of the first sections to identify the current available housing land and compares these figures to the emerging requirement of the RSS.
- 1.1.20 The decision as to the allocation of land for development rests with the LDF, not the SHLAA and not all areas identified as broad locations or which are currently constrained by planning policy may be brought forward through the LDF. However, the assessment indicates that if available sites were to be brought

forward for development the requirements of the RSS, as currently identified, may be met. However, if higher figures, as are being considered through the Examination in Public, were to be adopted by the RSS, then even with the development of identified sites within Broad Locations may not meet the RSS requirements.

- 1.1.21 The final RSS requirement remains unknown and therefore the SHLAA provides a stock of potentially developable land for housing to meet the requirements when defined. In order to identify which sites will be brought forward the Council will undertake further assessment of the sustainability of settlements, their future roles and functions, as part of the Core Strategy.
- 1.1.22 The SHLAA therefore provides no comment on the relative merits of different settlements, locations or sites. The SHLAA considers the principle of development of sites, if the settlement or location were considered to be a sustainable location for development.
- 1.1.23 The 2008 SHLAA considered the opportunities for housing delivery through Windfalls and also through the consideration of broad locations.
- 1.1.24 It has been agreed by the Steering Group that the analysis of windfall should be reassessed as part of this study in order to reflect the changing study threshold and also the availability of figures for 2007 – 8.
- 1.1.25 Section 7 therefore provides a revised Windfall calculation reflecting the changed circumstances.
- 1.1.26 Section 8 does not provide any further assessment of Broad Locations for development but simply points to the findings of the 2008 SHLAA which undertook an assessment of locations around each of the study settlements.
- 1.1.27 Finally Section 9 draws provides a summary of findings.

## **2 Methodology**

### **2.1 Introduction**

- 2.1.1 In order to guide the SHLAA review, a steering group of key stakeholders was set up at the outset and asked to agree a methodology for the study team to follow in undertaking the update.
- 2.1.2 The original study had followed closely the requirements set out in the SHLAA Practice Guidance (July 2007) and the subsequent advice issued by PAS. It was therefore felt to be robust in regard to the relevant requirements. However, it was constrained to an extent by available resources.
- 2.1.3 Therefore certain elements of the key parameters for the study were reconsidered and some altered to reflect changing circumstances. The categorization of sites was amended to provide a greater spectrum of sites to be considered in order to give the Council the maximum range of sites to consider in developing the LDF. However, in principle the study was undertaken in the same way as the 2008 SHLAA.
- 2.1.4 The brief sections below set out the main elements of the study, reflecting the SHLAA Practice Guidance stages.

### **2.2 Stage 1: Planning the Assessment**

- 2.2.1 As previously discussed, a Steering Group of key stakeholders were asked to comment on the methodology for the study and also provide input during the drafting of the documents.
- 2.2.2 English Heritage was the only organisation which provided written comments on the draft methodology. These comments (Letter dated 03.11.08) considered the role of the historic environment in considering both the suitability of sites for development and the dwelling yield which may result from development in areas of historic interest.
- 2.2.3 Discussions with representatives of English Heritage confirmed that the methodology of the study was robust in its draft form and concluded that changes were not necessary. However, it was acknowledged that the historic environment is likely to be an important consideration in the assessment of many sites and the SHLAA has considered these aspects in reaching the conclusions in this document.
- 2.2.4 Following a meeting of the Steering Group, it was agreed to amend the study parameters from the SHLAA 2008.

#### Time Periods

- 2.2.5 The SHLAA 2008 provided analysis for the period 2006 – 2026, which reflects the RSS and LDF plan periods.

- 2.2.6 There is no need to amend this study period and it has been adopted for this review.

#### Base Date

- 2.2.7 In order to provide clarity with regard to findings, and also in order to ensure compatibility with other Council documents, a base date for the 2008 study was chosen of 1 April 2007.
- 2.2.8 The review updates all figures to 1<sup>st</sup> April 2008, which was the revised base date for the 2009 SHLAA.
- 2.2.9 The findings are presented in 5 year time bands from the base date, as before.

#### Study Extent

- 2.2.10 The “Call for sites” issued in May 2007 sought to identify opportunities for housing provision in Stratford-upon-Avon, any of the 8 settlements identified as a Main Rural Centre (MRC) or any one of the 21 Local Centre Villages (LCV).
- 2.2.11 All of the sites coming forward in Stratford-upon-Avon and the MRCs were assessed by the project team, while the sites in LCVs were listed in an Appendix of the study but not assessed by the project team. The details of the latter sites have been retained by the District Council to assist in the identification of opportunities for “local choice” developments under Policy COM.1 of the Adopted Local Plan.
- 2.2.12 The Adopted Local Plan and the emerging Core Strategy for the district both focus future development on the Main Rural Centres and Stratford-upon-Avon, avoiding dispersal to the smaller settlements. Therefore, in the context of limited resources it was considered that the focus for identification of sites in this review of the SHLAA should be these main settlements.
- 2.2.13 One of the Steering Group members, Residents Against Shottery Expansion (RASE), did not agree with this approach and felt that a wider scope should be considered. It was concluded by the Steering group as a whole that the approach of the study is robust and reflects the emerging policy background, as well as reflecting the resources available to the study.
- 2.2.14 While the scope of the SHLAA review has been defined on this basis, as stated in para. 54 of PPS3, the District Council can call upon information derived from sources additional to the SHLAA when identifying sites for new housing in Local Development Documents. Therefore, the scope of the SHLAA review should not be seen as preventing the District Council from giving due consideration to alternative locational development strategies if the need for such is seen to arise as preparation of the Core Strategy is progressed.
- 2.2.15 Although this SHLAA review has concentrated on those settlements that are specifically identified for development in the locational strategy so far defined by the District Council, it also recognizes the opportunities for sites to emerge elsewhere through the Local Choice policy of the adopted Local Plan (COM.1),

the District Council having sought to save this policy and reflect it in the emerging Core Strategy. Therefore, a list of sites currently being considered for development justified by Policy COM.1 are included in this study, reflecting the potential delivery of dwellings from this source.

#### Site size threshold

- 2.2.16 The sites specifically identified and assessed in the original study are only those which might yield 10 or more dwellings. This was, as suggested in the SHLAA Practice Guidance, a response to the resources available to the study at the time.
- 2.2.17 It was agreed by the Steering Group that an extension of the study to consider smaller sites, which may yield 6 or more dwellings, is appropriate in order to seek to identify as many site specific opportunities as is possible.

