



To: Executive Councillor for Planning and Sustainable Transport
Report by: Head of Planning Services
Relevant scrutiny committee: Development Plan Scrutiny Sub 12/7/2011
Wards affected: All Wards

Draft Strategic Housing Land Availability Assessment (SHLAA) –Phase 1

Non Key Decision

1. Executive summary

- 1.1 Planning Policy Statement 3 requires Local Authorities to produce a Strategic Housing Land Availability Assessment (SHLAA) to form part of a robust evidence base to inform the production of Development Plan Documents. The main purpose of the SHLAA is to assess the amount of land that may be available for new housing in Cambridge over the next 20 years in order to inform the review of the Cambridge Local Plan. It is important to note that the SHLAA does not allocate land for development, or determine whether planning permission would be granted for housing development on a site.
- 1.2 Future housing provision will be set locally through the review of the Local Plan which will need to balance housing need and demand against the capacity of the area to accommodate new development. This will need to ensure that any housing proposal sites are deliverable. Technical work on the SHLAA prepares the way for this work. The review of the Local Plan will also need to balance housing pressures against pressure for the development of other uses such as employment.
- 1.3 Work on the SHLAA is now at an advanced stage. The purpose of this report is for Members to consider the draft SHLAA prior to a six week consultation in September 2011.
- 1.4 The structure of the SHLAA is:-
 - a) main report detailing the methodology and conclusions (Appendix A)
 - b) second volume Part 3 that goes through the sites identified in the SHLAA with maps and site assessment forms (Appendix B)
- 1.5 Appendix C outlines suggests a draft schedule of consultees for the consultation.

2. Recommendations

- 2.1 This report is being submitted to the Development Plan Scrutiny Sub-Committee for prior consideration and comment before decision by the Executive Councillor for Planning and Sustainable Transport.
- 2.2 The Executive Councillor is recommended to:
- a) agree the draft SHLAA for consultation (Appendices A & B) subject to any amendments from Ward Members and; and any amendments resulting from ongoing work (Phase 2) with land owners and the Housing Market Partnership over the summer.
 - b) To agree that if there are any major changes in approach resulting from consultation with the Housing Market Partnership over the summer, these are considered and agreed in consultation with Chair and spokes before public consultation.
 - c) To approve the draft schedule of consultees (Appendix C).
- 2.3 Appendix B is too large to attach to the agenda. A printed copy has been placed in the Member's Room for reference. All documents are published on the Council's web site with the agenda documents.

3. Background

- 3.1 Planning Policy Statement 3: Housing (PPS3) requires the Council to produce a SHLAA. The main purpose of a SHLAA is to assess the amount of land that is potentially available for new housing in the future. This is part of the PPS3 requirement for local planning authorities to plan, monitor and manage the supply of housing.
- 3.2 The SHLAA has been prepared in accordance with government best practice guidance published by CLG in 2007.¹ This sets out a 10 stage process to assess sites in a SHLAA. The main report in Appendix A follows this approach.
- 3.3 The primary role of the SHLAA is to:
- Identify sites with potential for housing;
 - Assess their housing potential; and
 - Assess when these sites are likely to be developed.
- 3.4 This is not the first time that this sort of exercise has been undertaken. An Urban Capacity Study was prepared in 2002 to support the production of the existing adopted 2006 Local Plan.
- 3.5 The key difference between a SHLAA and an Urban Capacity Study (UCS)² is that the UCS did not necessarily fully assess the likelihood of sites coming forward for development. The guidance at that time did not require such an assessment but Planning Policy Statement 12 now places much more emphasis on deliverability.

¹ Strategic Housing Land Availability Assessments –Practice Guidance –CLG 2007
(<http://www.communities.gov.uk/publications/planningandbuilding/landavailabilityassessment>)

² The Urban Capacity Study was produced in 2002 and looked at the supply of residential land and fed into the Local Plan and Structure Plan processes.

