

South Gloucestershire

LOCAL PLAN

2018-2036

Housing and Economic Land Availability Assessment Proposed Methodology February 2018

1. Introduction

- 1.1 The purpose of this methodology document is to explain the way in which South Gloucestershire Council will undertake its Housing and Economic Land Availability Assessment (HELAA) during production of the new Local Plan. This Methodology has been prepared at this stage in order to allow members of the public and other stakeholders an opportunity to comment on the proposed approach and understand how it relates to work undertaken to support the West of England Joint Spatial Plan (JSP).

How to Comment on the HELAA Methodology

Comments are invited from 5th February to 30th April 2018.

Via email: planningpolicy@southglos.gov.uk

Via post: Spatial Planning and Specialist Advice Team, South Gloucestershire Council, Badminton Road, Yate, Bristol, BS37 5AF.

- 1.2 Following the end of the consultation period, the methodology will be updated as appropriate and finalised. It is anticipated that the HELAA site assessment process will take place during 2018 to support both the JSP and the Council's new Local Plan with the final HELAA expected to be published in Autumn 2018. Updates to the HELAA may be necessary as the new Local Plan progresses to submission and independent examination in public.

2. Purpose of the HELAA

- 2.1 Ensuring an adequate supply of land for development is a key function of the planning system as set out in the NPPF. In order to clearly document this supply, the council is preparing a HELAA. Once complete, the HELAA will form part of the evidence base for the emerging South Gloucestershire Local Plan. The assessment is required by the National Planning Policy Framework (NPPF). In particular, Paragraph 159 of the NPPF states that local planning authorities should prepare such a document in order to:
- 'establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period'.*
- 2.2 In addition, Paragraph 161 requires local planning authorities to undertake a review of land available for economic development at the same time, or in combination with, the assessment of land for housing. Therefore, in order to conform with national policy, the HELAA will comprise an assessment of land that is considered appropriate for housing and economic development uses, including retail.
- 2.3 Guidance on how such assessments are undertaken is provided by National Planning Practice Guidance (NPPG) 'Housing and Economic Land Availability Assessments'. This requires that assessments should be used to identify a future supply of land which is

suitable, available and achievable for housing and economic development uses over the plan period. For the purposes of the council's development plan preparation the HELAA will:

- Identify sites for new homes to be provided from the urban living and non-strategic growth requirements, with potential for development in accordance with JSP requirements; and
- Establish their development potential by assessing their suitability for development and the likelihood of development coming forward at a given point in time.

2.4 The outcomes of the HELAA process will subsequently inform the following areas of work:

- The allocation of sites for development within the emerging South Gloucestershire Local Plan in accordance with JSP requirements;
- The identification of the council's housing land supply position; and
- The preparation of Neighbourhood Plans where relevant.

