

**City of Bradford  
Metropolitan District  
Council**

**BRADFORD STRATEGIC HOUSING LAND  
AVAILABILITY ASSESSMENT**

**DRAFT METHODOLOGY FRAMEWORK FOR  
CONSULTATION**

**SEPTEMBER 2008**

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## 1. INTRODUCTION

### What Is a SHLAA?

- 1.1. A Strategic Housing Land Availability Assessment (SHLAA) can best be described as a process of pooling, from a variety of sources, all known potential sites for housing development and then – in partnership with stakeholders – carrying out a technical assessment of their suitability, availability and achievability. The study produces a list of sites which are either :
  - Deliverable within the short term – within 5 years
  - Developable in the medium or longer term (usually the 6-10 and 11-15 year periods);
  - Or not currently developable.
- 1.2. Carrying out a SHLAA is not a one off exercise. Once completed the SHLAA should be updated and rolled forward on an annual basis.
- 1.3. It is, however, important to stress that **the SHLAA makes no assessment of whether such sites should actually be allocated for development in the Local Development Framework (LDF)**. There are many factors involved in selecting the most appropriate sites in the LDF such as local environmental impact which are not part of the SHLAA process. Indeed the Government advises Local Planning Authorities, particularly where subject to high rates of population and household growth, to cast the net as wide as possible in searching for sites for inclusion in the SHLAA. Thus sites which are assessed favorably by the SHLAA process may not necessarily be suitable for allocation in the LDF. However sites, which having been assessed in the SHLAA are not considered developable, will not be considered for allocation in the LDF.
- 1.4. The SHLAA thus provides vital evidence to support both the Council's plan making and its management and monitoring of housing land supply and housing delivery. More specifically the SHLAA will assist in the production of :
  - **A 5 Year Housing Land Supply Statement** – Local Planning Authorities (LPA's) must ensure that there is an adequate and continuous supply of housing land to enable its house building targets (set out in Regional Spatial Strategies) to be met. The Government requires LPA's to assess, on an annual basis, how much land is currently deliverable and by this it means sites which are suitable, available now (or within the next 5 years) and are achievable now (or in the next 5 years) in terms of their attractiveness to developers and the market. The process of appraising the sites in the SHLAA will provide the data to make this assessment;

- **Bradford’s LDF Core Strategy** – the LDF Core Strategy for Bradford will determine the broad pattern and scale of development across the district over the next 15 years. It will identify where there will be growth, where critical environmental assets need conserving and how to ensure the development that takes place is sustainable. The Council have recently undertaken consultation and engagement to investigate a number of possible spatial options for where growth will go. The eventual choices made in the Core Strategy will affect how much land and how many sites for housing need to be identified in each settlement in the district. By looking at the potential supply land in across the district, the SHLAA will assist in showing how realistic different options for accommodating housing growth would be.
- **Bradford’s Allocations DPD** – as stated above the SHLAA will provide a pool of sites for the Allocations DPD to select from – and assuming that there are more than the required number of sites available, the DPD will select those which are most sustainable, which promote a continuing emphasis on the use of previously developed land and are most in line with the LDF Core Strategy.

**Guidance and Best Practice**

- 1.5. Paragraph 11 of Planning Policy Statement 3 (PPS3) states that LDF’s should be informed by a robust evidence base including Strategic Housing Land Availability Assessments. LPA’s should draw on the work contained in their SHLAA to identify in their LDF sufficient deliverable sites for the first 5 years of the plan period and sufficient developable sites for the 6-15 year period.
- 1.6. In formulating the methodology for Bradford’s SHLAA the Council will have regard to a number of sources of both guidance and examples of recent good practice. First and foremost the Government produced a Practice Guidance Document in July 2007.
- 1.7. The Practice Guidance sets out the core outputs of a SHLAA and these are listed below:

<b>Figure 1: Strategic Housing Land Availability Assessment - Core Outputs</b>	
1.	A list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary).
2.	Assessment of the deliverability/developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be

	developed.
3.	Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified).
4.	Constraints on the delivery of identified sites.
5.	Recommendations on how these constraints could be overcome and when.

- 1.8. In addition to these core outputs the Government also emphasises the principle that SHLAA's should be the product of a partnership between local authorities and key stakeholders, in particular house builders and local property agents.
- 1.9. The Government suggests that the SHLAA should aim to identify as many sites as possible with housing potential in and around as many settlements as possible in the study area.
- 1.10. In addition to the Government's Practice Guidance further advice has been issued by the Planning Advisory Service and by the Yorkshire and Humber Regional Assembly in a report prepared by consultants ARUP. The latter is particularly useful in that it has looked at the issues facing local authorities in this region in delivering SHLAA's within the required timescales and resources constraints. It emphasises the need to keep SHLAA's as simple as possible and utilise existing data wherever possible.
- 1.11. In formulating its framework methodology, account has also been taken of the work being done in Sheffield and Rotherham as the only large urban authorities in the region with a SHLAA which is nearing completion.

### **Purpose of This Paper**

- 1.12. Despite the presence of advice and guidance there are many issues which need to be resolved before the detailed SHLAA methodology can be finalised. The purpose of this paper is both to raise awareness of the work being carried out by the Council and to seek views and comments on those issues. The final and detailed methodology will be formulated having considered the response to this paper and in consultation with the SHLAA Working Group which will be set up in due course.
- 1.13. The rest of this paper is organised according to the 10 stages in carrying out a SHLAA identified by the Government in its Practice Guidance document. The 10 stages themselves are reproduced in Appendix 1. Key questions on which the Council is seeking views are highlighted in boxes at the end of each section. However the Council is happy to receive comments on any issues over and above those specifically identified.

- 1.14. Comments on this paper and the SHLAA should be submitted to the Council no later than Monday 20<sup>th</sup> October 2008. Comments should be sent to :

Simon Latimer  
City of Bradford Metropolitan District Council  
Local Development Framework Group  
8th Floor Jacob's Well,  
Manchester Road,  
Bradford,  
BD1 5RW

Comments can also be e-mailed to [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk) or;

If you have any queries about the SHLAA you can also contact us on 01274 434606

### **Next Steps**

- 1.15. In the coming weeks the Council will be further refining its methodology, beginning the process of gathering data on known potential housing sites, setting up its IT systems to record and analyse the results of the SHLAA, and working to set up a SHLAA Working Group to carry forward the study.
- 1.16. In parallel with the issuing of this paper the Council is also issuing a 'Call For Sites'. This is a key part of the LDF process. Landowners, developers and interested parties are being asked to submit proposed sites for possible allocation in the LDF. These may be sites for housing development but could also be for other forms of development such as offices, business and industry, shops and community facilities. The Council will consider in due course the merits of these sites for inclusion in the LDF. Those sites put forward for housing development will be included in the SHLAA study.
- 1.17. The Council will put a summary of the comments received on this SHLAA paper and its responses to them on the LDF website. When completed the SHLAA will itself be placed on the website.

## **2. PLANNING THE ASSESSMENT**

### **Sub-Regional Working & Consistency**

- 2.1. There are a number of important issues which relate to the planning of the SHLAA which are alluded to in the Government's Practice Guidance. The first is whether it would be practical and beneficial to carry out a joint SHLAA with other local authorities in the same housing market area.
- 2.2. At this time it is concluded that such a joint SHLAA would be impracticable for a number of reasons.
  - Although there is an overlap in markets between Bradford and its adjoining authorities there is no one market covering all of these administrative areas;
  - Working out a housing requirement – which is essential for the SHLAA process - for such overlapping areas would not be possible as the RSS only indicates housing targets on a Local Authority basis;
  - The Strategic Housing Market Assessment (SHMA) reports prepared by Ecotec for the Yorkshire and Humber Assembly provide analysis on a local authority basis; local authorities were thus considered a good approximation as to actual markets;
  - Local authorities adjoining Bradford are at different points in their LDF and their timetable for production of LDF documents is different;
  - The scale of sites involved in adjoining authorities differs widely as do the resources available to carry out the studies; while all studies need to be robust their methodologies and processes have to be cognisant of the resources available to carry them out.
- 2.3. Despite the above the Council's officers have been in discussion with neighbouring authorities and there is a consensus to continue informal co-operation and liaison to ensure that as far as possible methodologies are consistent and results and best practice is shared.

### **Stakeholder Involvement – The SHLAA Working Group**

- 2.4. The Government has indicated that SHLAA's should be produced in partnership with key stakeholders such as house builders, local agents and social landlords. This means forming a working group to both agree the approach and methodology for the SHLAA and to undertake the site assessments.
- 2.5. Arguably the most important thing is to ensure that the working group is representative of stakeholders connected with housing delivery in the district and has the right range of knowledge and skills to add value to and ensure a

robust appraisal of sites, in particular with respect to their deliverability. It is also important that the SHLAA Working Group does not become too large and unwieldy. The SHLAA Working Group will have to take decisions and make judgements on hundreds of sites and issues and thus a working group of any more than 10 members would in the Council's view be unworkable.

