

Strategic Housing Land Availability Assessment



2014 Review



Disclaimer	1
Glossary	2
1 Introduction	5
2 Planning Policy Background	6
3 Purpose of the Assessment	7
4 Outputs and Process Checklist	9

Methodology

5 Additional Methodological Notes 2014	11
6 Introduction	19
7 Stage 1: Planning the assessment	21
8 Stage 2: Determining which sources of sites will be included in the Assessment	24
9 Stage 3: Desktop review of existing information	25
10 Stage 4: Determining which locations will be surveyed	27
11 Stage 5: Carrying out the survey	28
12 Stage 6: Estimating the potential of each site	29
13 Stage 7: Assessing if sites are likely to be developed	31
14 Stage 8: Review of the assessment	37
15 Stage 9: Identifying and assessing the potential of broad locations	38
16 Stage 10: Determining the potential of windfalls	39

Results and Analysis

17 Land Supply Demonstrated by Assessment	40
---	----

Annual Review & Conclusions

18 Annual Review	50
19 Conclusions	51

Tables

Table 1a CLG Core Outputs	9
Table 1b CLG Process Checklist	9
Table 2 Dwellings from Windfall Sites (Excluding Gardens) 2003 to 2014	13

Contents

Table 3 Sources of sites with potential for housing in the planning process.	24
Table 4 Information Sources	25
Table 5 Density assumptions in relation to Site Size Based on research in 'Tapping the Potential'	29
Table 6 Annual Delivery Rates - New Build	34
Table 7 Annual Delivery Rates - Conversions	35
Table 8 Deliverability - All Sites	41
Table 9 Supply of land for housing as illustrated in the forward trajectory	43
Table 10 Requirement based on RSS	44
Table 11 Requirement based on Core Strategy Preferred Options Document	45
Table 12 Summary of Five Year Deliverable Land Supply	48
Table 13 Summary of five year land supply position	48

Figures

Figure 1 Letter	14
Figure 2 Lapsed Permissions Form	16
Figure 3 Existing permissions form	17
Figure 4 Strategic Housing Land Availability Assessment Process	19
Figure 5 Housing Trajectory 2014 to 2031	42

Disclaimer

THE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA) IS PURELY A TECHNICAL BACKGROUND DOCUMENT AND DOES NOT ALLOCATE SITES FOR DEVELOPMENT - THAT IS THE ROLE OF THE DEVELOPMENT PLAN DOCUMENT COVERING LAND ALLOCATIONS AND DESIGNATIONS UPON WHICH FULL CONSULTATION WILL TAKE PLACE AT THE APPROPRIATE TIME. THE POINTS BELOW EXPLAIN IN MORE DETAIL WHAT THE SHLAA IS AND IS NOT.

In relation to the information contained within this report (and any other report relating, or making reference, to the findings of Calderdale's Strategic Housing Land Availability Assessment) the Council makes the following disclaimer without prejudice:

- The SHLAA does not give any development or planning status to land.
- None of the sites have any commitment or support from the Council and the SHLAA is not Council Policy.
- The SHLAA is not an allocation document and does not put forward proposals that the status of land should change.
- Whether any policy or designation should change is not for the SHLAA to address, but rather for the preparation of the Local Plan.
- The identification of potential housing sites in the SHLAA does not imply that the Council will necessarily grant planning permission for residential development. Planning applications will continue to be treated on their merits against the appropriate development plan policies (currently to be found in the Replacement Calderdale Unitary Development Plan adopted 2006) and other material planning considerations. Sites which are, for example, currently in employment use or in the Green Belt still need to be assessed against the relevant planning policies that seek to protect employment land and the Green Belt.
- The identification of potential housing sites in the SHLAA which is a purely technical document does not imply that they will necessarily become residential allocations in the Local Plan.
- The inclusion of potential housing sites in the SHLAA does not preclude them being developed for other suitable purposes.
- The exclusion of sites from the assessment does not preclude the possibility of residential development being granted on them. Some sites may never have been identified whilst others have been discounted.
- Information relating to individual sites in the SHLAA is based on the best information available at the time of the assessment. Circumstances may change or there may be some omissions and/or factual inaccuracies, which the Council does not take liability for. There may be additional constraints to consider that were not identified at the time of the assessment. Likewise some constraints may no longer be applicable.
- The deliverability categories (short, medium and long term) are based on judgements made on the best information available at the time of the assessment. Circumstances or assumptions may change which may mean that sites come forward sooner or later than envisaged.
- Capacities and densities identified on sites either relate to the number of dwellings for which planning permission has been granted or are based on indicative assessments by employing density multipliers adjusted to take account of known constraints. They are indicative and may change.
- The status of sites and information relating to them may have changed since the last assessment. For example, an identified site may subsequently have been granted planning permission whilst other planning permissions may have lapsed. The study is updated annually and any changes including new information is input to the database at this point.

Glossary

Achievability – 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 essentially a judgement about the economic viability of the site, and the capacity of the developer to complete and sell the housing over a certain period.

Allocation – Area of land identified in the Council's development plan. The allocation will also indicate the Council's preferred use for the land.

Annual Monitoring Report (AMR) – An annual assessment of the effectiveness of policies and proposals in the Replacement Calderdale Unitary Development Plan and emerging Local Plan together with information on progress in preparing the Local Plan.

Availability – 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 or operational requirements of landowners. This means that it is controlled by a housing developer who has expressed an intention to develop, or the landowner has expressed an intention to sell.

Brownfield – Land which is or was occupied by a permanent structure. Also referred to as 'Previously Developed Land'.

Call for Sites – Exercise carried out by the Council inviting interested parties to submit sites for consideration in the Strategic Housing Land Availability Assessment and the Local Plan.

Core Strategy – This was the key document in the Local Development Framework setting out the long term vision for the district and the policies and objectives required to deliver that vision. The Local Development Framework has now been replaced by the Local Plan.

Deliverability – A site is considered to be deliverable if it is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within 5 years from the date of adoption of the plan.

Density – A measure illustrating the potential number of dwellings that can be accommodated within a defined area. (Usually measured as the number of dwellings per hectare). See also Gross Density and Net Density.

Density Multipliers – Measurement used to establish the potential capacity of each site.

Developable – A site should be in a suitable location for housing development, and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time.

Development Plan Document (DPD) – The documents that form the statutory development plan for the District as part of the Local Development Framework. This has been superseded by the Local Plan approach.

Employment Land Review (ELR) – The review provides information concerning the need for new employment sites within Calderdale and whether the existing ones are fit for current and future purposes.

Filtered Sites - Sites that did not have any potential for residential development.

GIS – Electronic mapping software.

Green Belt – An area of open land defined on the Proposals Map, in accordance with Government

guidance where strict controls on development are applied in order to check the unrestricted sprawl of large built up areas, safeguard the countryside from encroachment, prevent neighbouring towns from merging with one another, preserve the special character of historic towns and assist in urban regeneration.

Greenfield Land – Term used to describe land that has not been previously developed.

Gross Density – Applying the total area of a site to the Density measurement, before discounting any land for uses not directly associated with housing.

Held in Abeyance – Sites that are considered unlikely to be developed within the timeframe of the Strategic Housing Land Availability Assessment but should be re-assessed through the annual review to determine whether they could move forward into the period covered by the Strategic Housing Land Availability Assessment.

Housing Land Availability Database – Database containing information on all planning permissions for residential development and their status.

Housing Trajectory – Report comparing past housing supply performance against future rates of predicted supply.

Integrated Regional Strategy - A single Strategy that was to be developed to replace the Regional Spatial Strategy, the Regional Economic Strategy and the Regional Housing Strategy, prior to the Government's revocation of these regional strategies.

Land Allocations and Designations Development Plan Document – The planning document that provides land allocations and designations for the use and protection of land under the Local Development Framework system. These will now be included in the Local Plan.

Local Plan - The new development plan for Calderdale, made up of a number of individual documents that set out the Council's policies for the development and use of land.

Net Density - Measurement of the site's area that will be developed for housing and directly associated uses (i.e. discounting land for shops, major roads, wider open spaces).

National Land Use Database (NLUD) - Database of brownfield (or Previously Developed) land.

National Planning Policy Framework (NPPF) - Sets out the Government's planning policies for England and how these are expected to be applied.

National Planning Practice Guidance (NPPG) - web-based resource introduced 6th March 2014, providing all national planning practice guidance.

Planning Officers Society – Body representing the most senior professionals and managers of public sector planning functions.

Planning Policy Statement (PPS) – Issued by Central Government to replace the existing Planning Policy Guidance notes in order to provide greater clarity and to remove from national guidance advice on practical implementation, which is better expressed as guidance rather than policy. Replaced by the National Planning Policy Framework in March 2012.

Regional Spatial Strategy (RSS) – The former development strategy for the region for the next 15-20 years and possibly longer. The Regional Spatial Strategy identified the scale and distribution of new housing in the region, indicated areas for regeneration, expansion or sub-regional planning and specified priorities for the environment, transport, infrastructure, economic development, agriculture, minerals and waste treatment and disposal. Regional Spatial Strategies have been revoked with the

4 Glossary

Yorkshire and the Humber Regional Spatial Strategy revoked February 2013.

Replacement Calderdale Unitary Development Plan (RCUDP) – The current land use plan for Calderdale. A single tier District Wide plan based on land issues at both the strategic and local level. The RCUDP has regard to legislation and strategic guidance issued by Central Government, but is otherwise prepared by the local planning authority.

Site of Special Scientific Interest (SSSI) – Areas designated by Natural England as being of special interest by reason of their flora, fauna, geological or physiological features and having statutory protection to preserve these features.

Strategic Flood Risk Assessment (SFRA) – A detailed assessment of flood risk areas throughout the district.

Strategic Housing Market Assessment – This study will estimate housing need and demand for both market and affordable housing across the district.

Suitability – A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. For sites not allocated for housing in development plans or having the benefit of planning permission for housing, policy restrictions, physical problems or limitations, potential impacts and environmental conditions should be considered.

Urban Audit – Database of sites that informed the Urban Capacity Study.

Urban Capacity Study (UCS) – Study that assessed the potential of the urban areas to accommodate further development (particularly housing) in order to inform the review of the UDP.

Windfall Sites – Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available (NPPF definition)

1 Introduction

1.1 Planning Policy Statement 3 Housing (PPS3) introduced the requirement for local authorities to undertake Strategic Housing Land Availability Assessments (SHLAAs) in order to provide a pool of sites from which to select sites for allocation when preparing their Local Plan and also to ensure that they maintain a 5-year supply of housing land in order to meet the need for new homes. This requirement has been retained in the National Planning Policy Framework (NPPF) published in March 2012. It is a purely technical exercise which precedes the plan making stages of the Local Plan and forms an important component of the wider evidence base underpinning it.

1.2 The first SHLAA, undertaken in 2009, broadly coincided with the commencement of work on the Core Strategy DPD thereby enabling it to inform the overall spatial options to be considered for eventual adoption in the Core Strategy. This SHLAA review will inform the Local Plan which is now being prepared instead of the former Local Development Framework. It has been undertaken in accordance with the NPPF and the National Planning Practice Guidance (NPPG) published by the Department for Communities and Local Government (DCLG) with sites assessed through a structured and robust assessment of their developability and deliverability. The SHLAA has been undertaken in partnership with a Working Group comprised of relevant stakeholders and therefore the outcomes are not solely based on the views of the Council but also those of relevant interests such as house builders.

1.3 SHLAAs must be reviewed and updated and this provides the opportunity not only to add new sites but also to refine and build up a more detailed picture of sites currently within the database.

6 Planning Policy Background

2 Planning Policy Background

2

National Planning Policy

2.1 National Policy on housing is set down in the National Planning Policy Framework (NPPF) which replaced Planning Policy Statement 3 Housing (PPS3). This sets out the Government's objective of ensuring that the planning system delivers a flexible, responsive supply of land for housing with sufficient suitable land available to achieve housing delivery objectives. Local Plans are to set out policies and strategies for delivering the required level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption taking account of the objectively assessed housing needs of the district. The SHLAA is one of the major means of identifying sites and broad locations. The supply of land is to be reviewed annually in order to ensure at least a continuous five-year supply of deliverable sites. In addition to identifying specific sites and broad locations local planning authorities are also required to:

- Identify those strategic sites which are critical to the delivery of the housing strategy over the plan period;
- Show broad locations on a key diagram and locations of specific sites on a proposals map; and
- Illustrate the expected rate of housing delivery through a housing trajectory for the plan period.

