# Strategic Housing Land Availability Assessment (SHLAA)

Update Report 2010

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### **Important Notice - Disclaimer**

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

- the identification of potential housing sites, buildings or areas within the SHLAA does not imply that the Council would necessarily grant planning permission for residential development. All planning applications incorporating residential development will continue to be treated against the appropriate development plan and material planning considerations.
- the inclusion of potential housing sites, buildings or areas within the study does not preclude them from being developed for other purposes. For example, many of the sites identified are still in employment use and the redevelopment of these for further employment use would generally be considered appropriate;
- the boundaries that are attached to sites, buildings and areas are based on the information available at the time. The SHLAA does not limit an extension or contraction of these boundaries for the purposes of a planning application;
- the exclusion of sites, buildings or areas from the study (either because they
  were never identified or are identified as being constrained) does not preclude
  the possibility of planning permission for residential development being
  granted on them or for these sites being allocated. It is acknowledged that
  sites will continue to come forward (particularly small sites) that will be
  suitable for residential development that have not been specifically identified
  in the SHLAA;
- the categorisation of sites in terms of when they may come forward (short, medium or long term) is based on Officers' views held at the time of the study (1st April 2010). Circumstances or assumptions may change which may mean that sites could come forward sooner or later than originally envisaged. The SHLAA does not prevent planning applications being submitted on any sites identified or excluded within it at any time;
- the information that accompanies the SHLAA is based on information that was available at the time of the study and there may be some omissions and/or factual inaccuracies which the Council does not take liability for. Therefore, users of the SHLAA findings will need to appreciate that there may be additional constraints on some sites that were not identified at the time of the survey and that planning applications will continue to be treated on their own merits at the time of the planning application rather than on the information contained within the assessment. Likewise, some of the identified constraints may have been removed since the information was compiled. Issues may arise during the course of a detailed planning application that could not / were not foreseen at the time of the study. For example, the SHLAA may identify a site as having no contamination but detailed ground investigations during the preparation of a planning application may indicate that this is not correct. Applicants are therefore advised to carry out their own analysis of sites to identify any constraints or other information for the

- purposes of a planning application and not rely solely on the findings of the SHLAA;
- the capacity identified on the sites either relates to the numbers granted within a planning permission (where applicable) or is an estimate based on an appropriate density for the site in question. In arriving at these densities, Officers have taken into account locational and sustainability factors along with issues around local character and general views on the site. However, the capacities identified do not preclude densities being increased on sites, subject to details. Nor does it mean that the densities envisaged within the assessment would be appropriate and these would need to be assessed through the normal planning process when submitting a planning application.
- the study has a base date of 1st April 2010 and the findings are only a 'snap-shot' of information held at that time. Therefore, some of the information held on the database will be subject to change over time. For example, sites that are identified as not having planning permission may have secured permission since the information was compiled, whilst planning permissions may have lapsed on other sites. The Council intends to use the SHLAA as a 'living document' that will be continuously updated with a comprehensive overall update each year.

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### 1. Introduction

This document, based on the latest available information, is a refreshed version of the previous adopted SHLAA dating from February 2009.

Planning Policy Statement 3: Housing (PPS3) sets out the national policy direction for the delivery of housing through the planning system based on the 'plan, monitor and manage' (PMM) approach. One of PPS3's key objectives is to continue to make effective use of land by reusing land that has been previously developed. This includes land and buildings that are vacant or derelict as well as land that is currently in use but which has the potential for redevelopment in the future. This approach is in preference to the release of previously undeveloped or greenfield sites.

PSS3 also seeks to ensure that the planning system delivers a flexible and responsive supply of land for housing using the PMM approach. To meet this objective, authorities should identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption of the Local Development Framework (LDF). Local authorities are also required to identify specific deliverable sites to deliver sufficient housing to meet housing requirements over a rolling five-year period.

Authorities are required under PPS3 to provide a robust evidence base that identifies sufficient housing land over these periods in the form of a Strategic Housing Land Availability Assessment (SHLAA). SHLAA's are expected to form a key component of the evidence base to support the delivery of sufficient land for housing to meet district housing requirements. The main aim of SHLAA's is to identify as many sites with housing potential in and around settlements as possible. Rossendale's SHLAA looks at the housing potential of sites to cover the LDF plan period up to 2026 (i.e. over the next 15 years).

It is important to note (as outlined in the disclaimer to this report) that whilst the SHLAA is an important evidence source to help inform the plan-making process, it will not in itself determine whether a site should be allocated for housing development or whether planning permission would be granted for residential development.

This summary report sets out how Rossendale's SHLAA has been carried out and presents the findings of the assessment.

### 2. Background

One of PPS3's key objectives is to ensure that the planning system delivers a flexible and responsive supply of land for housing using the PMM approach. To meet this objective, authorities are required to identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption of the LDF.