- 2.6. There are a number of established groups in Bradford which currently operate to ensure joined up working and engagement on housing issues. In order to get the optimum combination of skills and knowledge and the optimum range of accountability it is proposed that all of these groups should have representation on the SHLAA Working Group. These groups include the Bradford Housing Partnership, the Bradford Housing Association Liaison Group, and the Bradford Property Forum.
- 2.7. It is therefore proposed that the Bradford SHLAA Working Group should comprise the following representation:

**Table 1 : Proposed SHLAA Working Group Composition**

Bradford Council (Chair) – LDF Group	x 2
Bradford Council - Housing Service	x1
House Builders	x 3 including: 1 Rep via HBF + 1 Local Developer + 1 RSL
Estate / Property Agent	x 1
Bradford Property Forum	x 1 if not covered by the above
Bradford Housing Partnership	x 1 if not covered by the above
Bradford Housing Association Liaison Group	x 1 if not covered by the above

- 2.8. The Council is keen to ensure that the working group contains a representation from different types of house builders and not just the volume / national sector. Thus ideally the working group should also include a local firm, Registered Social Landlord and a company's with experience of dealing with conversions or urban redevelopment schemes.
- 2.9. Groupings or bodies who may also be candidates for inclusion in the working group include:
- Bradford Council's Regeneration and Asset Management Services
  - InCommunities (formerly Bradford Community Housing Trust),
  - English Partnerships;
  - Environmental interests such as the CPRE and Environment Agency;
  - The Government Office – Planning
  - Yorkshire and Humber Regional Assembly

- Neighbouring Local Authority Planning Representatives (in an observational capacity).

2.10. The Council welcomes suggestions and offers for membership of the SHLAA Working Group. However it cannot guarantee that it will be able to accommodate all such requests, particularly if a large number are received. Candidates should consider carefully whether they are truly able to expend the time and resources in assisting the Council appraise 100's of sites and also maintain their involvement over the whole period of the SHLAA which could last up to 9 months. The Council will be assisting working group members by providing as much advance information on sites as possible, focusing discussion on the most complex or significant sites, limiting the number of meetings to those which are strictly necessary and maximising the use of electronic communication. Council officers are happy to talk to any parties who are interested in being part of the working group should they require further information.

2.11. As well as membership a second key issue is to determine the role and remit of the group and determine how decisions will be made and differences resolved. One possible approach would be for the Council to compile the list of sites to be assessed, survey them and populate an agreed data set, and then forward that information to working group members with provisional assessments under the three tests of suitability, availability and achievability. The key issue will be the extent to which working group members will be able to give of their time and resources. The extent of resource which non council representatives are able to offer produces a number of options which would include:

- All working group members to visit all sites and then offer their observations on all of the 3 tests; or
- Working group members to scrutinise the Council's preliminary views on site suitability and availability but focus most of their time and resources on the achievability test; or
- Working group members to divide the sites up between them and visit a selection of the sites each and offer their observations on them; or
- Sites within the overall list to be prioritised with working group members visiting the prioritised subset. Prioritised sites could include those which are potentially deliverable (and thus within the first 5 years supply) and the large sites which offer potentially greatest contribution to meeting the quantum requirement.

2.12. Clearly it would not be possible or appropriate for the Council to take a view on these different approaches to undertaking site appraisals until the working group is formed and able to provide its advice. However, the Council welcomes views on this issue at this early stage.

## **Period Covered By The Study and Proposals For Annual Updating**

- 2.13. As outlined above the study needs to provide an assessment of available land for the 15 year period covered by the LDF. However, based on the advice in PPS3 the 15 year supply period commences only when the LDF Core Strategy is adopted. Bradford's LDF Core Strategy is not scheduled for adoption until 2011, more than 2 years away. It is therefore proposed that the first SHLAA should cover a 17 year period in order to provide an adequate basis for the LDF.
- 2.14. The 17 year time span – illustrated in the diagram in Appendix 2 would be divided as follows:
- Years 0-7 (Up to 31 March 2016) – this would provide the land resource for the first 5 year phase of the LDF . Any sites which are not be considered deliverable within years 1 to 5 (i.e. up to the 31<sup>st</sup> March 2014) would be excluded from the 5 year land supply.
  - Years 8-12 – sites developable within the middle phase of the LDF
  - Years 13-17 – sites or broad areas which would contribute to the later phase of the LDF.
- 2.15. Sites with a formal planning status i.e. those which either are allocated in the RUDP or which are not allocated but which have an extant planning permission for housing development will be included in the SHLAA analysis. The Council's housing register, which contains this data, is updated annually with a base date of the 1<sup>st</sup> April. The first SHLAA will therefore be based on April 2008 data.
- 2.16. As the Council has yet to complete a SHLAA it has yet to carry out a full, PPS3 compliant, 5 year supply analysis and statement. The next formal statement is required to be submitted to the Government at the end of June 2009. It is proposed that the 2009 statement is based on the initial SHLAA which is expected to be completed by April together with the SHLAA update which will take place straight afterwards.
- 2.17. The Government requires that a local authority's SHLAA is updated on an annual basis. However this does not mean that the whole SHLAA process is carried out anew each year. As the Regional Practice Guidance suggests, the methodological approach to the SHLAA will have already been agreed by the working group, site information will have been captured and saved within the Planning Service's IT systems. The Regional Practice Guidance thus suggests that a partial review will suffice. This is an effectively an update and roll forward which in the first instance would include:
- Updating the base date of planning status data to April 2009;
  - Adding any new sites which have gained planning status since the first study was commenced and assessing the availability, suitability and achievability;

- Adjusting the remaining capacity of sites under construction and removing any completed sites;
- Adding any new sites which have not got planning status but which have come to the working group's attention – this may be through master planning work for example which has progressed further since the original SHLAA was carried out;
- Producing a new 5 year supply analysis and statement.

2.18. Although the first update will be by logic and necessary a rapid update, it will be open to the Council and its partners to initiate more thorough and complete SHLAA reviews in subsequent years should the need arise.

### **Scrutiny and Quality Assurance**

2.19. It is important that the SHLAA is as comprehensive, as thorough in its assessment, as transparent in its inbuilt assumptions and thus as robust as it can be given the constraints under which it is operating. Quality, transparency and scrutiny will be ensured via the following mechanisms:

- By offering via this paper an early opportunity to shape the SHLAA process and methodology;
- By constituting a balanced SHLAA Working Group with the local knowledge and skills to provide robust site analyses;
- By agreeing with the stakeholder working group their roles, responsibilities and decision making protocols and making them available in the SHLAA report;
- By recording in its final SHLAA report, the appraisals of sites, where disagreements occurred and how they were resolved;
- By providing site surveyors adequate briefing to ensure consistency of approach in appraising sites;
- By quality checking a sample of survey returns;
- By utilising, if necessary, consultants to independently appraise sites where agreement between working group member cannot be achieved;
- By publishing the SHLAA in full at the conclusion of the study.

### **Data Systems**

2.20. The Planning Service will be creating a database for the SHLAA which links to its existing systems – urban capacity, NLUD returns, housing monitoring and GIS.

### **Resources and Timetabling**

2.21. Within the Local Authority the primary resource will be the Allocations DPD team of which 2 members will sit on the working group with the team leader acting as SHLAA chairman. Additional internal resources will be secured as necessary including technical expertise on highways matters. Stakeholders

sitting on the SHLAA Working Group will also form a key resource in terms of both time and expertise.

- 2.22. A draft timetable for the study is included at Appendix 3 and is based on a preliminary assessment of the scale of the work involved and on the practical and real experience of other authorities whose SHLAA's are either underway or near completion. This timetable will need to be adjusted once the precise number of sites involved is known (post Call For Sites) and once the roles and remit and methodology details have been agreed with the working group.

**KEY QUESTIONS :**

1. How should the SHLAA Working Group be constituted and who should be on it?
2. What should be the role of the SHLAA Working Group, and how should it contribute to a robust study?
3. How should the site appraisal work be organised and what role should the non council working group members play?
4. Do you agree with the proposals for updating the SHLAA in 2009?
5. How can the quality and transparency of the SHLAA be best assured?
6. Is the timetable for completion of the SHLAA (see Appendix 3) realistic and how can it be assured?