Regional Planning Policy

2.2 Policy H2 of the Regional Spatial Strategy (RSS) adopted in May 2008, required local planning authorities to prepare SHLAAs in order to provide evidence for their Local Plans. The RSS has now been revoked with the Order to revoke the Regional Strategy for Yorkshire and Humber coming into effect on 22nd February 2013.

Local Planning Policy

2.3 The statutory development plan for the district is the Replacement Calderdale Unitary Development Plan adopted in August 2006 (as amended by direction of the secretary of state 3rd August 2009). Following the Planning and Compulsory Purchase Act 2004, this was to be replaced by the Local Development Framework and consultation on the Core Strategy Preferred Options document took place between October and December 2012. Being prepared in parallel with the Core Strategy but one stage behind was the Land Allocations and Designations Development Plan Document (DPD) on which early community engagement took place at the start of 2014. Both of these documents are now to be combined into a single Local Plan. This must be underpinned by robust evidence and the SHLAA is just one piece of a much broader evidence base.

3 Purpose of the Assessment

3.1 Strategic Housing Land Availability Assessments (SHLAAs) are required by national planning policy formerly set out in Planning Policy Statement 3 Housing (PPS3) and which has now been replaced by the National Planning Policy Framework (NPPF). Whilst only one part of the evidence base underpinning Local Plans, they form a crucial component of this evidence base. Their primary purpose as a technical exercise is to provide a strategic assessment of the potential for housebuilding across the district by exploring whether or not there is an adequate supply of housing land that is suitable, available and where development is achievable. The assessment must follow a structured approach and provide a robust assessment of potential. It will help inform the spatial strategy to be adopted in the Local Plan. SHLAAs do not however, seek to make policy decisions on which sites should be developed nor begin to formulate development plan policy but rather their role is to support decision making. They do not therefore pre-judge the strategic approach that the Local Plan will eventually take. Site selection will be determined through the plan making process when potential housing sites will need to be balanced against other policy considerations and when consultation and Sustainability Appraisal must be undertaken. SHLAAs are by definition strategic exercises in which the assessments of sites cannot be at the level of sophistication required when deciding on development plan allocations or when assessing planning applications.

3.2 Previous Government guidance in 'Tapping the Potential - Assessing urban housing capacity: towards better practice'⁽¹⁾ required local authorities to undertake urban capacity studies and the Calderdale Urban Capacity Study was published in 2001⁽²⁾ However, whilst this study does provide a starting point for compiling a list of sites to assess in the SHLAA there are differences between the two types of study. They both explore the potential for housing growth in the district but whereas the urban capacity study made assumptions about the likelihood of sites coming forward, the SHLAA assesses the developability and deliverability of sites in greater depth, including those in locations not covered in urban capacity studies (such as sites in rural settlements, brownfield sites outside settlement boundaries and broad locations).

3.3 Essentially the purpose of the assessment is to meet the requirements, formerly of PPS3 and subsequently the NPPF and the associated Planning Practice Guidance⁽³⁾ The main objectives are:

- To identify and update annually a supply of specific deliverable sites (as defined below) sufficient to provide five year's worth of housing against the housing requirement with an additional buffer of 5% to ensure choice and competition in the market for land;
- To identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15; and
- To manage the supply to ensure a continuous 5-year supply of deliverable sites.

3.4 Deliverable sites are defined in the NPPF (footnote 11) as those that are:

- available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

3.5 Developable sites are defined in the NPPF (footnote 12) as those in a suitable location for housing development where there is a reasonable prospect that the site is available and could be

1 Tapping the Potential - Assessing urban housing capacity: towards better practice, DETR, 2000

2 Calderdale Urban Capacity Study, March 2001, CMBC

3 Planning Practice Guidance, Department for Communities and Local Government (DCLG), updateable web-based resource launched 6th March 2014

8 Purpose of the Assessment

developed at the point envisaged.

4 Outputs and Process Checklist

4.1 The Core Outputs required from SHLAAs together with the process to be followed are listed in the CLG Practice Guidance⁽⁴⁾ and the more recent Planning Practice Guidance. Tables 1a and 1b below list these requirements and also how they are met in the Calderdale SHLAA.

Table 1a CLG Core Outputs

CLG's Core Outputs	Calderdale SHLAA
1. A list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations where necessary)	Appendices 1 and 2 to this SHLAA contain schedules of sites uniquely referenced. All sites are held within GIS and available electronically.
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)	The sites listed in Appendices 1 to 3 have been assessed with regard to their suitability, availability and achievability and a conclusion reached on their developability and deliverability together with an assessment of when they may come forward. Additional information is held in the SHLAA database.
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)	The capacity of each site has been assessed using an agreed range of density multipliers adjusted to take account of known constraints and market factors.
4. Constraints on the delivery of identified sites	Constraints preventing sites coming forward or reducing capacity have been identified and recorded in the SHLAA database
5. Recommendations on how these constraints could be overcome and when	Where possible recommendations on how these constraints can be overcome have been recorded in the SHLAA database.

Table 1b CLG Process Checklist

CLG's Process Checklist	Calderdale SHLAA
1. The survey and assessment should involve key stakeholders including house builders, social landlords, local property agents and local communities. Other relevant agencies may include the Housing Corporation and English Partnerships (a requirement in areas where they are particularly active)	<p>The draft methodology was sent to key stakeholders for consultation (listed in Organisations consulted on Draft Methodology). A Working Group comprising representatives of the housebuilding industry, registered social landlords, adjacent local authorities and environmental groups was established to oversee and steer the assessment (membership listed in Appendix 7)</p> <p>The 'Call for Sites' exercise drew and continues to draw responses from a wide range of sources including housebuilders and landowners with substantial information provided in some instances. The surveys to determine the likelihood of older planning permissions proceeding</p>

10 Outputs and Process Checklist

4

CLG's Process Checklist	Calderdale SHLAA
	and the intentions of landowners provided more information from house builders, developers and landowners.
2. The methods, assumptions, judgements and findings should be discussed and agreed upon throughout the process in an open and transparent way, and explained in the Assessment report. The report should include an explanation as to why particular sites or areas have been excluded from the Assessment.	<p>The Working Group set up to oversee and steer the Assessment discussed and agreed the methodology, assumptions, judgements and findings in an open and transparent way and these are explained in this report. Consultation on the draft methodology provided an opportunity for wider comment. Further advice on the methodology was provided by Arups and POS Enterprises Ltd.</p> <p>Appendix 4 (Filtered Sites) lists those sites excluded from the final assessment together with the reasons for this.</p>

5 Additional Methodological Notes 2014

Introduction

5.1 The complete background to how the initial SHLAA and subsequent reviews were undertaken is covered in Sections 6 to 16 of this document. Rather than amend these on successive reviews a separate section outlining the main actions taken for the current review is included prior to the main sections covering the methodology. The same approach was taken for the last review. The subsequent sections on the methodology employed previously retain references to PPS3 Housing as this was the relevant guidance at that time. Following completion of the last review the Coalition Government published its draft online planning guidance following the Taylor Review of all planning guidance and where relevant to SHLAAs this is reflected in the current review.

5.2 Once the Council had completed the initial assessment of sites the new sites together with amended sites requiring re-assessment were sent to the Working Group for their input. Comments were received from Calderdale Housing Services and one of the housebuilder representatives on the Working Group.

Identification of Sites For Assessment and Amendment

5.3 Sites added to the SHLAA numbered 186, of which 56 were a result of site submissions in response to the ongoing 'Call for Sites' exercise, and 130 from the Housing Land Availability database of housing sites with planning permission. Existing sites were re-assessed to determine whether any amendments were required including from information received during the review year. A re-assessment of all sites categorised as Held in Abeyance was also undertaken to determine whether any could move forward.

5.4 A questionnaire was sent to all landowners/developers who either have planning permission for residential development and where development has yet to commence or whose site has been under construction for 2 years or longer and not registered any completions recently (sites of 5 or more dwellings). In addition the Council contacted landowners/developers who previously had planning permission but which has now lapsed (sites of 3 or more dwellings). The questionnaire and associated letter is attached to this review year note as Appendix A. Of the 76 landowners/developers contacted only 8 (10%) responded to the survey.

5.5 Sites built out during the review year were removed from the SHLAA by checking the 'Filtered' field in the database.

Site Surveys

5.6 All new sites (and existing sites where necessary) were the subject of site visits utilising the survey form included in the main document as Appendix 9.

Estimating the Housing Potential of each site

5.7 The housing potential of each site was calculated as previously (see Section 12). Where it was clear from site surveys or information received from the Working Group that the figure resulting from the density multiplier approach required modification this was undertaken.

Assessing when and whether sites are likely to be developed

5.8 The approach to undertaking the Suitability, Availability and Achievability Tests was as previously (see Section 13). Input from the Working Group helped refine the assessments in relation to developability and deliverability along with site capacity.

Review of the Assessment

5.9 The broad approach is as set out as previously (see Section 14). However, the context is changing with RSS now having been revoked but, as yet, no other housing requirement figure adopted by the Council. The figure included in the Core Strategy Preferred Options consultation is higher than the RSS figure but cannot be attributed much weight at the moment for a number of reasons including that representations were made for both higher and lower figures, the Strategic Housing Market Assessment (SHMA) is being updated to take account of the latest information and the Local Plan has yet to go through the examination process. Efforts have been made to increase the number of sites in the SHLAA and further analysis of all SHLAA sites will take place as the Local Plan progresses, particularly those parts concerning the land allocations. During both the Core Strategy Preferred Options consultation and the early engagement workshops regarding land allocations undertaken in early 2014, communities were asked to forward any sites they are aware of to the Council (in particular brownfield sites) in order to increase the supply of potential sites.

Windfalls

5.10 Since the publication of the NPPF in March 2012, national planning policy has changed in relation to windfall sites. Whereas the former PPS3 Housing generally precluded the inclusion of a windfall allowance in the early part of SHLAAs the NPPF states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance is to be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends and should not include residential gardens.

5.11 Historically windfalls have made a significant contribution to housing provision in Calderdale as explained in Section 16. The original purpose of this section was to complete the SHLAA process by including commentary on Step 10 of the CLG guidance (housing potential of windfalls).

5.12 In order to ensure that any windfall allowance is robust further refinements have taken place in the way that windfalls are monitored. Sites in the Housing Land Availability database have been assessed from the period of the first SHLAA to ensure that sites identified in this and subsequent reviews are not counted as windfalls. Additionally in June 2010, the Coalition Government amended Annex B of PPS 3 Housing to exclude private residential gardens from the definition of previously developed land in an effort to prevent over development of neighbourhoods and 'garden grabbing'. This change potentially reduces the contribution of such sites to the windfall figure. Monitoring since then reflects this change but in order to provide a more robust figure for contributions from windfalls going forward analysis of all sites gaining planning permission since April 2008 has been undertaken in order to identify garden sites. Ideally this would be continued back to an earlier date but is a large and resource intensive exercise, particularly as it contains complexities such as the fact that completions arising from planning approvals granted some years previously can continue to add to the housing supply. This data was then added to the Housing Land Availability (HLA) database. By applying average garden site approval rates as a proportion of all windfall approvals for applications approved since 2008 to overall windfall completions rates for the period 2003/04 to 2009/10 windfall completion rates (minus gardens) were arrived at as in the previous SHLAA Review. Some minor data amendments have been made to specific sites during the review year and these are reflected in the annual totals. For the period 2010/11 to 2013/14 actual windfall completion rates (excluding gardens) are employed. The average annual figure for windfalls (excluding gardens) for the period of the last 11 years is 458 (see Table 2 'Dwellings from Windfall Sites (Excluding Gardens) 2003 to 2014'). In order to be as conservative as possible this has been lowered to 400 dwellings per annum for the purpose of the SHLAA review. Further details and any future analysis will be incorporated into the Housing Technical Paper being prepared as part of the background work to the Local Plan. As a comparison, analysis of windfalls during preparation of the Replacement Calderdale Unitary

Development Plan also provided a figure in excess of 400 dwellings per annum.