3. South Gloucestershire Context

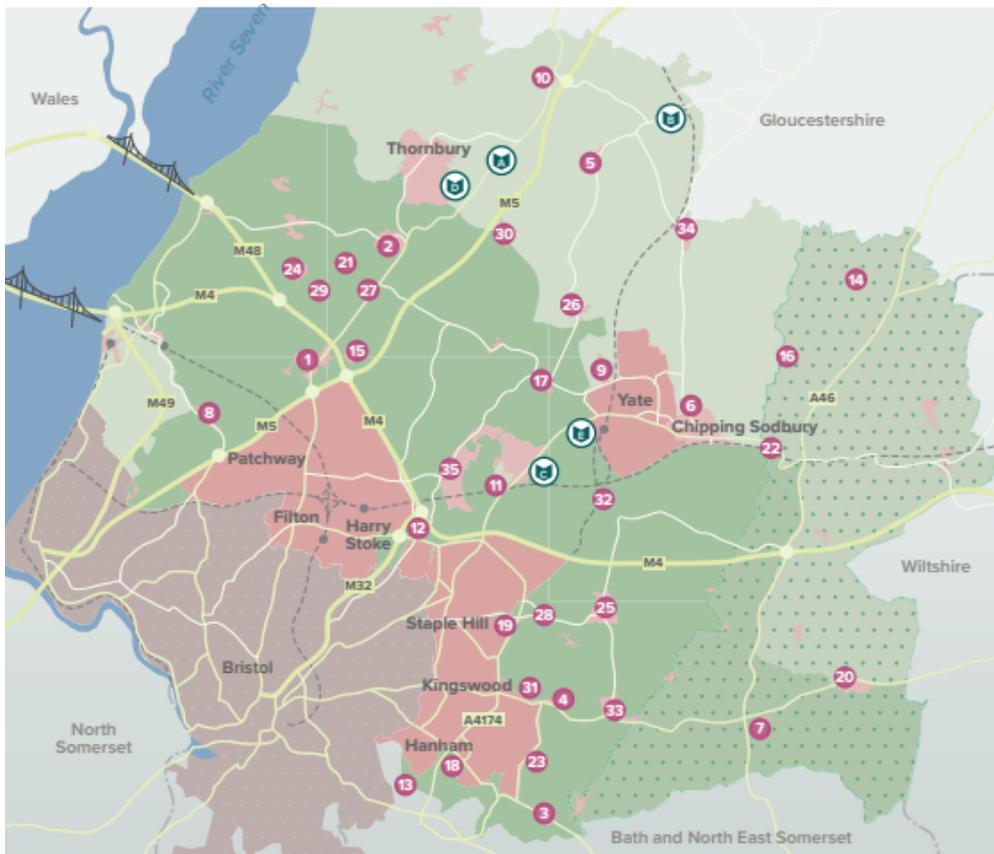
3.1 South Gloucestershire Council has worked jointly with its neighbouring West of England authorities (North Somerset, Bristol City and Bath & North East Somerset), in order to prepare a Joint Spatial Plan (JSP). The JSP, which was subject to Regulation 19 public engagement between November 2017 and January 2018, sets out the housing and employment requirements for each of the four authorities, and also identifies broadly where those needs should be met.

3.2 The housing requirement for South Gloucestershire is for 32,500 new homes to be provided between 2016 and 2036. This development will be met in the following ways:

- 22,300 homes already with planning permission and/or planned for through the South Gloucestershire Core Strategy;
- 2,900 homes through Urban Living in the North and East Fringes of Bristol and Yate;
- At least 6,000 homes in the plan period within Strategic Development Locations (SDLs), the broad locations that have been established within the JSP (Buckover Garden Village, Charfield, Coalpit Heath, Thornbury and Yate). The locations will each deliver a minimum of 500 dwellings; and
- 1,300 dwellings for Non-Strategic growth, in the rural area. .

3.3 The JSP proposes a contingency from SDLs, comprising 775 new homes south of Chipping Sodbury within the plan period (with total capacity of around 1,500 new homes) and an additional 225 new homes to be built at North West Yate SDL to be brought into the plan period. In addition, the JSP also proposes a contingency from non-strategic sites, comprising an additional 500 new homes.

- 3.4 With regards employment land, the JSP supports the delivery of 82,500 additional jobs in the West of England between 2016 and 2036. While this figure has not been disaggregated between the respective local authorities, the Strategic Development Locations have been identified to deliver significant employment space. In addition to employment at Strategic Growth Locations, the council has made further employment land available within the three Enterprise Areas at Severnside, Emersons Green and Filton as well as a wide range of free standing employment sites throughout the district in Safeguarded Employment Areas as set out at Core Strategy Policy CS12.
- 3.5 It is therefore the role of the HELAA process to support the identification of sites to deliver housing and employment uses as part of the Urban Living, Strategic Development Locations and Non-Strategic Growth elements of the Local Plan in order to add to and secure sufficient ongoing supply of new homes and jobs. The broad areas identified for these three elements of development are shown in Figure 1 below.
- 3.6 In terms of Non-Strategic Growth, the Council has already undertaken work in order to identify the rural places that may be appropriate for some development. This work has been based on an assessment of two key issues:
- Access by sustainable transport to key services and facilities, to ensure the development of isolated rural dwellings is avoided and sustainable patterns of growth are maximised; and
 - Avoiding rural areas surrounded by defined flood zones 3 and 2, as required by the sequential test.
- 3.7 In total, 35 places have been identified as potentially being suitable for Non-Strategic Growth. These places are presented at **Appendix A**. The map on the next page also sets out the location of the 35 places being investigated for non-strategic growth.



