

## Report of the Assistant Director (Planning, Transportation & Highways) to the meeting of the Regeneration and Economy Overview & Scrutiny Committee to be held on 2<sup>nd</sup> March 2011.

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### Subject:

Bradford Local Development Framework (LDF) – Strategic Housing Land Availability Assessment (SHLAA)

### Summary statement:

This report explains the role and purpose of the SHLAA - one of the key items of evidence which the Council is required to produce in support of the Local Development Framework. The SHLAA compiles a list of potential housing sites across the district and assesses whether each would be capable of delivering new homes and if so how many and when. The results of all these individual site appraisals can then be aggregated to give an insight as to the scale and nature of land supply in different parts of the district – including for example the extent of previously developed as opposed to green field land .

The SHLAA thus provides some of the information necessary to make informed choices in the LDF Core Strategy on the scale and distribution of housing growth across the district. It also provides a menu of potential sites which could be allocated for housing development within the LDF Allocations Development Plan Document (DPD) subject to further more detailed assessments of the local impact or benefits that development of these sites would bring. Finally the data provided by the SHLAA reveals whether the Council has a Planning Policy Statement 3 (PPS3) compliant 5 year housing land supply.

The report explains the stages of the SHLAA, key aspects of its methodology, progress so far, future steps and some preliminary results.

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## Summary

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### 1. Background

#### What Is a SHLAA and Why Is It Produced

- 1.1. Members will be aware that work is currently underway to produce a new statutory development plan for the district which will in due course replace the current plan – the Replacement Unitary Development Plan (RUDP) – itself adopted in October 2005. This new plan, the Local Development Framework (LDF) will set out a spatial strategy for the future development of the district. It will identify both sites and areas for new development, growth and investment and also areas such as the greenbelt which will receive protection from development. The LDF is being prepared against a backdrop of rapid population growth within the district which is generating the need for new homes, jobs, services and infrastructure. It faces the challenge of developing a strategy for how around 50,000 new homes are to be accommodated within the district over the next 15 years, based upon the requirement set out in the Regional Spatial Strategy for Yorkshire and the Humber (RSS). The new plan will need to secure the regeneration of some areas while also protecting valued open spaces, wildlife habitats and conservation areas.
- 1.2. The LDF will comprise a number of separate documents each of which has to go through rigorous scrutiny and public consultation. The strategic aspects of the LDF will be contained in the Core Strategy, while site specific proposals will be contained in Area Action Plans for the City Centre and Shipley / Canal Road, an 'Allocations' document for the rest of the district and a Waste Management Plan.
- 1.3. All LDF documents have to be prepared in compliance with detailed government regulations and have to be backed up by robust up to date evidence and information. The Government have specified a number of research documents

which must be produced and then used to inform policy choices, and have also published practice guidance to ensure that such documents are produced in a consistent way.

- 1.4. Strategic Housing Land Availability Assessments (SHLAA) are one of the research documents which the government requires the Council to produce. It would therefore not be possible to progress the LDF without a SHLAA and the contents of the LDF would be likely to be found unsound by the Planning Inspectorate at examination if the SHLAA was not produced in line with the Government's best practice documentation.
- 1.5. A SHLAA can best be described as a process of pooling, from a variety of sources, all known potential sites for housing development and then 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 the next 5 years;
  - Developable in the medium or longer term (usually the 6-10 and 11-15 year periods);
  - Or not currently developable
- 1.6. Although the SHLAA provides data and assessment of individual sites its main role lies with the information and issues which are revealed once the site data is amalgamated on a district wide and area by area basis to reveal the extent and nature of the potential supply of land.
- 1.7. Carrying out a SHLAA is not a one off exercise. Once completed the SHLAA should be updated and rolled forward on an annual basis. While the production of the first SHLAA is a very long and complex process, updates should be much simpler and quicker. This is because the majority of sites within the SHLAA database will have simply their data rolled forward and only new sites (for example any new planning permissions ) will be surveyed and assessed from scratch.
- 1.8. Members will be aware that there are a great many factors including any local impacts and problems and any local benefits of development which need to be assessed before ever a site is recommended or rejected for allocation as a housing site in the development plan. The purpose of this study is NOT to undertake all of this more detailed analysis – that will take place after the SHLAA study as part of the rest of the LDF work programme. The study simply aims to sieve out the worst sites which have little chance of being accepted in policy terms (See Para 1.15 below) and focus on determining which remaining sites are economically viable for developers to deliver. It thus narrows the range and choice of sites to allow more focused planning assessments and public consultation in due course.
- 1.9. **Thus the SHLAA makes no recommendations as to whether such sites should actually be allocated for development in the Local Development Framework (LDF).** The SHLAA is a technical appraisal document not a policy document. However 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 favourably 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 normally be considered for allocation in the LDF.