### **2.3 Stage 2: Determining which sources of sites will be included in the assessment**

- 2.3.1 In line with the 2008 SHLAA, the Steering Group confirmed that the whole range of potential site sources should be considered as part of the review.
- 2.3.2 This included all sites allocated for development within the Adopted Local Plan but the Steering Group concluded that sites identified in the Draft Core Strategy as Development Opportunities should not be given weight in the assessment as the document has not been adopted and remains in the early stages of consideration.
- 2.3.3 In considering the sources of sites, the role of sites outside of the study extent has been considered. In addition to the sites emerging through the Local Choice policy mentioned in the preceding section, there remain some brownfield sites in the countryside or in smaller villages which may be suitable for development within the context of the development plan. However, the yield from these sites will be very limited as the adopted policy for these areas focuses on replacements dwellings and is generally then a policy of restraint. Therefore, these have not been surveyed as part of this study and the focus has been on larger urban areas, as applied by the steering group through the methodology.
- 2.3.4 Sites which lie outside of study settlements which have planning permission have been identified in this study and are counted in the figures in this document, as are sites specifically identified by the Council as potentially delivering housing as a result of COM.1 policies.
- 2.3.5 There are proposals for an Eco Town within the district at Long Marston, known as Middle Quinton. The proposals are being promoted by the land owners for approximately 6,000 dwellings.
- 2.3.6 The concept of Eco-Towns and the proposals for Long Marston itself have been subject of significant opposition. The Governments Draft PPS Eco-Towns was subject of consultation until 30<sup>th</sup> April 2009 and the proposals in Stratford-on-Avon remain subject to legal challenge.

- 2.3.7 Even if the scope of the SHLAA review were broad enough to include rural brownfield sites, the uncertainties over delivery described above would make it difficult for the Long Marston site to be included as a site opportunity with the capacity sought by the promoters of the Middle Quinton Eco-Town concept. However, much information about the site has been separately compiled and is now available to inform the preparation of Local Development Documents as and when the need arises.

#### Call for sites 2008

- 2.3.8 As a result of changes to the study threshold and in order to identify the maximum range of potential sites, a widespread "Call for sites" was undertaken in November and December 2008.
- 2.3.9 Agents, developers and land owners were invited to promote sites for inclusion in the review.
- 2.3.10 Over 400 letters were sent to individuals and organisations identified by the District Council and details of the study and call for sites were posted on the Council's website and reported in the local press.
- 2.3.11 As a result 35 sites not previously identified were brought to the attention of the study and further information on 20 sites which were previously considered was submitted.

### **2.4 Stage 3: Desktop review of existing information**

- 2.4.1 The 2008 SHLAA and other sources of written material were assessed as part of the SHLAA review.

### **2.5 Stage 4: Determining which sites and areas will be surveyed**

- 2.5.1 The status of all sites previously identified in the SHLAA 2008 was considered and any where circumstances were known to have changed were revisited, as were any new sites identified as part of the study, within or adjacent to the study settlements.
- 2.5.2 Where sites previously identified had been considered not developable and circumstances were not known to have changed, the sites were not revisited.

### **2.6 Stage 5: Carrying out the survey**

- 2.6.1 All sites which may potentially yield dwellings in the future were surveyed and each of the main settlements was visited in order to identify further opportunities.

### **2.7 Stage 6: Estimating the housing potential of each site**

- 2.7.1 Each site which may be deliverable or developable was assessed as to the potential delivery of housing.

- 2.7.2 This process was undertaken through the application of density multipliers, the assessment of particular site characteristics and, in some cases, an assessment by a panel of local agents and developers.

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

- 2.8.1 An assessment criteria schedule was included in the agreed methodology for the review.

### Stage 7a Assessing suitability for housing

- 2.8.2 The suitability of sites for development in principle has been assessed. This is necessarily an initial assessment considering the principles of development and based on the information available at the time of writing. The assessment considers the physical characteristics of the sites which are able to be judged from a site inspection from public areas, the impacts of the development on potential occupants having made assumptions regarding the likely character of development and the surrounding land uses and also policy restrictions.
- 2.8.3 It is not possible, within the bounds of the study, to provide a detailed assessment of every site and it is likely that further information regarding sites will come forward over time. This information may be used to inform the LDF process and also future revisions of the SHLAA.
- 2.8.4 It has been agreed that the relevant policies which are applied to sites are those in the Adopted Local Plan and sites which are currently clearly contrary of these policies cannot be considered to be Deliverable at this point in time. However, sites which are assessed to be suitable for development in all other regards have been identified as such in this study.
- 2.8.5 The majority of these sites lie within areas assessed to be Broad Locations in the 2008 SHLAA. There are also some, generally smaller sites, which do not lie within Broad Locations which have characteristics which indicate that their development may be suitable if the policies of the Council were to alter. Notably this applies to the alignment of Built Up Area Boundaries where there may be sites on the edge of settlements which could be suitable for development. Other examples may be sites allocated for uses other than housing which are currently protected from development but which may be reconsidered as part of the wider LDF.
- 2.8.6 It was agreed that the policies of the Draft Core Strategy should not be given any weight in the assessment of sites.

### Stage 7B: Assessing availability for housing

- 2.8.7 As in the SHLAA 2008, the availability of sites was judged through the intentions of land owner or developers. Clear evidence from interested parties has been gathered in order to justify the inclusion of sites in the study as being developable.

### Stage 7c: Accessing achievability for housing

- 2.8.8 The viability of sites in the SHLAA 2008 was judged by the consultant team based on a review of the existing market at that point in time.
- 2.8.9 In undertaking this review a panel of local developers and agents were asked to consider the viability of a selection of sites based on their knowledge of the local markets and available site information.
- 2.8.10 This panel visited a selection of sites representing a variety of scenarios from within the district. A panel meeting was held in March 2009 in order to arrive at a view on the sites in question.
- 2.8.11 Following the meeting the discussions held and the views on specific sites were applied to the sites in question and to other similar sites identified by the study.

### Stage 7D: overcoming constraints

- 2.8.12 The constraints to development were identified through the process of considering sites and where they remain a barrier to development the sites are rejected.
- 2.8.13 Where sites are considered suitable for development the constraints, notably the impact of development on neighbours, was considered as part of the overall assessment. One of the Steering Group members, RASE, considered that explicit information on this topic should be made public. However, the Steering group as a whole concluded that the approach taken is robust and no further assessment of sites is necessary.

## **2.9 Stage 8 Review of the assessment**

- 2.9.1 Following the assessment of sites from all sources the findings were brought together in relation to the likely requirements for housing, as emerging in the RSS.

## **2.10 Stage 9 Identifying and assessing the housing potential of broad locations**

- 2.10.1 An assessment of all areas around main settlements was undertaken as part of the 2008 SHLAA.
- 2.10.2 It was agreed as part of the methodology, that no further work would be undertaken on the consideration of broad locations. However, sites within these broad locations were assessed in the light of this previous assessment.

