



# Draft Strategic Housing Land Availability Assessment (SHLAA)

## - Explanatory Note

August 2018

### 1. Overview

- 1.1 National planning guidance requires local planning authorities to prepare and keep up-to-date a Strategic Housing Land Availability Assessment (SHLAA)<sup>1</sup>. Its purpose is to provide information on the deliverability of sites for potential development.
- 1.2 A SHLAA is an evidence base document to inform and support the preparation of a Development Plan. Its principal aim is to identify sufficient sites within the local authority area that are capable of meeting the requirements identified for housing development over a plan period.
- 1.3 It is important to stress that the identification of a site in a SHLAA does not, in itself, determine whether or not it will be allocated for housing in the Development Plan. Nor does it imply that the site will receive planning permission. It is the role of the SHLAA to provide information on the range of sites which are available to meet need, and a distinction should be drawn between whether a site is suitable for development and whether development is appropriate on a particular site.
- 1.4 In short, the SHLAA is about whether a site *could* be developed; not whether a site *should* be developed.
- 1.5 More information about the SHLAA can be found on the District Council's website at [www.stratford.gov.uk/shlaa18](http://www.stratford.gov.uk/shlaa18).

### 2. Background

- 2.1 This new SHLAA updates and supersedes previous versions of the SHLAA that provided an input to the identification of housing allocations in the Core Strategy<sup>2</sup>. This version is also the first to be prepared in accordance with the national Planning Practice Guidance (PPG)<sup>3</sup> and the joint methodology agreed in 2015 by the Warwickshire and Coventry local authorities to provide a consistent approach across the sub-region.
- 2.2 This particular SHLAA has been produced to inform the identification of reserve housing sites as required by the Core Strategy. Reserve sites will be identified in

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<sup>1</sup> See paragraph 67 in the National Planning Policy Framework (NPPF), July 2018

<sup>2</sup> Previous versions of the SHLAA are available on the Council's website at [www.stratford.gov.uk/shlaa](http://www.stratford.gov.uk/shlaa)

<sup>3</sup> Planning Practice Guidance that accompanies the NPPF is available at <https://www.gov.uk/government/collections/planning-practice-guidance>

the emerging Site Allocations Plan that, when adopted, will sit alongside the Core Strategy as the statutory Development Plan for Stratford-on-Avon District<sup>4</sup>.

- 2.3 Section 6 below provides further explanation on the need for reserve sites and the relationship between the SHLAA and the Site Allocations Plan.
- 2.4 The PPG advises that a SHLAA should identify and assess all sites and broad locations regardless of the amount of development needed, in order to provide an audit of available land. However, the current version of the SHLAA has a more specific and focused purpose which is to inform the identification of reserve housing sites. For that reason it does not cover a number of matters that SHLAAs usually do, such as assessing the scope for small-scale windfalls or the extent of the urban capacity of the District. This is because such sites are likely to conform to the Core Strategy and could come forward for development in any case. On that basis, they would not be suitable as reserve sites which will only be released for development if certain criteria are met.
- 2.5 The main outputs of this SHLAA are to:
- Identify locations with potential as reserve housing sites in accordance with Core Strategy Policy CS.16;
  - Assess the potential and capacity of sites by analysing their suitability, availability and achievability;
  - Identify constraints to the implementation of specific sites; and
  - Assess when specific sites are capable of being developed if required.
- 2.6 In undertaking the assessment of sites, the District Council is required to involve key parties who are able to assist the process of identifying deliverable sites. This draft SHLAA has been published for consultation in order to provide further input from landowners, housebuilders, local communities, infrastructure providers and other agencies.
- Relationship to the 'Call for Sites'*
- 2.7 A 'call for sites' is an opportunity for landowners and other interested parties to advise the Council about land that is potentially available for development. Unlike previous versions of the SHLAA, and in line with the PPG, this SHLAA does not rely solely on sites that have been promoted to the Council. Instead, most land around applicable settlements has been assessed, together with specific locations in open countryside. Information from the 'call for sites' has been used to assist in assessing the availability and achievability of development.