### 3. WHICH SOURCES OF SITES WILL BE INCLUDED IN THE ASSESSMENT

#### Robustness and Casting the Net Widely

- 3.1. The Government's Practice Guidance for SHLAA's explains that a key decision which must be made at the start of the process is the types and sources of sites which will be included in the assessment. The guidance presents one way of categorising such sites, making a distinction between:
  - **Sites already in the planning process** – sites with either development plan allocation for housing or with permission for housing. This includes sites which although under construction, have yet to be completed.
  - **Sites not currently in the planning process** – including vacant land and buildings, surplus public sector land, land in non residential use such as car parks and commercial property, garage blocks and proposals for the re-modelling of existing housing areas.
- 3.2. All of the above sources are proposed for inclusion in the SHLAA. With regards to the re-modelling of existing residential areas, the Council is currently working with its partners to bring forward proposals within the former Council estates including Holmewood and Thorpe Edge. Master planning activities are at the early stages in both cases and depending on how quickly they progress the SHLAA will need to take a flexible approach to assessing their potential whether as broad locations for growth or as a collection of individual sites.
- 3.3. The Government suggests that while some types of land or geographical areas may be excluded from SHLAA's, this should only be done where clearly justified and in agreement with stakeholders. Given the scale of the housing growth envisioned for Bradford in the recently adopted RSS – over 50,000 dwellings over the next 20 years, nearly doubling recent housing completion levels – it is suggested that the SHLAA needs to include as wide a selection of sites and locations as possible. This will maximise the pool of sites passed on at the end of the SHLAA for consideration as LDF allocations. It will therefore enhance the thoroughness and robustness of the study.
- 3.4. The Council will therefore include all known sites whether greenfield or brownfield, and in all settlements regardless of their size or position in the current UDP settlement hierarchy. Thus sites which are located in Bradford's rural settlements, sites put forward as rural exception sites for purely affordable housing, potential sites within the green belt and urban extensions will all be included.
- 3.5. With regard to the latter, the idea of urban extensions, at Holmewood on the SE side of Bradford and Apperley Bridge / Esholt on the Northern side of

Bradford, has already been put forward as part of the Core Strategy – Spatial Options consultation earlier this year. Urban extensions are normally investigated at stage 9 of the SHLAA process. However because these areas are already in the public domain and are already under investigation by the planning authority, it is proposed that they are included from the outset. The final SHLAA report, will then be able to comment on the extent to which other site specific areas of land supply could meet the district’s housing requirement with or without such urban extensions. The suggested inclusion of these areas from the outset is supported by the following extract from the Planning Advisory Service’s document on SHLAA :

- 3.6. *“It may be necessary in a core strategy to bring forward broad locations (or strategic sites in the terminology of the draft PPS12) outside existing settlements to be able to meet the housing targets laid down in the regional spatial strategies. The SHLAA guidance provides for broad locations to be considered where the need to do so is demonstrated following the assessment of specific sites, and quantification of the potential supply from them.” This logic suits most situations, However, where the authority is already sure that to meet housing requirements will require significant urban extension(s), it may make better sense for the potential broad locations to be assessed alongside brownfield and greenfield sites. This will offer the benefits of providing evidence about the developability of such areas, supporting public debate about where the growth might go, and avoiding the need to involve survey partners in two iterations of the assessment.” (PAS, 2008, page 7)*
- 3.7. The one potential source of sites mentioned by the Government in its Practice Guidance which the Council does not intend to include in the SHLAA is new free standing settlements. It is considered that the need for such proposals should in the first instance be included in the RSS. No such indication is given in the RSS, whose focus for Bradford is very much on the regeneration and remodelling of existing urban areas.

### **Bradford’s Site Sources**

- 3.8. Given the above analysis, the sites which are included in the SHLAA will arise from the following sources and datasets:

**Table 2 : Sites Sources for the SHLAA**

<b>Sites With Planning Status</b>
• Sites Under Construction
• Sites with Planning Permission - Unstarted
• UDP Housing Allocations - Unstarted
<b>Sites Without Planning Status</b>
• UDP Allocated Safeguarded Land
• Surplus / Poorly Performing Employment Sites Identified via the Employment Land Study
• Urban Capacity Study Sites

• Masterplan Sites
• Surplus Council Owned Land
• Pressure Sites
• SOMS
• Call for Sites
• Green Belt Survey Sites

**Notes:**

- *UDP Safeguarded Land – in the adopted Replacement UDP a number of areas of land lying between the edge of the built up area and the green belt were safeguarded as a land bank reserved for future allocation should the supply of sites within settlements be insufficient.*
- *Employment Sites – In 2007 the Council commissioned consultants AUPS to produce an Employment Land study to assess the future need for employment land and the adequacy of existing sites allocated or with permission for such development. All existing sites were assessed and scored against a range of criteria – those sites performing poorly and recommended for allocation or potential de-allocation are to be included in the SHLAA;*
- *A significant amount of work has already been carried out in identifying surplus land and buildings as apart of the Council’s Urban Capacity Study- this work and the sites identified will be rolled forward into the SHLAA;*
- *Masterplan Sites – a number of master planning documents have been produced in recent years covering Bradford City Centre, Airedale and Manningham. Any possible housing sites identified in these documents will be included in the SHLAA along with sites related to emerging Masterplans such as those being formulated by Incommunities (formerly BCHT);*
- *Over the last year the Council has received a number of site submissions from developers and land owners wishing to see their proposals included in the SHLAA / LDF process – these have been recorded on a ‘Pressure Sites’ file and will all automatically be included in the SHLAA;*
- *SOMS – ‘Site Omissions’ - the term used to describe site proposals put forward by objectors to the UDP;*
- *Green Belt - A full survey of the green belt was carried out in 1999/2000 as part of the Replacement UDP revealing a number of potential development sites which could have been proposed for allocation had the need for housing and constraints on land supply proved challenging enough to warrant their deletion from the green belt;*

**Site Thresholds**

- 3.9. Another decision which needs to be made is what site size threshold to use in the SHLAA and whether small sites as well as large sites should be assessed. This needs to relate to the nature of land supply in the particular area, the use to which the information will be put, and the scale of the task in terms of number of sites and resources available to the study.
- 3.10. As with most statutory development plans, the current UDP only allocates and designates sites which are at least 0.4 ha in size. For this reason and because of the finite resources available for the study and the need to be realistic about the amount of time external partners on the SHLAA Working Group will be able to offer, one option would be for Bradford’s SHLAA to use a site threshold of 0.4 ha. The exception to this would be for sites already with full or outline planning permission where no threshold would be used.

The exception in relation to the latter is to ensure an accurate 5 year land supply assessment is made. It should be noted however that should a 0.4 ha threshold be adopted there will be a number of smaller sites identified during the Urban Potential Study (which used a 0.2 ha threshold for most areas) which would be excluded from the SHLAA.

- 3.11. An alternative way of distinguishing between small and large sites is to use a dwellings threshold. This has been used in other SHLAA studies and latest government guidance, for example, site thresholds for affordable housing now uses numbers of dwellings rather sites areas. In Sheffield and Rotherham's SHLAA a distinction is made between what they classified as large sites – those with a capacity of 15 dwellings or more, and small sites with a capacity of less than 15 dwellings.
- 3.12. Whether or not the area or dwellings capacity method is used to distinguish between small and large sites a further consideration would be how to include sites which although small in size, could be developed at high densities. Where such sites would contribute 15 dwellings or more they should arguably be included in the SHLAA.

#### **KEY QUESTIONS :**

7. What sources of sites should be tapped to ensure the SHLAA is robust?
8. Is the Council right in sourcing sites in all categories except new settlements, and in all settlements in the district regardless of their size?
9. How should the SHLAA assess the potential of newly emerging masterplans for the remodelling of existing housing estates and should they be considered as sites or broad locations?
10. How should the potential of broad locations for growth such as Apperley Bridge / Esholt and Holmewood be judged and what are the right criteria and mechanisms for doing so?
11. At what stage in the SHLAA process should the potential of the Apperley Bridge / Esholt and Holmewood urban extensions be considered?
12. What site size threshold should be used for the SHLAA given the need to reflect the resources available to the study – should it be based on site area or site capacity?
13. If site capacity is used, is 15 dwellings the right number to distinguish between small and large sites?
14. Would a threshold of 15 dwellings for building conversions be more suitable than sticking to the 0.4ha threshold?

