

# Draft Strategic Housing Land Availability Assessment Main Report

January 2022

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# 1 Introduction

#### Introduction to the SHLAA

- 1.1 The Strategic Housing Land Availability Assessment (SHLAA) is used to support the plan making process by providing an understanding of the characteristics of residential land supply and opportunities available within North Somerset to meet the housing requirement. The approach ensures that all potential land supply options are assessed together to help inform which sites are potentially the most suitable and deliverable taking into account constraints and other factors that influence delivery. The SHLAA is being prepared alongside the emerging North Somerset Local Plan 2038 and will contribute to the information to enable the identification of sites and locations that are most suitable for the level of development required. The SHLAA is an iterative document and will be updated alongside the plan making process.
- 1.2 The SHLAA is an evidence source providing an overall assessment of housing potential including detailed appraisal of specific sites. It is not part of the development plan and does not in itself allocate sites. The identification of a particular site, or conclusions drawn following its assessment, does not imply that there is a presumption in favour of any development proposal, or that planning permission will be granted or refused should an application be submitted. The status of a site may change over time. In all cases the Council will exercise its statutory duties in relation to the consideration and determination of planning applications. It is important to note that not all of the sites that are identified as having suitable potential will necessarily be suitable for inclusion in the local plan.

# National guidance and primary purposes of SHLAA

1.3 National planning advice encourages local planning authorities to prepare a SHLAA as a key part of their evidence base when preparing a local plan. Government advice as set out in the National Planning Policy Framework (2019) states that:

'Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.' (Paragraph 67)

- 1.4 The primary purposes of the SHLAA are to:
  - Identify sites with potential for housing.
  - Assess their suitability for housing and development potential.
  - Assess the likelihood of development coming forward including site availability, achievability and deliverability.
- 1.5 National guidance is clear to state that 'the Assessment is an important evidence source to inform plan-making but does not in itself determine whether a site should be allocated for development' (National Planning Policy Guidance). This will be the role of the new local plan 2038 plan preparation.

# Previously published SHLAA reports

- 1.6 An Interim Report was published in November 2020 alongside the North Somerset Local Plan 2038 'Choices for the Future' Consultation<sup>1</sup>. This was followed by a Second Interim Report that updated and superseded that initial SHLAA document by including further sites, and additional analysis of sites against constraints. The Second Interim Report was published in April 2021 including site mapping.
- 1.7 This Second Interim Report covered a large part of Stage 2 of the methodology which relates to site/broad location assessment (see page 5 for methodology diagram), although identified where further work would still be required in relation to the investigation of additional relevant aspects e.g. transport implications of specific sites, overcoming identified constraints and assessing site achievability, availability and deliverability, the scope of which was indicated in the Next Stages at the end of the report.

### Scope of the January 2022 SHLAA

- 1.8 Further site assessment has now been carried out in the context of the preferred spatial strategy and locations identified in a report to the Council's Executive April 2021. This is reported in this SHLAA and identifies those sites considered to offer potential for consideration when allocating land in the emerging North Somerset Local Plan. It also indicates where sites are discounted through this more detailed assessment.
- 1.9 From the wider list of sites published in the Second Interim SHLAA, a methodology was used to identify those areas and sites that should be considered in greater detail as potential candidates compatible with the spatial strategy. In summary a series of Broad Locations were identified around the urban areas that acted as areas of search for potential sites. Similarly, areas of search were identified around the more sustainable villages and together, these areas of search formed the reference point for the more detailed assessment of SHLAA sites within. Sites outside of these areas of search were not assessed in further detail.

# SHLAA methodology

1.10 The methodology of the SHLAA will follow the steps set out in the National Planning Practice Guidance. The following diagram taken from the NPPG summarises the stages required:

<sup>&</sup>lt;sup>1</sup> Consultation ran from 2 November 2020 to 14 December 2020.