### **3. Methodology for identifying Land Parcels**

- 3.1 Because this SHLAA is being used to inform the selection of reserve housing sites, the focus of this SHLAA is on locations established in Core Strategy Policy CS.16; namely, Stratford-upon-Avon, Main Rural Centres, Local Service Villages and large freestanding sites. It does not cover other settlements or small greenfield sites in open countryside. Neither does it cover urban and rural brownfield sites because the principle of their redevelopment may be appropriate in any case.

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<sup>4</sup> Find out more about the Site Allocations Plan at [www.stratford.gov.uk/siteallocations](http://www.stratford.gov.uk/siteallocations)

- 3.2 Local Service Villages that are 'washed over' by Green Belt have also been excluded from this SHLAA. This is because the SHLAA is being used to identify reserve sites. In order for a site in the Green Belt to be allocated, it would first need to be removed from the Green Belt. It would not be logical to remove individual sites from the Green Belt without removing the adjacent settlement. Reviewing Green Belt boundaries is not part of the scope of the Site Allocations Plan.
- 3.3 For each of the settlements to be covered in this SHLAA, land parcels were identified that abut their existing built form. The boundaries of these parcels mostly follow physical features on the ground except where they would otherwise have been too extensive.
- 3.4 In certain cases, land adjacent to settlements has not been covered if it is in a specific use, such as a sports ground, unless it has been promoted by the owner.
- 3.5 Land that lies within Flood Zones 2 and 3 has generally been excluded because it is evident that sufficient land is present outside flood risk areas for the sequential approach to be applied.
- 3.6 The sub-regional methodology specifies that sites capable of providing fewer than five homes will not be identified in SHLAAs. The latest national Guidance also advises that a site threshold of 0.25 hectares or 5 dwellings should be applied. In respect of this SHLAA it is deemed appropriate to apply a higher threshold of 50 dwellings to Stratford-upon-Avon and the Main Rural Centres because of their physical size and character. This is also appropriate given this SHLAA's specific purpose to inform the identification of reserve sites rather than to provide a comprehensive basis for showing how the housing requirement for the District would be met. However, a degree of flexibility has been applied in assessing individual land parcels whereby the capacity of some of them is lower than this threshold.

#### **4. Assessment of Land Parcels**

- 4.1 The PPG requires the assessment of sites according to their suitability for housing, availability for development and achievability of implementation. The sub-regional methodology was applied to the assessment of land parcels, with a small number of minor adjustments and refinements based on the experience of applying the criteria to the character of Stratford District. The site evaluation criteria template is provided at **Appendix 1**.
- 4.2 For all of the land parcels identified, an initial desk top survey was carried out based on the sub-regional methodology. The Council's comprehensive GIS data was used for this assessment.
- 4.3 It was supplemented by site visits in order to assess the relationship of each parcel, individually and comparatively, to the settlement and the landscape around it, and issues such as access and neighbouring uses.
- 4.4 In accordance with the sub-regional methodology, a red-amber-green (RAG) convention has been used to assess each site against the criteria. For many criteria, the existence of a constraint that is considered able to be overcome is identified as 'amber'. For other criteria, a 'red' outcome is clearly appropriate.

4.5 The purpose of the RAG assessment is to highlight where issues that constrain sustainable development exist. The conclusions provide the opportunity for a professional judgement to be made, taking the assessment in the round, as to whether the existence of any particular constraint is of such significance that it renders the site undeliverable or inappropriate for development.

4.6 The following sub-sections cover the specific parts of the site assessment process identified in the flowchart in the PPG:

*(i) Suitability*

4.7 In assessing a parcel's suitability for housing, the following considerations were taken into account:

- policy designations, such as Green Belt, Area of Outstanding Natural Beauty, Special Landscape Areas;
- protected areas of acknowledged importance, eg. Sites of Special Scientific Interest, Scheduled Ancient Monuments, Conservation Areas;
- potential impact upon local features including landscape, settlement character, natural and heritage assets;
- physical problems or limitations, including access, infrastructure, flood risk, contamination;
- environmental conditions which would be experienced by prospective residents;
- adverse impacts of development on nearby land uses;
- loss of existing uses on the site.