- 1.10. 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.
- 1.11. 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 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 provides 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 how much housing development there will be in different parts of the district but these decisions must be backed up by evidence that there is sufficient developable land in those areas to meet these targets. The SHLAA will thus assist in showing how realistic different options for accommodating housing growth would be. The SHLAA will also illustrate the implications, on an area by area basis, of going for different quantum of development – for example it will show broadly how much green field or green belt land might be needed if the LDF Core Strategy advocates a given amount of housing development in a given town or village. It thus allows different options to be compared, and the implications of those options to be clear. Finally the SHLAA will inform targets for the split between green field and previously developed (brown field)land.
  - **LDF Site Allocations** - as stated above the SHLAA will provide a pool of sites for the LDF Development Plan Documents (DPD's) to select from – and assuming that there are more than the required number of sites available, the DPD's will have the task of identifying those which are most sustainable, which promote a continuing emphasis on the use of previously developed land and which are most in line with the LDF Core Strategy.
- 1.12. The main stages in producing the SHLAA, as set out in the Government's practice guidance, are shown at Appendix 1. At the time of writing this report stages 1-7 have been completed and stages 8, 9 and 10 are underway. The current focus is on analysing and mapping the results of the site appraisals and populating a series of tables which will show the nature of the developable land supply. Examples of the tables which are being produced are given in Appendix 2 but please note the exact make up of these tables may change in the production of the final report.

#### Key Aspects of Bradford's SHLAA Methodology

- 1.13. One of the first stages of the SHLAA is to compile the list of sites which are to be assessed. To make the task manageable Bradford has followed the standard convention of using a site size threshold of 0.4ha – smaller sites are not specifically

identified in the development plan. Over 700 sites have been assessed and the majority have come from the following sources:

- Sites already identified for housing development in the RUDP;
- Sites which though not identified in the RUDP have nevertheless been granted planning consent for housing development by the Council;
- Sites which have been identified by officers in extensive survey work as vacant, derelict or under used;
- Sites which land owners and developers have asked the Council to consider as potential LDF housing allocations - many of these are green field or green belt locations. The Planning Service issued a 'Call For Sites' at the start of the SHLAA process to ensure it had as many options to look at as possible;
- Sites which the Council's Asset Management service have asked to be included on the basis that they are or may become surplus to requirements in the coming years;
- Proposals within any masterplans which the Council has commissioned or produced;

1.14. Once data and information has been gathered the sites included in the SHLAA are subject several tests to identify whether they could deliver new homes should they be allocated in the LDF.

1.15. The first test categorises sites according to how likely they are to be considered suitable locations for housing development and in doing so filters out the worst sites. Ideally all sites would be in locations which the current RUDP would consider acceptable, however given the scale of the housing targets the district faces and the nature of many sites which land owners have submitted, this is not realistic. Sites are therefore placed into one of 4 categories:

- Suitable Now – these are sites which are already allocated in the RUDP for housing development, or already have planning permission for housing or which are in locations where there are no RUDP policy designations which currently prevent or constrain development such as urban greenspace, green belt etc.
- Potentially Suitable (Local Policy Constraints) – these are sites which fall within areas currently affected by policies or policy designations which constrain development – either preventing it from happening at all or influencing the scale and design so that it is in keeping with its surroundings. This includes environmental designations such as conservation areas, urban greenspace, green belt, and wildlife areas as well as sites currently identified for other non residential uses such as employment land; to be clear some of these are sites which would only come forward should the LDF actively remove the relevant designation, a process which would of course be subject to Council approval and public consultation and scrutiny at a public examination;
- Potentially Suitable (Physical Constraints) – these are sites which would require interventions to resolve dereliction, contamination, lack of infrastructure, difficult topography, bad neighbour uses etc
- Unsuitable – these are sites which fall within areas or zones in which national planning policies would normally rule out housing development - for example

high flood risk areas, national and internationally important wildlife areas, scheduled ancient monuments, and sites in proximity to hazardous installations;