- 3.6 The guidance requires sites to be considered deliverable or developable. To be considered **deliverable** (that is it could be brought forward and built in the first 5 years of the Plan), sites should:-
- **Be Available** – the site is available now is free of any legal restrictions, such as restrictive leases or covenants, and the land owner is keen to develop the land for residential purposes and doesn't want to keep the land in its current use or use it for another purpose.
 - **Be Suitable** – the site offers a suitable location in planning terms for development now and is free of known planning constraints;
 - **Be Achievable** – there is a reasonable prospect that housing will be delivered on the site within five years. There are no cost, market or delivery factors to prevent houses being built and sold.
- 3.7 To be considered **developable** (likely to come forward at some point after 5 years but within the next 20 years), sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available for, and could be developed at the point envisaged.
- 3.8 At this stage Officers have identified and undertaken a suitability assessment of a large number of sites as either being deliverable, developable or not developable. What is now being proposed is that these assessments are subject to consultation including consultation with landowners and developers to check if there is any interest on the part of land owners in development and whether such development is developable and deliverable. As part of this and in accordance with the guidance officers have set up a Housing Market Partnership (HMP). The HMP is made up of house builders, developers, social housing providers and others and can assist in ascertaining whether sites are developable and deliverable, as well as any mitigation measures associated with the development of particular sites. By involving these stakeholders at this stage the aim is to ensure the assessment of housing capacity is thorough and realistic. Consultation on the SHLAA will ensure that the evidence provided will stand up to scrutiny when the Review of the Local Plan is subject to public examination by a Planning Inspector. Consulting residents at this stage will ensure that the assessment benefits from their local knowledge of sites.
- 3.9 By identifying sites as deliverable / developable in the SHLAA this allows the Council to count those dwellings that could be built on these sites and contribute to future housing provision. The SHLAA is an important source of technical evidence to inform plan making in Cambridge, but **it does not allocate land for development, or determine whether planning permission would be granted for housing development on a site.** It is for the formal planning process to make the final decision as to whether development should take place on a site.
- 3.10 One of the purposes of a SHLAA is to demonstrate that enough land can be identified to meet policy requirements. Following the Government's decision about the possible imminent revocation of the East of England Plan, local authorities in Cambridgeshire agreed a joint planning statement³ on the future development

³ Environment Scrutiny Committee Meeting-October 5th 2010 Minute 10/65/ESC refers
(<http://www.cambridge.gov.uk/democracy/ieListDocuments.aspx?CIId=177&MIId=282&Ver=4>)

strategy for the County to 2031. This proposed following a more locally justified level of future housing supply and incorporated recent evidence prepared by Cambridgeshire authorities in responding to the draft review of the RSS submitted to the Government in March 2010. For Cambridge this work suggested that a provision of 14,000 dwellings would be more appropriate for Cambridge than the previous figure of 19,000 dwellings in the adopted RSS May 2008.

- 3.11 The Local Plan will review this figure in conjunction with a broad range of other evidence that informs housing need. For now the SHLAA has used this provisional figure to guide its assessment.