JSP - Strategic Development Locations

- Buckover
- Charfield
- Coalpit Heath
- Thornbury
- Yate

- Places for investigation for Non-Strategic Growth

Map Elements

- Urban Area
- Rural Locations
- Green Belt
- AONB
- Rest of South Gloucestershire
- Bristol
- River
- Motorway
- A Road
- B Road

For illustrative purposes only – details on this map do not represent the size or specific position of any future growth or that planning consent will be granted.

KEY	PLACES	EXISTING HOMES
1	Almondsbury	619
2	Alveston	985
3	Bitton	262
4	Bridgeyate	24
5	Cromhall	127
6	Chipping Sodbury	2138
7	Cold Ashton	35
8	Easter Compton	230
9	Engine Common	115
10	Falfield	88
11	Frampton Cotterell	2579
12	Hambrook	50
13	Hanham	*
14	Hawkesbury Upton	335
15	Hortham Village	293
16	Horton	62
17	Iron Acton	183
18	Longwell Green	*

KEY	PLACES	EXISTING HOMES
19	Mangotsfield	*
20	Marshfield	626
21	Old Down	80
22	Old Sodbury	121
23	Oldland	*
24	Olveston	395
25	Pucklechurch	937
26	Rangeworthy	167
27	Rudgeway	99
28	Shortwood	73
29	Tockington	131
30	Tytherington	180
31	Warmley	*
32	Westerleigh	182
33	Wick	623
34	Wickwar	585
35	Winterbourne	2543

* Outside Urban Area

Relationship to JSP 'Assessment of Strategic Development Locations' process

- 3.8 In preparing the JSP, the four West of England authorities have worked together to identify land suitable for strategic levels of growth beyond existing settlement boundaries – i.e. at Strategic Development Locations (SDLs).
- 3.9 Given the scope of the JSP, the initial work which informed the selection of the SDLs involved a broad 'area based' assessment of land suitability and did not focus on individual sites. This assessment work was published as supporting evidence to the 'Towards the Emerging Spatial Strategy Consultation' (Nov. 2016) in the form of 'Location Dashboards' for 37 places across the West of England. The methodology which underpinned this work was also published¹.
- 3.10 More detailed assessment work on each of the identified SLDs was subsequently undertaken and published as supporting evidence to the JSP publication draft consultation (Nov. 2017)².
- 3.11 Potential development sites, within South Gloucestershire, submitted through the JSP process will be assessed in accordance with the methodology outlined in this document.

¹ JSP Emerging Spatial Strategy (Nov. 2016). Evidence Base:

<https://www.jointplanningwofe.org.uk/consult.ti/JSPEmergingSpatialStrategy/view?objectId=295187#295187>

²JSP Publication Draft (Nov. 2017). Evidence Base:

<https://www.jointplanningwofe.org.uk/consult.ti/JSPPublication/view?objectId=313139#313139>

4. Methodology

4.1 This section sets out the proposed methodology for undertaking the HELAA. The methodology has been based on the guidance contained within the NPPG. Figure 2 below, which is contained within the NPPG, outlines the broad approach that local planning authorities should adopt when undertaking an assessment of sites.