#### 4. DESKTOP REVIEW OF EXISTING INFORMATION

- 4.1. The following sources of information, as described in the Government's Practice Guidance will be used where applicable in the Bradford SHLAA:

**Table 3 : Sources of Information For the SHLAA**

<b>Sites in the planning process</b>	<b>Purpose</b>
Site allocations not yet the subject of planning permission	To identify sites
Planning permissions/sites under construction (particularly those being developed in phases)	To identify sites
Site specific development briefs	To identify sites and any constraints to delivery
Planning application refusals	To identify sites – particularly those applications rejected on grounds of prematurity
Dwelling starts and completion records	To identify the current development progress on sites with planning permission
<b>Other sources of information that may help to identify sites</b>	
Local planning authority Urban Capacity Study	To identify buildings and land, and any constraints to delivery
Local planning authority Empty Property Register	To identify vacant buildings
English House Condition Survey	To identify buildings
National Land Use Database	To identify buildings and land, and any constraints to delivery
Register of Surplus Public Sector Land	To identify buildings and land
Local planning authority Employment Land Review	To identify surplus employment buildings and land
Valuation Office database	To identify vacant buildings
Local planning authority vacant property registers (industrial and commercial)	To identify vacant buildings
Commercial property databases e.g. estate agents and property agents	To identify vacant buildings and land
Ordnance Survey maps	To identify land
Aerial photography	To identify land

Source : Government Practice Guidance 2007

## 5. DETERMINING WHICH SITES AND AREAS WILL BE SURVEYED

- 5.1. The Government's Practice Guidance states that as a minimum, all sites identified by the desktop review should be visited and surveyed. Council officers will be visiting and surveying all those sites revealed by the review of sources set out in stage 2 and if when carrying out such work further new sites are found these will be added to the SHLAA.
- 5.2. However, Council's also need to consider whether it is necessary to undertake additional systematic survey work to find further sites. During 2007, in association with its urban capacity study, the Council has surveyed large parts of the district and including most areas likely to be significant sources of developable sites. This included:
- Bradford city centre
  - All town, district and local centres as identified in the RUDP
  - An 800M pedshed around Bradford City Centre
  - 400M pedsheds (walking zones) around Shipley, Keighley, Ilkley, and Bingley town centres;
  - All UDP designated mixed use areas;
  - All UDP employment sites
  - Sample surveys of residential areas based on the typical urban area typology
- 5.3. The only areas excluded from the urban capacity study were those greenfield sites – including safeguarded land and green belt - which adjoin existing built up areas. However these are proposed for inclusion in the SHLAA. Because of the recent and extensive nature of this urban capacity survey work the Council does not propose to carry out further new site search work for the SHLAA. However, the urban capacity survey work will be supplemented by all sites put forward to the Council in its call for sites exercise, and all the sources of sites identified at stage 2. This will itself involve a not inconsiderable amount of site survey work.
- 5.4. For clarity the settlements which will be included in the SHLAA are listed below:

**Table 4 : Settlements to be Included in the SHLAA**

Bradford	Baildon	Burley in	Oakworth
Thornton	Cottingley	Wharfedale	Riddlesden
Queensbury	Harden	Addingham	East Morton
Shipley	Wilsden	Silsden	Oxenhope
Keighley	Cullingworth	Steeton	
Ilkley	Menston	Haworth	
Bingley	Denholme		

- 5.5. Based on current information, table 5 below provides a rough estimate of how many sites could be included in the SHLAA and from what sources. As work is still ongoing on analysing these sources and the call for sites exercise has yet to begin, these figures should be taken as a broad approximation only. If a smaller site size threshold were to be used then the number could be much higher. The table below shows the SHLAA will in no way be reliant on the urban capacity study alone as these sites only form a small proportion of the total number of estimated sites to be included in the survey:

**Table 5 : Estimates of Site Numbers and Sources**

	<b>Approx No of Sites</b>
Urban Capacity	180
UDP Housing Allocations*	90
Un-started Planning Permissions**	48
Safeguarded Land	49
Pressure Sites***	115
SOMS	25
Call for Sites	75
Emerging Masterplans and Urban remodeling	20
Surplus Public Sector (not incl above)	20
Other desktop Sources	28
<b>TOTAL POTENTIAL NUMBER OF SITES</b>	<b>650</b>

*\*April 2007, Not started, without planning permission*

*\*\*April 2007, Not started, with planning permission (mixture of allocated and unallocated sites)*

- 5.6. The Government's Practice Guidance identifies a number of hotspots which should be covered in the SHLAA – development hotspots based on recent planning permissions, town and district centres and their surrounding pedestrian catchments, principal public transport corridors, specific locations within settlements which are the subject of regeneration strategies and market renewal initiatives. In the Council's view, all of these types of location would have been adequately covered by the approach identified above.

**KEY QUESTIONS :**

15. Which settlements should be included in the SHLAA – is table 4 correct?
16. In addition to the existing sites and areas known to the Council and the further sites listed in table 5, are there any other areas which need surveying for possible housing sites?

## 6. CARRYING OUT THE SURVEY

- 6.1. Survey work will be carried out during the autumn to supplement desktop information already available from existing Council systems and external sources. It will be based on a standard proforma aimed at recording the character of the site and its surroundings and geared towards assessing the suitability, availability, and achievability of the site. All surveyors will be briefed to ensure consistency between them and a sample of returns will be assessed to ensure quality control. As a minimum the following information will be collected:
- site size;
  - site boundaries;
  - current use(s);
  - surrounding land use(s);
  - character of surrounding area;
  - physical constraints, e.g. access, steep slopes, potential for flooding, natural features of significance and location of pylons;
  - development progress, e.g. ground works completed, number of homes started and number of homes completed; and
  - initial assessment of whether the site is suitable for housing or housing as part of a mixed-use development.

## 7. ESTIMATING THE HOUSING POTENTIAL OF EACH SITE

### The different approaches

- 7.1. The Government's Practice Guidance sets out a range of different approaches to estimating the potential yield of sites (see below). All have their advantages and disadvantages and would involve different amount of resources and different skill sets being required and utilised:
- 7.2. **Sketching schemes for each site** is the first option but would be highly resource intensive and time consuming even assuming the input from developers on the SHLAA Working Group. In the Council's view this option would be impracticable and should be ruled out;
- 7.3. **Drawing up or using a range of sample schemes for different types of site** would be a second possible approach. Each SHLAA site is then assigned to one of the samples using a best fit approach. Although schemes are not drawn up for each site this is still a resource intensive approach and would inevitably involve having to 'shoe-horn' standard schemes onto to sites in the knowledge that the real eventual schemes would differ. Time would also be taken up in the working group debating which schemes were applicable to each site and in resolving differences in opinion. It is our view

that it is doubtful whether the additional benefit in terms of accuracy would be sufficient to warrant using this approach over other less resource intensive approaches such as using density multipliers;

- 7.4. **Using Density multipliers** would involve setting standard densities for sites so that site yields are generated automatically. Different densities can be assigned according to either geographical area and / or type and size of site. The Government's Practice Guidance suggests that densities could reflect current local planning policies. The replacement UDP states that densities in high quality public transport corridors should be at least 50 dwellings per hectare while outside these areas between 30 and 50 dwellings per hectare will be the norm. The urban capacity study recently concluded by the Council rejected using these figures on mass because an analysis of actual yields obtained on recent sites showed that much higher figures were being achieved in some parts of the district.

#### **Urban Capacity Density Multipliers**

- City centre @ 200 units to the hectare
- Thornton Road and Canal Road Corridor @ 100 units to the hectare
- Shipley and Keighley town centres and marginal areas @ 100 units to the hectare
- All other sites @ 45 units to the hectare.

- 7.5. While care must always be taken in using historical data – even that which is relatively recent in nature - density multipliers based at least in part on recent experience will in our view provide the best solution for the SHLAA. For information the density multipliers used in the urban capacity study are presented below – it is suggested that the SHLAA Working Group define a new set of multipliers based on the most up to date information at that time including any emerging market trends. The Council also proposes that although each site is subjected to a density multiplier the working group is given the opportunity to 'reality check' the outcome to see if the assumed yield should be amended due the specific characteristics of the site and the surrounding area. Reasons why the yield might be amended could include:
- The characteristics of the surrounding area in terms of its market or character – for example in some areas conservation areas or other local characteristics may suggest a different density to that given by the multiplier;
  - Where decreasing the density and thus number of units would resolve a constraint such as site access or junction capacities.
  - Where increasing the density and thus number of units would make an otherwise marginal site financially viable.

#### **Net developable areas and floorspace yardsticks**

- 7.6. The SHLAA methodology will need to consider whether in calculating site yields consideration should be taken of how much of the site will actually be developed for residential and associated use. PPS3 states that net dwelling density is calculated by including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided. Thus any areas given over to shops, community facilities, or left undeveloped would be excluded.
- 7.7. Consideration should therefore be given as to whether using rules of thumb to translate gross into net site areas in the SHLAA. Set out below are the rules of thumb advocated in the Government's guide to carrying urban capacity studies, 'Tapping the Potential':

**Table 6 : Net Developable Areas – Possible Rules of Thumb**

Site Size	Assumed Net ratio
< 0.4 hectares	100% of gross site area
0.4 – 2 hectares	90% of gross site area
Over 2 hectares	75% of gross site area

- 7.8. In the case of sites which comprise buildings for conversion it is suggested that the SHLAA uses the yardstick advocated in both the national and regional guidance on preparing urban potential studies. Here the known potential is converted into a housing yield by using a gross to net ratio to determine the usable floor area (80% has been used in some studies with 60% in difficult or deep plan buildings). This is then divided by a unit floorspace - URBED has suggested that 70m<sup>2</sup> is a useful rule of thumb. This floorspace assumes a mix of one and two bedroom flats.