Stage 1- Site / broad location identification Determine assessment area and site size Desktop review of existing information Call for sites / broad locations Site / broad location survey Stage 2 - Site / broad location assessment Estimating the Suitability Availability development potential Overcoming constraints Stage 3 - Windfall assessment Determine housing / economic development potential of windfall sites (where justified) Stage 4 - Assessment review Assessment of Review assessment and development need prepare draft trajectory for housing and Enough sites / broad economic locations? development uses

Figure 1: SHLAA methodology - NPPG

# 2 Stage 1: Site/ Broad Location identification

#### Assessment area and site size.

- 2.1 The SHLAA relates to the administrative area of North Somerset.
- 2.2 North Somerset Council has engaged with the other West of England authorities and West of England Combined Authority (WECA) to seek consistency across SHLAA preparation, particularly during the early stages of the project.
- 2.3 No site size threshold is included within the SHLAA. It will assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions.

# Desktop review of existing information

- 2.4 The desktop review process has considered sites from various sources for inclusion in the SHLAA. These included:
  - Sites previously submitted to the 2017 call for sites,
  - Sites submitted to the Joint Spatial Plan (within North Somerset),
  - Sites submitted to the 2018 Issues and Options, and,
  - Sites submitted to date to the various stages of the Local Plan 2038.
     At this stage this includes the Pre-commencement stage, and the Challenges and Choices consultations,
  - Sites submitted to the 2020 call for sites, and,
  - Other sites submitted to the new Local Plan 2038 process
- 2.5 NPPG guidance emphasises the importance of not simply relying on sites that have been put forward by landowners or developers, but to actively identify sites that may assist in meeting the development needs of an area. At this stage, as part of the Broad Location assessments, any additional land opportunities have been identified and will be reported separately.

# 3 Stage 2: Site assessment

3.1 The assessment of suitability followed a two stage process – an initial baseline assessment of all sites, followed by further site assessment of a more select collection of sites.

# Baseline assessment

3.2 Firstly all sites were subject to a baseline assessment where the sites were considered against the various constraints identified in Table 1.

#### Further site assessment

3.3 Following April 2021, guided by the preferred spatial strategy, a range of sites were considered in further detail to determine sites with potential suitability for consideration for allocation in the local plan. This assessment also identified sites that are not considered to offer a suitable opportunity.

Primary Constraint	Secondary constraint	Site Specific constraints	
Site already developed with active use	Green Belt	Heritage features (listed buildings and Conservation Areas)	
Flood Zone 3b (SFRA, 2020)	Area of Outstanding Natural Beauty (AONB)	Parks and open spaces	
Site of Special Scientific Interest	Designated Local Green Space	Horseshoe Bat Zone A	
European Sites (RAMSAR, SAC, SPA)	Flood zone 3a (SFRA, 2020)	Groundwater Source Protection Zone	
Ancient Woodland	Areas of Critical Drainage (SFRA, 2020)	Woodland features on site	
National Nature Reserve	Horseshoe Bat Juvenile Sustenance Zone		
Local Nature Reserve	Local Wildlife Site		
Scheduled Monument	Priority Habitats		
Registered Park and Gardens	High Grade Agricultural land (Grade 1)		
Regionally Important Geological Sites			
Working mineral sites			
Table 1: Constraints/ features considered through the study			

#### Table 1: Constraints/ features considered through the study

# Scope and limitations of assessment

3.4 The SHLAA does not address the wider sustainability of sites either individually or collectively as this is a role for plan making and sustainability appraisal. All SHLAA sites have been considered through the Sustainability Appraisal. The SHLAA assessment has considered a defined set of factors but may not identify all constraints that may ultimately influence a sites suitability. As such the SHLAA will be subject to periodic review to capture additional information as necessary in order to maintain an up-to-date evidence base on land availability and specific detailed related to sites. The Site Schedules presented alongside this report will therefore be updated as the local plan progresses with further information.