Authorities are expected to provide this robust information in the form of a SHLAA, which will form a key component of the LDF evidence base. This evidence is needed to help support the delivery of sufficient land for housing to meet district housing requirements. The LDF will be looking to cover the period from 2010 to 2026 and the SHLAA will therefore look to identify potential housing land up to 31st March 2026 to ensure full coverage of the plan period.

The primary aim of the assessment is to identify as many sites with housing potential in and around as many settlements as possible, so that:

- Rossendale's housing requirements can be met;
- a continuous, flexible and responsive supply of housing can be provided;
- certainty can be provided to the house-building industry by identifying sites with housing potential;
- choices are available to meet the need and demand for more housing;
- an evidence base is provided for making decisions about how to shape places and allocate sites within the LDF.

The assessment has drawn upon a range of technical evidence sources that either had already been produced or were/are currently being undertaken to support the LDF. This includes the Employment Land Review, the Retail and Town Centre Study the Strategic Flood Risk Assessment and the Strategic Housing Market Assessment.

It is worth noting that there are some sites within the Borough that are considered to have some residential potential but have not been specifically identified within the SHLAA. This may be because they are of a confidential nature and cannot be identified due to commercial sensitivities (e.g. pre-application discussions which are confidential).

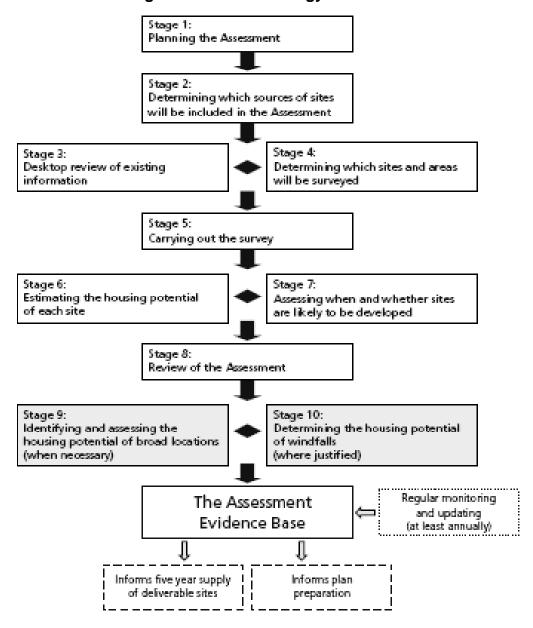
The results of the SHLAA are held within an Access database in conjunction with the Council's GIS system (Map-Info). The intention is to continuously review the information within the SHLAA database and formally update it on an annual basis, with a base date of 1<sup>st</sup> April through to 31<sup>st</sup> March. This annual review will determine if there have been any changes on the sites identified (e.g. if a site has been granted planning permission or if a site has started development). As well as being reported in the SHLAA and associated documents, the results will also be included in the Annual Monitoring Report for the LDF, which will include details on the housing trajectory taken from the SHLAA.

The remainder of this report sets out the methodology and processes on how the SHLAA was undertaken and summarises the findings from the assessment.

### 3. Methodology

Rossendale's SHLAA has followed the methodology set out in the CLG Practice Guidance. The Council has carried out the ten stages identified in Diagram 1 and this section of the summary report sets out how this has been done.

Diagram 1: Different Stages of the Methodology.



# **Stage 1 – Planning the Assessment**

Paragraph 54 of PPS3 states that LPAs 'should identify sufficient specific deliverable sites to deliver housing in the first five years' from adoption of the relevant LDD. Paragraph 55 further states that LPAs should also 'identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15.

Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated.'

The requirements of paragraphs 53 to 55 of PPS3 are carried through into the Practice Guidance, paragraph 5 of which requires LPAs to 'identify specific, deliverable sites for the first five years of a plan that are ready for development'. Paragraph 7 of the Guidance further states that a SHLAA should 'as a minimum....aim to identify sufficient specific sites for at least the first 10 years of a plan, from the anticipated date of its adoption.'

Thus, both PPS3 and the Guidance require LPAs to identify sites from the date of adoption of the relevant DPD. However, adoption of the Borough's Site Allocations DPD is not anticipated until March 2013. It has therefore been necessary to use the study base date of 1<sup>st</sup> April 2010 as the starting point in assessing the 5 year land supply, rather than the DPD adoption date.

In accordance with the Guidance, the SHLAA should be regularly kept up-to-date as part of the Annual Monitoring Report exercise, so as to support the updating of the housing trajectory and the rolling five-year supply of specific deliverable sites.