### **KEY QUESTIONS :**

17. What would be the best approach to assess the potential of each site e.g. sketching schemes for each site from scratch, using sample schemes, or density multipliers?
18. If density multipliers are used, what would be the most realistic densities to use? Should they be based on planning policy, an analysis of actual developments or both?
19. Is it worth calculating net developable areas for each site and if so are the rules of thumb identified in this paper appropriate? If not these then which should be used?
20. How should the potential of large conversions be determined?

## 8. ASSESSING WHETHER AND WHEN SITES ARE LIKELY TO BE DEVELOPED

### The Suitability Test

- 8.1. The key issue here is to determine which criteria will be used to assess the suitability of sites within the SHLAA and which criteria will be left out. Those left out could still form part of the subsequent LDF site appraisal process.
- 8.2. The Government's Practice Guidance suggests that a site will be suitable for housing development if it:
- Offers a suitable location for development;
  - Would contribute to the creation of sustainable, mixed communities
- 8.3. However the guidance also states that the SHLAA assessment should not be narrowed down by existing policies designed to constrain development, whilst the Regional Practice Guidance advises that the 'suitable' test should not seek to create local policy in its own right, but defer to national and up-to-date regional policy tests.
- 8.4. Having regard to the guidance at national and regional level it is suggested that the only designations may be included in the suitability test are:
- Sites of National / International Wildlife Importance – SSSI, SPA, SAC;
  - Flood Zone 3b – the functional floodplain;
  - Unacceptable locations close to Hazardous Installations (**see footnote**)
- 8.5. There are thus many local policies and designations in the current UDP – designations which may well be carried forward into the LDF – which could affect potential housing sites and even rule out their allocation. Some but by no means all of these are listed for information in table 7 below:

**Table 7 : RUDP Designations Potentially Affecting Site Suitability**

BH16	Historic Parks & Gardens	GB1	Green Belt
BH17	Local Historic Parks and Gardens	NE3	Landscape Character Areas
OS1	Urban Greenspace	NE4	Trees and Woodlands
OS2	Recreation Open Space	NE9	Sites of Ecological / Geological Importance (SEGI)
OS3	Playing Fields	NE9	Regionally Important Geological Sites (RIGS)
OS6	Allotments	NE9	Bradford Wildlife Areas

OS7	Village Greenspace	NE13	Wildlife Corridors
OS8	Small Areas of Open land in Villages Sites allocated for non residential uses	NR14	Best and Most Versatile Agricultural Land

**Notes:**

*HSE advice on determining whether development in the vicinity of hazardous installations should be approved in based on two criteria. Firstly the location of the development and whether it falls within the inner, middle or outer zones around the installation and secondly the type and sensitivity of development. In general:*

- *Developments of less than 3 dwellings are acceptable regardless of the zone;*
- *Developments of between 3 and 30 dwellings at densities less than 40 dph are unacceptable in the inner zone*
- *Developments of more than 30 dwellings, and development of more than 2 dwellings at high density (greater than 40 dph) are unacceptable in the inner and middle zones;*

8.6. In addition there are a whole series of policies and designations which could affect the form and intensity of development and which could therefore affect development costs and site achievability. These include sites affected by or adjoining conservation areas and listed buildings.

8.7. Because of the exclusion of some local policies from the suitability test, there is an obvious danger the SHLAA could give a misleading picture of housing land supply. For example it could include sites that are likely to be allocated for other uses or likely to be protected from development in the current or forthcoming development plan. One way of overcoming this problem would be for the SHLAA report and data tables to make clear how much of the identified supply could be affected by such current or potential local policy constraints. This enables figures to be aggregated or disaggregated in whatever way is considered appropriate and would allow LDF Inspectors to consider both 'policy on' and 'policy off' scenarios when reaching conclusions on whether there is an adequate supply of housing land. This was the approach agreed between member of the Sheffield / Rotherham SHLAA Working Group.

8.8. While it will be for the Bradford SHLAA Working Group to determine the final approach to assessing suitability, a possible framework for assessing suitability and classifying sites is set out in the table below:

**Table 8 : Proposed Approach To Classifying Site’s Suitability**

Definitely Suitable Now	Justification
<ul style="list-style-type: none"> <li>• All sites with planning permission for housing development;</li> <li>• All sites allocated in the UDP for housing development;</li> </ul> <p><b>AND</b></p> <ul style="list-style-type: none"> <li>• Those sites without planning status but which comply with <b>all</b> of the following criteria:               <ol style="list-style-type: none"> <li>1. Accord with national and regional policy on the location of housing development – for example sites within either the regional city of Bradford or the main urban areas of Shipley, Ilkley and Keighley and are thus sustainably located in relation to jobs, services and public transport;</li> <li>2. Would provide a suitable living environment for prospective residents;</li> <li>3. Have no <b>major</b> physical constraints including access, infrastructure, ground conditions, flood risks, pollution or contamination;</li> <li>4. Are not :                   <ol style="list-style-type: none"> <li>a. Within a site of national / international wildlife importance e.g. SSSI, SPA &amp; SAC;</li> <li>b. Within flood zone 3b – the functional floodplain;</li> <li>c. Classified as unacceptable by virtue of location close to a HSE identified hazardous installation;</li> <li>d. Subject to any of the potential local policy constraints listed in table 7;</li> </ol> </li> </ol> </li> </ul> <p><b>(These sites are eligible to be categorised as deliverable sites and thus in the 5 year supply - subject to satisfactory assessment of availability and achievability)</b></p>	<p>The suitability of such sites has already been established through the planning process. Re-assessing their suitability would be unnecessary and would not represent a reasonable use of resources.</p> <p>Criteria points 1 and 2 reflect guidance in PPS3 and in the Government’s Practice Guidance for SHLAA.</p> <p>Point 1 identifies those strategic locations within Bradford which have been established as the priority for development in both the RUDP and the recently approved RSS because of their accessibility to jobs, services and public transport and as such their status is highly unlikely to change within the LDF Core Strategy. Other settlements are not specifically listed - they could be suitable and sustainable locations for development, but their exact status and thus the level of development thought to be appropriate and sustainable could vary depending on the outcome of the forthcoming <b>local</b> policy in the LDF Core Strategy. Sites most likely to fall foul of criteria 1 would be those in smaller settlement where the scale of development involved would be inappropriate because they would be likely to provide for more than local housing need and generate significant increases in travel by car.</p> <p>Point 3 reflects guidance in PPS3 and in the Government’s Practice Guidance for SHLAA. Point 4 includes nationally derived policy constraints - some of these elements such as flood risk and pollution also relate to point 3.</p>

Suitable – But With Local Policy Constraints	
<p>These are sites which do not have a current allocation or permission for housing development, are consistent with points 1 to 4 above, but which are subject to current or future policy constraints as listed in table 7 including any of the following:</p> <ul style="list-style-type: none"> <li>• Are currently designated within the RUDP for an alternative development use e.g. employment, retail etc.</li> <li>• Are within the green belt but adjoining an existing settlement;</li> <li>• Are designated as open space, playing fields, urban greenspace, village greenspace, recreation open space or allotments;</li> <li>• Are designated as a Bradford wildlife site or within a wildlife corridor;</li> </ul> <p><b>These sites are not eligible for inclusion as deliverable sites but are eligible for inclusion as a developable sites within years 6-10 or 11-15 of the SHLAA study period - subject to satisfactory assessment of availability and achievability.</b></p>	<p>The criteria selected here are those which are most likely to limit or prevent allocation in the forthcoming LDF and thus rule out housing development. There are many other local environmental criteria and designations of considerable importance such as conservation areas, landscape zones, minerals safeguarding areas but on the whole these are more likely to influence the form, design, timing and scale of development rather than the principle of development itself, and have therefore been excluded.</p>
Potentially Suitable	
<p>These are sites which do not have a current allocation or permission for housing development, are consistent now with points 1 and 4 above and could be consistent with points 2 and 3 above at some point within the SHLAA study period – i.e.</p> <ul style="list-style-type: none"> <li>• Current environmental conditions for prospective residents would be unacceptable but there is a reasonable prospect that such conditions could become acceptable during the SHLAA study period – this could be areas currently dominated by employment uses but which are subject to planned change through master plans;</li> <li>• There are current major physical constraints which could be overcome during the SHLAA study period</li> </ul> <p><b>These sites are not eligible for inclusion as deliverable sites but are eligible for inclusion as a developable sites within years 6-10 or 11-15 of the SHLAA study period - subject to satisfactory assessment of availability and achievability.</b></p>	<p>This category reflects the fact that in areas where major change is underway or planned or where programmed investment could resolve constraints, there will be sites which are not suitable at present but which could nevertheless deliver housing during the SHLAA and LDF periods. These sites should not be discarded as potential development plan allocations but neither can they be included as currently deliverable sites.</p>

Not Suitable	
<p>These are sites which do not have a current allocation or permission for housing development and which fail any of points 1 to 4 above.</p> <p><b>These sites would not form part of the 15 year supply of deliverable and developable sites but would be held on the Planning Service's SHLAA database for information purposes.</b></p>	<p>Sites which are within the green belt and are not adjoining a settlement or are not capable of forming an appropriate urban extension will be considered to have failed point 1 – i.e. they will not be considered an appropriate location for development.</p>

## **KEY QUESTIONS:**

21. What approach and criteria should be used to gauge the suitability of sites?
22. Should local policy designations and constraints be used to determine site suitability?
23. If local policy designations and constraints are not used to determine suitability, should those sites which are subject to such designations be specifically identified in the SHLAA and if so should that affect the categorisation i.e. as deliverable / developable sites?
24. What is your view on the approach set out in tables 7 & 8?