Methodology

- 3.12 The methodology for the SHLAA is set out in Section 5 of the draft SHLAA report at Appendix A. Stage 7a on page 18 describes assessing the suitability of sites. Potential sites were selected through an extensive desktop exercise using aerial photography, GIS mapping, planning records, constraint designations, the Local Plan, liaison with other Council departments and sections, and the previous Urban Capacity Study. All sites identified were visited where they were publicly accessible. In accordance with the guidance, officers contacted key stakeholders as part of a call for sites in May 2008. A density methodology was devised and consulted upon in February 2009.
- 3.13 The Site Assessment Criteria and a rigorous three-stage assessment methodology was agreed by Development Plan Steering Group in July 2009 and consulted on between July and August 2009. Consultees on this and the density consultation are listed in Annex 8 to the draft report. The Site Assessment Criteria comprised 43 planning and environmental criteria, which were used to sieve sites. These are detailed in Annex 1. Each stage contained a number of criteria. Level 1 covered strategic considerations such as Green Belt and flooding constraints, Level 2 more local environmental constraints such as protected open space, and tree preservation orders, and Level 3 sustainability access to facilities and design considerations.
- 3.14 Minor amendments were made to the criteria following this consultation and were agreed by the Executive Councillor, Chair and spokes. Sites were then assessed against these agreed criteria. The purpose of the three-stage approach is to filter out poorly performing sites through a series of considerations that move from the fundamental constraints of Level 1 to the more detailed site-specific criteria of Level 3. Sites have been scored using a traffic light system as outlined in figure 1 below. Sites that have passed Level 1 are then subject to more detailed testing against the Level 2 and Level 3 criteria. Sites that pass Level 2 would then be subject to more detailed testing against the Level 3 criteria.
- 3.15 If a site scores a red 'site is not developable' for any of the criteria, it should not be considered as having potential for housing in the SHLAA and will not proceed to being assessed against the next Level of criteria. Where a site scores amber against one or more of these criteria, this does not necessarily mean that the site is not developable but detailed appraisal of the significance of the site in its local context will assess any constraints on the site and identify potential mitigation measures to overcome these constraints. This would fall to any prospective developer as part of the planning application process. However it could be that a site that gets a number of amber scores could be judged to mean that it is

unrealistic to consider the site developable. This does have the potential to affect the deliverability of a site.

Figure 1: SHLAA Suitability Assessment Criteria Scoring System

KEY	LIKELY EFFECT
Red=r	The site is not developable.
Amber=a	The site may be developable subject to detailed justification and mitigation measures to enable acceptability of detailed development proposals.
Green=g	The site is developable.

- 3.16 In light of the significant housing pressures in Cambridge, the site identification exercise carried out has attempted to identify as many sites as possible before making an initial assessment as to whether they were developable or not. There has been no lower size limit on sites identified.
- 3.17 Sites identified in the 2002 Urban Capacity Study that have not been developed, allocated or identified in the SHLAA have been reassessed against the methodology used in the SHLAA.
- 3.18 The SHLAA considers a range of different types of site such as vacant and derelict land and buildings, surplus public sector land, land in non-residential uses such as car parks and commercial premises, additional opportunities in housing estates such as under used garage blocks, open space that doesn't meet the Local Plans criteria to justify protection.
- 3.19 Officers have not included any land in the Green Belt, open space meriting protection, sites in the flood plain (Flood Zone 3b), private gardens, and protected industrial land identified in the Employment Land Review (unless they have been carried forward from the Urban Capacity Study or included from the call for sites). The work is consistent with the Draft Open Space and Recreation Strategy assessment, which is also being considered at this meeting. These constraints are consistent with the SHLAA Practice Guidance, the adopted Local Plan and other national guidance.
- 3.20 All appropriate sites in the Council's own 3-year rolling Housing programme have been considered in the SHLAA, and as new sites are added to the programme they will be incorporated into the SHLAA as appropriate through the annual review.
- 3.21 891 sites were identified from a range of potential sources for assessment. They were subjected to a desktop assessment against the agreed Site Assessment Criteria to assess **suitability** and were also the subject of a site survey. A number of exclusions were applied to separate out sites already built out or in the planning system, along with sites likely to generate less than 10 units (Local Plans do not normally allocate sites below this level). All of the remaining 184 sites assessed in Part 3 of the Main Report now need to be scrutinised by the Housing Market Partnership to assess if they are deliverable or developable. Officers will also need to approach land owners to ascertain their **availability**.

Approach to Density

- 3.22 The SHLAA Practice Guidance suggests that a design-led approach can be used to assess housing potential on particular sites and using sample schemes, to extrapolate the number of dwellings that are achievable the total amount of housing that could potentially be developed.
- 3.23 However, this approach has not been taken for Cambridge, given the time and resources of the assessment team, and the relatively small size of sites potentially available in the urban area. Instead, this SHLAA uses an approach to assessing potential density largely based on the methodology developed for the 2002 Urban Capacity Study. This methodology applies density multipliers to sites according to geographical location and accessibility and the size and shape of individual sites. A further multiplier is applied to convert assumptions from gross to net.
- 3.24 The results were then cross checked against and modified in light of recent trends in development across Cambridge. Cross checks were also undertaken on a site by site basis for favoured sites using a design led approach with the Council's Urban Design Team.
- 3.25 The actual number of dwellings, which might be acceptable on a particular site may be higher or lower than those generated by the assessment and it will be up to the planning application process to make a final judgement.
- 3.26 Informal stakeholder consultation was undertaken on the proposed approach to calculating density was undertaken in February 2009