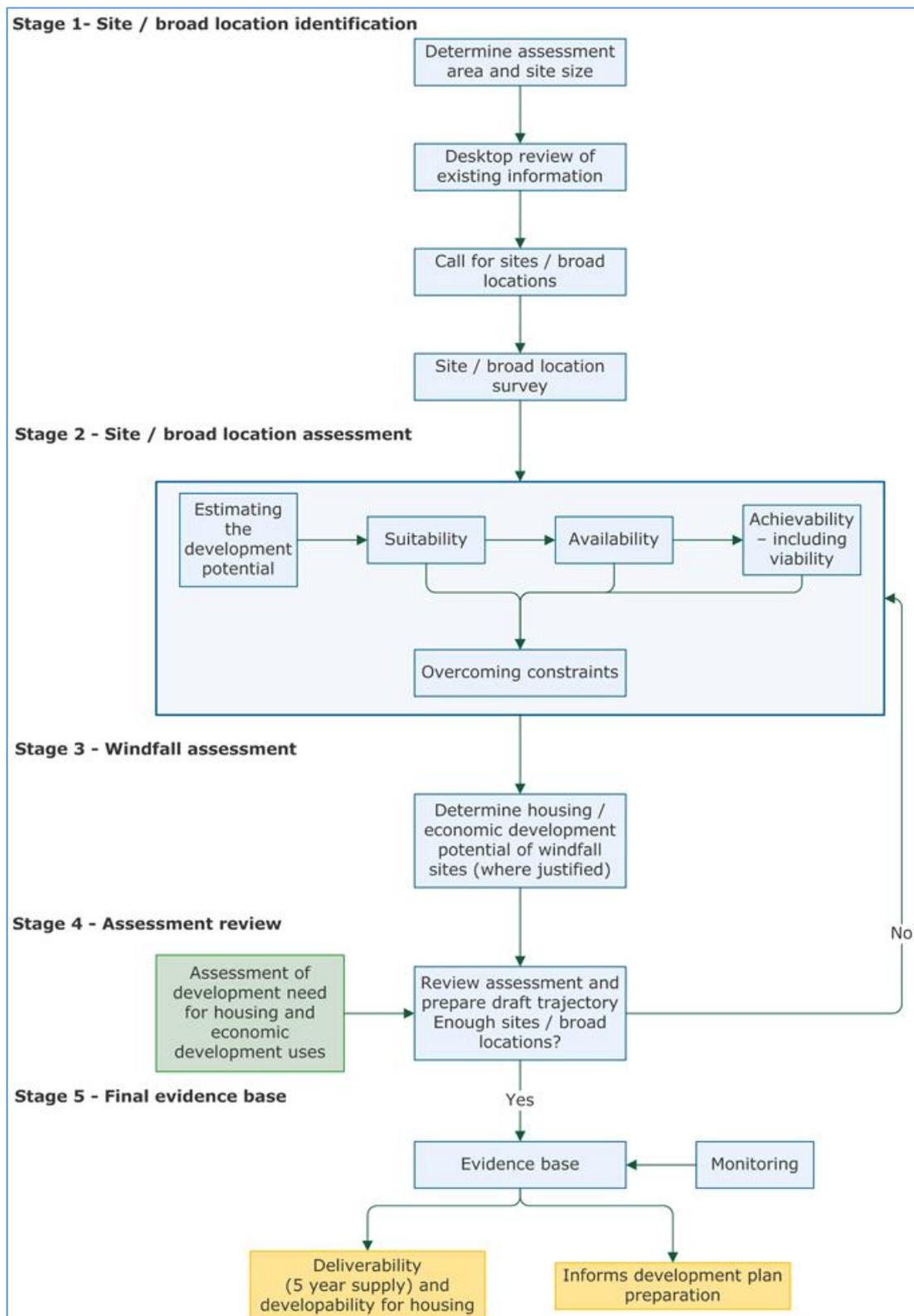


Figure 2: Site Assessment process, NPPG.

Identification of Sites

- 4.2 In undertaking a HELAA process, the NPPG identifies that local planning authorities should take account of potential sites from a variety of sources. The different types of site are presented in Table 1 below, along with the potential source of information from a South Gloucestershire perspective.

Type of Site	South Gloucestershire: Potential Data Sources
Existing site allocations without planning permission	Core Strategy and Policies, Sites and Places Plan sites
Planning permissions for housing and economic development that are unimplemented or under construction	Authority Monitoring Report
Planning Applications that have been refused or withdrawn	Planning application records
Land in the local authority's ownership	South Gloucestershire Council Property Services Team (including One Public Estate initiative)
Surplus and likely to become surplus public sector land	National register of public sector land plus engagement with public sector organisations
Vacant and derelict land and buildings	Local authority empty property register South Gloucestershire Urban Localities: Review of Potential (NASH Partnership, Feb 2018); Call for Sites
Additional opportunities in established uses (making productive use of under-utilised facilities such as garage blocks)	South Gloucestershire Urban Localities: Review of Potential (NASH Partnership, Feb 2018); Call for Sites
Business requirements and aspirations	Enquiries received by local planning authority; Active engagement with sector
Large scale redevelopment and redesign of existing residential or economic areas	South Gloucestershire Urban Localities: Review of Potential (NASH Partnership, Feb 2018); Call for Sites
Sites in rural locations	Call for Sites
Sites in and adjoining villages or rural settlements and rural exception sites	
Potential urban extensions and new free standing settlements	

Table 1: Identification of sites for assessment.