## **2.11 Stage 10: Determining the housing potential of windfall**

- 2.11.1 The 2008 SHLAA included an assessment of windfall based on available data from 1987 – 2007. This assessment reflected the study threshold at that stage, 10 dwellings.
- 2.11.2 This review has sought to identify sites yielding 6 or more dwellings and therefore it was agreed with the Steering Group that the assessment of windfall should be recalculated on this basis, and in addition figures for 2007 – 8 added to the assessment in order to reflect the most current position.

## **2.12 Summary**

- 2.12.1 The SHLAA review has been undertaken in line with the advice of the CLG Practice Guidance 2007 and develops the methodology from the 2008 SHLAA.
- 2.12.2 It seeks to provide the Council with a robust evidence base in order to inform the LDF process.

### **3 Completions**

3.1.1 Figures for the completion of dwellings in 2006/7 were included in the original SHLAA and figures for 2007/8 are now available.

3.1.2 The total (net) number of dwellings completed since 1 April 2006 are:

- 2006/07 455
- 2007/08 394

3.1.3 These figures can be set against the total requirement for housing from the emerging RSS.

## **4 Sites with planning permission**

- 4.1.1 Section 4 and Appendix 1 of the SHLAA 2008 report indicated the potential delivery of housing from sites with planning permission of all sizes.
- 4.1.2 These figures have been updated to the current base date, 1<sup>st</sup> April 2008, based on council records.
- 4.1.3 The assessment of sites has been split based on the study threshold. Therefore Appendix B contains two tables; the first indicates those sites which will yield 6 or more dwellings (large sites), the second, yielding 5 or less development (small sites).
- 4.1.4 In order to provide robust evidence regarding the majority of dwellings, the agent for each extant application yielding 6 or more dwellings has been contacted in order to confirm that the site remains available for development and also to indicate the likely timescale for implementation. With regard to “small “sites no investigation of the sites has been possible within the remit of this study.
- 4.1.5 However, the Council does have information on many of the sites involved and this study reflects the Council’s assessment of the status of these sites and the likelihood of their completion.

### Large sites

- 4.1.6 The table at Appendix B1 indicates that a total of 752 dwellings may come forward for development within 5 years on sites with planning permission for 6 or more dwellings.
- 4.1.7 The delivery of these dwellings has been investigated through discussions with agents and/or land owners and some sites which have planning permission have been given a zero yield at this stage, reflecting the circumstance of the site.

### Small sites

- 4.1.8 Figures for small sites (less than 6 dwellings) with planning permission have been included as Appendix B2.
- 4.1.9 This indicates that a total of 167 dwellings (net) may come forward in the next 5 years. This figure reflects the net delivery of housing, which is reduced from the gross figure of 290 as many small sites involve the replacement of an existing dwelling.
- 4.1.10 As discussed above, the Council has some information relating to sites which indicates that some are now unlikely to deliver housing despite having a valid consent. These have been identified as delivering a 0 yield in Appendix B2. It may be that some of these sites subsequently are shown to be deliverable, at which point they will be included within future revisions of the SHLAA. However, the figures are based on current best knowledge.

Overall potential supply of dwellings

- 4.1.11 The total estimated delivery of dwellings from planning permissions has fallen since the 2008 SHLAA. This in part is due to the completion of numerous sites in a strong housing market in combination with the Council's moratorium on new housing and the additional assessment of potential site delivery undertaken by the Council for this study.

## 5 Site specific sources

### 5.1 Introduction

- 5.1.1 The main area of study in the SHLAA focuses on the identification and consideration of site specific sources for housing development. In the 2008 SHLAA this involved the assessment of over 450 sites against the tests of Suitability, Availability and Achievability as set down in PPS3 and the SHLAA Practice Guidance.
- 5.1.2 The circumstances relating to all of these sites have been reviewed in order to identify whether sites continue to meet the tests. In addition, new sites which have been identified from a range of sources, including pre application discussions with officers and late submission to the previous SHLAA have been included.
- 5.1.3 The methodology was expanded through agreement with the Steering Group to reconsider the threshold for sites in order that specific sites yielding 6 or more dwellings be identified.
- 5.1.4 In order to identify the smaller specific sites and also to seek to identify further larger sites, a call for sites was undertaken in late 2008. The widespread publicity regarding the review and the inclusion of new sites known to the Council, resulted in 35 additional sites being added to the total list.
- 5.1.5 In assessing all sites it was agreed that a range of categories be applied to sites in order for the study to identify as wide a range of sites as is possible for the LDF to draw upon.
- 5.1.6 Therefore sites located within the study settlements and of a scale which might deliver 6 or more dwellings, were considered against the criteria agreed by the SHLAA Steering Group at the outset of the study and categorized into one of four categories:
1. Sites which meet all tests of suitable, available and achievable. These sites are considered to be developable within the current policy framework and could come forward, subject to gaining planning permission, in the short term.
  2. Sites which are available for development and would be achievable (viable to develop) and which are located within Broad Locations for development. These sites would not be developable within the current planning policy framework but are located within areas considered suitable in principle for development in the medium to long term, based on analysis undertaken as part of the 2008 SHLAA. Before the sites can come forward the LDF will need to consider the relative merits of settlements and locations in order that the most appropriate locations are brought forward for development.
  3. Sites which are available for development, are likely to be achievable (viable) and are considered to be practicable to develop in line with the criteria of the SHLAA study but are currently contrary to local policy designations and are outside of identified Broad Locations for development. These sites are generally

small scale opportunities which provide an opportunity for development in a sustainable manner but current local plan policy constrains development. However, some of the sites are relatively large and would potentially have significant landscape and highways impacts.

4. Sites which are not available for development as they are not being promoted at present, those which are contrary to clear cut designations such as flood or nature conservation designation, and those sites which would clearly not be viable to develop due to on site constraints such as ransom strips or infrastructure requirements.

## **5.2 Findings per settlement**

- 5.2.1 The findings of the SHLAA assessment are presented in Appendix C and D.
- 5.2.2 In Appendix C a table for each settlement provides a summary assessment for each site and a conclusion as to the status of that site.
- 5.2.3 In appendix D each settlement is mapped showing the sites considered and their reference number for the purposes of this study. The sites are colour coded to reflect their assessed status.
- 5.2.4 The sites are given a status based on the SHLAA assessment and reflecting their position as at the base date of 1<sup>st</sup> April 2008.
- 5.2.5 The sites are divided between the following categories:

### Sites with planning permission at the base date.

- 5.2.6 Sites which were subject to extant consent for 6 or more dwellings (on 1.4.08) are identified as such on the maps and in the summary tables.
- 5.2.7 The likely delivery of housing from this source is indicated in Appendix B and has been verified through discussions with relevant land owners and developers.
- 5.2.8 The analysis indicates that a total of 919 dwellings may come forward from all sites (yield of 1 or more dwellings) in the first 5 years after the base date. These figures include sites with planning permission which are not within the study settlements and therefore not shown on the maps. This includes three “large” sites included in Appendix B1 and numerous smaller sites included in Appendix B2.