Approach to small sites

- 3.27 The Planning Policy Statement 3 (PPS3 Housing) states that no small windfall sites should be included in the SHLAA for the first ten years. The SHLAA Practice Guidance at Stage 9 allows for broad locations to be identified. These are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. The advantage of identifying broad locations is that the community will be clear about where future development will be directed and there will be greater certainty for developers about where development will be encouraged.
- 3.28 In dense urban areas like Cambridge built up to its boundary such sites have however contributed to the City's housing supply for many years. The SHLAA has identified and assessed over 570 other small sites and has looked at past trends in actual completions of such sites. While it is not proposing to test whether all of these specific sites are likely to be deliverable or developable they will be used to guide the general locations where such development might be considered acceptable in future.
- 3.29 In accordance with PPS3 the draft SHLAA is not currently proposing to rely upon on windfalls for the supply of housing in Cambridge.
- 3.30 Work is being carried out to cluster the general locations of the large number of small sites, which were assessed. Officers have also looked at actual planning consents granted and built out for small housing schemes involving less than 10 dwellings since 2001/2. This has revealed that these types of site could contribute 103 dwellings per annum over the 20 years to 2031.

Initial Findings

- 3.31 To date the SHLAA has reviewed capacity already in the planning system (sites allocated, with permission and sites already completed) as well as potential new sites.
- 3.32 Initial findings are that there is a potential capacity for 14,099 dwellings to be built up to 2031 (see Table 1 below). However this is reliant on the full delivery of the fringe sites, and on the consultation with key stakeholders, including developers and landowners on the initial sites put forward.
- 3.33 These assessments produced a list of 60 sites, which are now the subject of more specific discussion and research with land owners and a Housing Market Partnership who are being asked to provide a market view of their developability.

Table 1: Total dwellings developed / deliverable / developable 2011-2031 (work in progress)

Dwellings developed 1 st April 2001 to 31 st March 2010:	4,307
Deliverable Schemes (5 year supply)	
Dwellings in urban extensions	4,426
Dwellings on other large allocations without permission	990
Dwellings on large allocated sites with Planning permission	1,055
Dwellings deliverable on small sites with permission	224
Sub Total	
Developable Schemes (6-10 years supply)	
Dwellings in urban extensions	2,998
Dwellings on other large allocations without permission	625
Dwellings on large allocated sites with Planning permission	30
SHLAA Sites	
Dwellings on 60 identified sites as potentially being developable / deliverable about 89pa over 19 years deliverable and developable (depends on HMP views)	1691
Future small sites estimates 103pa (based on past 9 year trend) over 20 years	2,060
Grand Total:	14,099

- 3.34 The results of this research enabled a Housing Trajectory to be compiled which shows how the Council's overall housing requirement can be met by 2031. This is shown in Table 5 Stage 8 in the main report (Appendix A).
- 3.35 Based on providing 14,000 new homes to 2031:
- Some 10,382 homes have already been allocated or permitted in planning consents in April 2010.
 - The above allowance for small sites of less than 10 dwellings could contribute 2,060 new homes by 2031.
 - This leaves around 1,600 dwellings to find through the SHLAA. The SHLAA seeks to identify suitable land to address .

- 3.36 The provisional list of sites in this draft SHLAA (Table 4), at present has potential to contribute a constrained capacity of around 1700 dwellings. These sites however are subject to ongoing assessment over the summer with ward members and the Housing Market Partnership.
- 3.37 For the September consultation officers will provide a further technical document outlining details of all the rejected sites.