The Council was keen to ensure that the initial SHLAA was carried out in partnership with a range of stakeholders, to help ensure that the direction and content of the SHLAA is accountable. Accordingly, a whole range of potential stakeholders that could be interested in participating in the SHLAA were identified from the Council's comprehensive LDF database. The stakeholders identified included a range of community groups, government departments (including Government Office for the North West [GONW] and North West Regional Assembly [NWRA]), neighbouring local authorities, a range of housebuilders that have operated in the Borough (and the HBF) and landowners, amongst others. These stakeholders were invited to become involved in the early stages of the SHLAA 2009 and were invited to comment on the draft methodology produced by the Council in conjunction with the consultants. A seminar was held on Wednesday 22 October 2008 at Hardmans Mill in Rawtenstall, attended by those who had responded to the Council's invitation to join a 'Stakeholder Advisory Group' for the SHLAA. As well as officers from the Borough Council and the Council's Portfolio Holder for Regeneration, the seminar was attended by a range of external stakeholders including developers and house builders. The purpose of the event was to brief stakeholders on the study objectives, and describe/discuss our approach to the study and technical inputs/assumptions.

In addition to commenting on the draft methodology, a "Call for Sites" (February/March 2008) exercise was undertaken, whereby stakeholders on the LDF database and members of the public were invited to put forward sites which they felt had potential for development/protection. A form was available to provide the relevant information needed to allow the Council to assess sites being suggested. All sites that were suggested as part of this exercise were assessed in the SHLAA.

Early in the study a range of strategic public sector bodies such as the Environment Agency North West and Natural England were consulted in order to identify any particular constraints that may have a bearing on the delivery of housing in Rossendale. Utility providers have been consulted, to establish whether there are any significant capacity issues in the Borough.

This 2010 SHLAA was refreshed internally as it was felt that sufficient expertise existed within the Council to identify potential housing sites through existing databases and local knowledge. The Council was in the fortunate position that other research projects were either completed or were at the latter stages of completion, and the results of these surveys have been fed into the SHLAA work. In particular the Employment Land Review (ELR) was progressed alongside the initial SHLAA and the results of the ELR were fed into findings of the latest SHLAA.

The results of the SHLAA have also utilised the expertise and knowledge of stakeholders that have responded to the invitation to submit sites.

# Stage 2 – Determining which sources of sites will be included in the assessment

In line with the CLG guidance, the findings of the Rossendale SHLAA include an assessment of the following sources of sites that have potential for housing that are currently in the planning process. Please note that the following sources relate to the position at the 1st April 2010:

- land allocated (or with permission) for employment or other land uses
- existing housing allocations, which do not benefit from an extant planning consent
- sites identified for potential disposal in the Council's Open Space Review;
- surplus employment land identified by the Council's Employment Land Review:
- the Urban Potential Study of 2005;
- sites identified through the 'call for sites' exercise which the Council undertook during February and March 2008 to inform its Site Allocations DPD, and other sites which have been submitted to the Council for consideration;
- sites identified in the draft Rawtenstall AAP or the draft Bacup, Stacksteads and Britannia AAP;
- the Council's latest NLUD return;
- previously withdrawn and refused applications for housing

In addition, the results of the SHLAA include an assessment of other sites where there may be potential for residential development. These include:

- vacant and derelict previously developed land and buildings;
- vacant land not previously developed;
- underused land and buildings
- surplus public sector land; and
- other land in non-residential use (e.g. car parks, commercial buildings).

### Stage 3 - Desktop review of existing information

The Council already had access to a considerable amount of information relating to potential housing sites within the Borough as part of the SHLAA review, including the

SHLAA 2009. This also included a range of databases and GIS datasets that contained important information that has helped to assess the deliverability and developability of sites, including site constraints. The following sources of information were used as part of the desktop review of existing information:

- outstanding Local Plan housing allocations;
- sites identified for potential disposal in the Council's Open Space Review;
- surplus employment land identified by the Council's Employment Land Review;
- SHLAA 2009;
- the Urban Potential Study of 2005;
- sites identified through the 'call for sites' exercise which the Council undertook during February and March 2008 to inform its Site Allocations DPD, and other sites which have been submitted to the Council for consideration:
- sites identified in the draft Rawtenstall AAP or the draft Bacup, Stacksteads and Britannia AAP;
- the Council's latest NLUD return;
- previously withdrawn and refused applications for new
- Aerial photography

The initial list of potential housing sites – compiled from the sources listed above – contained almost 1,000 sites, although at that stage there was a significant amount of duplication (that is, sites that had been identified from multiple sources). We then removed: all duplicates, sites below the minimum site size threshold of 0.10ha, and sites which the Borough Council considered to have no realistic prospects for housing.

It is clear that there was a significant amount of information that was already contained in the various datasets that either existed or have evolved since the initial SHLAA was undertaken. This has helped to give a comprehensive assessment of potential sites for residential development to meet the rolling five-year requirement advocated in PPS3 and also help to identify sufficient housing land to meet future supply through the LDF process.