- 1.16. The second test ascertains whether a site is available and outcomes range from those sites where the land owner is known and is confirmed to be marketing the site for development, sites where landowners are known but have ruled out housing development and sites where land ownership is unknown. Extensive use has been made of questionnaire surveys to ascertain owner intentions, and land registry data but it is not always possible to determine the current status of sites.
- 1.17. The third test which is applied to sites ascertains whether a site would be economically viable for house builders to develop and if the site is viable, how many homes the site could yield. The assumptions made at this stage – for example the densities at which sites are assumed to be developed at and the rate of housing completions on each site once development is underway – have a large bearing on the final results of the SHLAA.
- 1.18. Sites which are not ruled out as unsuitable, unavailable or unviable are included within a table – a 17 year by year trajectory - which estimates when and at what rate housing units may be completed.

#### Consultation and Engagement

- 1.19. Government guidance requires that the process of assessing the sites and compiling the SHLAA is carried out by a working group comprising both Council officers and housing developers. Because the SHLAA focuses on site viability, buy in and involvement by the development sector is considered essential if the results of the SHLAA are to be given credence.
- 1.20. Best practice suggests that the working group should comprise representation from the Planning and Housing Services, volume house builders, social housing providers, and estate agents. Due to the large and onerous levels of work and commitment which involvement in the SHLAA requires, it is not easy to secure such involvement. When Bradford issued its 'Call For Sites' it also invited expressions of interest for membership of the SHLAA working group. The Planning Service also briefed the Bradford Housing Partnership and Bradford Housing Association Liaison Group of the study and secured the nomination of a couple of social housing providers to join the SHLAA Working Group. The table below indicates current membership of Bradford's SHLAA working group.

**Table 1 : SHLAA Working group membership**

<b>Bradford Council</b>	<b>Market House Builders</b>	<b>Social Housing Providers</b>
Planning Service (x2) Housing Service (x2) Asset Management Service	Persimmon Barrat / David Wilson Hallam Land Redrow	InCommunities Firebird Manningham
<b>Estate Agents</b>		
Dacre Son & Hartley		

- 1.21. The process followed has been for Council officers to carry out all survey work, information gathering, questionnaire surveys first and capture this within a database and GIS system. Officers have then assessed each site against the 3 tests and forwarded site appraisals to the working group in batches. Working group members have then visited and assessed the sites, reviewed the data and indicated those sites where they have differing views to that indicated by the Council. A negotiation process then ensues to resolve differences where it is possible to do so.
- 1.22. Before the SHLAA process commenced the Planning Service published a methodology document for consultation. The main aim of the consultation was to attract comments from government agencies, developers and agents to test whether the methodology choices proposed were sound and in line with government guidance. Letters and e-mails to notify of the consultation exercise and explain the SHLAA and Call For Sites process were sent to a wide range of potential consultees including ward members and parish councils. A total of 93 comments were received from 13 organisations, mainly from house builders and planning agents. Detail about the SHLAA and Call for Sites process was placed on the Planning Service web pages and a short and simple downloadable guide to SHLAA was also added.

## 2. **Report issues**

- 2.1. The next stages of the SHLAA are to complete the data analysis and draft the report. Normal practice would be for the SHLAA to be published for comment and for information at the same time as the Core Strategy Preferred Options document is published. This is currently envisaged to be this summer. The SHLAA would be published alongside other evidence base research reports (such as the employment, retail and transportation studies) so that the public can see the evidence which led to the policy choices in the Core Strategy. The general public will therefore have the following opportunities to comment on the SHLAA and on site specific proposals:
  - Firstly when the SHLAA and Core Strategy is published most likely in the summer;
  - Secondly when the first SHLAA annual review is completed, most likely early 2012;
  - Thirdly when the LDF Allocations DPD Issues and Options Consultation takes place currently envisaged to be early 2012;
  - And additionally at the further 2 formal LDF consultation stages – at the preferred options stage, at the publication plan stage and then where objections are unresolved at the Examination in Public which is presided over by the Planning Inspectorate.
- 2.2. As emphasised above, the SHLAA report will not indicate any Council view on whether the 700 or so sites within it will be allocated for development. The first stage at which the Council will be asked to approve a draft list of such sites will not be until the 'LDF Allocations Preferred Option Stage' later in 2012 and before that there will already have been at least 3 stages of public consultation which will give