- 4.3 The council will seek to identify all potential sites from these sources in order to assess their suitability for development. The only sites that will not need to go

through the site assessment process are those highlighted in green within Table 1. This is because the principle of development has already been accepted in those locations.

Call for Site Submissions and “Up to Date Information”

4.4 As identified within Table 1, a significant aspect of the identification of sites will be those sites that are submitted through the formal Call for Sites process and through previous Development Plan Document consultation stages. The council has already undertaken a number of Call for Sites exercises over recent years in order to inform the preparation of different planning policy documents. The previous Call for Sites stages are outlined below.

Call for Sites / DPD consultation Stage	Dates
New Local Plan	Prospectus Document (January 2017)
Joint Spatial Plan (JSP)	Initial JSP Call for Sites (January 2015) Issues and Options (November 2015) Towards an Emerging Spatial Strategy (November 2016)
Policies Sites and Places Plan (PSP)	Regulation 18 consultation document (November 2015).

Table 2: Previous Call for Sites exercises

4.5 The range of sites submitted to the council through the various Call for Sites undertaken to date have been analysed, given a new reference and are available to view on the council’s website: www.southglos.gov.uk/callforsites.

4.6 The interactive map on the council’s website displays each site along with key supporting information, including whether the site is supported by an up to date “Call for Sites Response Form”. The council considers “up to date” to mean a Call for Sites Responses Form has been submitted from February 2016 onwards.

4.7 Where information relating to previously submitted sites is considered to be up to date, the site will continue to be assessed through the HELAA process. Submitted sites with no form, or lacking an up to date form have not been taken forward. Where this applies, promoters will be required to submit a new Call for Sites Response Form, along with any supporting information, to establish that the site is still available and achievable. Guidance on this has been provided at www.southglos.gov.uk/callforsites as part of the new Call for Sites to support this stage of the Local Plan.

4.8 As noted in paragraph 3.5, the HELAA will only assess sites that have potential for housing and employment development (or a mix of uses including housing and/or employment). The Call for Sites process allows sites to be submitted for other

proposed uses such as Gypsy and Traveller's and community uses. The council will consider the suitability of such sites separately from the HELAA process. The inclusion of a site on the Call for Sites register does not infer that the council in any way supports the development of that site.

Assessment of Sites

- 4.9 Following the identification of sites, a process of assessment must take place in order to identify their suitability for development. The council is proposing to undertake an initial High Level Assessment of all relevant sites in order to sieve out those that fail basic tests, and therefore do not need to be subject to a more detailed assessment. The criteria that will be used during this High Level Assessment are presented within **Appendix B** to this document.
- 4.10 As part of this initial sieve, and in order to keep the HELAA process manageable, the council is proposing that only sites that are capable of delivering 10 or more dwellings or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above are assessed in detail.
- 4.11 Sites that make it through the initial High Level Assessment sieve will then be subject to a more Detailed Assessment. In accordance with the guidance contained within the NPPG, the assessment of sites can be broken down into three distinct areas. These are an assessment of:
- Suitability;
 - Availability; and
 - Achievability.
- 4.12 **Suitability:** This is an assessment of the sites suitability for development, taking account of policy constraints (including Green Belt and heritage and environmental designations) and physical constraints (including topography and flooding).
- 4.13 **Availability:** This is an assessment of whether the site can be considered available for development, taking into account land ownership and existing uses. The Council will be seeking to avoid the allocation of sites which are likely to fail to deliver development within the required time period, due to fragmented and complex ownership issues, or disagreements potentially over "ransom strips" of land that need to be acquired to enable development.
- 4.14 **Achievability:** This identifies whether there are likely to be any abnormal costs that may result in proposed development being financially unviable, for instance due to a need to deliver major utilities infrastructure or undertake remediation works on contaminated sites.
- 4.15 The proposed criteria for the Detailed Assessment are identified within **Appendix C** to this document.