# Stage 4: Determining which sites and areas will be surveyed

Rossendale contains a relatively small number of settlements (39), few of which are remote from services because they are located close together either within the steep-sided valleys of the River Irwell, or on the main north south routes which radiate from the valley. Furthermore, the Borough's towns and villages are surrounded by expanses of almost completely unpopulated moorland, and the topography of Rossendale is a significant challenge to finding potential sites for residential development in the Borough.

For the above reasons, a comprehensive approach was taken to consider all sites within or adjacent to any of the Borough's 39 settlements.

This extensive approach is necessary in order to fully assess the potential to achieve the Borough's housing targets set out in the Core Strategy. Another reason for taking an extensive approach is so as not to pre-empt the identification of appropriate areas for accommodating growth. This will be undertaken through the LDF preparation process. Furthermore, the approach is consistent with paragraph 7 of the Guidance which states that a SHLAA study should: 'aim to identify as many sites with housing potential in and around as many settlements as possible in the study area'.

Notwithstanding the above, account has been taken of a site's location in relation to key services in assessing the 'suitability' of sites (see the Site Assessment Criteria used to assess sites housing potential, in Appendix 1). Thus, sites that are located in the Borough's largest settlements of Rawtenstall, Haslingden, Bacup and Whitworth fare better against the locational suitability criterion than sites in other parts of the Borough, reflecting the wider range of key community services and facilities in the larger settlements.

The second bullet under paragraph 25 of the Guidance states: 'in areas dominated by rural settlements, it may be necessary to identify all the sites with potential for housing'. For the purposes of this study a minimum site size threshold of 0.10ha has been applied.

# **Stage 5: Carrying out the survey**

All those that were involved in carrying out the site surveys were briefed to ensure that they followed a consistent approach in recording information. The survey work was done using a combination of internal and external resources.

The SHLAA database was created to collate all the relevant information needed to assess the potential of sites, associated constraints and particular opportunities within the sites. Much of this information was already evidenced in the desk-top exercise undertaken in Stage 3 and the survey work helped to clarify some of the information. This included site boundaries and size, current use(s), surrounding land uses, character of surrounding area physical constraints, development progress (where relevant) and an initial assessment of whether the site would be suitable for housing.

# Stage 6: Estimating the housing potential of each site

The estimation of housing potential for each site identified in the SHLAA was guided by existing and emerging planning policy on housing densities. The Council's Proposed Submission Core Strategy has been published and this identifies that the Council is seeking to impose minimum density requirements of 30 dwellings per hectare across the Borough, rising to 50+ dwellings per hectare on sites in sustainable locations well served by public transport such as within and adjacent to Rawtenstall, Bacup, Haslingden and Whitworth.

These densities were applied to the sites within the SHLAA unless there were particular site circumstances, opportunities or constraints that warranted reducing

them. For example, densities may have been reduced on some sites due to a potential detrimental impact on a feature of the natural or built environment (e.g. listed building).

For each identified site it was necessary to estimate the potential housing yield. In order to do this, a series of factors were applied, as detailed below. For a small number of sites a yield figure was entered manually instead. The main example of this relates to "call for sites" submissions, which often specify the number of dwellings that the developer intends to provide at the site. With these sites, if the number of dwellings proposed would result in a development density that is appropriate in the local context, then the yield figure was inserted manually.

#### (i) Gross site area

Where two or more sites contain areas that overlap, the common area of land is only considered as part of one site and is discounted from any others to avoid double counting. The gross site area specified in the database is the area within the digitised site polygon after this process was completed, measured using GIS.

### (ii) Permanent features factor

A factor was then applied to represent the percentage of the gross site area likely to be available for housing after account has been taken of any special site specific capacity constraints relating (for example) to site shape, topography, obstructions to development (e.g. substations) or water bodies. Site constraints, and the appropriate percentage reduction, were assessed on a site by site basis for all sites.

### (iii) Gross to net factor

A gross to net factor was applied to the residual site area following application of the permanent features factor. The gross to net factor takes account of any requirements to provide supporting facilities on the site. We have adopted the most up-to-date advice on net density, namely that contained in Annex B of PPS3 which states that net dwelling density is calculated by:

'...including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided.'

For the largest sites (above 10ha), the gross to net factor applied was 50 per cent, to allow for significant additional infrastructure such as schools, community facilities, roads, green spaces and so on. For sites of between 0.4ha and 10ha, the amount of additional infrastructure required will be much less, and so a greater proportion of the site can be allocated to housing. Consequently, a less severe ratio has been applied for sites with a gross area of between 0.4ha and 10ha. For sites up to 0.4ha, the amount of additional infrastructure that is required is assumed to be negligible. This is because these sites should be capable of utilising existing infrastructure, and also because smaller sites will not generate a need for significant new supporting infrastructure. For sites with a gross area up to 0.4ha, we have therefore applied a gross to net factor of 100 per cent. Table 1 below sets out the specific gross to net ratios that were used.