the public the opportunity to both comment on the SHLAA and also put forward any new alternative sites options – for example derelict or brown field sites.

- 2.3. When the current SHLAA is completed and published it will comprise the following elements:
  - A report summarising the methodology and approach taken;
  - An executive summary;
  - A commentary on the results i.e. the nature of the land supply at a district wide level – amount, brown field green field split etc.
  - A commentary on the results on a settlement by settlement basis;
  - A series of maps showing where the sites in the SHLAA are;
  - A statement as to whether the District has a PPS3 compliant 5 year supply of deliverable sites which will produce the target number of new homes over the period;
  - A series of technical appendices;
  - A downloadable spreadsheet with details and data on each site including the key issues resulting in the appraisal result for that site;
- 2.4. Members will be aware from the content of this report so far that the SHLAA document is likely to contain sensitive and contentious information. Care will need to be taken in the timing of the release of the SHLAA and the way in which it is explained and communicated.
- 2.5. Work on analysing the SHLAA data is ongoing. However, there are some key messages from the preliminary results (which are subject to further testing and refinement and may therefore be amended in the final report) relating to the district wide position which are considered below.
- 2.6. Firstly the district does not have a sufficient supply of ready to go, deliverable sites – the Council does not therefore meet the requirement set out in PPS3 to have a 5 year supply of deliverable land. The reasons for this are quite straight forward but the solutions are more problematic and will take time to address.
- 2.7. The main reason is that the supply of land is heavily based on the sites identified in the RUDP but the RUDP was itself based on housing targets at around half the level we are now having to plan for. Furthermore many of these RUDP sites have already been implemented. Secondly a significant proportion of the land supply with planning permission is on sites within the city centre and / or based on schemes containing flats and apartments the market for which has substantially dropped. While activity on some city centre schemes are now starting to come forward again other sites have been mothballed or are seeing amended applications being submitted with lower levels of residential units at lower densities.
- 2.8. The implications of the absence of a 5 year land supply are that Planning Appeals on sites which would not normally gain planning permission – for example on green field or green belt land – are more likely to be successful. This has been the experience elsewhere in the Country. There is therefore a real imperative to increase the supply of deliverable land and the only significant means of doing that is via the production of the LDF.

- 2.9. A second issue emerging from the analysis of the SHLAA data is the tightness of the land supply and its over reliance on green field sites. By this we mean that the SHLAA is showing a total maximum housing capacity on deliverable and developable sites of around the 50,000 mark which equates roughly to the RSS housing requirement. Although this may appear to indicate that there is sufficient or nearly sufficient land available to meet the need for new homes in the district, this ignores the fact that significant proportion of this supply is in locations such as green belt where development would normally be resisted. This illustrates the need, to increase the number of urban and brown field sites within the SHLAA when it is updated later this year and thus reduce the reliance on and need to select green field sites. The current SHLAA did in fact involve extensive surveys of the built up areas of the district but this survey work is now 2 years old and thus a further survey may be required. In addition a further Call For Sites exercise would give the public a new opportunity to submit their own brown field site proposals.
- 2.10. It should also be noted that the SHLAA includes all those sites which the RUDP identified for development and which have not yet been implemented including green field sites such as those currently the subject of planning applications at Sty Lane, Micklethwaite and at Derry Hill and Bingley Road, Menston. Should any of these sites be lost then replacements would need to be found and added to the supply. There is little room for manoeuvre in land supply terms.
- 2.11. Despite the level of work undertaken during the SHLAA and the time taken in compiling it, the results will still need to be used with care and there are a range of uncertainties which members and officers will need to be aware of. These include:
- Uncertainty as to what density and therefore yield sites may achieve in the future as the focus switches from apartments to family houses;
  - Uncertainty until detailed work is complete on the level of new development which may be feasible within the Shipley / Canal Road area;
  - The extent and likely take up of development in the city centre as regeneration activity continues;
  - The extent to which the Council can identify additional brown field sites particularly those which the SHLAA working group have classified as undeliverable due to land ownership issues or generally poor market confidence in some areas;
  - The potential additional contribution from possible green belt releases not currently within the SHLAA;
  - Uncertainty over the rate at which sites may come forward given assumptions about the rate of economic and housing market recovery that may take place in the coming years;
- 2.12. Work will also start soon on preparing for the first annual SHLAA update. The update will become evidence for the examination of the LDF Core Strategy when it is submitted to scrutiny by the Planning Inspectorate. The SHLAA update will amend the list of sites in the SHLAA to a base date of April 2011 as follows:
- Adding sites which have gained planning permission since the study commenced and re-appraising those whose planning permission have lapsed;
  - Removing sites where development has been completed;
  - Updating information on sites in the database – for example sites may have commenced development, may have changed ownership, may have had