# Estimating development capacity

- 3.5 The Core Requirements of the SHLAA require an indication of development capacity to be provided on each site. Estimates of dwelling capacity use a combination of the following:
  - Density multipliers have been used to provide a consistent Benchmark Dwelling Capacity (BDC) across all sites. This was reported at Second

- Interim SHLAA stage within the Site Schedules document and is also provided in the schedules published with the January 2022 SHLAA.
- Capacities indicated by respondents to the call for sites, also reported in the above documents;
- More detailed capacities following the further site appraisal stage taking into
  account site constraints, and potential delivery prospects. The latter is
  particularly important for larger sites where it is important to understand the
  realistic dwelling capacity across the plan period where this is often
  considerably less than the theoretical capacity indicated by the use of density
  multipliers.

# Density multipliers

3.6 Table 2 sets out the assumptions used to generate the BDC. This provides an indicative capacity only as the methodology cannot entirely factor in the nuances of a given site which would need to be undertaken if the site was to be considered for allocation. The approach differentiates between dwelling yield on smaller sites where the net residential area to gross site area ratio will generally be higher, and larger sites where the addition of other non-residential uses will reduce the ratio. For the largest sites, a working assumption is to assume 40 dph average across 50% of the gross site area, however dwelling capacities will be refined as the local plan progresses, and sites are examined in greater detail.

Site size (ha)	Net Residential Area assumed as a percentage of gross site area	Density			
0-0.39	100%				
0.4 to 1.99	90%	40			
2 to 9.99	75%				
10+	50%				
BDC = (Site area x NRA) x average density					
Table 2: Dwelling yield assumptions					

3.7 The dwelling capacity estimated for each site also assumes the provision of dwellings on the site is being maximised. It may be that alternative solutions to the site's development are preferred such as the provision of employment or other uses on the site. Some allowance for this is made on the larger sites, but on smaller sites, this is assumed to be undertaken at plan-making stage and the dwelling capacities may be altered accordingly. Development briefs and/or masterplanning processes could be utilised to explore and test alternative site approaches.

# Assessing availability

- 3.8 The general assumption is that a site is considered available for development when, on the best information available, there is confidence that there are no overriding factors such as legal or ownership problems, multiple ownerships, ransom strips, tenancies or operational requirements of landowners which would remove the realistic prospect of the site coming forward.
- 3.9 A general assumption applied at this stage is that if a site has been submitted for consideration through a call for sites exercise or through a representation to the current local plan process, the site is available within the plan period to 2038. Sites included within the SHLAA that have not been submitted to this current plan e.g. sites submitted to the previous JSP, are not automatically considered to be available and further investigations are required.

#### Assessing achievability

- 3.10 Planning Practice Guidance requires that all policy requirements are set out at the plan making stage and viability tested in order that this can inform the price paid for land. It also confirms that the role for viability assessment is primarily at the plan making stage, and that viability testing is not required to consider each individual site.
- 3.11 Central to this is the assumption that to be viable, the development of the site should deliver an appropriate return to the landowner whilst achieving policy requirements and aspirations for the development. The balance between development costs and value are critical to this and as such the prospects for viability are likely to be influenced by the location of the site, the demand for property in the area, as well as any specific costs that could arise through the development e.g. related to site remediation or other 'abnormal' costs.
- 3.12 Viability is going to be related to the identified policy and infrastructure requirements of the local plan, where these place a cost on development, particularly for the larger sites. Viability work is due to be carried out taking into account infrastructure requirements emerging through the Infrastructure Delivery Plan. When this is available, the implications for the deliverability of specific sites will be considered.
- 3.13 Achievability is also about demonstrating a reasonable prospect that sites can be brought forward at a particular point in time. For sites identified as having potential for further consideration, an indication of potential delivery across the plan period (across three broad time periods) has been carried out and presented within the sites schedules. This is intended to provide a starting point for consideration of capacity across the plan period for those sites taken forward but should be considered further in setting dwelling figures in the local plan. Where a site is identified as having potential for consideration but hasn't been submitted to the local plan 2038, they are generally not considered achievable within the first part of the plan period due to uncertainty around availability.