PPG2 limits the redevelopment of PDL sites in the Green Belt to an area equivalent to the built footprint, but only for 'major developed sites'. Paragraph C1 of Annex C to PPG2 provides a range of examples of major developed sites, including factories, collieries and power stations. For major developed sites a bespoke gross to net ratio equivalent to the proportion of the site that is covered by built footprint has been applied.

It should be noted that, in reality, each site would be considered individually as and when it is taken forward for allocation or proposed for development. Nevertheless, the gross to net ratios that we applied for the purposes of our yield assessment are as set out in Table 4.4.

**Table 1- Gross to Net Ratios** 

Gross Site Area (ha)	Percentage Net	
Up to 0.4ha	100%	
0.4ha to 2ha	90%	
2ha to 10ha	75%	
Over 10ha	50%	
'Major developed sites' in the Green	Area equivalent to the part of the site that	
Belt	is covered by built footprint	

#### (iv) Mixed use factor

A mixed use factor was applied to sites most likely to be developed for mixed uses, to indicate the notional proportion of the net site's total capacity which is assumed to generate residential use, regardless of whether the mix of uses is horizontal or vertical. The majority of the sites that this factor applies to are located in Rawtenstall and Bacup town centres.

The mixed use factor applied was 50 per cent in all cases. It is also possible to apply other mixed use factors (25 per cent, 75 per cent and 90 per cent) although these have not been applied to any of the sites in the database.

### (v) Density assumptions

The majority of residential completions in recent years have been at densities of less than 30 dph in all parts of the Borough. Distribution of completions across the higher density bands 30-49 dph and >=50 dph is somewhat uneven, with the only completions of 50 dph or more taking place in Haslingden.

Analysis of the data also shows that the highest average densities were achieved in the three settlements of Haslingden, Bacup and Rawtenstall. This reflects the larger nature of these settlements and the wider range of services on offer.

Larger sites exist outside the main centres and beyond the edges of the towns, although the densities achieved on these sites are much lower, reflecting the more rural nature of the areas involved.

The Proposed Submission Core Strategy identifies a minimum density of 30 dwellings per hectare across the Borough with higher densities of 50 dwelling per hectare or more in the settlements of Rawtenstall, Bacup, Haslingden and Whitworth or where well served by public transport.

As such the density assumptions that were used is assessing housing potential are set out below:

**Table 2 – Density Assumptions** 

Site Location	Density (dph)		
Rawtenstall, Bacup, Haslingden or Whitworth	50		
Smaller settlements: Helmshore, Edenfield, Goodshaw,	30-40		
Loveclough, Waterfoot, Stacksteads, Britannia, Facit and			
Shawforth			
All other settlements	30		

The housing capacity of any identified site is then calculated by:

# Gross site area x permanent features factor x gross to net factor x mixed use factor x density

At the bottom of the fourth part of the Access sites database are two fields entitled 'Net residual site area available for housing (ha)' and 'yield'; these figures are the residual area and theoretical housing yield after the factors described above have been applied.

In practice, the Council will have to undertake more detailed work on the densities that are achievable at any given site, as and when it is brought forward for development. Furthermore, the guideline capacities for very large sites must be treated with caution as it is not possible to foresee the mix of uses that they might be called on to accommodate. Nevertheless it is considered that the consistent framework shown in the table above is appropriate for the purposes of this strategic assessment.

# Stage 7: Assessing when and whether sites are likely to be developed

The results of the SHLAA seek to provide evidence to support the Council's position in relation to the requirements of PPS3, in terms of both identifying a deliverable five year supply and also potential sites for the next ten years and beyond. The SHLAA has assessed the suitability, availability and achievability of identified sites to determine if overall they can be considered to be deliverable and developable, or otherwise.

In line with the CLG guidance (and other guidelines), in order for a site to be considered within the five year requirement the site, or at least part of it, must be considered to be **deliverable** (i.e. have a realistic prospect of delivering some housing within the five year period). Paragraph 54 of PPS3 states that for a site to be considered deliverable the site should be suitable, available and achievable.

In assessing the **suitability** of a site for housing (stage 7a) the Council has examined each site against;

- creation of sustainable mixed communities
- · planning policy restrictions;
- · physical problems or limitations;
- potential impacts of a site being released for residential use; and
- the living conditions that would be experienced by prospective residents.

The findings of the SHLAA has followed the CLG methodology in determining that sites that are allocated or have planning permission for residential use, will be suitable.

In assessing the **availability** of sites for housing (stage 7b), the Council has assessed land ownership constraints that may be associated with bringing sites forward. This has included identifying whether there are any obvious legal or ownership problems, including ransom strips or multiple ownership issues. However, it should be noted that the Council has not identified the ownership of every site within the SHLAA as this was considered too costly an exercise to do and information could quickly become outdated.