## **The Availability Test**

- 8.9. The Government's Practice Guidance states that a site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as:
  - Multiple ownerships
  - Ransom strips
  - Tenancies
  - Operational requirements of landowners
- 8.10. The Practice Guidance suggests that this will mean that a site is either:
  - Controlled by a housing developer who has expressed an intention to develop; or
  - The landowner has expressed the intention to sell.
- 8.11. The Practice Guidance states that the existence of a planning permission does not necessarily mean that the site is available. They also point out that legal searches carried out to ascertain ownership can only be relied upon for a short period.
- 8.12. Finally the guidance suggests that where problems are identified, an assessment must be made as to how and when they can realistically be overcome.
- 8.13. The Government's Practice Guidance raises a number of issues through terminology which it uses and which is undefined. In particular what constitutes the best information available? Where does the burden of proof lie – in having positive proof of landowner or developer intentions or in simply indicating an absence of constraints that would prevent development? And taking account of these issues how should limited resources and time constraints affect the methodology for assessing availability. The table below indicates a potential approach which might be used:

**Table 9 : Proposed Approach to Assessing Site Availability:**

<p><b>A site which is available now</b></p> <p>will be one where the owner of the site is known and either:</p> <ul style="list-style-type: none"> <li>• Development has commenced; or</li> <li>• The site is in the ownership of a housing developer; or</li> <li>• The site is or has recently (within the last 12 months) been marketed for housing development by the owner; or</li> <li>• The owner has indicated a willingness to sell the land and there is some form of documentation to support this;</li> </ul> <p>Such sites can potentially be included in the 5 year supply.</p>	<p><b>A site which will be considered available within years 1-5</b></p> <p>is one where the site owner is known and:</p> <ul style="list-style-type: none"> <li>• A developer has indicated that ownership of the site is likely to be secured within the next 5 years; or</li> <li>• An owner has indicated willingness to sell within years 1-5; <b>and</b></li> <li>• There are no ownership constraints such as ransom strips, multiple ownerships, or tenancies or where such issues exist there is justifiable confidence that they will be resolved within the time period;</li> </ul> <p>Such sites can potentially be included in the 5 year supply.</p>
<p><b>A site which is available beyond year 5 :</b></p> <p>will be one where the owner of the site is known and:</p> <ul style="list-style-type: none"> <li>• A developer has indicated that ownership of the site is likely to be secured within years 6-15; or</li> <li>• An owner has indicated willingness to sell within years 6-15; <b>and</b></li> <li>• There are no ownership constraints such as ransom strips, multiple ownerships, or tenancies or where such issues exist there is justifiable confidence that they will be resolved within the time period;</li> </ul> <p>Such sites can be considered for inclusion in the supply for years 6-10 or 11-15.</p>	<p><b>A site where availability is classified uncertain:</b></p> <p>will be one where either :</p> <ul style="list-style-type: none"> <li>• Ownership is unknown / uncertain;</li> <li>• Ownership is known but owner intentions i.e. when the site will become available are unknown or uncertain;</li> <li>• Owners are unwilling to release the site but there is a prospect of intervention to overcome this e.g. use of CPO powers.</li> </ul> <p>Such sites will not be considered as part of the 5 year supply but <b>may</b> be considered available within years 6-15 where based on the best judgment of the SHLAA Working Group of any known physical or <i>ownership</i> constraints and market conditions in the area. Such sites <b>may</b> be considered available within years 6-10 or 11-15.</p>
<p><b>An site will be considered unavailable where:</b></p> <p>The owner of the site is known and:</p> <ul style="list-style-type: none"> <li>• The owner has indicated that the site will not be released for housing development; or</li> <li>• Where a site which may otherwise be available is affected by constraints such as ransom strips where there is no reasonable prospect that they may be overcome.</li> </ul> <p>Such sites will <b>not</b> be considered part of the 15 year housing land supply at all.</p>	

- 8.14. The above approach is based on the assumption that establishing both ownership and explicit landowner / developer intentions for every site will not be realistic. Clearly the assessment of availability depends in the first instance on being able to establish who owns the site. There are currently a large number of sites which may be subject to the SHLAA where ownership is unknown. The Council will therefore attempt to ascertain ownership via a stepped approach:
- Collating information from any recent planning applications / permissions;
  - Undertaking mail shots to establish or re-establish ownership and owner intentions;
  - Utilising the knowledge and contacts of both the SHLAA Working Group and key stakeholders including developers, agents and members of the Bradford housing partnership;
  - Using land registry searches
- 8.15. Given limited time and resources the measures above, particularly the use of land registry searches, will be targeted initially on those sites which are thought most likely to form part of the 5 year supply and those sites with greatest capacity / potential contribution in terms of dwelling units.

#### **KEY QUESTIONS :**

25. What level of evidence and information is required to demonstrate that a site is available for housing development?
26. What methods and criteria should be used to assess availability?
27. What part should availability factors play in assigning sites to the different time periods / phases of the study?
28. If ownership or owner intentions and thus availability is unknown or uncertain how should this affect the site's inclusion or exclusion from the supply?
29. Does Table 9 form an appropriate basis for considering availability in the SHLAA?

#### **The Achievability Test**

- 8.16. The Government's Practice Guidance states that a site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is said to be a judgment about the economic viability of a site, and the capacity of the developer to complete and sell the housing over a certain period. It is suggested that the main factors to take into consideration are:

- **Market Factors**

- Adjacent uses
- Economic viability of existing, proposed and alternative uses in terms of land values
- Attractiveness of the locality
- Level of potential market demand and projected rate of sales

- **Cost Factors**

- Site preparation costs in relation to any physical constraints
- Any exceptional works necessary
- Relevant planning standards or obligations
- Prospect of funding or investment to address identified constraints or assist development

- **Delivery Factors**

- Phasing by the developer
- Realistic build out rates on larger sites
- Whether there is a single developer or several developers offering different housing products
- Size and capacity of the developer

- 8.17. The two main ways of using such factors are either to carry out residual valuation models to assess economic viability or to carry out a more intuitive analysis which incorporates the views of developers and property agents. For the Bradford SHLAA it is considered that carrying out residual financial appraisals for every site would be impractical because of the large numbers involved and of questionable value because of the value judgments needed to set appraisal assumptions & inputs. However, financial appraisals may have a role in selective cases, for example where a site is known to have considerable abnormal development costs.
- 8.18. Attempts will be made to contact the developers of all larger schemes that have planning permission. For schemes where construction has not yet started, developers will be asked whether they intend to implement the permission. All developers will be asked about the timescales for completing their schemes.
- 8.19. Analysis of achievability involves identifying how many units will be delivered and at what points in the 15 years span of the study. It is suggested that it would be inappropriate to make site-by-site estimates of annual completions for the two phases beyond the initial 5 year supply period as it would imply a degree of precision that is not possible when looking that far ahead. Inevitably, estimates of actual rates of completions become more difficult the further into the future those estimates are made. Instead the SHLAA assessment could produce a dwelling completions trajectory based on take-up of the housing supply at an average rate over the two latter phases.

- 8.20. Estimating dwelling completions for schemes will also involve making assumptions about both the lead times for development on schemes to commence once planning permission has been gained and build rates once development is underway. In the Sheffield / Rotherham SHLAA these assumptions have been made explicit and have been based on the advice of the HBF. The Council will consult both the HBF and other members of the working group on these key factors. The assumptions taken by Sheffield and Rotherham SHLAA are indicated below:
- 8.21. **Lead Times** – the provision of statutory services to a site can comfortably exceed a year and it takes approximately 6 months from site start to first house completion. In the case of apartment schemes this period is much longer as a large amount of development is undertaken at the same time. For sites under 50 dwellings a lead in time of one year was therefore used for the time between obtaining planning consent and starting delivery of units on site. For sites over 50 dwellings a two year lead in period was used.
- 8.22. **Build Rates** – the table below indicates the assumptions made in the Sheffield and Rotherham SHLAA. Bradford’s SHLAA Working Group will need to take a view on whether build rates in Bradford are likely to follow this pattern or whether there are any specific circumstances which justify departing from these numbers.