5.13 The above analysis also showed that garden sites are still coming forward as housing sites. Whilst no longer included in the windfall figure they will inevitably add to the overall completions figures.


Table 2 Dwellings from Windfall Sites (Excluding Gardens) 2003 to 2014

Year	Dwellings from Windfall Sites (Excluding Gardens)
2003/2004	310
2004/2005	425
2005/2006	713
2006/2007	717
2007/2008	708
2008/2009	513
2009/2010	445
2010/2011	335
2011/2012	394
2012/2013	303
2013/2014	174
Total	5037

APPENDIX A

Planning permissions and Lapsed sites Questionnaire

Figure 1 Letter


www.calderdale.gov.uk

Economy and Environment
Spatial Planning
Westgate House
Halifax
HX1 1PS

«Agent_name »
«Address2 »

Dear «Agent_name »

**CALDERDALE LOCAL PLAN
STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT REVIEW**

As you may be aware Calderdale Council is currently preparing its Local Plan which will eventually replace the Replacement Calderdale Unitary Development Plan (RCUDP). As part of the evidence base underpinning this work the Council produced a Strategic Housing Land Availability Assessment (SHLAA) which is to be kept under annual review. This assessment provides a pool of sites to consider for allocation in the Local Plan as well as informing the Council's position in relation to the national planning policy requirement to maintain a 5 year supply of housing land.

The SHLAA includes an assessment of whether sites are developable and deliverable and, since not all planning permissions are implemented, it is important that only those likely to actually contribute to the supply of housing are included in the assessment.

The Council is therefore contacting all landowners/developers who either have planning permission for residential development and where development has yet to commence or whose site has been under construction for 2 years or longer and not registered any completions recently (sites of 5 or more dwellings). In addition the Council is contacting landowners/developers who previously had planning permission but which has now lapsed (sites of 3 or more dwellings). Our records indicate that the attached planning permission/lapsed permission falls within these categories.

It would therefore be helpful if you could please take the time to complete the attached questionnaire and return it to the Council spatial.planning@calderdale.gov.uk or Spatial Planning,



Calderdale MBC, Westgate House, Halifax HX1 1PS. A response by **Friday 14th November 2014** would be most helpful.

Should you have any queries regarding the above please do not hesitate to contact one of the following:

John Houston (tel. 01422 392385; email john.houston@calderdale.gov.uk)

Paul Copeland (tel. 01422 392208; email paul.copeland@calderdale.gov.uk)

I look forward to hearing from you and thank you in advance for any information you may supply to assist the Council in the review of its SHLAA.

Yours sincerely

John Houston

John Houston
Principle Planner

Figure 2 Lapsed Permissions Form



HOUSING DEVELOPMENT QUESTIONNAIRE	
Strategic Housing Land Availability Assessment (SHLAA)	
	
1. Lapsed permission details – our records	
Applicant name:	«Applicant_»
Agent name (if applicable):	«Agent_name»
Planning application ref:	«Permission_Number»
Planning proposal & site address:	«Address» «RoadStreet_Name» «Settlement_Name» «Town» «Planning_Permission_Description»
Decision date:	«Decision_Date»
LAPSED PLANNING PERMISSIONS	
Are you the owner of this site? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Is it your intention to re-apply for planning permission? Yes <input type="checkbox"/> No <input type="checkbox"/>	
If so, approximately when? Click here to enter a date.	
Assuming planning permission is granted when would you envisage commencing development? Click here to enter a date.	
2. Reasons for non-implementation	
If you do not intend to re-apply for planning permission, please provide an explanation why e.g. site constraints, inability to gain ownership, finance etc.? Click here to enter text.	
3. Returning Information	
<p>Thank you for taking the time to complete this questionnaire.</p> <p>Please provide your name and date this form below and return to spatial.planning@calderdale.gov.uk</p> <p>Alternatively send to: Spatial Planning , 1st Floor, Westgate House, Halifax, HX1 1PS</p>	
Name: Click here to enter text.	Date: Click here to enter a date.
Please return no later than Friday 14 th November 2014	

Figure 3 Existing permissions form

HOUSING DEVELOPMENT QUESTIONNAIRE	
Strategic Housing Land Availability Assessment (SHLAA)	
	
1. Current planning permission details – our records	
Applicant name:	«Owner»
Agent name (if applicable):	«Agent_name»
Planning application ref:	«Permission_Number»
Planning proposal & site address:	«Address» «RoadStreet_Name» «Settlement_Name» «Town» «Planning_Permission_Description»
Decision date:	«Decision_Date»«Decision_Date»
EXISTING PLANNING PERMISSIONS	
2. Implementation of your planning permission	
Is it your intention to implement the above planning permission before it expires?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Please indicate the predicted commencement and completion dates (month and year where possible) of this development.	Commence? Click here to enter a date. Complete? Click here to enter a date.
If your development has commenced, is it your intention to build out the site with the number of dwellings in the planning permission?	Yes <input type="checkbox"/> No <input type="checkbox"/>
If your permission is for apartment/flats do you intend to change this to houses?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Where applicable, please indicate the anticipated number of dwellings to be completed each year (e.g. any plans for phasing the development).	Year 1 (Apr 14 – Mar 15) Number of Units Click here to enter text.
	Year 2 (Apr 15 – Mar 16) Number of Units Click here to enter text.
	Year 3 (Apr 16– Mar 17) Number of Units Click here to enter text.
	Year 4 (Apr 17 – Mar 18) Number of Units Click here to enter text.
	Year 5 (Apr 18 – Mar 19) Number of Units Click here to enter text.
	Year 6 (Apr19 - Mar20) Number of Units Click here to enter text.
	Later Please give details Click here to enter text.

5

Are you the owner of this site? Yes ☐ No ☐

Thank you for taking the time to complete this questionnaire.

Alternatively send to: Spatial Planning, 1st Floor, Westgate House, Halifax, HX1 1PS

Date: [Click here to enter a date.](#)



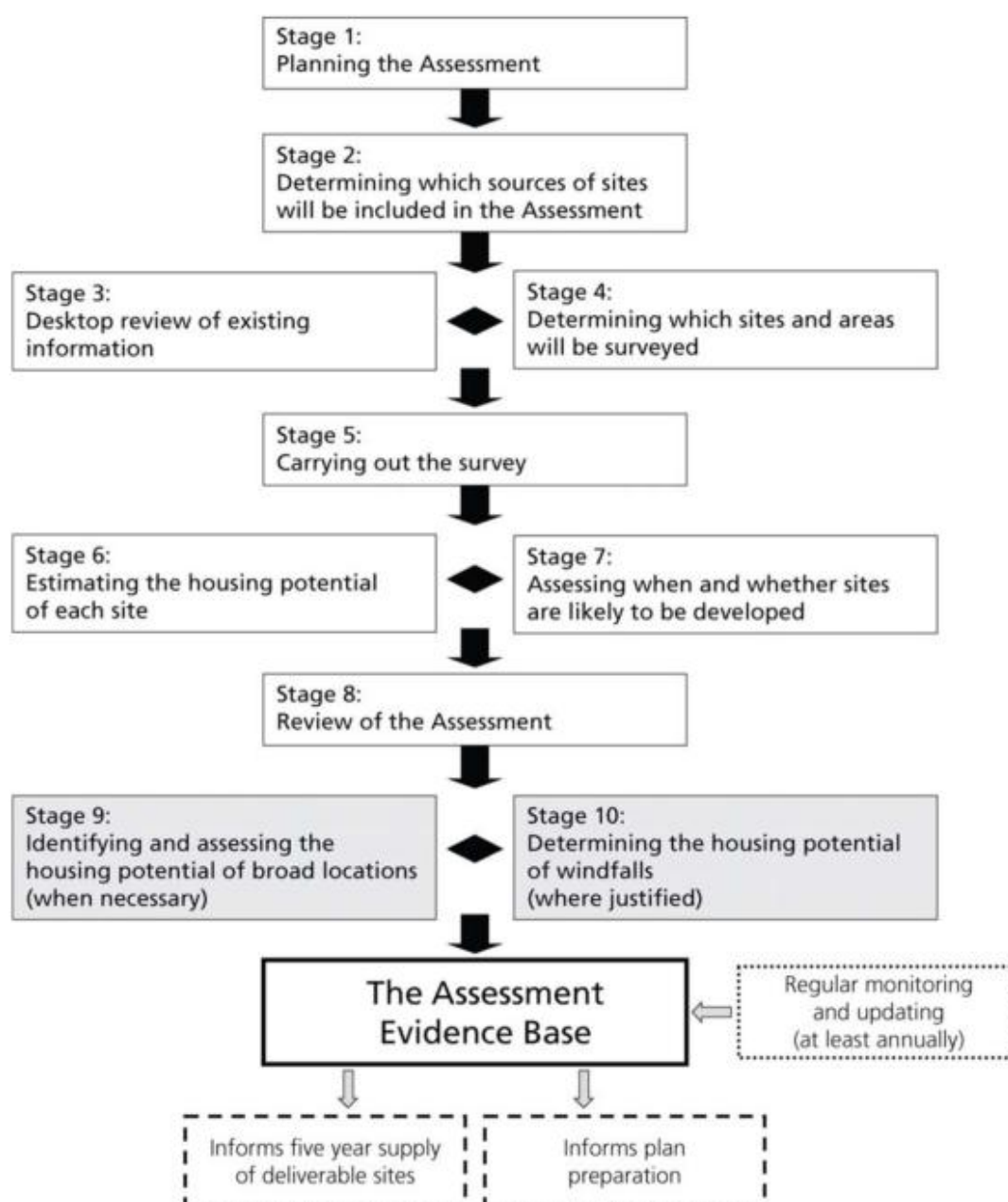
**CALDERDALE
LOCAL PLAN**

6 Introduction

The Methodology

6.1 The Government published Practice Guidance in July 2007⁽⁵⁾ on undertaking SHLAAS and this has been followed in undertaking the Assessment. The Guidance has ten stages as shown in Figure 4 below.

Figure 4 Strategic Housing Land Availability Assessment Process



Source: CLG Strategic Housing Land Availability Assessment Practice Guidance, 2007

6.2 Additional guidance was prepared by Arups on behalf of the Yorkshire and Humber Assembly⁽⁶⁾ and produced to assist the local authorities in the region in undertaking their SHLAAs. Its purpose was not to replace the CLG Practice Guidance but to add value to it. Regard was also had to the advice contained in this additional guidance in determining the methodology. Further advice published by the Planning Advisory Group (PAS)^{(7) (8)} also influenced the detail of the methodology.

6.3 Consultation with POS Enterprises Ltd on the proposed methodology involving a face to face meeting was also of assistance in determining the methodology, including the assumptions employed. This was viewed as particularly helpful and relevant given that POS Enterprises Ltd played a significant part in writing the CLG Guidance.

6.4 Prior to the first assessment commencing a draft methodology was published for consultation and sent to some 50 stakeholders. Only a limited number of responses were received and these are listed in Appendix 6. These comments were taken account of in determining the final methodology. Ultimately the final methodology, including the assumptions employed in the assessment, was agreed by the Working Group set up to oversee the study.

6.5 The same methodology was employed in subsequent reviews when built sites were removed from the assessment, others amended to reflect changed circumstances and/or new information and new sites added.