Instead, the findings of the SHLAA are based on information held within various datasets and local knowledge where available (e.g. through planning applications or through evidence submitted from the call for sites exercise).

One of the main reasons for assessing the availability of sites is to identify whether sites are likely to come forward within a five year period (deliverability criteria). Some of the site submissions that have been put forward by landowners and developers suggested that sites may only become available in the longer term (i.e. after five years). These sites have not been considered to be 'available' in the SHLAA in the sense that they would not contribute to the five year supply of deliverable sites. However, they may become available in the longer term. Other sites that were identified as being 'available' (i.e. could come forward in the next five years) by landowners may not have been identified as being 'available' in the SHLAA if the sites were not deemed suitable.

In assessing the **achievability** for housing (stage 7c), the Council sought to identify whether there was a reasonable prospect that housing would be developed on particular sites at a particular point in time. This part of the assessment included an analysis of the general viability of bringing sites forward, which involved looking at:

- · market factors;
- cost factors, including infrastructure; and
- delivery factors

Each site within the SHLAA has been assessed on when residential development is likely to be 'achieved'. This has also been related to policy issues at the national, regional and local level. The results of the SHLAA indicates the amount of units that are likely to be delivered on sites within the short term (0-5 years), medium term (6-10 years) or long term (11-15 years).

The results have also enabled the SHLAA to produce a more detailed assessment of the housing numbers that will be produced by specific sites within each of the next five years. This information has been used to produce the Housing Trajectory which will be included in the Annual Monitoring Report. The housing trajectory is broken down by the amount of housing land that is expected to be delivered on brownfield and greenfield sites.

Sites have **only** been considered to be deliverable (in terms of the five year supply) if the site is deemed to be suitable, available and achievable.

Stage 7d of the CLG guidance suggests that work should be undertaken to help determine how any identified constraints on sites/areas can be removed. The findings of the SHLAA has identified possible ways in which constraints can be removed, where possible, and the Council is committed to continuing to work with appropriate agencies and stakeholders to help identify how other constraints can be overcome on sites that have development potential.

Although this site assessment provides a good indication of each site's performance against a broad number of important measures, it is still necessary to undertake a supplementary assessment of the sites to ensure that certain 'core' constraints are fully taken into account.

The various core constraints – relating to bad neighbours, nature conservation, flood risk and whether the site is located in the Green Belt – are considered in order of significance as to which are most easily overcome and which are more likely to prevent a site from coming forward. In the case of the latter, this is not to say that the constraint could not be overcome, rather that it is likely to delay the site coming forward until such time as it is possible, or worthwhile, to overcome the constraint.

The approach to site categorisation is set out in the Table at the rear of the Site Assessment Criteria, presented in Appendix 1. Each site was placed initially into Category 1, 2 or 3 on the basis of its overall performance in the GIS-based site assessment. However, if a site was affected by additional constraints of the types listed in the table at the rear of Appendix 1, these will tend to downgrade its categorisation as indicated. The overall categorisation of a site therefore depends on the particular combination of constraints affecting it.

Sites located within Flood Risk Zone 3a and greenfield sites in the Green Belt are automatically considered to be Category 3 sites, even if they are not subject to any other constraints. In the case of the Green Belt, even though this is a policy constraint rather than a physical constraint – and therefore is theoretically easier to address - it is nevertheless a nationally important policy designation. Green Belt should only be deleted where there is very strong justification and the minimum amount of land possible should be lost. Therefore, if there is sufficient housing supply to come forward from other sources, then there would be limited (or no) realistic prospect of Greenfield sites in the Green Belt coming forward.

With respect to flood risk, there is a clear sequential approach in PPS25 which is reflected in the prioritisation of sites. Flood Risk Zones 1 and 2 are both acceptable locations for housing but under the sequential approach, Zone 1 is preferable to

Zone 2. Accordingly, sites in Flood Zone 1 and 2 have been placed into Category 1. The Council's Strategic Flood Risk Assessment (SFRA) was used to establish whether any sites were within Flood Zone 3b ('the Functional Floodplain', where housing development is effectively ruled out by PPS25). Any sites within Flood Zone 3b were automatically excluded from the study on that basis. Housing development can be acceptable in Flood Zone 3a, provided a PPS25 'Exception Test' is passed. Nevertheless, under the PPS25 sequential approach, Flood Zone 3a sites are the least preferred location for housing development and so a Category 3 rating was given to any sites within Flood Zone 3a (if more than 50 per cent of a site is covered by Flood Zone 3a, it is deemed to be a Flood Zone 3a site).

Bad neighbour and current occupier constraints were considered in the 'secondary' categorisation exercise. Whilst these constraints are unlikely to prevent a site coming forward for development, they nevertheless require mitigation, which may affect the availability of a site for residential development. Sites facing these constraints have thus been downgraded to Category 2 or 3.