- 4.16 In order to help inform the assessment of sites, specialist advice from council officers will be sought where considered necessary. This will include involvement from the council's transport, heritage and landscape officers. Advice from other council departments may also be sought if this would assist the assessment process. Importantly, where constraints to development are identified, the council must assess whether those constraints can be overcome.
- 4.17 Following the Detailed Assessment process, a conclusion for each site will be reached. Where a site is considered to be suitable, available and achievable, it can be concluded to be **deliverable** (i.e. that development could take place within five years). Alternatively, a site can be concluded to be **developable** if it is likely that development could take place at a given point in time beyond the initial five year period.
- 4.18 Where a site has been promoted for residential or mixed use development, and is identified as being either deliverable or developable, an assessment will be made with regards the number of dwellings that are likely to come forward on the site. In order to inform this, a net indicative dwelling density will be applied as follows:
- Sites within the north and east fringes of Bristol (within South Gloucestershire) and within the existing settlement boundary of Yate: 50 to 150 dwellings per hectare on 80% of the site;
 - Sites within areas identified as Strategic Development Locations: 40 dwellings per hectare on 50% of the site; and
 - All other locations, including rural areas: 30 dwellings per hectare on 80% of the site.

Windfall Development

- 4.19 The NPPG allows local planning authorities to include an allowance for windfall development (unplanned development that may come forward through the planning application process in future). The adopted Core Strategy included a windfall figure for small sites between 1-9 homes. The council has considered the inclusion of a small sites allowance should continue over the period 2018 to 2036 and has presented technical work to justify this.

5. Final Outputs and Use

- 5.1 The outputs that will result from the HELAA process are identified below.
- A list of all sites considered, cross referenced to their locations on maps;
 - An assessment of each site, in terms of suitability for development, availability and achievability in order to determine whether a site is realistically expected to be developed and when (having undertaken an initial sieve of sites to remove those that are not considered realistic; and
 - The potential type and quantity of development that could be delivered on each site, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when.
- 5.2 The HELAA will inform identification of sites to be allocated within the South Gloucestershire Local Plan. It will also help inform the preparation of Neighbourhood Plans, as well as the identification of housing land supply within the annual Authority Monitoring Report (AMR).
- 5.3 It is important to note that the HELAA site assessment process will determine whether any given site **could** be developed, not whether it **should**. As such, further work will need to be undertaken in order to inform the identification of the spatial strategy for South Gloucestershire that will form the basis of the new Local Plan.

Appendix A – Locations to be investigated for suitability to deliver Non-Strategic Growth.

Almondsbury	Hanham - outside urban area	Pucklechurch
Alveston	Hawkesbury Upton	Rangeworthy
Bitton	Hortham Village	Rudgeway
Bridgegate	Horton	Shortwood
Chipping Sodbury	Iron Acton	Tockington
Cold Ashton	Longwell Green - outside urban area	Tytherington
Cromhall	Mangotsfield - outside urban area	Warmley - outside urban area
Easter Compton	Marshfield	Westerleigh
Engine Common	Old Down	Wick
Falfield	Old Sodbury	Wickwar
Frampton Cotterell	Oldland - outside urban area	Winterbourne
Hambrook	Olveston	