### Developable sites

- 5.2.9 In order for sites to be considered developable the following three key tests must be met:
  - Available; that the site is available now, or there is a reasonable prospect that it will be available at a specific point in time.

- Suitable; that the site is in a suitable location for housing and would contribute to the creation of sustainable mixed communities. This includes compliance with the adopted Development Plan for the District, which includes the Adopted Local Plan but excludes the policies of the draft Core Strategy.
- Achievable; that there is a reasonable prospect that housing will be economically viable and therefore developed.

5.2.10 Sites which meet all three tests are indicated in the maps of settlements and in the associated table.

5.2.11 These sites are drawn together into a separate table, Appendix E, which demonstrates the potential delivery of housing from all identified sites.

5.2.12 This table indicates that a total of 296 dwellings may come forward from sites identified by this study.

5.2.13 Individual site assessment sheets for each developable site are included at Appendix F, these provide evidence as to how the site has been assessed and the calculation of dwelling yield which may result.

5.2.14 This dwelling yield has been arrived at through a combination of site assessment and the consideration of evidence provided by site owners and developers, as well as the District Council.

#### Sites within Broad Locations

5.2.15 As a part of the analysis of identified sites, the sites located on the edge of settlements which are located within the Broad Locations identified as part of the 2008 SHLAA, have been assessed.

5.2.16 These sites are considered to be potentially suitable for development in the longer term. However, their location outside of Built Up Area Boundaries means that they are currently not considered suitable when compared against adopted policy.

5.2.17 The yield for housing arising from these sites has been calculated based on assumption for the level of dwellings which might come forward and the likely level of development for other uses as part of the site. This will be subject of further detailed consideration through the LDF.

5.2.18 Generally a yield of 35 dwellings per net developable area has been applied, reflecting a reasonable yield considering the requirements of PPS3.

5.2.19 With regard to the identification of net areas a consistent approach was applied, calculating a net area based on the overall gross site promoted. This assessment assumed a lower net developable area for larger sites to reflect the increased need for infrastructure, mix of uses and structural landscaping. Therefore a site of less than 5ha may be considered to have a net to gross of 90%, whilst a much larger site of 50ha may have a net to gross of 75%.

- 5.2.20 A summary of potential yield from these sites is shown separately in Appendix G and assessment for each site included in Appendix H.
- 5.2.21 This assessment indicates a total likely delivery of 5,855 dwellings on specific identified sites within Broad Locations.
- 5.2.22 This figure provides an indication of the likely delivery of housing. However, it must be acknowledged that the identified sites do not necessarily relate to all broad locations identified in the 2008 SHLAA. There are broad locations identified in the 2008 SHLAA where no land is being promoted for development.
- 5.2.23 Thereby the figure for delivery from this source will reflect a lower level of delivery than might be anticipated if all suitable broad locations were to be delivered.
- 5.2.24 The SHLAA does not allocate any land for development and the consideration of sites in this category does not give them any status in terms of the development plan.
- 5.2.25 The identification of sites for development in the future will be determined through the Core Strategy and relevant Development Plan Documents. Therefore, not all of the broad locations will necessarily be taken forward and the figures provide sufficient flexibility for the Council to consider the strategic distribution of housing in relation to the creation of sustainable communities.
- 5.2.26 This assessment also does not preclude other locations being identified through the LDF process which may prove, through further analysis, to provide opportunities in a sustainable location.

#### Sites constrained by local policy

- 5.2.27 All available sites were reviewed as part of the SHLAA Review and those which had previously been discounted reconsidered and the reasons behind their rejections reconsidered.
- 5.2.28 Those sites where housing development might contribute to a sustainable pattern of development, but where current policy constraints prevent development were identified and reassessed.
- 5.2.29 The justification behind this assessment is that it may be that the LDF has to reconsider policies for development in the face of future housing requirements and therefore, in order to provide a robust evidence base, the SHLAA should identify the choices which the Council may make in order to meet future requirements.
- 5.2.30 In assessing sites the criteria set out in Appendix 2 of the adopted study methodology was used. Those sites which were contrary to the adopted local plan policies (Box 2) but were considered to be suitable for development based on the criteria in boxes 1, 3 and 4 of the appendix were included in this category and are illustrated on the settlement maps in Appendix C.

- 5.2.31 The sites are drawn together into Appendix I which includes a potential yield of housing from each identified site. This yield has been arrived at through a simple application of a multiplier of 30 dwellings per gross hectare for all sites.
- 5.2.32 The simple application of a multiplier is intended to provide an indication of the level of yield which may be possible without undertaking any detailed assessment of sites as the sites are very clearly contrary to policy and many are unlikely to be acceptable. However, the sites do represent a stock of available housing sites which may provide opportunities and which should be judged through the LDF process.
- 5.2.33 As a result of the reassessment a total of 9,788 dwellings were identified as potentially being developable if LDF policy were to allow for such development. However, it is clear that much further work is required in the justification of these sites through the LDF process.

#### Sites not currently developable

- 5.2.34 The majority of sites within the study have been assessed as being “Not currently developable”, that is that they do not meet one of the three key criteria.
- 5.2.35 These sites are identified and the reason that they are considered currently undevelopable is set out in the summary table for each settlement (Appendix D).
- 5.2.36 The District Council provided a complete list of sites in its ownership to the study for assessment. Many of these sites are not currently available for development as the Council has no intention of selling the land. Furthermore many of the sites are of high amenity value or in other active uses, which makes the sites unsuitable.
- 5.2.37 Many of the sites which are undevelopable have been identified through the earlier Urban Capacity Study. These sites have often not been promoted since that time and there is no realistic proposition of them coming forward for development. Therefore they are not considered available at this time but should be monitored by the Council in future SHLAAs.
- 5.2.38 Finally, there are sites which have been promoted to the SHLAA study in 2007 or 2008 but which are not considered suitable for development. In many instances these sites are located outside of the study settlements but not within broad locations as defined in the 2008 SHLAA. Alternatively they often are subject of clear cut designations such as SSSI and notably flood risk area, or they do not have suitable highway access.

#### Sites below the study threshold

- 5.2.39 In order to make the most efficient use of resources, a study threshold of 6 or more dwellings was set at the outset of the review. This reduced the threshold from the 2008 SHLAA, which had a threshold of 10 or more dwellings.
- 5.2.40 Sites which obviously aren't capable of delivering 6 or more dwellings are excluded from detailed assessment in this review.