Next Steps

- 3.38 Following DPSSC, officers will continue to refine the SHLAA (Phase 2) and consult with the Housing Market Partnership and other stakeholders on the content of the SHLAA. Site owners will have to be identified and contacted to ascertain the likely availability of sites. Owners will also be able to advise on deliverability and developability of sites as well as any measures to overcome development constraints on sites. Any shortfalls will need to be tackled by the identification of new sites which will have to be assessed in the same way as sites already reviewed. Any new sites identified by the HMP or other stakeholders will need to be assessed against the same rigorous SHLAA Site Assessment Criteria used and will need to be agreed by the Executive Councillor for Planning and Sustainable Transport in conjunction with Chair and Spokes in advance of consultation. Any other changes to the SHLAA will also be agreed before consultation.
- 3.39 A list of proposed consultees for September can be found in Appendix E.
- 3.40 It is important to note that the six week consultation will include a fresh call for sites and may result in sites being removed or further sites being added. Any new sites identified at this stage will also need to be assessed against the same rigorous SHLAA criteria used and will be reported back to the Executive Councillor Chair and Spokes. Consultation at this stage will ensure that residents have the opportunity to comment at an early stage and the site assessment benefit from their local knowledge of sites.
- 3.41 The final draft SHLAA will be presented to Environment Committee for its consideration and final agreement in January 2012.
- 3.42 The government practice guidance suggests regular review and update of SHLAA's through the Council's Annual Monitoring process. Regular updates to the SHLAA will also be necessary as the Local Plan Review progresses at each of its key stages and immediately prior to any Examination.

4. Implications

Financial/Procurement

- 4.1 There are no direct financial implications arising from this report.

Staffing

- 4.2 There are no direct staffing implications arising from this report.

Equal Opportunities

- 4.3 There are no direct equal opportunities impacts arising from this report. An Equalities Impact Assessment will be undertaken.

Environmental

- 4.4 There are no direct environmental implications arising from this report. The draft SHLAA has considered a wide range of environmental criteria in the assessment of sites. The new Local Plan for Cambridge will assist in the delivery of high quality and sustainable new developments along with protecting and enhancing the built and natural environment of the City.
- 4.5 The implications of not identifying sufficient deliverable and developable land is that there would be a high risk that the new Local Plan would be found unsound at examination. Without a suitable supply of sites to draw from we would also be vulnerable to planning appeals being approved by the Secretary of State in undesirable locations such as the Green Belt. PPS3 also requires us to demonstrate a 5 year supply of deliverable residential land otherwise planning applications for housing should be “considered favourably” (PPS3, paragraph 71). This could lead to an increased number of appeals as developers may find it easier to challenge planning applications that are refused.
- 4.6 It is required that the SHLAA be reviewed annually in order to maintain a 5 year rolling supply of deliverable sites. The proposed way to do this is through the Annual Monitoring Report, accepting that this is likely to have some implications for staff resources.

Community Safety

- 4.7 There are no direct community safety implications arising from this report although any subsequent policies in the Local Plan will have to consider this

5. Background papers

- 5.1 These background papers were used in the preparation of this report:

- Planning Policy Statement 3;
- Strategic Housing Land Availability Assessment: Practice Guidance.
- Annual Monitoring Report 2010.
- Urban Capacity Study 2002

6. Appendices

Appendix A: Draft Strategic Housing Land Availability Assessment – Main Report

Appendix B: Draft Strategic Housing Land Availability Assessment – Site Maps and Assessments (only available electronically)

Appendix C: Proposed Consultees

7. Inspection of papers

To inspect the background papers or if you have a query on the report please contact:

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Appendix C

Draft List Of Proposed Consultees

Organisation

Accent Nene Ltd
ADAS
Anchor Trust
Argyle Street Housing Co-op Ltd
Arup Economics & Planning
Atkins
Babraham Road Action Group
Barratt Eastern Counties
Barton Close Residents' Association
Barton Housing Association Ltd
Bateman Street & Bateman Mews Residents' Association
Beacon Planning Limited
Bedfordshire Pilgrims Housing Association
BENERA
Bidwells
Bishops Court Residents' Company Ltd
Bradmore & Petersfield Residents Association
Brooklands Avenue Area Residents' Association
Brookside Residents Association
Brunswick & North Kite, Residents' Association
Bulstrode Gardens Residents Association
Cambanks Residents' Society Ltd
Cambridge & County Developments (CHS Group)
Cambridge Cyrenians
Cambridge Federation of Tenants & Leaseholders
Cambridge Partnerships
Cambridge Road Safety Advisory Council
Cambridge University Estate Management & Building Service
Cambridge University Hospital NHS Foundation Trust
Cambridgeshire County Council
Cambridgeshire County Council Property & Estates
Cambridgeshire Partnerships
CAMCAT Housing Association
Camstead Ltd
Carter Jonas Property Consultants LLP
Castle Community Action Group
Cheffins
Cherry Hinton & Rathmore Roads Residents' Association
Christs Pieces Residents Association
Circle Anglia
Clerk Maxwell Road Residents' Association
Corfe Close Residents Association (CCRA)
Countryside Properties (Special Projects) Ltd
Covent Garden Residents Association
CREW
CRONC
Devonshire Road Residents Association
East Cambridgeshire District Council
East Chesterton Community Action Group
EMRAG

English Heritage
Environment Agency
FECRA (Cambridge Federation Of Residents Associations)
Fenland District Council
Fenners Lawn Residents Association Ltd
Flagship (Cambridge Housing Society)
Mr Freeman
Gazeley Lane Area Residents' Association
George Pateman Court Residents' Association
Glisson Road/Tenison Road Area Residents' Association
Gough Way Residents Association
Granta Housing Society Ltd
Granta Housing Society/Metropolitan Housing Partnership
Greenlands' Residents Company
Grosvenor
Guest Road Residents' Association
Hanover & Princess Court Residents' Association
Hazelwood & Molewood Residents' Association
Highsett Houses Residents' Society
Highsett Residents' Society
House Builders Federation
Homes & Communities Agency
Hundred Houses Society
Huntingdonshire District Council
Iceni Homes (Hundred Houses) Tenants' Association
Iceni Homes Ltd
January Consultant Surveyors
King Street Neighbourhood Association
Kings Hedges Neighbourhood Partnership
Laxton Way Residents' Association
Lichfield & Neville Residents' Action Group
Marshall Group of Companies
Mill Road Community Improvements Group
Millington Road & Millington Lane Residents Association
Mitchams Corner Residents' & Traders'
Mott MacDonald
Mulberry Close Residents Society
NAFRA 19 Acre Field Residents' Association
Natural England, Four Counties Team
New Pinehurst Residents Association
Norfolk Terrace & Blossom Street Residents Association
North Newnham Residents' Association
Norwich Street Residents Association
Old Chesterton Residents' Association
Old Pinhurst Residents Association
Orchard Close Residents Association
Oxford Road Residents Association
Park Street Residents' Association
Petersfield Area Community Trust (PACT)
Places for People
Protect Union Lane Group
Rapleys
Ravensworth Gardens Residents Association Ltd
Riverside Area Residents Association
RPS

Rustat Neighbourhood Association
Sanctuary Housing Group
Sandy Lane Residents' Association
Savills
Savills L&P Ltd
SOLACHRA
South Cambridgeshire District Council
St Andrew's Road Residents Association
St Mark's Court Residents Association
St Matthews Gardens Residents Association
Storeys Way Residents' Association
Tavistock Road & Stratfield Close Residents' Association
Tavistock Road & Stratfield Close Residents' Association

The Eights Marina Management Board
Three Trees Residents' Association
Three Trees Residents' Association
Trumpington Residents Association
University Estate Management & Building Service
Varsity Place Residents Association
Victoria Park Residents Working Group
VIE Residents' Association
West Cambridge Preservation Society
Windsor Road Residents Association (WIRE)
Windsor Road Residents (WIRE)
Windsor Road Residents Association
Windsor Road Residents Association (WIRE)
WSP Development & Transportation Ltd
York Street Residents' Action Group