Appendix B - High Level Assessment Criteria

1. The site would provide less than 10 dwellings or, for economic uses, is less than 0.25 hectares or would deliver less than 500 square metres of floor space.
Justification: Sites that would provide less than 10 dwellings, have been discounted to ensure that the process of assessing sites is manageable. Any future proposals for such sites will be considered against the policies within the new Local Plan and do not require specific allocation.
2. The site lies outside of the areas identified for Urban Living, Non-Strategic Growth or Strategic Development Locations.
Justification: The Joint Spatial Plan (JSP) requires that housing needs, beyond those to be delivered on existing allocations and within the Strategic Development Locations, should be met through sites in areas identified for Urban Living opportunities or Non-Strategic sites.
Urban Living sites will be located within the North and East fringes of Bristol, within South Gloucestershire and within the settlement of Yate.
Non-Strategic Growth will be directed to the one of the 35 identified rural places within South Gloucestershire (including on the edge of the North and East fringes of Bristol), but not within settlements already identified for strategic growth by the JSP. Sites within 200 metres of one of the 35 identified places (see Map 1 and Appendix 1) will be considered as suitable, provided there is suitable and safe routes and connections between the site and the existing village or settlement. Unless evidence is provided to suggest otherwise, residential sites proposed beyond 200 metres of the 35 places or where not connected to one of these 35 places will be considered to lead to creation of isolated, car dependent rural dwellings, or creation of new free standing rural settlements, neither of which will be considered acceptable.
3. The site already has planning permission.
Justification: Sites with planning permission will form part of the final HELAA. However, as the principle of development in these locations has already been accepted, it is not necessary to undertake more a detailed assessment to establish deliverability.
4. Proximity to, and impact on, international and national wildlife sites.
Justification: Sites that are within International and National Wildlife Sites will be discounted.
5. The site is wholly within Flood Zones 2 or 3.
Justification: The Sequential Test, outlined within the NPPF, identifies that Local Planning Authorities should direct development to sites within Flood Zone 1 where possible. Where this is not possible, sites within Flood Zones 2 and then 3 can be considered. Therefore, the HELAA will initially only assess in detail those sites wholly/partly within Flood Zone 1. Should it transpire that identified housing needs cannot be met in sustainable locations within Flood Zone 1, other sites will subsequently be considered in line with national guidance.
6. The site cannot be accessed by road.
Justification: Sites that have no potential to connect to the road network should be discounted. Where connection is considered possible, detailed site assessments will identify whether safe access can be delivered, taking into account the width of existing roads and the need for appropriate visibility splays. It is expected that site promoters should provide information to assist the council in its consideration of this issue.

Appendix C - Detailed Assessment Criteria

1. SITE INFORMATION	
Reference number	
Site name/address	
Landowner	
Agent	
Greenfield/PDL	
Site Area (ha)	
Proposed use	
Proposed number of homes/amount of employment space	
Is the site urban, adjacent to urban, identified rural place (one of 35) or general rural	
Site origin (e.g. Call for Sites)	

2. SITE ASSESSMENT – SUITABILITY (see Sections 5 of Call for Sites form)	
Site description (including topography and surrounding land uses)	
Current use	
Adjacent uses	
Planning and other designations (AONB, Green Belt, Local Green Space etc.)	
Planning history	
Has site previously been considered in Local Plan/Core Strategy Examinations, if so, record Inspector's recommendation	
Landscape/townscape impact – including reference to Landscape Character Assessment 2012; cumulative landscape impact; existing screening	
Ecological Impacts (including SSSI & local wildlife sites within or adjacent to site)	
Trees (including TPO, ancient woodland within and adjacent to site)	
Agricultural land quality	
Heritage impacts (Locally Listed, Listed building, conservation area)	
Archaeology (Scheduled Monuments etc.)	
Public Rights of Way (within or near site)	
Access (Highways) <ul style="list-style-type: none"> • Site access • Impact on wider highway network 	

<ul style="list-style-type: none"> • Access to strategic/main highway network • Availability of public transport/walking/cycling 	
Access to services – distances from bus stop/rail station/shop/GP/school in accordance with Policy PSP11 (Policies, Sites and Places DPD)	
Impacts on existing residential amenity (including access to open space)	
Availability of utilities infrastructure – e.g. water/gas/electric	
Air quality/noise	
Land contamination	
Flood risk (zone/drainage)	
Suitability (assessment conclusion – Suitable now/Potentially Suitable, Local Policy Constraints/Potentially Suitable, Physical Constraints/Unsuitable)	

3. SITE ASSESSMENT – AVAILABILITY (see Sections 2 and 6 of Call for Sites form)

Availability of the site for the proposed use e.g. <ul style="list-style-type: none"> • Details of ownership provided? • Single or multiple ownership? • Willing landowner • Existing use on site • Existing tenancy or lease agreement 	
Availability (assessment conclusion)	

4. SITE ASSESSMENT – ACHIEVABILITY (see Section 7 of Call for Sites form)

Identification of any abnormal costs or other constraints to development which would prevent or delay this site being delivered (including utilities infrastructure and contamination issues)	
Achievability (assessment conclusion)	

5. CONCLUSIONS - Deliverable/Developable/Potentially Deliverable/Potentially Developable/Neither Deliverable or Developable

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Approximate Yield:

6. TIMING - following assessment, when could site be delivered?

1 to 5 years

6 to 10 years

11 to 15 years

16 – 20 years