renewed planning permissions with different yields, may have been subject to proposals for non housing use;

- Adding sites which were sent to the Council after the previous closing date for site submissions.
- Adding any new sites – for example brown field sites identified by the community – which are submitted to the Council for consideration.

### 3. **Options**

- 3.1. While this report is mainly for information and does not contain options, members will have a key role in scrutinising the results of the SHLAA and determining in the light of its content and other information and evidence the best approach to provide for the required number of new homes in the district via the various LDF documents.

### 4. **Contribution to corporate priorities**

- 4.1. The SHLAA is intended to support and inform the production of the LDF which is in turn intended to secure regeneration and investment in the district. It is being prepared so as to compliment and deliver the priorities as set out in the Big Plan and in the Council's Housing and Economic Strategies. Delivery of the LDF will indirectly assist in various initiatives such as the waste PFI scheme and the Shipley / Canal Road Corridor Urban Eco Settlement.

### 5. **Recommendations**

- 5.1. That members note the content of this report.

### 7. **Background documents**

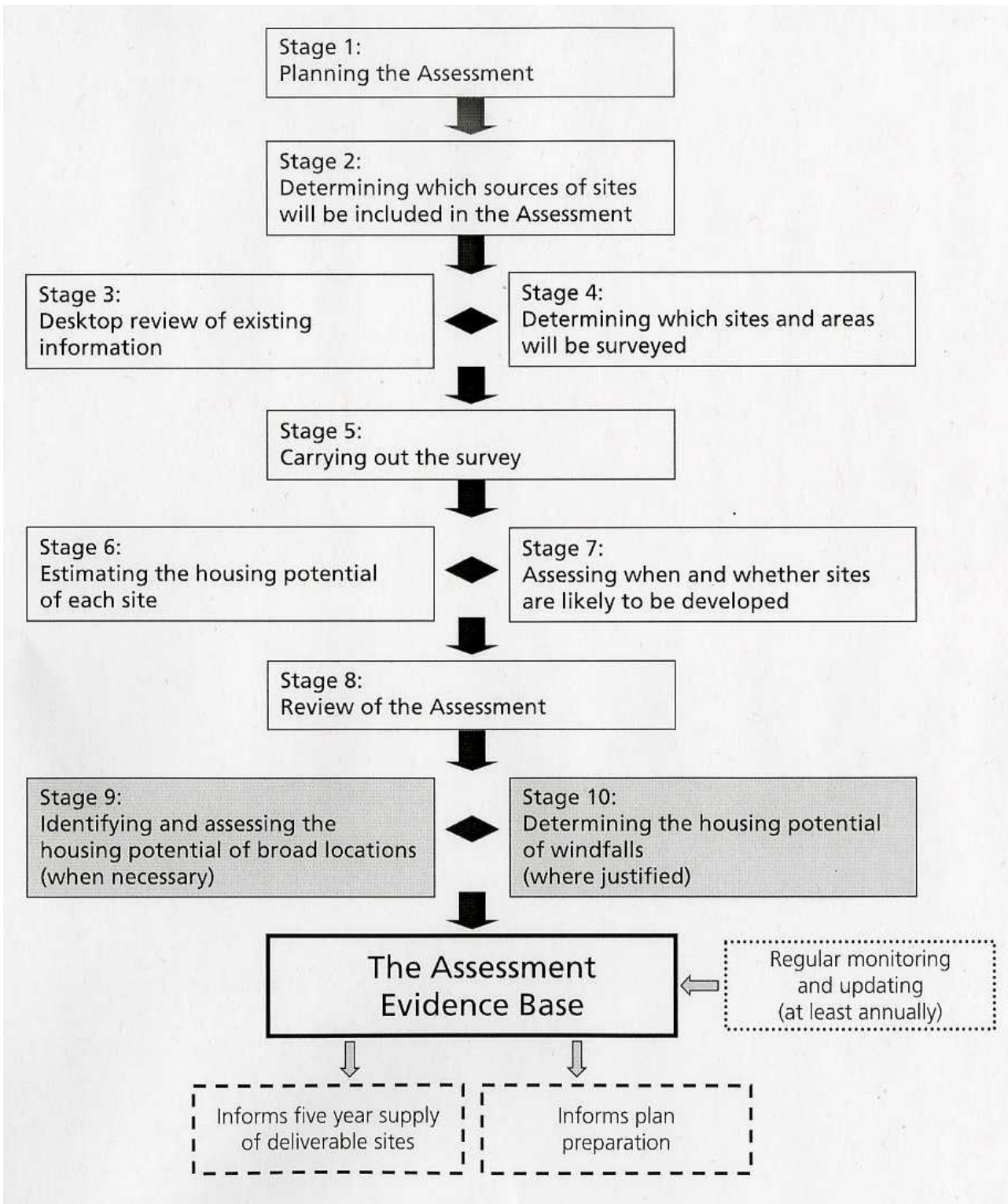
Bradford SHLAA Draft Methodology Framework for Consultation (CBMDC 2008)  
SHLAA Practice Guidance (CLG 2007)

### 8. **Not for publication documents**

None

### 9. **Appendices**

**APPENDIX 1 – THE SHLAA PROCESS**



Appendix 2 – Examples of SHLAA Output tables to be Included in the SHLAA Report

District Wide Capacity – Summary Table – Timing Of Supply and Green Field / PDL Split

	'Deliverable Sites'			'Developable Sites'						TOTAL		
	SHORT TERM Years 1-6			MEDIUM TERM Years 7-12			LONG TERM Years 13-17					
	Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point
<b>District Wide Trajectory Total</b>												
Green Field												
Mixed												
PDL												
PDL Consolidated*												
PDL %												
<b>District Wide Residual Supply*</b>												
Residual – GF												
Residual – Mixed												
Residual PDL												
<b>District Wide Capacity Total</b>												

**NOTES**

District Wide Trajectory Total

- the total capacity from deliverable and developable which is expected to come forward within the 17 year period

\*District Wide Mixed

- these are sites which are part PDL and part green field.

\*Residual supply

- sites expected to start within the period but be completed afterwards. The residual supply is the remaining capacity of a site not accounted for within the trajectory period.

District Wide Capacity Total

- the sum of the trajectory total and the residual unassigned supply. It gives a truer picture of the total capacity of deliverable and developable sites.

**Assessment Of Capacity of Sites Considered Deliverable & Developable Within the SHLAA Period\* According To Suitability Category**

		SHORT TERM			MEDIUM TERM			LONG TERM			TOTAL		
		Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point
<b>District Wide Trajectory Total</b>													
	<b>Suitable Now</b>												
	<b>Potentially Suitable (Policy Constraints)</b>												
	Green Belt												
	Other												
	<b>Potentially Suitable (Physical Constraints)</b>												
<b>Residual Supply*</b>													
<b>District Wide Residual Supply Total</b>													
	<b>Potentially Suitable (Policy Constraints)</b>												
	Green Belt												
	Other												
	<b>Potentially Suitable (Physical Constraints)</b>												
<b>District Wide Capacity Total</b>													