4.8 The overall suitability conclusion is derived from the consideration of these criteria and the application of professional judgement. The benefit of assessing sites in this way is that it simply and transparently highlights areas where issues may exist. It is not the case that the suitability of a parcel is determined by totalling up the number of criteria that have been satisfied.

*(ii) Availability*

4.9 A site is available for development when, on the best information available, there is confidence that no legal or ownership problems exist, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. To be available, a site should be controlled by a housing developer who has expressed an intention to develop or by a landowner who would be prepared to sell the site for development.

4.10 The current lack of availability of an individual site is only an issue if it is identified as being suitable and otherwise achievable for development.

*(iii) Achievability*

4.11 A site is considered achievable for development where there is a reasonable prospect that residential development will be achieved on the site at a particular point in time. Assessing achievability is essentially a judgement about the economic viability of the site and the ability of the developer to implement a scheme. In the case of Stratford-on-Avon District, very few sites would not be attractive to housebuilders because the local housing market is so buoyant.

4.12 The SHLAA provides a starting point for the consideration of the viability of a site that will inevitably be informed by more detailed consideration and evidence as a

site is progressed through the plan-making and planning application processes. Viability assessments for individual sites have not been carried out as part of this SHLAA. If there are obvious constraints present on a site that will have implications for the viability of development, such as contamination as an example, these have been identified. In the absence of such constraints it is assumed that sites would be financially viable for development.

*(iv) Overall Deliverability*

- 4.13 Taking the suitability, availability and achievability assessments together, an overall conclusion is reached about the deliverability of each parcel. However, while conclusions can be drawn based on a comparative assessment of parcels, it is not as straightforward as adding up the number of greens, ambers and reds because the criteria have not been weighted.
- 4.14 In practice, coming to an overall conclusion for each parcel involves making a judgement as to the relative importance of each factor, taking into account any designation that covers the land and the nature of any physical or environmental constraints that have been identified.

*(v) Development potential*

- 4.15 Establishing the appropriate number of homes that could be provided on a land parcel is an important aspect of establishing the eventual capacity of reserve sites, individually and cumulatively. This assessment has only been undertaken in this SHLAA for those land parcels that are deemed to be suitable, available and achievable.
- 4.16 For each of these land parcels, one of two approaches has been used to determine their capacity. For those parcels where most of the gross area is suitable for development a density of 30 dwellings per hectare has been applied to the net area, having taken structural landscaping and other specific factors into account. For those parcels where a significant part has been identified as not appropriate for development due to specific circumstances such as flood risk, settlement character, landscape impact, a 30dph density has been applied to the developable area only.

*(v) Timescales*

- 4.17 For those land parcels that are identified as being potential reserve sites, an indication is given as to the expected timescale for their delivery from the base date of the SHLAA (ie. 2018). These timescales depend on the information known about each site in relation to its suitability and availability for housing at the time of the assessment.
- 4.18 Assumptions have been made about build out rates and lead in times. In general terms, if there are no known constraints to development and the site is owned or controlled by a landowner/developer who is actively promoting it for development, it is placed in the 0-5 year timescale. If a site is complex, in multiple-ownership or has constraints to development, or there is no clear immediate intent to develop, it is assigned a later timescale, ie. 6-10 years or 11-15 years. Large sites can straddle more than one phasing period based on the likely rate of implementation.

- 4.19 A Site Assessment Proforma for each of the land parcels that has the potential to be identified as reserve housing sites in the SAP will be included in the final version of the SHLAA which will accompany the Plan itself.

## 5. Core Outputs

- 5.1 In line with the PPG, this SHLAA is consistent with the following set of standard outputs, which should be produced from the assessment to ensure consistency, accessibility and transparency:
- a list of all sites considered, cross-referenced to their location shown on maps;
  - an assessment of each site, in terms of its suitability for development, availability and achievability, including whether it is viable, to determine whether a site is realistically expected to be developed and when;
  - contains more detail for those sites which are considered to be realistic candidates for development, whereas others have been discounted for clearly evidenced and justified reasons;
  - the potential quantity of dwellings that could be delivered on each site, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when.