It is important to emphasise that for a site to achieve a Category 1 rating, it would need to be suitable, and available (or capable of being made available) within 5 years, and achievable.

The placing of a site into Categories 1, 2 and 3 is intended to give a useful indication of the deliverability and potential timing of a site's development and, hence, its suitability for inclusion as an allocation in the LDF. Sites in Category 1, which have minimal constraints, are considered to be deliverable within the first five years. These sites are clear candidates for allocation. Sites in Category 2 have a limited level of constraints such that they are likely to be available for delivery after the first five years. These sites may be suitable for allocation, depending on their individual circumstances and on specific measures being proposed to overcome their constraints. Sites in Category 3 have more significant constraints; for these sites to be considered appropriate for development or for allocation it would have to be clearly demonstrated that the significant constraints could be overcome in order to make them deliverable.

However, the inclusion of a site in a higher Category should not be taken to represent a recommendation that it should be allocated in the LDF, as the categorisation process does not take account of all the policy considerations that are relevant in selecting sites for allocation. Equally, it should not be concluded that a site assigned to a lower Category band cannot come forward, or that it cannot be allocated for development. Rather, it would need to be demonstrated that the site's constraints could be overcome in order to secure its deliverability.

### Stage 8: Review of the Assessment

The findings of the SHLAA are set out in Section 4 of this Summary Report, identifying the level of housing that could potentially be delivered over the coming years. It is considered that sufficient sites have been identified in the SHLAA to meet the longer term housing targets for the Borough. However, the Council is committed to reviewing and updating the SHLAA in the light of changing circumstances. As mentioned, the SHLAA will be treated as a living document and sites can be added

or removed on a regular basis as the document evolves. The same is true for assumptions made within the SHLAA, if for example certain sites are coming forward earlier than envisaged.

# Stage 9: Identifying and assessing the housing potential of broad locations (where necessary)

The Council has not identified broad areas for residential development, as the results of the SHLAA clearly demonstrate a sufficient supply of deliverable and developable housing sites to meet and exceed the housing requirement.

# Stage 10: Determining the housing potential of windfalls

PPS3 recognises that there may be local circumstances where a windfall allowance can be justified and suggests that an assessment of previous rates of windfall completions will help to inform decisions about whether the amount of land / buildings coming forward is likely to sustain that level, or whether it will increase/decrease.

As stated previously, it is much easier to identify larger sites that have potential for housing but smaller sites are still expected to continue to come forward.

Paragraph 59 of PPS3 states that windfalls 'should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. In these circumstances, an allowance should be included but should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends.'

Where there is evidence of a high and consistent proportion of new dwellings generated on small sites, a case could be made for adopting a small site allowance as an element of the total housing requirement for the Borough. The level of production on sites below 0.10ha (the study site size threshold) has been assessed, and it has been concluded that supply from this source has been negligible. Furthermore, using a relatively low minimum site size threshold of 0.10ha has ensured a comprehensive approach to site identification.

For the above reasons, it is not considered necessary to include a small site allowance for the purpose of this study.

### 4. Findings

The assessment of housing potential from the sites identified in the database combines the calculation of theoretical dwelling yields for individual sites within the categorisation in terms of their likelihood of coming forward for development.

The database has been carefully checked to ensure it does not include any site duplication. As explained in Section 3, the database does not contain sites which have planning permission for residential development. Planning permissions therefore do not contribute to the housing yield total provided by the database, as all residential commitment sites are dealt with separately in the assessment (see Section 4 and 5 of this report for details).

All of the sites in the database are theoretically suitable for residential development. However, some of them are nevertheless subject to constraints which might restrict their likelihood of being brought forward as application sites, the likelihood of them being approved and the likelihood of them achieving their fully assessed capacity (yield) if they were to be approved. These factors will also affect whether it would be appropriate to allocate them in the LDF.

All of the sites in the database have been subjected to a comprehensive site assessment, as detailed in Section 3. Each site has been assessed against 21 criteria in order to derive an initial overall score (out of 104) for each site. The 21 assessment criteria measures are closely related to the 'suitability', 'availability' and 'achievability' criteria referred to on pages 16 and 17 of the Practice Guidance, and they reflect local circumstances. The GIS-based site assessment provides a good indication of each site's performance against a broad number of important measures, and forms the first step in the site categorisation exercise, whereby sites are placed into one of three category bands as follows:

- 'Most deliverable sites' those sites which perform best in the assessment, and which therefore appear to be the most developable/deliverable. For brevity these sites are referred to as 'Category 1'
- 'Moderately deliverable sites' those sites which perform moderately well in the assessment. These sites can still be brought forward, but the constraints affecting them will need to be addressed. These sites are referred to as 'Category 2'.
- Least deliverable sites' sites which are affected by severe constraints. These sites are not necessarily ruled out, but they face very significant constraints which would need to be overcome to make them deliverable. These sites are referred to as 'Category 3'.