6.6 Each of the ten stages is now reported in turn.

6 Understanding Yorkshire and Humber's Strategic Housing Land Availability, Regional Practice Guide, Ove Arup and Partners Ltd, April 2008
7 Strategic Housing Land Availability Assessment and Development Plan Document Preparation, Planning Advisory Service, January/February 2008
8 Implementing Your Local Development Framework - Strategic Housing Land Availability, Planning Advisory Service, April 2008

7 Stage 1: Planning the assessment

7.1 The CLG Practice Guidance requires that a number of management issues be addressed at the outset of planning the assessment. These were consequently given detailed consideration in planning the assessment as follows:

Joint Assessment with the other local planning authorities in the housing market area

7.2 When planning the first SHLAA the neighbouring local authorities of Kirklees MC and City of Bradford DC were contacted in order to explore the possibilities of a joint study. However, following discussions with these neighbouring local authorities this approach proved impractical for the following reasons:

- The strategic housing market assessments being prepared by Ecotec on behalf of the Yorkshire and Humber Assembly were not complete and without which market areas had not been defined;
- The timescales for the production of the Core Strategy and Site Allocations DPDs were not the same in the local authorities of Bradford, Calderdale and Kirklees. With no plans for joint DPDs on housing the need for joint SHLAAs was reduced; and
- The comprehensive approach undertaken for the earlier urban capacity study in Calderdale meant that the starting point and timescale for any land availability study was unlikely to be the same in districts where different approaches had been employed.

7.3 Whilst it was concluded that a joint study was not possible on this occasion, it was agreed that a consistent methodology should be employed to enable meaningful comparisons and aggregation of results, both for the market area and to inform the ongoing regional work on land availability. A consistent approach also enables collaboration on future SHLAA updates. Consultation therefore took place on each authority's proposed methodology. In addition attendance at neighbouring authority's Working Group meetings was encouraged with Bradford being present at Calderdale's Working Group Meetings. Further involvement with other local authorities in the Yorkshire and Humber region took place through attendance at their Working Group meetings and discussions on specific aspects of the assessment. Exchanges of information relating to databases, data sets and data format took place with neighbouring and other local authorities in the region.

7.4 When undertaking reviews of the SHLAA consideration was again given to joint working but many of the above factors still apply including the fact the the local authorities are working to different timescales. For example, when the first review of the Calderdale SHLAA commenced some authorities were still working towards completion of their first SHLAA. However, involvement in other local authorities' SHLAA preparation has continued to take place.

Working Group and Key stakeholders to be included in the study

7.5 As a housing market partnership did not exist to take the study forward the key stakeholders to be included in the study had to be determined. These are listed in Appendix 5 with representatives of each category consulted on the draft methodology. As advised in the CLG Practice Guidance key stakeholders were involved at the outset of the Assessment so that they could help shape the approach with comments received on the draft methodology taken into consideration in arriving at the final methodology.

7.6 In order to set up a Working Group those types of organisation referred to in the CLG Guidance were contacted. These included house builders, social landlords, local property agents and local communities. The regional office of the Home Builders Federation was contacted to provide representatives of the housebuilding industry. A number of invitations were sent out on several separate occasions in order to obtain the desired representation on the Working Group. A number

22 Stage 1: Planning the assessment

of those contacted were not able to commit to the Working Group and therefore some time was spent in obtaining membership. This was made more difficult by both the fact that other local authorities in the region were undertaking their SHLAAs and the economic downturn with some members having to withdraw from the group and replacements sought. However, a group including house builders, registered social landlords and neighbouring local authorities and capable of meeting the CLG Guidance requirements was convened to oversee and steer the Assessment. The full membership is given in Appendix 7.

7.7 The opportunity to obtain wider community involvement was taken with the 'Call for Sites' submissions made available on the Council's website and 1:10,000 maps showing these sites made available for viewing during the Issues and Options stage of the Core Strategy. The 'Call for Sites' was left open during the review year and a number of new submissions were received. The need to undertake a SHLAA, together with progress on the assessment was reported both to Members through the Local Plan Working Party and to the Strategic Housing Forum hosted by Housing Services. Prior to publication of the first SHLAA it was publicised with a full Member Briefing and presentations to all parish and town councils. Both prior to and following publication of the first SHLAA numerous communications were received from members of the public and at least one public meeting held. It was also discussed at several Ward and Area Forums. In order to provide the opportunity to submit information during the review year the SHLAA was left open for comments (as opposed to full consultation as is the case with statutory planning documents) on the Council's website where a number of comments were submitted.

Summary of comments received in relation to previous Reviews

7.8 A number of comments were received on previous Reviews, however these have been fewer in number than for the initial SHLAA. The majority of comments received concerned a small number of sites, some were from local residents and some were from landowners or developers who submitted additional information concerning their site. The main themes were as follows:

- Traffic impacts;
- Certain sites provide a defensible green belt boundary;
- Sites should remain in the green belt to prevent urban sprawl;
- There is a danger that development at certain sites will merge the urban areas of Calderdale and Bradford;
- There are ongoing problems resulting from earlier development, additional development would compound this; and
- Impact of additional development on water runoff and drainage.

7.9 Additional information received from landowners and developers concentrated on the identified constraints from the original SHLAA site assessments.

Resources, Skills, Management and Quality Assurance

7.10 Within the local planning authority the primary resource was identified as the Spatial Planning Team (formerly the Planning Policy Team), members of which led the Assessment and provided the necessary input regarding the setting up of the database and GIS links together with compiling the list of sites to be assessed. The Working Group discussed and agreed the methodology with those members representing the house building industry providing input on the developability and deliverability of the identified sites.

7.11 In order to ensure that the Assessment was as robust as possible in terms of the methodology regard was had to the additional guidance and advice on SHLAAs produced by Arups, the PAS publications and the consultation undertaken with POS Enterprises Ltd discussed above.

7.12 The consultation with POS Enterprises Ltd on the proposed methodology referred to in paragraph 5.3 and involving a face to face meeting was also of assistance in ensuring the methodology, including assumptions employed, was robust and that the assessment met the requirements set down in the CLG Practice Guidance. POS Enterprises Ltd in appraising the methodology considered that its stated intentions were faithful to both the process and the principles of the guidance.

7.13 Numerous checks of the data held in the database were carried out in order to ensure both that the data was as accurate as possible and to ensure consistency throughout the Assessment. Where doubts existed about any sites these were explored as far as practicable given the resources and time available for the Assessment and those sites where uncertainty remained were categorised as Held in Abeyance and as such not included in the final list of sites but positioned to be reviewed on the planned annual updates.

7.14 These steps have ensured the quality of the Assessment, a matter the Government Office for Yorkshire and the Humber (GOYH), in responding to the draft methodology, advised be addressed. There is no expectation in the CLG Practice Guidance itself that there be independent quality control of a SHLAA.

Project timetable

7.15 The review will continue to both inform the preparation of the Core Strategy and provide information on the 5-year supply of housing land as required formerly by PPS3 and subsequently by the NPPF. It also provides a pool of sites for consideration as allocations in the Land Allocations and Designations DPD which is being prepared in parallel but one stage behind the higher level document. Given the programme for preparation of the DPDs information on sites for all categories of development has been submitted to the local authority at the same time as those specifically relevant to the SHLAA, particularly those relevant to the Employment Land Review (published December 2008 and updated 2012). A project plan for the SHLAA was prepared and used to measure progress on the Assessment.

8 Stage 2: Determining which sources of sites will be included in the Assessment

8.1 In determining the sources of sites for inclusion in the SHLAA, the CLG Practice Guidance together with the further advice in the Arup Guidance was followed. All of the sources of sites in the CLG Practice Guidance were included in the Assessment as shown in Table 3 'Sources of sites with potential for housing in the planning process.' with the exception of large urban extensions and new free standing settlements. The broad locations for these should normally have been identified in RSS but as none were these sources of sites were not included in the Assessment. Smaller urban extensions were included in the Assessment. In the case of existing residential areas potential opportunities within these were recorded as opposed to areas of large scale re-design and re-development.

8.2 Certain areas excluded from the UCS also had no potential for housing and these are excluded from the current study for the same reason. They include areas unacceptable for housing development and which are subject to protection because of their nature conservation value, or because they are uses that must be retained such as allotments, functional Open Space and Woodland evidenced by the Open Space Study⁽⁹⁾.

8.3 Regard was had to national and regional policies but a policy neutral approach taken at the local level, other than where policies related to clear physical features such as in the case of SSSIs. The most obvious implication of this approach was that no regard was had to the Green Belt boundary. However, sites lying within the Green Belt some distance from settlement boundaries were not included in the Assessment since such sites are clearly unsuitable in terms of location and sustainability implications. Such sites were recorded but not assessed further. This policy neutral approach at the local level enabled a larger pool of sites to be identified than would have otherwise been the case thereby providing the evidence to consider a range of strategies when developing the Core Strategy.

Table 3 Sources of sites with potential for housing in the planning process.

Sites in the planning process
Land allocated (or with permission) for employment or other land uses which are no longer required for those uses
Existing housing allocations and site development briefs
Unimplemented/outstanding planning permissions for housing
Planning permissions for housing that are under construction
Sites not currently in the planning process
Vacant and derelict land and buildings
Surplus public sector land
Land in non-residential use which may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of mixed use development
Additional housing opportunities in established residential areas, such as under-used garage blocks
Sites in rural settlements and rural exception sites
Small urban extensions

9 Stage 3: Desktop review of existing information

9.1 A desktop survey of known sites was undertaken and produced varying amounts of information. The data sources used and the information they provided are listed in Table 4 'Information Sources'. All of the sites from the various sources were input to the SHLAA database and mapped using GIS. Sites from the various sources were rationalised to avoid duplication. Information relating to the sites was input to the database, including the more detailed information often provided with the sites resulting from the 'Call for Sites Exercise' (see Appendix 8 for pro forma used in 'Call for Sites' Exercise). Ordnance Survey Plans, aerial photographs and Google Street View were examined to confirm boundaries and provide additional information. The information held in GIS was downloaded to Handheld PCs for use in the field survey when it could be viewed at a range of scales.

Table 4 Information Sources

Information Source	Data Provided
Housing Land Availability (HLA) Database, published quarterly by CMBC	Sites with planning permission including those under construction and housing completion figures
Replacement Calderdale Unitary Development Plan (RCUDP)	Allocated sites, particularly for housing, employment and mixed use
Employment Land Review (ELR)	Sites required for employment use
Calderdale Urban Capacity Study (UCS) Database including earlier Urban Audit	Database of some 1200 sites resulting from field surveys
The National Land Use Database (NLUD), maintained by CLG and updated annually	Brownfield sites
'Call for Sites Exercise' undertaken to provide landowners and developers with the opportunity to put forward sites for consideration in the Local Plan.	Survey form ensured data supplied was relevant to the SHLAA tests of suitability, availability and achievability
Planning application refusals	Potential sites and possible constraints information
Lapsed Planning Permissions	Potential sites where principle of development previously accepted
Ordnance Survey Maps	Updating of the UCS sites, drawing of boundaries, measurement of site areas, constraints
Aerial Photos	Updating of the UCS sites, current use, topography, whether brownfield or greenfield, site boundaries, constraints
Google Street View	New sites and updating of existing sites, current use, topography, whether brownfield or greenfield, site boundaries and constraints
Land and Property Services	Knowledge of Council owned sites including any plans for disposal and potential timescale
Site Briefs e.g. Copley Valley Regeneration Scheme	Assessment of housing numbers, constraints, timescale

26 Stage 3: Desktop review of existing information

9

Calderdale MBC Strategic Housing Land Availability Assessment 2014 Review

Information Source	Data Provided
Calderdale Open Space, Sport and Recreation Study (and emerging update)	Whether land in open space use should be retained
Planning Permissions Survey (see Stage 7)	Potential from older planning permissions and time frame
Land Ownership survey (see Stage 7)	Availability of sites and time frame

10 Stage 4: Determining which locations will be surveyed

10.1 Whilst the RSS settlement network will clearly influence the allocation of sites at the plan making stages this did not generally constrain the areas surveyed in the SHLAA where the opportunity was taken to assemble as much information as possible about potential housing sites. This built on the approach taken in the UCS when an extensive field survey was undertaken and therefore as comprehensive a survey as resources would permit was also undertaken for the SHLAA. The experience of the UCS is that by using a street-by-street approach other sites not previously identified will be identified and therefore this approach was followed in the SHLAA. This in conjunction with the 'Call For Sites' exercise is considered to have at the very least provided reasonably comprehensive coverage. Thus all sites without planning permission, some 760 sites were visited in the field survey at the time of the initial SHLAA.