**Table 10: Possible Build Rate Assumptions**

Type of site	Dwellings per year
At least 90% houses, single builder	35
At least 90% houses, two or more builders	70
Houses and more than 10% flats, single builder	50
Houses and more than 10% flats, two or more builders	100

- 8.23. The supply of sites considered deliverable in the first 5 years of the study will most likely be focused on those which already have planning permission. The SHLAA Working Group will need to give particular consideration to whether sites which have yet to have a planning application submitted can be delivered within 5 years. Given that the lead time for units to be delivered could be up to 2 years based on the assumptions above, then it may be appropriate to exclude sites from the 5 year supply where there is no known intention to submit a full application within years 1-3.

### **KEY QUESTIONS :**

30. What factors should be used to judge achievability and which of those set out by the Government are most important;
31. What methodology should be used to ascertain achievability?
32. Should financial models such as residual valuation be used for some or all sites?
33. What assumptions should be made with regard to lead times for sites which have gained planning permission?
34. What assumptions should be made with regard to build rates?

### **Overcoming Constraints**

- 8.24. Where constraints have been identified, the Government's Practice Guidance states that the assessment should consider what action would be needed to remove them. Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, or environmental improvement.

### **The Sequential Approach To The 3 Tests**

- 8.25. The Yorkshire and Humber Regional Assembly commissioned report prepared by consultants ARUP advises that the 3 tests should be carried out in sequence in the following order:

1. **Suitable**  
▼
2. **Available**  
▼
3. **Achievable**

- 8.26. Sites which are categorised as not suitable will not be carried forward to the second test of availability and similarly sites which are considered unavailable will not be carried forward to the test of achievability. This will help ensure the most efficient use of resources and time.

## **9. REVIEWING THE RESULTS AND IDENTIFYING THE POTENTIAL FROM BROAD LOCATIONS & WINDFALL**

### **Reviewing the SHLAA Results**

- 9.1. Stage 8 of the SHLAA involves reviewing the results of the site appraisals so that the housing potential of all sites is combined. This will produce an indicative housing trajectory demonstrating how much housing can be delivered and when. The Council and its partners will need to assess these results against the housing requirement being used within the LDF Core Strategy. The results of this review will determine what further work the SHLAA needs to undertake as part of stages 9 and 10.
- 9.2. Ideally the SHLAA will have identified sufficient developable sites to meet at least the first 10 years of the LDF plan period and preferably the full 15 years. Given that some of the sites which are considered developable within the limited confines of the SHLAA may actually be affected by local planning policy constraints and local environmental designations, the SHLAA should arguably be aiming to identify an even greater supply of sites i.e. beyond the 10 / 15 years targets since this will allow for a genuine choice of sites which represents the best strategic and 'sustainable' fit and which avoids locally sensitive or valued locations.
- 9.3. At this stage it will also become clear as to whether there is an adequate number of deliverable sites and thus whether the district has a 5 year supply of housing land as required by PPS3.
- 9.4. If it is concluded that insufficient sites have been identified then there are a number of options open to the working group. These include assessing the housing potential of broad locations and determining the housing potential of windfall. Before these assessments are commissioned the working group should consider whether there are any further sites which could be identified and appraised. These may have emerged during the course of the previous stages via new planning permissions granted, further pressure sites submitted to the Council, from master planning work which has advanced since the start of the study or from newly emerging local authority surplus land. The likelihood of needing to include such sites, or windfalls and broad locations, ahead of the first annual update of the SHLAA, may be greater in Bradford's case due to the size of the housing requirement in the newly adopted RSS and the massive increase in land supply required compared to the previous RSS.

### **The Role of Broad Locations and Windfall**

- 9.5. The Government's Practice Guidance states that broad locations are areas where housing development is considered feasible and will be encouraged,

but where specific sites cannot yet be identified. Examples of broad locations include:

- Within and adjoining settlements – for example, areas where housing development is or could be encouraged, and small extensions to settlements; and
- Outside settlements – for example, major urban extensions, growth points, growth areas, new free-standing settlements and eco-towns. The need to explore these will usually be signalled by the Regional Spatial Strategy.

9.6. As has been explained above, the Council has already identified two small urban extensions as part of its Core Strategy consultation and it is proposed that these are assessed ‘up front’ rather than waiting until stage 9 of the study. Should the SHLAA need to address further broad locations then it is proposed that the initial search should be for locations within the main urban areas. There are a number of potential such areas including Bradford City Centre, Canal Road, the East Bradford West Leeds Corridor, the areas of Manningham and Thorpe Edge which are currently the subject of master planning activities. The stage which has been reached in terms of the work to underpin these areas and master plans varies and this will affect whether they can be considered as broad areas or whether they will contribute specific identifiable sites. This issue will therefore need to be revisited by the SHLAA Working Group at the appropriate time along with the approach for identifying such areas and calculating their capacity / potential.

9.7. The Government’s Practice Guidance reiterates the policy of PPS3 which indicates that the supply of land for housing should be based upon specific sites, and where necessary, broad locations. However, it recognises that there may be genuine local circumstances where a windfall allowance is justified. Within Bradford as in most of West and South Yorkshire, windfalls have in recent years constituted a major part of the housing units delivered. As table 11 below shows, up to 71% of completions have come from this source. Moreover as much as 98% of these have been on brownfield land thus making a significant contribution to sustainability.

**Table 11 : Recent Windfalls as a Proportion of Overall Completions**

<b>Monitoring Year</b>	<b>No of Dwellings On Windfall Sites</b>	<b>Total No of Dwellings Completed (gross)</b>	<b>% of Total Completions on Windfall Sites</b>	<b>% of Windfall Completions on PDL</b>
<b>2004/5</b>	991	1390	71%	90%
<b>2005/6</b>	969	1382	70%	95%
<b>2006/7</b>	963	1598	60%	98%
<b>2007/8</b>	1677	2230	75%	96%

Source : Bradford Council, 2008

- 9.8. Regardless as to whether there is a shortfall of identifiable developable sites, it is suggested that SHLAA should include a detailed analysis of recent windfall trends and potential future supply from this source. Such contributions would be left out of the tabular analysis of land supply if they are not needed or included if they are.
- 9.9. Based on the above analysis it is proposed that the following sequential approach is used, should stage 8 reveal a shortfall of identifiable sites:

**Table 12 – A Proposed Sequential Approach To Identifying Additional Land**

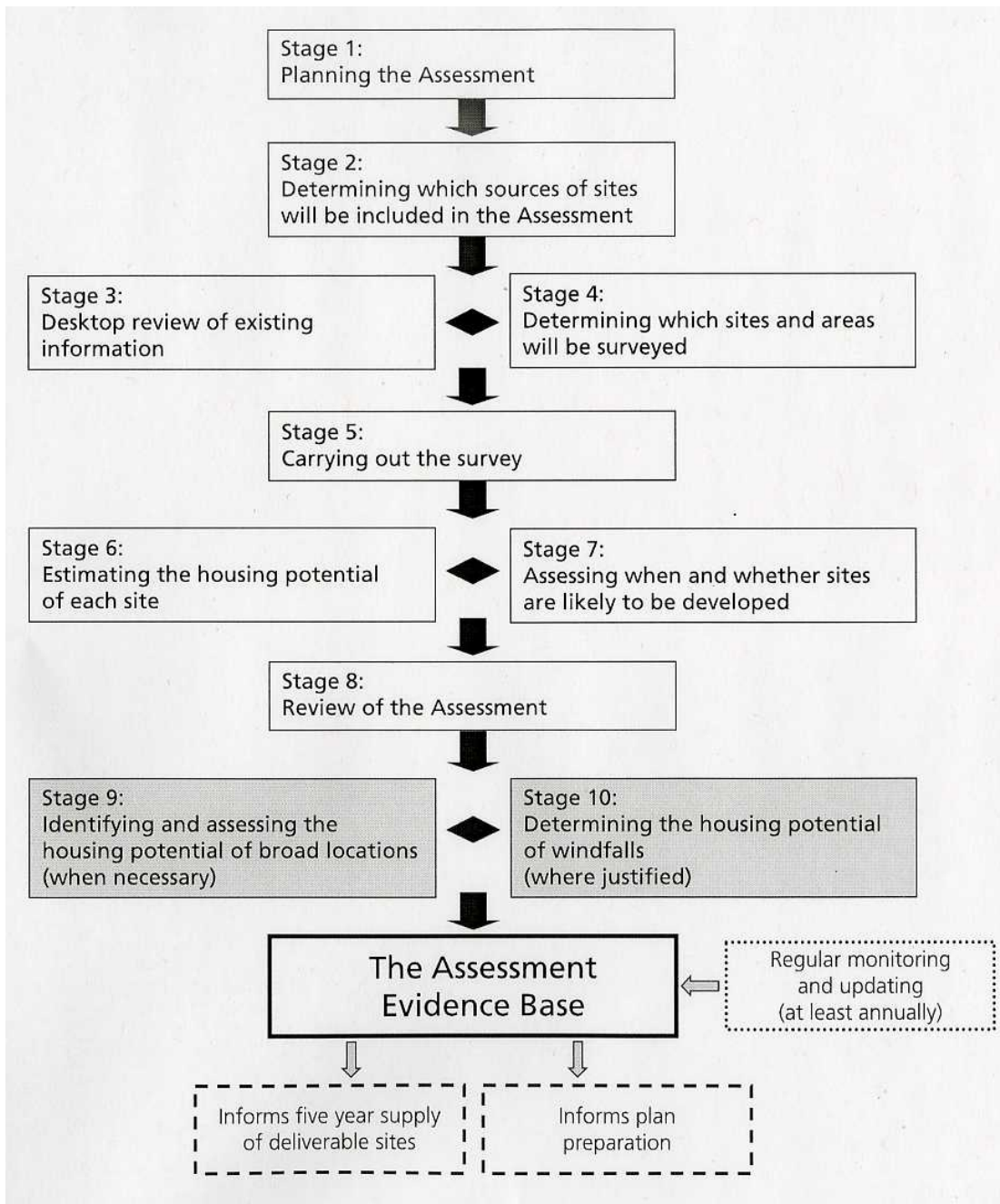
<b>First Option</b>	Include specific sites which have emerged during the study – e.g. new pressure sites, master plan sites and new surplus public land.
▼	<i>If still insufficient land .....</i> ▼
<b>Second Option</b>	Assess the capacity of any appropriate broad areas <b>within</b> Bradford or the Principal Towns;
▼	<i>If still insufficient land .....</i> ▼
<b>Third Option</b>	Include a contribution from windfalls based on robust and up to date data and agreed by the working group;
▼	<i>If still insufficient land .....</i> ▼
<b>Fourth Option</b>	Consider whether there are any broad areas <b>adjoining</b> Bradford or the Principal Towns e.g. modest urban extensions which are consistent with the Regional Spatial Strategy.