## 6. Relationship to Reserve Sites and the Site Allocations Plan

- 6.1 Whilst the Core Strategy already plans for sufficient numbers of homes to meet its housing needs, there are always risks that some sites with planning permission will not get built or that additional housing needs arise that should be met within the District. The NPPF requires Development Plans to provide flexibility to adapt to changing circumstances. If such eventualities were to occur and such provision is not made, it could lead to an undersupply of housing and a risk that the Core Strategy will become out of date and no longer valid.
- 6.2 To prevent this from happening, a sensible and pragmatic approach is to identify 'reserve sites'. Such sites would only be brought forward for development within the plan period if monitoring showed there to be a shortfall in housing supply that could not be met elsewhere, or other specific circumstances arose that required the provision of more housing. It enables the Council, as the Local Planning Authority, to retain control of and continue to manage development in the District. Reserve sites also provide certainty to communities as to where alternative or additional development could take place rather than having to react to speculative applications or appeals.
- 6.3 Policy CS.16 of the Core Strategy<sup>5</sup> specifies that reserve housing sites should be capable of meeting 20% of the housing requirement to 2031, i.e. around 2,920 homes, and identifies the specific circumstances where a reserve site may need to be released for development. These are:
- To rectify any identified shortfall in housing delivery in order to maintain a 5 year supply of housing land in Stratford-on-Avon District;

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<sup>5</sup> Find the full Core Strategy at [www.stratford.gov.uk/corestrategy](http://www.stratford.gov.uk/corestrategy)

- To contribute to meeting any identified additional need for housing in relation to a net growth in jobs at Jaguar Land Rover arising from development of the employment allocation at Gaydon Lighthorne Heath;
- To contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA as demonstrated through the agreed outcomes of ongoing joint working between the Coventry and Warwickshire local planning authorities;
- To contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA that it is accepted through co-operation between the relevant councils as needing to be met within the HMA and most appropriately being met within the District

6.4 It is not the purpose of the SHLAA to identify potential reserve sites. This will be done through the Site Allocations Plan (SAP). However, the scope of this particular SHLAA is established by the clear purpose of the SAP in this respect. Decisions about which sites to identify will be based on the findings of the final version of this SHLAA and other technical material, and will also be informed by the recommendations of the Sustainability Appraisal/Strategic Environmental Assessment.

6.5 The outcome of this assessment provides a basis for identifying in the Site Allocations Plan a wide range of reserve housing sites, in terms of size and location, which are capable of meeting the overall number of dwellings specified in Policy CS.16.

# Appendix 1

## Strategic Housing Land Availability Assessment

### Site Evaluation Criteria



#### A. Assessment of Suitability

##### i. Major planning considerations

Criteria	Purpose	Assessment
<b>Green Belt</b>	The NPPF seeks to maintain the openness of the Green Belt by restricting inappropriate development. Very special circumstances need to be demonstrated as to why development would outweigh the harm. Green Belt boundaries can be reviewed in exceptional circumstances through the preparation of a Local Plan.	Inside Green Belt = RED Outside Green Belt = GREEN
<b>Area of Outstanding Natural Beauty</b>	The NPPF requires great weight to be given to conserving the landscape and scenic beauty of Areas of Outstanding Natural Beauty.	Inside AONB = RED Adjacent to AONB = AMBER Outside AONB = GREEN
<b>Conservation Area</b>	Development should seek to enhance the significance of Conservation Areas and make a positive contribution.	Inside Conservation Area = RED Adjacent to Conservation Area = AMBER Not inside or adjacent to Conservation Area = GREEN
<b>European / National Wildlife Site</b>	The NPPF affords significant protection to these important wildlife habitats including RAMSAR, NNR, SAC, SSSI and Ancient Woodland. Development that causes harm to the geological and conservation value of such sites should not be permitted.	Inside protected site = RED Adjacent to protected site = AMBER Not inside or adjacent to protected site = GREEN
<b>Special Landscape Area / Area of Restraint</b>	The Core Strategy includes specific policies to resist development in areas deemed to be of important local landscape value and character. Development should not cause significant harm to these areas.	Inside SLA or AoR = RED Outside SLA or AoR = GREEN
<b>Flood Risk</b>	The NPPF sets out a sequential approach to development with the aim to steer development away from areas of highest risk.	Entirely or mostly inside Flood Risk Zone 2 or 3 = RED Partly inside Flood Risk Zone 2 or 3 = AMBER Outside Flood Risk Zone 2 or 3 = GREEN
<b>Heritage Assets</b>	The NPPF seeks to conserve heritage assets in a manner appropriate to their significance. Substantial harm or loss to Scheduled Monuments, Registered Historic Parks and Gardens, and Listed Buildings should be exceptional or wholly exceptional.	Inside heritage asset = RED Adjacent to heritage asset = AMBER Not inside or adjacent to heritage asset = GREEN
<b>Local Wildlife Site</b>	In addition to nationally important sites, Warwickshire County Council has identified sites of local wildlife value. Development should not significantly affect the biodiversity value of these sites.	Inside LWS = RED Adjacent to LWS = AMBER Not inside or adjacent to LWS = GREEN