10.2 At the time of the initial SHLAA sites with the benefit of planning permission were not visited systematically due to the scale of the task with there being some 1060 such sites in the database. As explained in Table 4 'Information Sources' in the previous section the Housing Land Availability Database holds information on these sites. Where there were doubts about sites these were addressed through a questionnaire survey in the first SHLAA (see Appendix 10 and Assessment Stage 7).

10.3 Historically smaller sites have been a significant source of housing supply in Calderdale and therefore a relatively small site size threshold of 0.1ha was agreed with the Working Group and employed in the assessment. A minimum threshold was required since resources did not permit the assessment of sites below this size. Adopting this threshold was considered justified given the importance of small sites in Calderdale. Both the CLG Practice Guidance and further advice in the ARUP Guidance refer to including those sites that 'make a significant contribution to the delivery of housing'. This approach is further expanded on in the Arup Guidance where it is noted that some 'urban' authorities such as Calderdale also have significant rural areas where the dwelling requirement may have to be reconciled against identifiable sites adjacent to and within current small settlements. POS Enterprises Ltd advised that the UCS included a lot of potential from small sites which should logically be carried forward. Furthermore, a small site size will maximise the yield from the urban areas and correspondingly reduce the amount of Green Belt land release, an approach which is compatible with national planning policy. Adopting a threshold of 0.1ha also avoided the inclusion of most, but not all, land attached to existing houses (garden sites) which would have both been time consuming to survey and stimulate interest in owners bringing such sites forward. This is not something the Council wishes to encourage because of the effect of over development and the number of such planning permissions in the recent past which have resulted in calls from Members and other interested parties to prevent this type of development. At the national level this issue resulted in private Members' bills seeking to change the status of gardens from brownfield to greenfield land and this amendment was subsequently made by the Coalition Government in June 2010. The site size threshold was not applied to sites with planning permission since these already formed a part of the housing supply.

10.4 Whilst it is for each district to determine the sites making a significant contribution to their housing supply, for purposes of comparison the neighbouring districts of Bradford and Kirklees are employing thresholds of 0.4 ha and 0.2 ha respectively.

11 Stage 5: Carrying out the survey

11

11.1 Field surveys were undertaken for the initial SHLAA and subsequent reviews. All of those involved in the field survey were clearly briefed to ensure consistency in undertaking the survey and answering questions to ensure that the status and purpose of the Assessment could be clearly conveyed. Thus the surveyors, when questioned or indeed seeking information in the course of undertaking the field survey, made it clear that sites identified in the survey will not necessarily be allocated for housing but rather the assessment will determine the overall potential that exists for housing within the district. The actual inclusion of any sites in DPDs is for the plan making process itself which is subject to statutory regulations regarding public consultation.

11.2 The information recorded in the desktop review was checked and additional information gathered about the sites held in the database. All of the information was recorded on a form and subsequently input to the database. Hand held PCs were employed enabling the Ordnance Survey base to be viewed at a variety of scales. Given the proximity of many sites, the survey was undertaken by walking from one site to another which increased the opportunities for both finding additional sites and viewing known sites in their wider context. Where additional sites were found these were recorded and added to the database. A copy of the site survey form is provided in Appendix 9.

12 Stage 6: Estimating the potential of each site

12.1 Various means of assessing the housing potential of each site were considered by the Working Group. The preferred approach was to employ a range of density multipliers to provide an indicative density as a starting point. All of the identified sites were subsequently provided to the Working Group (schedule and A4 Plan) for their comments in relation to both stages 6 and 7. Capacities were adjusted by members of the Working Group to take account of constraints and viability factors. The capacities in the database were then amended accordingly and the reasons recorded.

12.2 The existing RCUDP Policy H10 was not considered sufficiently detailed in terms of providing a range of density multipliers but its overall principles in relation to density were respected. Prior to agreeing the density multipliers to employ, a range of density assumptions were considered by the Working Group in order to reflect site capacities as accurately as possible and without overstating the capacity. In determining the actual density multipliers to use the Working Group resolved to employ those quoted in "Tapping the Potential"⁽¹⁰⁾

12.3 The use of sample schemes was considered by the Working Group to supplement the approach of density multipliers on certain sites but concerns were raised regarding the number of assumptions inherent in this process together with the fact that a variety of schemes could be put forward by different developers for the same site.

12.4 The gross density multipliers were converted to net density multipliers using the ratios included in 'Tapping the Potential'. This document is based on recognised research into densities in relation to site size and carries considerable weight. The higher end of the ratios in 'Tapping the Potential' have been used as most of the sites in Calderdale are relatively small. Sites over 2ha in rural areas came out below the 30dph net density included in the former PPS3 but there are probably few of these sites in rural areas, if any, in Calderdale. By varying the densities used an overestimate of potential should not result. However, whilst not wishing to overestimate the potential there was also the risk of underestimating it given that the definition of net density in the former PPS3 includes directly associated uses. The areas to which the relevant multipliers related were mapped in GIS in order to determine the appropriate multiplier for each site. One option for further refinement of the assessment, and particularly if the assessment were found to have identified insufficient land, would be to conduct sensitivity testing with regard to the density assumptions.

12.5 Those sites having the benefit of planning permission for new build apartments were re-assessed using the density multipliers in recognition of the fact that these are unlikely to be built given the collapse in the apartment market and revised planning applications received, most likely for houses. Sites where the only realistic option was conversion were not re-assessed, as is the case with many of the old mill buildings in the district .

Table 5 Density assumptions in relation to Site Size⁽¹⁾

Location	Site Size	0.4ha	0.4 - 2ha	>2ha
	Gross to Net Ratio	100%	90%	75%
Town Centres (areas within 'blue' town centre notation in RCUDP)	Gross Density	60 dph	60 dph	60 dph
	Net Density	60 dph	54 dph	45 dph

10 Tapping the Potential: Assessing urban housing capacity:towards better practice, DETR, 2000.

30 Stage 6: Estimating the potential of each site

12

Location	Site Size	0.4ha	0.4 - 2ha	>2ha
Near Public Transport Nodes (e.g. Rail Station 750m)	Gross Density	50 dph	50 dph	50 dph
	Net Density	50 dph	45 dph	38 dph
Walking distance of town centres (750m from edge of 'blue' town centre notation in RCUDP)	Gross Density	50 dph	50 dph	50 dph
	Net Density	50 dph	45 dph	38 dph
Other urban areas (remaining areas shown as urban in RCUDP and sites immediately adjacent urban areas)	Gross Density	40 dph	40 dph	40 dph
	Net Density	40 dph	36 dph	30 dph
Rural areas (within and adjacent smaller settlements in green belt and Area Around Todmorden - washed over or inset in RCUDP)	Gross Density	35 dph	35 dph	35 dph
	Net Density	35 dph	32 dph	26 dph

1. Based on research in 'Tapping the Potential'

13 Stage 7: Assessing if sites are likely to be developed

An initial filtering of sites was undertaken with any clearly not having potential or being outside the parameters of the assessment filtered from the assessment and the reasons recorded. Filtered sites remain within the database and are listed in Appendix 4 (Filtered Sites) along with the reasons for filtering. The criteria for filtering were agreed with the Working Group and range from, for example, sites detached from any defined settlement to sites where unacceptable environmental conditions would be experienced by residents such as sites within general industrial areas, being below the study threshold of 0.1ha or as a result of rationalising overlapping and duplicate sites and boundaries. The tests themselves were undertaken in turn with any site not satisfying a test not necessarily continuing to the next test but being recorded as Held in Abeyance. On some occasions the opportunity was taken to retain the site and find out more information first.

In order to determine whether sites are developable and deliverable as required by the former PPS3 and now the NPPF the three tests in the CLG Practice Guidance of Suitability, Availability and Achievability were applied to each site.

The CLG Practice Guidance defines what is meant by the terms developable and deliverable as follows:

Developable

- In a suitable location for housing development; and
- Reasonable prospect will be available and could be developed at a specific point in time.

Deliverable

- Site is available now; and
- Offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within five years from the date of adoption of the plan.

Not Currently Developable

- Not known when a site could be developed e.g. where one of the constraints is severe and it is not known when it might be overcome.

As explained in the CLG Practice Guidance in practice it was the degree of availability and achievability which influenced the final site assessment. The factors to be considered for each of the tests are set out in the CLG Practice Guidance. These were expanded and agreed by the Working Group and further informed by the Arup Guidance. A simple scale was employed and agreed with the Working Group with the definitions of the selected categories provided in Appendix 12.

Stage 7a Assessing Suitability for Housing

13.1 The Practice Guidance provides the overall context for assessing suitability in paragraph 37 where it states, "A site is suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities."

13.2 Sites with planning permission or allocated in the RCUDP were generally considered suitable unless circumstances had changed altering their suitability. Other sites were assessed against a range of factors based on those suggested in the CLG Practice Guidance and summarised below, with their suitability recorded as "Yes", "Possibly" or "Not Currently Suitable" (see Appendix 12 for definitions).

- Policy restrictions - high level policy (in the form of national and formerly regional level policy) was applied which in summary terms generally relates to the sustainability of sites and locations. As regards policy at the local level (principally in the RCUDP) generally a policy neutral approach was adopted. Account was only taken of those policies relating to physical features such as SSSIs with policies such as those relating to the green belt and rural area around Todmorden ignored. This is in accordance with the CLG Practice Guidance and ensures that the Council is in the best possible position when determining its overall strategy towards housing provision in the Core Strategy. This approach was also recommended by ARUPs in their advice given that the need for a review of the Green Belt in Calderdale had been recognised by the Inspector who held the Inquiry into the RCUDP and also the Secretary of State via RSS acknowledged that a strategic review of the West Yorkshire Green belt is required. The current development plan status of sites was recorded in the database making it clear that some sites will require a policy change.
- Physical problems or limitations - examples include access, infrastructure, ground conditions, flood risk, hazardous risks, pollution and contamination. With regard to flood risk, the advice produced by ARUPs is that sites within Flood Risk Zone 3b (functional flood plain) be considered unsuitable because PPS25 (now replaced by the NPPF) contains a presumption against any housing development in this zone. For the other flood risk zones the advice is that since the sequential test in PPS25⁽¹¹⁾ (replaced by the NPPF and associated technical guidance) is intended to balance flood risk against other policy objectives, such sites be included in the Assessment, otherwise the omission of such sites would prejudice the subsequent sequential test which more appropriately takes place as part of the plan making process. This advice was followed in the Assessment.
- Potential impacts - examples include effect on landscape features and conservation.
- Environmental conditions - such as those that would be experienced by prospective residents.

Stage 7b Assessing Availability for Housing

13.3 The factors taken into consideration were based on those in the CLG Guidance and included any legal and ownership problems arising from multiple ownerships, ransom strips, tenancies or operational requirements of landowners. A four point scale of "Yes", "High Possibility", "Low Possibility" and "No" was used to record a site's availability (see Appendix 12 for definitions). Essentially to be available a site had to be controlled by a housing developer who had expressed an intention to develop (either through applying for planning permission or the 'Call for Sites' Exercise) or the land owner had expressed an intention to sell.

13.4 The assessment acknowledged that the fact a site has planning permission does not necessarily mean it is available since planning applications can be made by persons who do not necessarily have an interest in the land. In addition sites can commence but then development can be halted. At the time of the initial SHLAA where there were doubts about sites these were addressed through a questionnaire survey (see Appendix 10). For subsequent reviews questionnaires are not employed due to the relatively low response rate for the initial SHLAA, rather site visits are undertaken where it is unclear as to how sites are progressing. Therefore schedules of sites under construction for more than 3 years and lapsed sites have been created for further investigation, including a programme of site visits which is currently well advanced. These sites are too numerous to accommodate during a single review of the SHLAA but once complete it will be possible to confirm their status for the HLA database and suitability for inclusion in the SHLAA.