**KEY QUESTIONS :**

35. What approach / action should the SHLAA Working Group take should it find that there are insufficient developable sites?
36. Is the sequential approach outlined in Table 12 appropriate?
37. Should sites which have emerged during the course of the study be included in the SHLAA at Stage 8 or held back for the first annual SHLAA update?
38. How should broad locations, if required, be identified?
39. What criteria and method should be taken in calculating the capacity of broad locations?
40. What approach should be taken to considering windfall within the SHLAA?

# **APPENDICES**

# APPENDIX 1 : THE SHLAA PROCESS



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## APPENDIX 3 : TIMETABLE FOR THE SHLAA

	Stage	
	Database and GIS Design and Set Up	August – September 2008
	Methodology draft	July – August 2008
	Consultation on methodology	September 2008
	Call For Sites	September 2008
1.	Planning the assessment	July – September 2008
2.	Determining which sources of sites will be included in the assessment	July – September 2008
3.	Desktop review of existing information	August – October 2008
4.	Determining which sites and areas will be surveyed	August – October 2008
5.	Carrying out the survey	September – November 2008
6.	Estimating the housing potential of each site	November – December 2008
7.	Assessing when and whether sites are likely to be developed	November – January 2009
8.	Review of assessment	January - February 2009
9.	Identifying and assessing the housing potential of broad locations (where necessary)	February – March 2009
10.	Determining the housing potential of windfall (where justified)	February – March 2009
	Publish	April 2009
	Preparation for SHLAA update	March - April 2009
	Completed SHLAA update	June 2009

## **APPENDIX 4: SCHEDULE OF KEY QUESTIONS**

### **PLANNING THE ASSESSMENT**

1. How should the SHLAA Working Group be constituted and who should be on it?
2. What should be the role of the SHLAA Working Group, and how should it contribute to a robust study?
3. How should the site appraisal work be organised and what role should the non council working group members play?
4. Do you agree with the proposals for updating the SHLAA in 2009?
5. How can the quality and transparency of the SHLAA be best assured?
6. Is the timetable for completion of the SHLAA (see Appendix 3) realistic and how can it be assured?

### **SOURCES OF SITES TO BE INCLUDED IN THE ASSESSMENT**

7. What sources of sites should be tapped to ensure the SHLAA is robust?
8. Is the Council right in sourcing sites in all categories except new settlements, and in all settlements in the district regardless of their size?
9. How should the SHLAA assess the potential of newly emerging master plans for the remodelling of existing housing estates and should they be considered as sites or broad locations?
10. How should the potential of broad locations for growth such as Apperley Bridge / Esholt and Holmewood be judged and what are the right criteria and mechanisms for doing so?
11. At what stage in the SHLAA process should the potential of the Apperley Bridge / Esholt and Holmewood urban extensions be considered?
12. What site size threshold should be used for the SHLAA given the need to reflect the resources available to the study – should it be based on site area or site capacity?
13. If site capacity is used, is 15 dwellings the right number to distinguish between small and large sites?
14. Would a threshold of 15 dwellings for building conversions be more suitable than sticking to the 0.4 ha threshold?

### **DETERMINING WHICH SITES AND AREAS WILL BE SURVEYED**

15. Which settlements should be included in the SHLAA – is table 4 correct?
16. In addition to the existing sites and areas known to the Council and the further sites listed in table 5, are there any other areas which need surveying for possible housing sites?

### **ESTIMATING THE HOUSING POTENTIAL OF EACH SITE**

17. What would be the best approach to assess the potential of each site e.g. sketching schemes for each site from scratch, using sample schemes, or density multipliers?
18. If density multipliers are used, what would be the most realistic densities to use? Should they be based on planning policy, an analysis of actual developments or both?
19. Is it worth calculating net developable areas for each site and if so are the rules of thumb identified in this paper appropriate? If not these then which should be used?
20. How should the potential of large conversions be determined?

### **ASSESSING THE SUITABILITY OF SITES**

21. What approach and criteria should be used to gauge the suitability of sites?
22. Should local policy designations and constraints be used to determine site suitability?
23. If local policy designations and constraints are not used to determine suitability, should those sites which are subject to such designations be specifically identified in the SHLAA and if so should that affect the categorisation i.e. as deliverable / developable sites?
24. What is your view on the approach set out in tables 7 & 8?

### **ASSESSING THE AVAILABILITY OF SITES**

25. What level of evidence and information is required to demonstrate that a site is available for housing development?
26. What methods and criteria should be used to assess availability?
27. What part should availability factors play in assigning sites to the different time periods / phases of the study?
28. If ownership or owner intentions and thus availability is unknown or uncertain how should this affect the site's inclusion or exclusion from the supply?
29. Does Table 9 form an appropriate basis for considering availability in the SHLAA?

### **ASSESSING THE ACHIEVABILITY OF SITES**

30. What factors should be used to judge achievability and which of those set out by the Government are most important;
31. What methodology should be used to ascertain achievability?
32. Should financial models such as residual valuation be used for some or all sites?
33. What assumptions should be made with regard to lead times for sites which have gained planning permission?
34. What assumptions should be made with regard to build rates?

## **REVIEWING THE ASSESSMENT, BROAD LOCATIONS AND WINDFALL**

35. What approach / action should the SHLAA Working Group take should it find that there are insufficient developable sites?
36. Is the sequential approach outlined in Table 12 appropriate?
37. Should sites which have emerged during the course of the study be included in the SHLAA at Stage 8 or held back for the first annual SHLAA update?
38. How should broad locations, if required, be identified?
39. What criteria and method should be taken in calculating the capacity of broad locations?
40. What approach should be taken to considering windfall within the SHLAA?

## APPENDIX 5: LIST OF TABLES AND FIGURES

<b>Figure 1</b>	Strategic Housing Land Availability Assessment - Core Outputs
<b>Table 1</b>	Proposed SHLAA Working Group Composition
<b>Table 2</b>	Sites Sources for the SHLAA
<b>Table 3</b>	Sources of Information For the SHLAA
<b>Table 4</b>	Settlements to be Included in the SHLAA
<b>Table 5</b>	Estimates of Site Numbers and Sources
<b>Table 6</b>	Net Developable Areas – Possible Rules of Thumb
<b>Table 7</b>	RUDP Designations Potentially Affecting Site Suitability
<b>Table 8</b>	Proposed Approach To Classifying Site’s Suitability
<b>Table 9</b>	Proposed Approach to Assessing Site Availability
<b>Table 10</b>	Possible Build Rate Assumptions
<b>Table 11</b>	Recent Windfalls as a Proportion of Overall Completions
<b>Table 12</b>	A Proposed Sequential Approach To Identifying Additional Land