- 5.2.41 Sites below the study threshold but identified from what-ever source, are illustrated in the maps for each settlement but no assessment undertaken.
- 5.2.42 Some of these sites may be suitable for development and may come forward for development. As they do these sites will be identified as sites with planning permission in future SHLAAs.

Sites located outside of the study settlements

- 5.2.43 Sites located in settlements not defined as Main Rural Centres or Stratford-upon-Avon, or located in the countryside were not within the area of search of the SHLAA 2008 and this approach has remained consistent for this review.
- 5.2.44 This approach reflects the adopted local plan policy, proposed to be taken forward into the Core Strategy, that development be focused on the main settlements of the district. In this way the best use of available services and facilities can be achieved, with the intention of creating a sustainable pattern of development.
- 5.2.45 All sites promoted for development but lying outside of the study settlements have been mapped and given a reference number. However, no detailed assessment of these sites has been undertaken.
- 5.2.46 These sites are listed separately in Appendix J for reference.
- 5.2.47 In conjunction with this approach a limited review of figures held by the Local Authority has been undertaken in order to identify what level of housing development may come forward in these other settlements, or the countryside, as a result of local choice policy (COM.1).
- 5.2.48 Analysis of council figures indicates that in the period 2005 – 2008 40 dwellings were delivered as a result of Policy COM.1. (in parallel in the period 2001 – 2008 a total of 26 dwellings were built as a result of rural exceptions policy)
- 5.2.49 The draft figures for the 2008/9 period indicate the delivery of 10 homes as a result of a Local Choice Scheme being delivered.
- 5.2.50 Beyond this the Council can currently identify sites and schemes which may deliver approximately 121 dwellings in the future.
- 5.2.51 The list of these sites is included in the table below:

Table 5.1 Sites which may be delivered as a result of Policy COM.1

<b>Scheme title/location</b>	<b>No. of units</b>
<b>Long Compton.</b> Land east of Weston Court.	4
<b>Stretton-on-Fosse.</b> Land adj. Harolds Orchard.	4
<b>Napton.</b> Sites at (1) Fells Lane and (2) Priors Marston Road.	18
<b>Snitterfield.</b> Land north of Bearley Road.	14
<b>Bishops Itchington.</b> Land off Gaydon Road.	12
<b>Claverdon.</b> Land off Curlieu Lane, Norton Lindsey	12
<b>Fenny Compton.</b> Land north of Station Road	10
<b>Harbury.</b> Land at Bush Heath Lane.	13
<b>Ilmington.</b> Land at Armscote Road.	10
<b>Long Itchington.</b> Sites at (1) Land adj Russell Close & (2) Land off Stockton Road.	12
<b>Stockton.</b> Land off Glebe Close.	12

5.2.52 The sites identified are in varying stages of delivery and the timing of this delivery is uncertain. In principle all sites could be delivered within 5 years but in reality it is more likely that some sites will take significantly longer and others will not be delivered at all.

5.2.53 Therefore, it might be considered that on average 10 - 15 dwellings per annum might be delivered from this source for the next 10 years but this should be subject to monitoring by the Council as part of future SHLAA revisions.

5.2.54 At the present time it is suggested that a total of 130 dwellings might be expected to come forward in the period from 1.4.08 for 10 years.

## 6 Review of assessment

6.1.1 Drawing together the findings of the previous sections, the total identified supply of housing from identified sites is set out below.

Table 6.1. Housing potential on identified sites

Source of housing potential	2006-07	2007-08	2008 - 13	2013 - 18	2018 - 26	2008 - 26
Completions	445	394				839
Sites with planning permission						
Large sites			752			752
Small sites			167			167
Site specific sources						
Large sites			267	29		296
Sites within Broad locations				2,259	3,596	5,855
Policy Constrained sites				3,174	6,614	9,788
COM.1 sites			65	65		130
<b>Total housing</b>	<b>445</b>	<b>394</b>	<b>1,251</b>	<b>5,527</b>	<b>10,210</b>	<b>17,827</b>
<b>Average per annum</b>	<b>445</b>	<b>394</b>	<b>250</b>	<b>1,105</b>	<b>1,276</b>	<b>891</b>

6.1.2 The figures presented above draw together the various elements of analysis undertaken in the SHLAA review with regard to specific sites.

6.1.3 The figures reflect the range of potential housing land sources from sites which already have planning permission to sites which may be suitable for development but are currently considered contrary to adopted policies.

6.1.4 The total figure for available housing land provides for more houses than the RSS Phase 2 Revision Preferred Option proposes (5,600 dwellings) and is also in excess of the figures proposed by the GOWM study by Nathaniel Lichfield

(10,100 dwellings in all scenarios). However, the figures do include a number of sites which will require a significant shift in local policy if they are to be delivered for development and this can only occur through the development plan process.

- 6.1.5 Hence the majority of sites are identified to be delivered after 2013, which reflects the point at which the Core Strategy and associated Development Plan Documents might be adopted.
- 6.1.6 It is not for the SHLAA to propose that any or all of the sites identified might be allocated for development, nor that policies of the Council should be amended.
- 6.1.7 If the existing policies, which result in development being restricted, are maintained in the LDF this will have a consequential impact on the availability of land for development, such that only a little over 2,000 dwellings might be developable.
- 6.1.8 If this were to be the available supply the requirements of RSS Phase Two Revision, even at its lowest level, are unlikely to be met. Therefore, in line with the requirements of the SHLAA practice guidance non-site specific sources of supply have been considered, notably the updating of the assessment of the windfall calculations from the 2008 SHLAA, which are provided in the following section.