13.5 Information for sites without the benefit of planning permission was sought in two main ways. For sites submitted as a result of the 'Call for Sites' exercise availability information was requested on the pro-forma and generally supplied. For other sites a survey to determine land availability was carried out. After obtaining ownership details from the Land Registry, land availability questionnaires

accompanied by a covering letter were sent to the respective landowners. This survey also provided two scenarios covering a 'normal' market and that created by the economic downturn in order to obtain as balanced a picture as possible. A copy of the questionnaire is included in Appendix 11. This exercise also resulted in a number of landowners contacting the Council when further information was often gathered.

Stage 7c Assessing Achievability for Housing

13.6 The CLG 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 essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and sell the housing over a certain period. The main factors taken into consideration in assessing achievability were based on those in the CLG Practice Guidance and can be summarised as:

- Market Factors such as 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 such as site preparation costs in relation to any physical constraints, any exceptional works necessary, relevant planning standards or obligations and prospect of funding or investment to address identified constraints or assist development; and
- Delivery Factors such as phasing by the developer, realistic build out rates on larger sites, whether there is a single developer or several developers offering different housing products and size and capacity of the developer.

13.7 In order to obtain as realistic a view as possible regarding the achievability and deliverability timescales of sites and taking the above factors into account much reliance was placed on the input of the housebuilder representatives on the Working Group. A schedule listing all identified sites together with an A4 site plan of each site and 1:10,000 plans showing the location of sites across the district together with a pro-forma (see Appendix 13) was sent to all members of the Working Group for their comments. The views of the housebuilders were particularly useful for determining whether sites were developable and when, together with views on their capacity. The comments returned on the pro-formas were input to the database and analysed to ensure agreement across the Working Group with a brief summary assessment undertaken of each site highlighting any salient factors. The additional survey seeking owners' intentions referred to in previous sections was also helpful in determining the achievability and deliverability timescale of sites. The achievability of sites was recorded on a 3 point scale of "Highly Likely", "Possible" and "Not Achievable" (see Appendix 12 for definitions).

13.8 The actual timing of sites coming forward was also assessed and recorded under a four point scale reflecting their deliverability of "Short term deliverable site", "Medium term deliverable site", "Long term deliverable site" and "Held In Abeyance" (see Appendix 12 for definitions). For larger sites the delivery period occasionally overlapped two of the deliverability categories with the predominant one being recorded in the database. Within these time periods completions were also allocated to years. This took account of the number of completions realistically possible on any one site based on information provided by the housebuilders and shown in Table 6 'Annual Delivery Rates - New Build' and Table 7 'Annual Delivery Rates - Conversions'. The timescale used was over 17 years in order to reflect the fact that the SHLAA was produced around two years in advance of the programmed adoption date of the Local Plan. This accords with the advice in national planning guidance that SHLAAs should cover at least the period of 15 years from the date of adoption of the Local Plan. Whilst a degree of prioritisation based on selected delivery time periods is useful, clearly this cannot be too precise when attributing to specific years further ahead. Sites will be moved between years on the annual reviews as more information becomes available and as they move closer to the present.

13.9 The Held in Abeyance category (18 years and beyond) is included to record those sites that

it is less clear will be developed within the time period of the Local Plan but should be re-assessed on the annual review to determine whether they could move forward. Only limited information is shown for many of these sites as they may have fallen at the first test and subsequent tests not carried out. Sites fall within this category for a number of reasons. For example, there may be constraints which cannot be overcome during the period of the Local Plan or for which further information is required. The spatial strategy which is adopted in the Local Plan may make sites currently unsuitable more suitable or other evidence based studies will determine the most appropriate use for some sites. There are also a number of underused employment sites across the district where an alternative use may be more appropriate but unless these sites have been put forward in the 'Call for Sites' Exercise they have not been included in the SHLAA as the Council does not wish to prejudice the future of existing employment uses. The majority of the "Held in Abeyance" sites are developable but there is more uncertainty about the timing of any development.

13.10 At the end of the Assessment there were a small number of sites where views differed as to their developability and/or deliverability. In most cases this was the result of additional or more recent information and based on this information these sites were placed in the most appropriate Deliverability category. Usually this was the Longer Term Deliverable Site category due to there being a greater level of uncertainty about these sites.

Table 6 Annual Delivery Rates - New Build

Site Status	Site Size/ Number Units <50	Site Size/ Number Units >50	Notes
Under Construction Lead in time	N/A	N/A	
Under Construction Build Rate	30	30	Mid-point of 25-35 dwellings per annum range employed (range as advised by Working Group members). Build rate applied to residual of the agreed capacity not already built.
Full Planning Permission (PP)/Reserved Matters PP Lead in time	1.5 years	2.5 years	1 year for infrastructure etc + 6 months to first completion. For new build flats, a further 6 months is added to cover the period to re-apply for planning permission, assuming these will not come forward due to the oversupply in the market. Additional year allowed for sites over 50 dwellings.
Full Planning Permission (PP)/ Reserved Matters PP Build Rate	30	30	Mid-point of 25-35 dwellings per annum range employed (range as advised by Working Group members).
Outline PP Lead in Time	2.5 years	3 years	6 months to obtain Reserved Matters planning permission + 1 year for infrastructure etc + 6 months to first completion + additional 6 months to reflect current market conditions. Longer period for larger sites.

Site Status	Site Size/ Number Units <50	Site Size/ Number Units >50	Notes
Outline PP Build Rate	30	30	Mid-point of 25-35 dwellings per annum range employed (range as advised by Working Group members).
PP sites subject of questionnaire survey (Initial SHLAA)			Lead in and build rates as per above rows, reflecting site status, and adjusted for questionnaire responses. Non-responses set to "Held in Abeyance"
Other Sites Lead in time			Based on information from Working Group site by site. Checked to ensure sites requiring policy change accord with LDS timetable
Other Sites Build rate	30	30	Mid-point of 25-35 dwellings per annum range employed (range as advised by Working Group members).

Table 7 Annual Delivery Rates - Conversions

Site Status	Site Size/ Number Units <50	Site Size/ Number Units >50	Notes
Under Construction Lead in time	N/A	N/A	
Under Construction Build Rate	40	40	Mid-point of 35 -50 dwellings per annum range employed (range as advised by Working Group members).
Full Planning Permission (PP)/ Reserved Matters PP Lead in time	1 Year	2 years	
Full PP/ Reserved Matters PP Build Rate	40	40	Mid-point of 35 -50 dwellings per annum range employed (range as advised by Working Group members).
Outline PP Lead in time	2 years	2 years	
Outline PP Build Rate	40	40	Mid-point of 35 -50 dwellings per annum range employed (range as advised by Working Group members).
Other Sites Lead in time			Based on information from Working Group site by site. Checked to ensure

Site Status	Site Size/ Number Units <50	Site Size/ Number Units >50	Notes
			sites requiring policy change accord with LDS timetable
Other Sites Build Rate	40	40	Mid-point of 35 -50 dwellings per annum range employed (range as advised by Working Group members).

Notes

Mixed use schemes - non-housing uses retained. Re-calculation applied to percentage of site granted planning permission for housing (from application drawings)

New Build Flats - assumed most planning permissions for new build flats would be re-negotiated. Therefore re-calculated for houses using density multipliers employed in Assessment (see Stage 6) and additional 6 months added to reflect need for obtaining revised planning consent.

Delivery Years calculated according to sites status e.g. sites with planning permissions based on decision date (sites taken from March 2010 HLA database)

Build rates quoted in tables are mid-points of ranges Working Group house builder representatives advised are achievable

For larger sites assumed more than 1 developer but output restricted to reflect market take up of dwellings

Stage 7d Overcoming Constraints

13.11 Where constraints were identified these were recorded in the database along with a description of the constraints, whether action was required to overcome them, the type of action required and whether this could be achieved in the time period covered by the Core Strategy. The views of the Working Group were important in assembling this information.

13.12 In terms of major constraints these can be broadly summarised as the A58/A644/A649 Junction at Hipperholme and the crossing of the Calder and Hebble Navigation in the vicinity of the former Sterne Mills at Copley.

13.13 During the annual review further more detailed information was sought on a number of both the existing and new identified sites. This was both as a result of information submitted during the review year and direct approaches to relevant bodies such as, for example, the Environment Agency.

14 Stage 8: Review of the assessment

14.1 The assessment of developable and deliverable sites was reviewed with an indicative trajectory produced in order to determine whether their combined potential was sufficient to provide a pool of sites to allow genuine choice about sites to allocate. The trajectory included sites for the whole of the period of the Local Plan from its programmed date of adoption and for the preceding 2 years leading to adoption and indicated the points within this 17 year time frame when sites could be delivered. The actual number of dwellings identified in the assessment and the forward trajectory can be viewed in the Results and Analysis Section of this report. Since the actual number of dwellings that could potentially be delivered exceeded the Core Strategy Preferred Options housing requirement figure it was considered that this did not justify attempting to boost the supply by re-visiting matters such as the density assumptions or seeking further information on some of the sites classified as "Held in Abeyance" in order to move these sites into the period covered by the assessment. Rather, it was concluded that it was appropriate to conclude the review with a view to collecting further information during the review year and as part of the preparation of the Local Plan land allocations work, programmed for 2015. Furthermore, with the economic downturn the risk of the supply diminishing significantly in the short term was considered unlikely.

15 Stage 9: Identifying and assessing the potential of broad locations

15.1 As explained in the preceding section sufficient land has been identified to meet the requirements of the assessment and therefore there is not a need to identify and explore the potential of broad locations. Notwithstanding this fact, during the course of the assessment there are a number of areas that have been identified which could be considered as broad locations. These have been noted should there be a need to assess these areas at a future review of the assessment. Such areas include:

- constrained sites within the urban areas where a more comprehensive approach would enable these to come forward such as existing areas containing a number of older employment premises not suited to the needs of modern employers; and
- extensions to existing settlements, particularly where it is known that some of the land owners are interested in putting their land forward for development but where additional land is required to create logical planned extensions although in some cases there may be a need to avoid the coalescence of settlements.

16 Stage 10: Determining the potential of windfalls

16.1 The former PPS3 Housing stated that allowances for windfalls (sites not specifically identified as available) should not be included in the first 10 years of land supply unless there is evidence of genuine local circumstances that prevent specific sites being identified. This point was also emphasised by both the Home Builders Federation and Government Office for Yorkshire and the Humber in response to the draft methodology. The NPPF takes a different approach as reflected in Section 5.

16.2 Historically windfalls have made a significant contribution to housing provision in Calderdale and this is expected to continue. For example, sites below the study threshold of 0.1ha will come forward and this is confirmed by a number of such sites being put forward by land owners in response to the 'Call for Sites' exercise. Some employment sites are also likely to continue to come forward for development but are not included in the Assessment because they are currently being used for employment purposes. Future reviews of the SHLAA will monitor and record windfalls to reflect the identification of such sites in this process. Once windfalls have planning permission they will become part of the housing supply and be added to the SHLAA database on the next update.

17 Land Supply Demonstrated by Assessment

17.1 This is the fifth Calderdale SHLAA and the appendices listing the sites follow the same format as previously. Appendix 1 contains the detailed Schedule of Sites with Planning Permission whilst Appendix 2a provides the Indicative Locational Maps for the Schedule of Other Sites (those sites without planning permission) included in Appendix 2b. Sites categorised as Held in Abeyance are listed in Appendix 3 along with the reason why they cannot be included in the Assessment at this time.

The Local Plan Housing Requirement

17.2 The provision of housing must be viewed against the backdrop of the Coalition Government's ambition to significantly increase the level of housebuilding nationally, as evidenced in for example, the NPPF⁽¹²⁾ Housing provision in relation to the RCUDP and RSS are provided in the Annual monitoring Report. The Council published its Core Strategy Preferred Options document in 2012 with the associated consultation undertaken in November/December 2012. Whilst the Preferred Options document included a housing requirement figure of 16,800 over the Plan Period numerous objections were received to this proposed level of housing provision with both higher and lower amounts sought. These together with the objectively assessed need figure which will be produced from the current update to the Strategic Housing Market Assessment will help inform the housing requirement figure for inclusion in the Local Plan.