<b>Major Infrastructure</b>	Development should avoid affecting or being affected by major existing and proposed infrastructure (e.g. route of High Speed 2, high pressure gas pipelines, high voltage electricity cables).	Infrastructure crosses substantial part of site = RED Infrastructure crosses small part of site or adjacent to it = AMBER Not affected = GREEN
<b>Minerals and Waste</b>	Development should not affect sites allocated or safeguarded for minerals extraction or waste management in the Minerals and Waste Local Plan.	Entirely or mostly inside Minerals or Waste allocation/safeguarded area = RED Partly inside or adjacent to Minerals or Waste allocation/safeguarded area = AMBER Not inside or adjacent to Minerals or Waste allocation/safeguarded area = GREEN

## ii. Other planning considerations

Criteria	Comment	Assessment
<b>Access to site (vehicles)</b>	Is there access to the site from the road network that is likely to meet highway standards?	No achievable access to site = RED Major works required = AMBER Minor works required = GREEN
<b>Access to site (walking and cycling)</b>	Is there access to the site for pedestrians and cyclists?	No access to site = RED Major works required = AMBER Minor works required = GREEN
<b>Accessibility to Local Facilities</b>	Is the site within reasonable walking distance of local services and facilities (eg. shop, school, doctor's surgery)?	Beyond 800m/10mins = RED Within 800m/10mins = AMBER Within 400m/5mins = GREEN
<b>Public Transport</b>	Is the site accessible to public transport services (400m/5mins to bus or 800m/10mins to rail)?	Not accessible to service = RED Accessible to infrequent (ie. less than hourly) service = AMBER Accessible to frequent service = GREEN
<b>Relationship to Highway Network</b>	Is the site well located in respect of the road network and vehicle movements?	Adjacent to minor road only = RED Adjacent to/within 200 metres of B road = AMBER Adjacent to/within 200 metres of A road = GREEN
<b>Public Right of Way (PROW)</b>	Is the site affected by a Public Right of Way?	PROW crosses site = RED PROW runs along edge of site = AMBER No PROW across or adjacent to site = GREEN
<b>Coalescence</b>	Does the site form an important contribution to defining and maintaining the separate identity of the settlement?	Significant contribution = RED Moderate contribution = AMBER Minor / no contribution = GREEN
<b>Settlement Form</b>	Is the site well-related to and capable of being integrated into the existing built form?	Poor relationship = RED Reasonable relationship = AMBER Good relationship = GREEN
<b>Settlement Character</b>	Does the site form an important contribution to the character of the settlement?	Significant contribution = RED Moderate contribution = AMBER Minor / no contribution = GREEN
<b>Neighbouring Amenity</b>	Would development of the site significantly impact upon the amenity of neighbouring occupiers (eg. overlooking etc.)?	Significant impact = RED Moderate impact = AMBER Minor / no impact = GREEN
<b>Neighbouring</b>	Is the site affected by neighbouring uses (eg. noise,	Significant impact = RED