# Overcoming constraints

3.14 Through the more detailed site assessment, where constraints have been identified on sites, these have been summarised and a series of suggestions for overcoming these constraints have been set out. In many cases this indicated a requirement for further site investigations e.g. to fully consider the implication of the constraint upon the sites development.

- 4 Stage 3: Windfall assessment
- 4.1 See document Residential and Survey (April 2021) for latest position on windfall.
- 5 Stage 4: Assessment Review
- 5.1 372 sites have been considered.

# Summary of Baseline assessment

#### Primary constraints

5.2 10 sites are affected by Primary Constraints in their entirety. A further 91 sites are partially affected by these constraints; these sites will be taken forward for further consideration although that part affected will not be considered for development potential.

#### Secondary constraints

- 5.3 For sites not subject to Primary Constraints, or only partially affected, the next step of the assessment was to flag up where sites are wholly or partially affected by one or more of the Secondary Constraints listed in Table 1.
- 5.4 Sites falling within any of these constraints were not discounted at the baseline assessment stage. It simply highlights which constraints are present on each site and where justification would be required if considering these sites through the preparation of the local plan. The SHLAA does not seek to provide any policy preference to these sites or constraints.
- 5.5 304 (82%) of the sites are identified as being affected by one or more of the Secondary Constraints. The specific constraint applying to individual sites is shown in the Sites Schedules.
  - 120 sites affected by Green Belt in whole or part affecting around 1640ha.
  - 108 sites affected by flood zone 3a in whole or part affecting around 2145ha.
  - 12 sites affected by AONB in whole or part affecting around 24ha.
- 5.6 Following the baseline assessment, 10 sites were discounted leaving 360 sites.

# Summary of further site assessment

- 5.7 From the 360 sites, a methodology was followed to identify areas of search for growth in line with the selected spatial strategy, and this focussed the further SHLAA assessment on a subset of sites likely to be more suitable in light of the spatial strategy. In total 210 individual sites were considered through this more detailed review from the pool of around 370 sites.
- 5.8 Table 2 provides a summary of the 208 sites, including which location they relate to, and the number of those sites considered to have potential for consideration. In total 90 sites are considered to have potential for consideration across North Somerset.

Location	No of sites within area of search	Potential sites for further consideration
Weston-super-Mare (west of M5)	32	10
Weston-super-Mare (east of M5)	14	8

Edge of Bristol	16	6
Nailsea and Backwell	38	22
Portishead	11	5
Clevedon	7	1
Yatton	19	10
Banwell	8	1
Bleadon	5	3
Churchill/ Langford	13	3
Congresbury	24	9
Sandford	10	6
Winscombe	9	5
Wrington	4	2

5.10 The sites assessed through this stage of the SHLAA are presented in the Location Templates document.

# 6 Summary of observations

- 6.1 The following conclusions can be drawn from the SHLAA:
  - A large number of sites have been considered across North Somerset covering a wide range of site types including large strategic sites, and smaller green field opportunities.
  - A range of site opportunities are identified with potential for further consideration.
    These are distributed across the Broad Locations and are in principle, compatible with
    the preferred spatial strategy. They provide a range of sites that can be considered
    for allocation.
  - Relatively few, 10 sites have been discounted because they were wholly in conflict with the Primary Constraints accounting for around 42ha.
  - 91 sites are partially affected by Primary Constraints and these were taken forward for further consideration. However, the part affected by the Primary Constraint will be discounted from the dwelling potential in order that the dwelling estimation only relates to the part not affected.
  - 48 sites are entirely unaffected by primary or secondary constraints accounting for around 75ha of land.
  - Around 90 sites are identified as having potential for further consideration, including sites within the Green Belt. Sites entirely within flood zone 3a are discounted at this stage from the SHLAA as there are considered to be reasonably available alternative sites that are sequentially preferable and available for consideration for allocation.

# See separate Sites Schedules and Place Templates

The Sites Schedule lists the sites considered and the assessment details collated to date, and will be subject to ongoing updating. The Place Templates summaries the assessment for each place.