17.3 Figure 5 'Housing Trajectory 2014 to 2031' and Table 9 'Supply of land for housing as illustrated in the forward trajectory' show the overall potential for housing in the district in relation to the draft housing requirement figure for the emerging Local Plan. For the purpose of this review the average annual housing requirement figure published in the Core Strategy Preferred Options document is included, as are indications of the amount of brownfield, greenfield and mixed brownfield/greenfield sites. As SHLAAs are policy neutral, ignoring the implications of planning policies such as those applying to the green belt, the intention is that more land is identified than is actually required.

17.4 Overall the supply of 20,180 potential dwellings is in excess of that needed for the Local Plan but the Council is continuing in its efforts to boost the supply of sites, particularly brownfield sites, in order to provide a greater selection of sites for the Local Plan. This has resulted in an increase in the potential land supply since the last review. Annualising the supply provides a figure of almost 1190 dwellings per annum over the 17 years covered by the Assessment. The trajectory shows a number of peaks and this reflects the positioning of sites based on current knowledge. Showing the actual yearly figures rather than averaging capacity for the deliverability periods takes the Assessment a little further than required under former Government Guidance (PPS3) and current national planning policy (NPPF) but is considered useful as it helps to illustrate the position over the whole of the trajectory. Clearly there is less certainty about the actual timing of sites coming forward in the later years of the trajectory and information relating to sites in this part of the trajectory in particular, will be refined on the annual review. Whilst the NPPF permits windfalls to be included in the first five years these are not actually included in the trajectory enabling a clear illustration of the contribution of identified sites.

17.5 The overall potential capacity for 20,180 dwellings involves 966 sites comprising 715 ha. This is spread over the 3 deliverability periods with around 4,100 dwellings in the Short Term, 11,300 in the Medium Term and 5,100 in the Long Term. A further 10,600 dwellings on 475 sites could be provided by sites Held in Abeyance, should the reasons causing them to be placed in this category be overcome. There are further sites classified as Held in Abeyance but where no capacity figure was recorded, usually due to these sites not being the subject of all 3 tests having failed one of the earlier tests. It should also be noted that the deliverability periods (including the Held in Abeyance

category) do not necessarily equal the sum of their component years as some, particularly larger sites, straddle more than one deliverability period. The three deliverability period totals shown in Table 8 'Deliverability - All Sites' do not therefore equal the 17 year total in Table 9 'Supply of land for housing as illustrated in the forward trajectory' which is based on the summation of individual years.

Table 8 Deliverability - All Sites

	Dwellings	Hectares	No. Sites
Short Term Assessment Years 1-7 (2014/15 to 2020/21)	4123	157	707
Medium Term Assessment Years 8-12 (2021/22 to 2025/26)	11278	391	148
Long Term Assessment Years 13-17 (2026/27 to 2030/31)	5073	167	111
Total	20474	715	966
Held In Abeyance Assessment Years 18+ (2031 +)	10609	400	475

Figure 5 Housing Trajectory 2014 to 2031

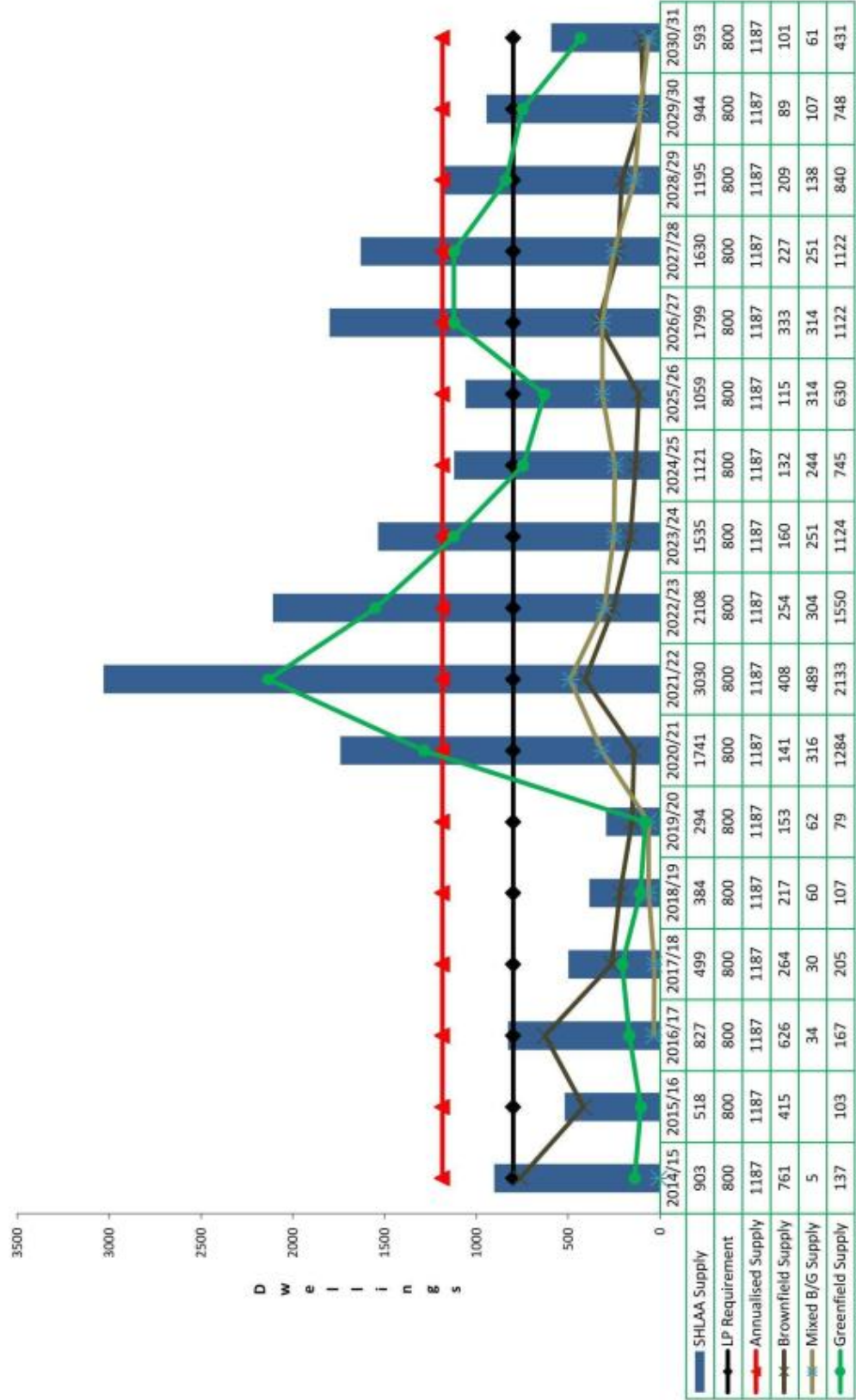


Table 9 Supply of land for housing as illustrated in the forward trajectory

Year	Timescale	Dwellings
1	2014/2015	903
2	2015/2016	518
3	2016/2017	827
4	2017/2018	499
5	2018/2019	384
6	2019/2020	294
7	2020/2021	1741
8	2021/2022	3030
9	2022/2023	2108
10	2023/2024	1535
11	2024/2025	1121
12	2025/2026	1059
13	2026/2027	1799
14	2027/2028	1630
15	2028/2029	1195
16	2029/2030	944
17	2030/2031	593
18+	3031+	10943
5 year total		3131
17 year total		20180

The Five Year Housing Land Supply

17.6 The requirement to maintain a rolling five year supply of deliverable land for housing is set out in the National Planning Policy Framework and the accompanying National Planning Practice Guidance.

The level of housing provision to be delivered over the following five years

17.7 The Planning Practice Guidance states that housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. It also states that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs. Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in

44 Land Supply Demonstrated by Assessment

17

Calderdale MBC Strategic Housing Land Availability Assessment 2014 Review

the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints. This advice is pertinent in the case of Calderdale where the current position in relation to the development plan is particularly complex.

17.8 The level of housing provision included in the Replacement Calderdale Unitary Development Plan (RCUDP) adopted in 2006 (and amended by the Secretary of State in 2009) and an extant plan, was delivered by the start of the 2008/2009 monitoring year. More recently the housing provision figure in the Regional Spatial Strategy (RSS) adopted in 2008, has been employed for the purposes of the housing trajectory and determining the five year housing land supply requirement. This in turn will be replaced by the Local Plan once adopted, programmed for late 2017.

17.9 Given the position in Calderdale, and to set the five year land supply requirement in context, a comparative assessment is provided. This review therefore provides an assessment in relation to both the RSS and the objectively assessed needs figure provided by the SHMA and reflected in the emerging housing requirement figure contained in the Core Strategy.

17.10 The period covered by the five year supply represents a 'forward look' corresponding with the requirements for completing Annual Monitoring Reports and calculates the five year period from beyond the review year covering the period 1/4/2015 to 31/3/2020.

The Requirement based on RSS

17.11 The requirement for the 5 years 2015/16 to 2019/20 based on the annual RSS requirement is 3350 dwellings (670 x 5). Adjusting this to reflect the level of housing provision delivered earlier in the Plan period requires a combination of actual completions (7953 net additional dwellings for the period 2004/05 to 2013/14) and projected completions for the year 2014/15. As completion figures are not yet available for the year 2014/15 the assumption is that the annual completion figure will be in the order of 465 dwellings based on average actual net completions for the previous 3 years. This gives a total completion figure for the period 2004/05 to 2014/15 of 8418 dwellings. Since the RSS requirement for this period was 6690 (500 x 4 + 670 x 7) this completion level is 1728 dwellings above the level required to meet the requirement for this period (6690-8418). Deducting this figure of 1728 completions from the total remaining requirement of 7370 leaves 5642 dwellings over the remaining 11 years of RSS (670 x 11 – 1728), a rate of 513 dwellings per annum. The requirement for the five year period 2015/16 to 2019/20 is therefore 2565 dwellings (513 x 5). Adding the buffer of 5% raises the overall supply required by 128 to 2693 dwellings. This is summarised in the Table below.

Table 10 Requirement based on RSS

			5 Year Period 2015/16 to 2019/20
a	Plan Provision 2004-2026		14060
b	Completions 2004-2014		7953
c	Assumed completions 2014/15		465
d	Total Completions 2004 to 2015	c + b	8418
e	Residual Requirement	a - d	5642
f	Annual Requirement	e/11	513
g	5 year requirement	f x 5	2565

			5 Year Period 2015/16 to 2019/20
	Shortfall to date 2004-2015		No
	Surplus to date 2004-2015		+1728
h	+ 5% required by NPPF	5% x g	128
	5 year supply with + 5%	g + h	2693

The Requirement based on the Core Strategy Preferred Options Document

17.12 It is not appropriate or possible to apply the residual method to the housing provision figure contained in the Core Strategy Preferred Options document since the housing requirement figure is not contained in a development plan (with a relevant base date). Until the emerging Local Plan has progressed further, and particularly prior to it being examined and adopted, it will not be totally clear whether or not the figure produced by a purely objective assessment of housing need will be appropriate for inclusion in the Local Plan whilst enabling that Plan to remain consistent with the policies set out in the NPPF.

17.13 The Core Strategy Preferred Options figure of 800 dwellings per annum multiplied by five years gives a required supply of 4000 dwellings. When the +5% is added to provide choice and competition in the market the actual supply required rises by 200 to 4200 dwellings. The position is summarised in Table 11

Table 11 Requirement based on Core Strategy Preferred Options Document

			5 Year Period 2015/16 to 2019/20
a	CS Preferred Options Provision (annual)		800
b	5 Year requirement	a x 5	4000
c	+5% required by NPPF	5% x b	200
	5 Year Requirement with +5%	b + c	4200

Sites with potential to deliver housing during the five year period

17.14 The NPPF requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. To be considered deliverable sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development on the site is viable. The assessment of sites categorised as falling within the five year supply was the same as that employed for all sites in the SHLAA as explained in Stage 7 of the Assessment. Specific comments relating to each supply category are included below. The supply is made up of the following:

- Sites under construction;
- Sites with planning permission not yet implemented;
- Sites where there is a resolution to approve a planning application but where the decision notice has not yet been issued;

46 Land Supply Demonstrated by Assessment

17

- Housing Allocations in the RCUDP;
- Identified unallocated sites without planning permission but where there is evidence a site is deliverable within five years; and
- A windfall allowance.