## **7 Windfall**

### **7.1 Introduction**

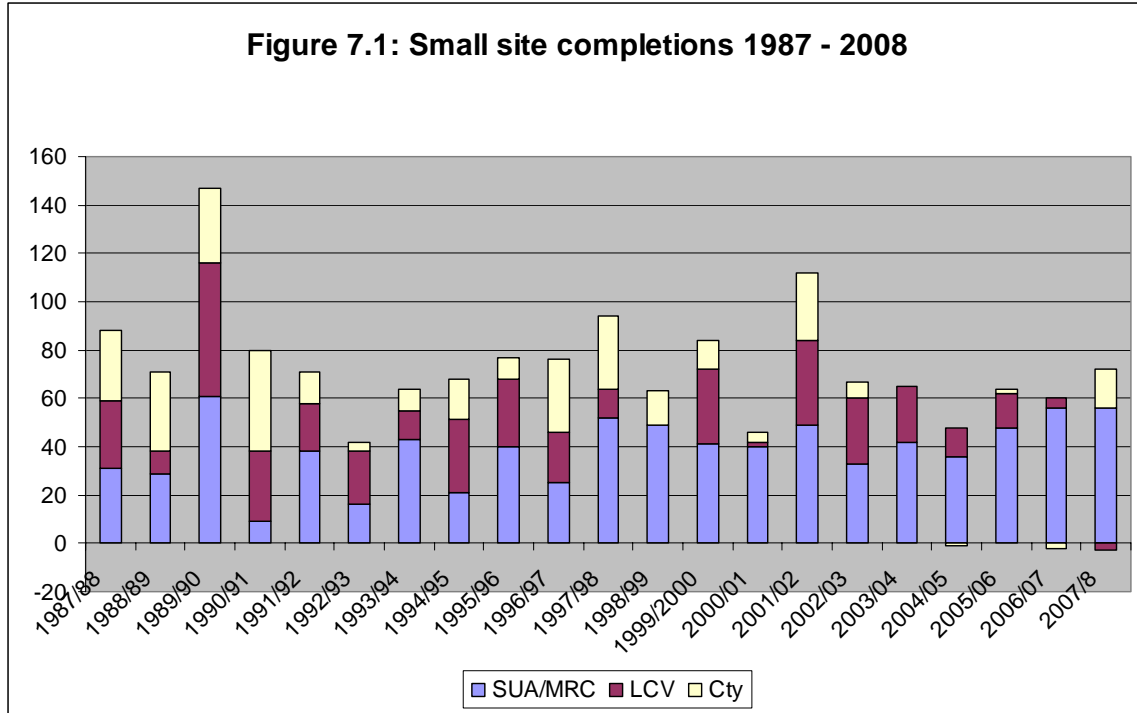
- 7.1.1 An assessment of windfall was produced in section 7 of the SHLAA 2008 based on previous delivery rates (1987-2007) and an understanding of the likely delivery of dwellings from previously unidentified sites in the future.
- 7.1.2 The agreed study methodology suggested that the long range of available data used in the 2008 document would mean that there was no requirement to revise the analysis.
- 7.1.3 However, at the Steering Group meeting of the 12<sup>th</sup> February 2009 it was agreed that a review of the analysis would be appropriate, not least as the definition of small and large sites has changed since the previous study.
- 7.1.4 The analysis undertaken for the 2008 SHLAA has been reworked to reflect the revised definition of small sites (net yield of 5 or less dwellings) and large sites (net yield of 6 or more dwellings).
- 7.1.5 The analysis has also been supplemented by the inclusion of figures for 2007 – 2008 which are now available.

### **7.2 Findings**

- 7.2.1 The assessment draws on the Council's records of housing delivery across the District. Figures are included for the demolition as well as the completion of dwellings and therefore the figures presented are net delivery rates.

#### Small sites

- 7.2.2 The graph included in the 2008 study illustrated the completion of dwellings on sites yielding less than 10 dwellings.
- 7.2.3 The table below draws from the same information but revises the threshold to 5 or less dwellings and extends the range of figures to 2007/8.



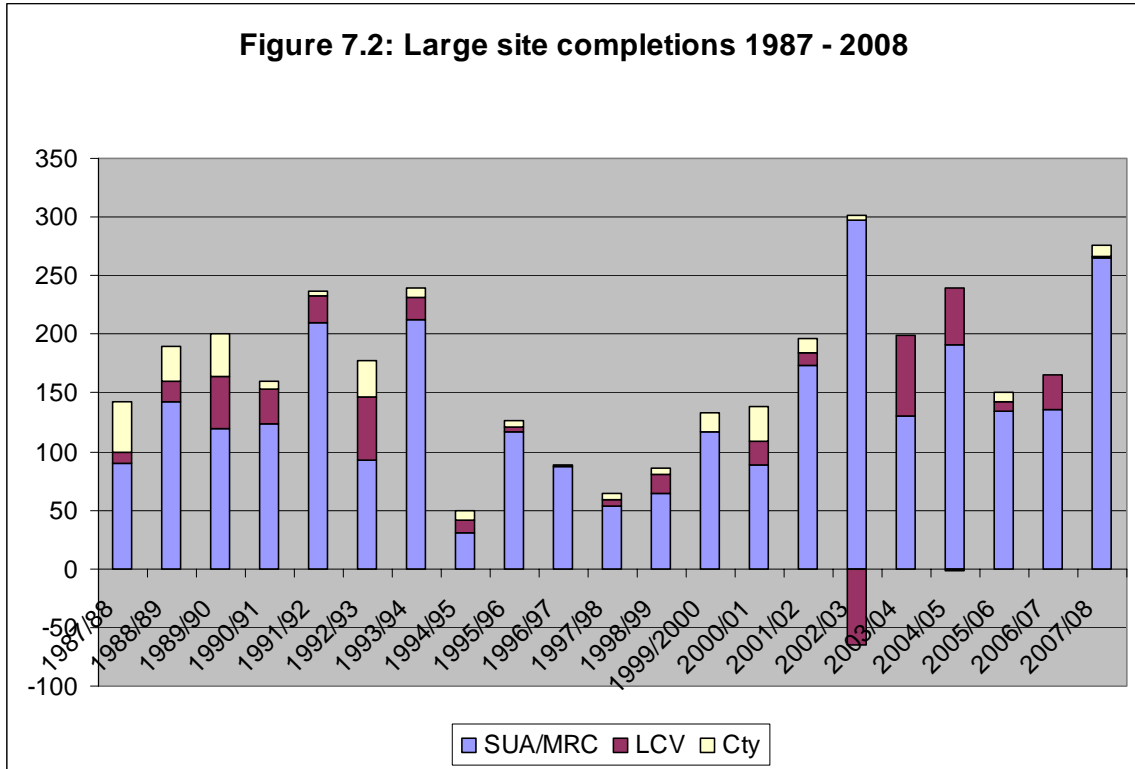
7.2.4 As previously illustrated, the bars are divided between sites in Stratford-upon-Avon/Main Rural Centres (SUA/MRC), Local Centre Villages (LCV) and Countryside (Cty).

7.2.5 The figures reflect the fluctuations in delivery illustrated in the previous table and the increasing percentage of sites coming forward in main settlements.