<b>Land Uses</b>	lighting, odour, etc.)?	Moderate impact = AMBER Minor / no impact = GREEN
<b>Landscape Sensitivity</b>	Is the site within a landscape that is sensitive to change as a result of development? (NB. see Landscape Sensitivity studies)	High & High-Medium sensitivity = RED Medium & Medium-Low sensitivity = AMBER Low sensitivity = GREEN
<b>Agricultural Land Classification</b>	Is the site classified as being the best and most versatile agricultural land?	Grade 1 or 2 = RED Grade 3a or partly Grade 1 or 2 = AMBER Grade 3b, 4 or 5 / not relevant = GREEN
<b>Non-designated Heritage Asset</b>	The NPPF seeks to conserve heritage assets in a manner appropriate to their significance, including non-designated features of historic and cultural importance.	Inside non-designated asset = RED Outside non-designated asset = GREEN
<b>Natural Features</b>	There may be a range of features on the site that are valuable for their habitats but are not designated.	Significant impact = RED Moderate impact = AMBER Minor / no impact = GREEN
<b>Tree Preservation Orders (TPO)</b>	Trees provide amenity value and are an important feature of the townscape and landscape and should be retained.	TPO within site = RED No TPO within site = GREEN
<b>Contaminated Land</b>	Is the site likely to be affected by contaminated land (eg. petrol filling stations, industrial land etc.)?	Contamination identified = RED Potential contamination = AMBER Contamination unlikely = GREEN
<b>Pollution</b>	Is the site likely to be affected by sources of pollution (eg. road, railway, business uses)?	Significant impact = RED Moderate impact = AMBER Minor / no impact = GREEN
<b>Previously Developed Land</b>	Is the site previously developed, ie. brownfield?	Greenfield land = RED Residential garden land = AMBER Brownfield land = GREEN
<b>Site Assembly</b>	Are there any constraints to assembling the site for development (eg. multiple ownerships)?	Significant constraint = RED Potential constraint = AMBER No known constraint = GREEN
<b>Site Topography and Shape</b>	Does the physical nature of the site constrain development?	Significant constraint = RED Moderate constraint = AMBER Minor / no constraint = GREEN

## B. Assessment of Availability

Criteria	Comment	Assessment
<b>Current Use</b>	There is a presumption against the loss of land in employment, community or leisure use, including public open space.	In active use, including agricultural buildings = RED Agricultural / forestry use = AMBER Vacant / undeveloped = GREEN
<b>Intentions</b>	Is there an intention by the landowner to sell/develop and is there a developer in place to bring the site forward for development?	No known intention to develop = RED Site promoted = AMBER Developer in place = GREEN
<b>Legal</b>	Are there any legal issues (eg. multiple land ownerships, ransom strips) that may affect the site coming forward for development?	Yes = RED Unknown = AMBER No = GREEN
<b>Ownership</b>	Has the landowner been identified?	Unknown = RED Known but no contact = AMBER Known with contact = GREEN

## C. Assessment of Achievability

Criteria	Comment	Assessment
<b>Local Market Analysis</b>	Is there demand within the local market for the site to sell?	Likely poor market conditions = RED Likely marginal market conditions = AMBER Likely good market conditions = GREEN
<b>SHLAA History</b>	Has the site been assessed in earlier version of the SHLAA?	Rejected = RED Inside Broad Location = AMBER With potential = GREEN Not previously assessed = GREY
<b>Planning History</b>	Does the planning history of the site provide any indication as to its suitability for development?	Permission refused on fundamental grounds = RED Permission refused on detailed grounds = AMBER No relevant history = GREY
<b>Viability</b>	Is development currently considered economically viable?	Not viable = RED Likely to be viable = AMBER Viable = GREEN

## Overall Assessment

Criteria	Comment	Assessment
<b>Availability</b>	Has the landowner (or other party) informed the District Council that the site is available for development?	No = RED Yes = GREEN
<b>Suitability - Environmental</b>	Are there any environmental constraints to the development of the site?	Significant constraints = RED Moderate constraints = AMBER Minor / no constraints = GREEN
<b>Suitability - Technical</b>	Are there any technical constraints to the development of the site?	Significant constraints = RED Moderate constraints = AMBER Minor / no constraints = GREEN
<b>Achievability</b>	Is development of the site achievable based on marketability, viability and previous history?	Significant constraints = RED Moderate constraints = AMBER Minor / no constraints = GREEN
<b>Overall Deliverability</b>	Is development of the site deliverable taking into account environmental and technical constraints and availability?	Not deliverable = RED Likely to be deliverable = AMBER Definitely deliverable = GREEN