Sites Under Construction and with Planning Permission

17.15 The Housing Land Availability Database (March 2014 version) provided the initial list of sites with planning permission or under construction providing information about new sites gaining planning permission or amendments to existing sites including removing those sites built out. It also provided information as to whether sites had commenced construction and the stage of construction reached during the review year. The NPPF states that sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. As in previous reviews and in order to ensure as accurate a reflection as possible as to sites which will come forward in the five year supply period, and eliminate those continually renewed but with no real intention of being developed in the short term, a questionnaire was sent to all landowners/developers who either have planning permission for residential development and where development has yet to commence or whose site has been under construction for 2 years or longer and not registered any completions recently (sites of 5 or more dwellings). In addition the Council contacted landowners/developers who previously had planning permission but which has now lapsed (sites of 3 or more dwellings).

17.16 The bulk of the five year supply comprises sites that are under construction or have planning permission. Delivery from some sites with planning permission or under construction, particularly larger sites, may be partially completed or construction may extend beyond the five year period and this is reflected in the calculation of the supply.

17.17 Since this is a forward look it looks one year ahead of the SHLAA review year. It is therefore SHLAA years 2 to 6 which are the relevant five year period. Year 1 of the SHLAA shows a supply of 903 units which will clearly not all be built in 2014/15 and form part of the continuing supply, given that completions for the first two quarters were only 158 units. Therefore the balance of these, once the assumed completion rate (based on the current completion rate of 79 x 4 quarters giving 320 units, rounded) has been taken into account have been carried forward to SHLAA Year 2 (Year 1 of the forward look five year supply). However, in order not to overestimate the supply it is assumed that completion levels for the whole year may be nearer to 400 units (closer to the 3 year average). As this is a forward look in identifying the supply it is impossible to state specifically the sites which will be completed during 2014/15 with any certainty. However, the scale of the supply in numerical terms is clearly demonstrated with only the balance carried forward from SHLAA Year 1 reflected in the five year calculation. The listing of sites comprising the supply shows sites from the first 6 years of the SHLAA since it is impossible to know which ones will have been developed by 2015/16. Future reviews will examine whether some of the SHLAA Year 1 supply should move back a year although many of these are under construction.

Sites where there is a resolution to approve a planning application but where the decision notice has not yet been issued

17.18 There are some sites where the principle of granting planning permission has been established but the decision notice has not been issued. This is often because the signing of a S106 agreement is required in relation to, for example, the provision of affordable housing or highway improvements. Such sites are likely to be implemented and contribute to the delivery of housing during the five year period. The only sites where the signing of a S106 agreement is awaited include a small portion of one site (01855) and the predominant part of one other site (00126).

Allocated Sites in the Replacement Calderdale Unitary Development Plan (RCUDP)

17.19 Input from the Working Group in undertaking both the current and previous reviews provided as accurate a picture as possible regarding the deliverability and time-scales for the remaining housing and mixed use allocations in the RCUDP. Based on current evidence none of these sites have been included in the five year supply as it was unclear whether they would come forward in the next five years. However, there remains the possibility that some could do so, particularly if there is an upturn in the economy when both housing allocations and mixed use allocations (including housing) may be developed. Interest has been expressed in a number of sites but for a variety of reasons the time-scales for delivery could be beyond the period of the five year supply.

Identified unallocated sites without planning permission but where there is evidence a site is deliverable within five years

17.20 As with the allocated sites, input from the Working Group helped determine the developability and deliverability timescales of unallocated sites without planning permission. Only 22 unallocated 'identified' sites are included in the five year period, including 14 brownfield or mixed brownfield/greenfield and 8 greenfield sites. The positioning of these sites reflects the approach in the NPPF towards both greenfield land and the limited infilling or the partial or complete redevelopment of previously developed sites in the Green Belt (which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development). For a number of these sites, particularly larger sites, the majority of completions are anticipated to take place beyond the five year period and it is only those elements falling within the five year period that have been included in the five year supply.

17.21 The SHLAA Working Group considered that there were a number of green belt sites which could come forward during the first five years of the housing trajectory but as these sites would require a policy change through the Local Plan process they have been allocated to the following years. Until the Green Belt Review has been undertaken it is not possible to say which areas may be removed from it as part of the Local Plan process. However, it is possible that some sites currently in the Green Belt and where there is known developer interest could come forward towards the latter part of the five year period.

Windfall Allowance

17.22 The NPPF states that local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance is to be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends and should not include residential gardens. The NPPF also defines windfalls as sites not identified as part of the Local Plan process.

17.23 The importance of windfalls to housing supply in the district along with refinements to their monitoring is explained in the additional methodological notes included in Section 5 of this Review. On average over the eleven year period from 2003/04 to 2013/14 (a period of both high and low economic activity) windfalls (excluding gardens) accounted for 458 dwelling completions annually. As in the previous review this figure has been rounded down to 400 dwellings per annum in order to ensure a conservative approach. Additionally in order to address the issue of overlap between planning permissions and a windfall allowance no allowance is included for the first 3 years of the five year period. It is assumed that most windfalls that will contribute to the supply in the first 3 years already have planning permission. Potentially such an approach could lead to a conservative estimate but is considered to be in the spirit of boosting housing supply as required by the NPPF. Neighbourhood Plans, possibly towards the end of the five year period, the less restrictive approach to unallocated sites in the technical update to RCUDP Policy H9 to align it with the NPPF, recent changes to permitted development rights for change of use from B1 office to residential use, the relaxed prior notification

48 Land Supply Demonstrated by Assessment

17

procedure to change from retail and agricultural uses to residential, and the contribution large windfall sites have made in the past all have the potential to contribute to the supply of windfalls.

17.24 The list of sites comprising the five year supply is contained in the document "Sites comprising the Five Year Supply of Housing Land" which is available on request, whilst the supply is summarised below.

Table 12 Summary of Five Year Deliverable Land Supply

Category	Total Dwellings	% total supply ⁽¹⁾
Planning permission/ under construction	2067 ⁽²⁾	54
Lapsed Planning Permission	62	1.6
Awaiting S106	60	1.6
RCUDP Allocations	0	0
Unallocated Identified Sites	836	22
Windfalls ⁽³⁾	800	21
Total	3825	

1. does not sum to 100 due to rounding in some rows
2. SHLAA Year 1 c/f less assumed completions (400)
3. 2 x 400

The five year supply

17.25 Dividing the deliverable supply by the five year housing requirement provides the level of housing supply. The results in relation to the different approaches undertaken to determine what constitutes the appropriate requirement are summarised in Table 13 'Summary of five year land supply position' which provides both the absolute position, the percentage and the number of years of supply.

Table 13 Summary of five year land supply position

	Requirement	Supply	5YHLS units	5YHLS %	Years (supply/annual requirement)
Regional Spatial Strategy					
5 Year Period 2015/16 to 2019/20	2565	3825	+1260	149	7.5
5 Year Period 2015/16 to 2019/20 +5%	2693	3825	+1132	142	7.1

	Requirement	Supply	5YHLS units	5YHLS %	Years (supply/annual requirement)
Core Strategy Preferred Options					
5 Year Period 2015/16 to 2019/20	4000	3825	-175	96	4.8
5 Year Period 2015/16 to 2019/20 +5%	4200	3825	-375	91	4.6

17.26 When assessed against the RSS the district has a five year supply of housing land even when the additional 5% is included in the requirement. Using the Core Strategy Preferred Options figure there is a slight shortfall in meeting the five year supply which increases when the additional 5% is included, giving a figure of 91% or 4.6 year's supply.

17.27 In summary the Core Strategy Preferred Options figure is currently the appropriate figure to use in assessing the district's position regarding a five year supply of housing land. However, the weight attributed to it should reflect the fact that this figure is not included in an adopted Local Plan and when determining planning applications decision makers must take into account whether a specific proposal is consistent with the policies set out in the NPPF as a whole.

The Strategic Housing Market Assessment (SHMA)

17.28 A Strategic Housing Market Assessment (SHMA) has also been undertaken as required by the NPPF and complements the SHLAA. This study estimates housing need and demand for both market and affordable housing across the district. It considers future demographic trends and identifies the accommodation requirements of specific groups such as first time buyers and older people. This work has been augmented by a further study⁽¹³⁾ which explores a number of scenarios and sensitivities to determine the major drivers of household change in Calderdale. Both of these documents can be found on the Council's website: [Calderdale Council Website](#) A review of the SHMA is currently well advanced. Once completed this will replace both former documents and inform the preparation of the Local Plan.

18 Annual Review

18.1 Given the low response rate in relation to the draft methodology, together with the fact that there is no requirement to consult on the SHLAA, it was determined that once the first SHLAA had been agreed by the Working Group the final report be published. This is the approach followed for subsequent reviews which update the SHLAA component of the wider evidence base for the Local Plan and which is available to view on the Council's website. With the major stakeholders represented on the Working Group, additional comments received during wider consultation generally related to specific sites rather than the overall approach. However, the SHLAA is updated annually and feeds directly into the Annual Monitoring Report (particularly the trajectory produced as part of Core Output Indicator H2c).

18.2 As well as adding new sites, the information on existing sites will be refined to build up as firm and up-to-date a picture of each site's developability and deliverability as possible. Information which it was not possible to obtain at the time of the previous assessment will be sought in advance of the review date including that relating to those sites recorded as "Held in Abeyance". The Council's website invites comments on the published SHLAA and any comments received will inform the annual review. In effect the SHLAA is a 'Living Document'.

18.3 In addition the annual review provides the opportunity to take into account any new or changes to existing high level policy in applying the suitability test and any changes to market conditions for applying the achievability test.

19 Conclusions

19.1 The Assessment has been undertaken in accordance with the NPPF and NPPG as well as the previously published and more detailed CLG Practice Guidance. It demonstrates that the pool of housing sites to draw on when making new development plan allocations in the Local Plan could provide approximately double the number of dwellings for which land will need to be allocated (once contributions from other sources of supply have been taken into account). This provides some flexibility in determining the appropriate strategy to pursue in the Local Plan and enables a range of options to be considered when for example, determining the most sustainable locations for growth or allocating land for other uses such as employment. The pool of sites increases further when the potential from the sites Held in Abeyance is also considered. The Publication version of the entire Local Plan is programmed for consultation in late 2016, whilst early community engagement in relation to the land allocations component took place in early 2014 with the SHLAA providing the basis for this exercise.

19.2 The Assessment has also demonstrated the Council's position in relation to its five year housing land supply.

19.3 The Assessment is reviewed annually when information on specific sites is updated and other influences such as changes in market conditions assessed as part of the overall review of the position in relation to housing land supply. This is undertaken in conjunction with a Working Group of key stakeholders.

19.4 As explained in the Disclaimer at the start of this report the SHLAA remains a technical exercise exploring the potential scale of housing land supply in the district and as such is just one part of the evidence base being prepared to underpin the Local Plan. Sites identified in the Assessment do not have any planning status and applications for planning permission will be considered against the Replacement Unitary Development Plan (as amended by direction of the Secretary of State August 2009) and any other material considerations.



Planning and Highways

Westgate House

Halifax

HX1 1PS

Telephone: 01422 288001

Email: spatial.planning@calderdale.gov.uk

If you would like this document in another format or language, please contact: 01422 288001

আপনি যদি এই তথ্য অন্য কোন মাধ্যম অথবা ভাষায় চান তাহলে দয়া করে যোগাযোগ করুন :

01422 288001

اگر آپ کو یہ معلومات کسی دوسری زبان یا شکل میں چاہیے تو رابطہ کریں :

01422 288001