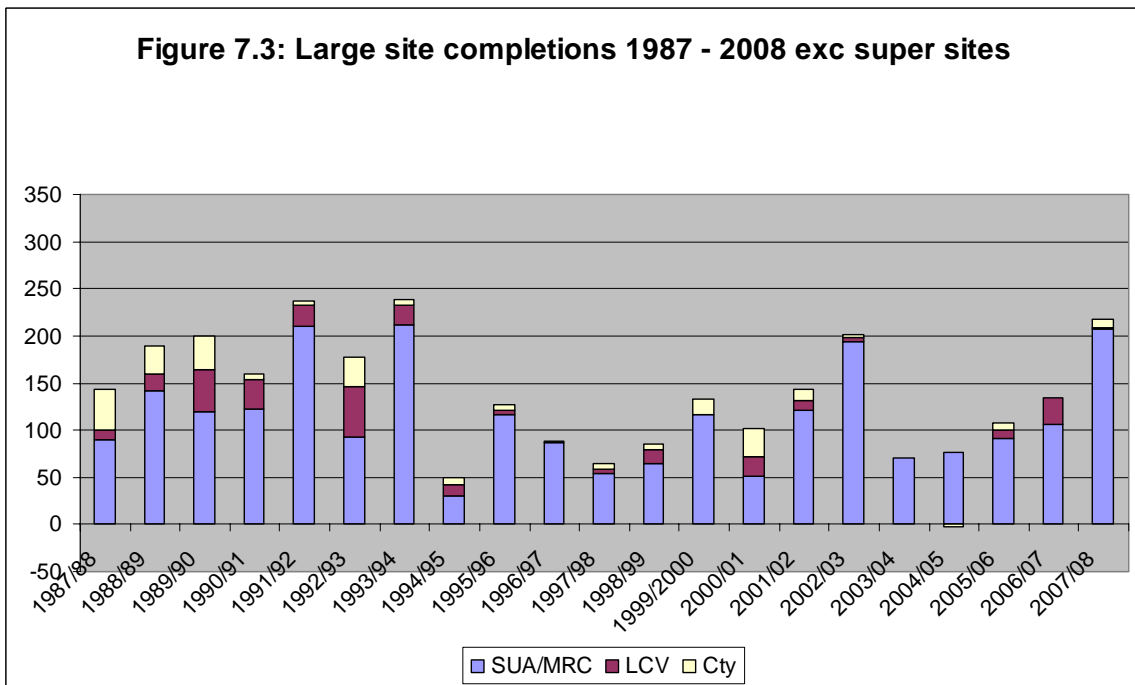
Large sites

7.2.6 The range of sites included in the assessment of large sites has been expanded to reflect the shift in study parameter, to include those sites which will yield 6 or more dwellings (net).

7.2.7 The table below represents the revised analysis when all sites are included in the analysis.



7.2.8 As per the previous analysis a revised graph has also been produced, removing the “super” sites.



7.2.9 A comparison of these two graphs demonstrates the impact of very large sites on the delivery of housing in recent years.

- 7.2.10 This impact was most pronounced from 2001 reflecting the focus on redeveloping brownfield sites and the rising market for housing.
- 7.2.11 It is because of the recent and short-lived impact of these large sites that the 2008 SHLAA sought to remove these sites from the analysis when looking forward.
- 7.2.12 The table below similarly removes these larger sites from the analysis, thereby seeking to illustrate the longer term trend of delivering housing within Stratford-on-Avon.

Table 7.1 Analysis of previous delivery of windfall sites

	<b>Total</b>	<b>Average completions</b>	
		<b>21 yrs</b>	<b>5 yrs</b>
MRC & SuA			
Large sites	2378	113	111
Small sites	815	39	48
LCV			
Large sites	310	15	8
Small sites	411	20	10
Countryside			
Large sites	259	12	3
Small sites	327	16	3
<b>Total</b>	<b>4500</b>	<b>214</b>	<b>182</b>
Large sites	2,947	140	121
Small sites	1,553	74	61

- 7.2.13 The figures show that, excluding the large sites which have been delivering housing in the period since 2000, the long term average of sites coming forward on brownfield sites would be 214 dwellings from all sources. However, the last 5 year average is 182 dwellings per annum.
- 7.2.14 The original analysis (SHLAA 2008) concluded that a total windfall rate of 180 dwellings per annum (100 on large sites, 80 on small) would be appropriate when considering future levels of delivery. This was considered to reflect the role of planning policy and the previous delivery of housing from brownfield sites within settlements.
- 7.2.15 It is considered that the overall delivery of housing from windfall in the longer term is likely to remain a total level of 180 dwellings per annum, 60 per annum on small sites and 120 per annum on large. This is below the long term average of 214 dwellings which has been delivered over a 20 year period but reflects a

- reasonable assumption of the long term delivery of dwellings on unallocated land.
- 7.2.16 This figure reflects the recent (5 year) average, which has been established at a time of high market demand but strict planning control in recent years, via the Moratorium. Going forward, sites will be identified in the LDF for development, however there will always be some level of “windfall”, as sites emerge which are not otherwise identified.
- 7.2.17 A recovering housing market and the lifting of the current moratorium will stimulate further sites coming forward in the short term. In the longer term sites will become available through various routes and the LDF will not be able to anticipate all of these.
- 7.2.18 In addition, small sites (5 dwellings or less), which makes up a third of the sites, will not be specifically identified in the LDF and many of the smaller sites in the larger sites category will similarly not be identified specifically in the LDF. Therefore, there remains an expectation that sites remain to come forward, though it is unlikely that they will continue to deliver at the long term average of over 200 dwellings per annum. Instead a lower level is considered appropriate to assume at present, but will be subject of ongoing monitoring through future revisions of the SHLAA.
- 7.2.19 There remains debate regarding the point at which such figures are included in an assessment and it will be for the Council to consider the appropriate rate and period at which to include a windfall analysis in the preparation of the LDF in the light of the guidance in paragraph 59 of PPS3 and particular local circumstances.
- 7.2.20 For the purposes of the SHLAA the study does not include any windfall within the period for 10 years after the anticipated adoption date of the Core Strategy (late summer 2010).
- 7.2.21 The application of a windfall figure based on the above analysis is illustrated in Table 7.2 below and draws upon the figures in Table 6.1 above.
- 7.2.22 It demonstrates a total housing land supply of just over 18,700 dwellings based on the analysis conducted for this study.

Table 7.2 Potential of housing sites including windfall figures

Source of housing potential	2006-07	2007-08	2008 - 13	2013 – 18	2018 - 26	2008 - 26
Completions	445	394				839
Sites with planning permission						
Large sites			752			752
Small sites			167			167
Site specific sources (identified through survey)						
Large sites			267	29		296
Sites within Broad locations				2,259	3,596	5,855
Policy Constrained sites				3,174	6,614	9,788
COM.1 sites			65	65		130
Non site specific sources (windfall)						
Large sites					600	600
Small sites					300	300
<b>Total housing</b>	<b>445</b>	<b>394</b>	<b>1,251</b>	<b>5,527</b>	<b>11,110</b>	<b>18,727</b>
<b>Average per annum</b>	<b>445</b>	<b>394</b>	<b>250</b>	<b>1,105</b>	<b>1,389</b>	<b>986</b>

## **8 Sites within Broad locations**

- 8.1.1 The SHLAA 2008 included assessment of Broad Locations based on clear cut designations, a landscape study and accessibility assessment. These basic parameters of assessment have not changed in the intervening period.
- 8.1.2 Therefore, at this point in time no further assessment of Broad Locations has been undertaken. However, in order that all material may be viewed as a whole, the assessment of Broad Locations set out in Section 8 of the 2008 SHLAA is included in this document as Appendix K.
- 8.1.3 This assessment draws upon the Landscape Study (Appendix 7 in the 2008 SHLAA) the Accessibility Analysis (Appendix 8 in the 2008 SHLAA) and the identified Broad Locations for development are included on mapping of each settlement (Appendix 6 in the 2008 SHLAA). Each of these appendices is also included as parts of Appendix K of this study.
- 8.1.4 Sites within the previously identified Broad Locations have been included in the assessment of specific sites (Section 5 of this report). There remains areas within broad locations which are not currently available but may be suitable in principle for development in the future and should be monitored in future updates of the SHLAA.
- 8.1.5 The 2008 SHLAA indicated a total potential delivery of over 8,500 dwellings on sites in Broad Locations. This update has indicated a delivery of 5,855 dwellings on land which is clearly available at present, the remainder (2,645 dwellings) being on land which is currently not available for development.
- 8.1.6 Through the LDF process this unavailable land may become available and actually increase the potential supply from this source without identifying further areas for development.

## 9 Summary

- 9.1.1 This SHLAA Review has been prepared in line with the Practice Guidance prepared by CLG in 2007 and best practice in undertaking such studies emerging in the period since. It has been based on the original Stratford-on-Avon District SHLAA completed in 2008 and the methodology has been informed by the views of a steering group brought together for that purpose.
- 9.1.2 The foci of the study has been the 8 Main Rural Centres and also Stratford-upon-Avon. These settlements are the focus for services and facilities and are identified in the Adopted Local Plan as the main focus for development.
- 9.1.3 It is acknowledged throughout this review that the LDF is the central policy document for the Council and this Review is part of the evidence base which helps to inform the Development Plan Documents. As such this review is intended to provide material which can be drawn upon when formulating policy but it must be appreciated that the Council has other sources of information available to it from a range of sources.
- 9.1.4 This Review builds upon the 2008 SHLAA and expands the evidence base by extending the range of sites to be considered initially through the reduction of the site size threshold.
- 9.1.5 It updates material with regard to the status of sites with planning permission and adds to the assessment of such sites through discussions with land owners and developers with regard to the intention to implement existing consents.
- 9.1.6 It also builds upon the work previously undertaken with regard to the identification of Broad Locations for development on the edge of settlements. It assesses specific sites within these locations in order to identify an available stock of land within areas which may be considered to be suitable for development in principle.
- 9.1.7 However, further work is required to consider the relative merits of sites around settlements and also the relative merits of developing within or around particular settlements. This is work which is rightly being undertaken as part of the wider evidence base for the LDF.
- 9.1.8 Finally, sites which may be considered to be practical to develop and which could contribute to sustainable communities have been identified, even where they conflict with adopted local policies. These sites may provide a stock of available sites for development if the local authority were minded not to continue with previous policies in future development plans.
- 9.1.9 In parallel with this it is acknowledged that a small number of sites may come forward for development in other settlements as a result of policies specifically aimed at meeting local needs.
- 9.1.10 The study methodology did not provide for specific assessment of such sites but, under the guidance of the Steering Group, sites which are known to the Council

- as potentially delivering housing have been included in the study. The number of dwellings likely to be delivered from such sources is low but a figure, derived from Council records, is identified in order to reflect the potential from this source.
- 9.1.11 There will also be some delivery of housing from sites not identified in the SHLAA or elsewhere. An assessment of future windfall figures was included in the 2008 SHLAA and has been updated to reflect current knowledge.
- 9.1.12 All assessments within the SHLAA must necessarily be based on existing information, which varies greatly for different sites. Also, in all cases the SHLAA considers the potential for housing delivery in principle and any identification of housing yield must always be considered to be an estimate based on current knowledge.
- 9.1.13 As sites progress through the planning process information improves and figures can be more accurately predicted. However, for many sites included in the SHLAA they remain in the very early stages of the process and the information available reflects this.
- 9.1.14 Future revisions of the SHLAA will revise figures and reconsider assessments and no doubt some sites currently considered to be developable will prove to be unsuitable in some way, whilst others which are currently discounted will provide to be deliverable.
- 9.1.15 The Council will monitor these changes over time through the SHLAA and these will inform the policies of the Council through the LDF.
- 9.1.16 The findings of the SHLAA Review indicates a limited potential supply of dwellings from the most deliverable categories of sites; planning permissions and deliverable sites.
- 9.1.17 The Council's own moratorium on housing consents has resulted in a gradual reduction of sites with planning permission for housing such that there remains only just over 900 dwellings with Consent for development at the base date of 1 April 2008.
- 9.1.18 The continued moratorium and the current recession will combined to keep down planning applications and the relative lack of financial incentive for land owners is also likely to have a consequential impact on the promotion of land in the immediate future.
- 9.1.19 The number of sites which the SHLAA has therefore been able to judge as Deliverable or Developable is therefore very low and under 300 dwellings are identified as being Suitable, Available and Achievable.
- 9.1.20 The Council therefore is only able to identify a potential supply of some 1,200 dwellings on specific sites at this point in time, a figure almost half of that identified in the 2008 SHLAA.
- 9.1.21 The implication for the LDF is that the Council will be required to consider options for the delivery of housing and in order to inform this process the 2008 SHLAA

considered the areas around each of the nine main settlements and identified potential Broad Locations for Development.

- 9.1.22 This review has built upon that assessment, identifying the potential delivery of dwellings within these Broad Locations on land currently promoted for development. This provides a substantial stock of dwellings but it will be for the LDF to identify which settlements should be the focus for development and around those settlements which areas should be judged more appropriate for development.
- 9.1.23 In order to provide a further range of options for development, the SHLAA has also sought to identify those sites where the application of local plan policies prevents development. This assessment identifies a significant stock of available sites but the choice as to the allocation of these sites will rest with the LDF and may be judged against the Broad Locations previously identified.
- 9.1.24 The SHLAA therefore provides a stock of sites which may be available for development depending on the policy decisions made through the adoption of the LDF Core Strategy and subsequent Development Plan Documents. In the mean time the inclusion of sites within the SHLAA should not be considered to support development proposals on any or all of these sites but will be one of the sources of evidence to be drawn from in the preparation of the LDF.