Sites which scored 83 or above out of 104 in the initial assessment clearly perform well and are affected by the fewest constraints. Accordingly, these were placed into Category 1. Sites achieving overall scores of between 72 and 82 out of 104 perform moderately well against the assessment criteria, facing more significant constraints than the best-scoring sites but which still appear to be achievable/deliverable, were initially placed into Category 2. Sites achieving low overall scores, of below 72 out of 104, perform least well against the assessment criteria, facing at least three

significant constraints; therefore, in the initial categorisation exercise, these sites were initially rated as Category 3.

The SHLAA identifies all sites within each of these categories. The reminder of this Section details the contribution each of the different categories make to the short and longer term housing potential across the Borough.

### Category 1 - Most Deliverable Sites

Category 1 sites are those sites that have been identified as being suitable for residential development within 5 years (i.e. 2010-2015) but as yet do not have current planning commitments (i.e. extant planning permission). They have been identified from various sources including the SHLAA 2009, Call for Sites exercise, open space strategy and Council owned land.

	Number of Sites	Potential Yield
Greenfield	22	469
Previously Developed	46	858
Total	68	1,327

### **Category 2 – Moderately Deliverable Sites**

Category 2 sites are those sites that have been identified as being suitable for residential development within the next 6-10 years (i.e. 2016-2020) but are not considered to be as deliverable as those in category 1 due to location or minor constraints. These too have been identified through a variety of sources as outlined earlier in section 3.

	Number of Sites	Potential Yield
Greenfield	126	5,007
Previously Developed	65	1,798
Total	191	6,805

#### Category 3 – Least Deliverable Sites

Category 3 sites are those sites that were assessed as part of the SHLAA but were not considered to be suitable for housing within the next ten years (i.e. before 2020) because of site and/or planning policy constraints (e.g. some sites are large greenfield sites in unsustainable locations in the Green Belt and some are sites that have been identified as being suitable for continued employment use).

Although the sites identified in Category 3 are considered to be the least deliverable, they have not been discounted from the SHLAA to reflect the fact that constraints on some of the sites may be able to be overcome, which could allow the sites to deliver residential development (e.g. if very special circumstances can be demonstrated on a Green Belt site or if an employment site comes forward for an acceptable mixed use development).

Thus the onus is on an applicant/developer/landowner to demonstrate how the constraints on Category 3 sites can be removed to allow residential development to take place.

	Number of Sites	Potential Yield
Greenfield	99	5,236
Previously Developed	58	2,308
Total	157	7,544

# **Summary of Findings**

There are 419 sites within categories 1-3 providing potential for 15,362 residential units. The table below sets out the summary of the categories.

Category	Number of Sites	Potential Yield
Category 1	68	1,327
Category 2	191	6,805
Category 3	157	7,544
Total	416	15,676

These results show that there is considerable potential for a significant amount of residential development within Rossendale over the next fifteen years, identifying enough land to exceed the housing requirement by four and half times.

The next section of this report gives an analysis of the implications of these findings against the future housing requirements for the Borough.

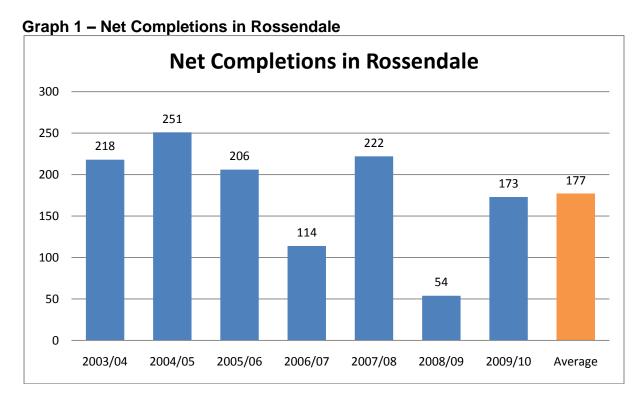
# 5. Analysis of Findings

This section of the report examines the SHLAA findings against the housing requirement set out in the Proposed Submission Core Strategy Development Plan Document: The Way Forward (2011-2026). This also involves an analysis of completion trends in previous years.

The housing requirement set out in the Proposed Submission Core Strategy is 222 dwellings per annum from 1<sup>st</sup> April 2011 up to 31<sup>st</sup> March 2026. Sufficient land must be identified to provide for 3,330 dwellings over the fifteen year plan period (222 dwellings in each of the 15 years between 2011 and 2026).

#### **Recent Completions**

It is important to look at the performance of housing completions in Rossendale over recent years.



Graph 1 shows that since 2003 there have been 1,238 completions across the Borough, with an annual average completion rate of 177 dwellings. This is below the requirement set out in the Core Strategy of 222 dwellings per annum (80% of the annual target). This shortfall is reflective of the recent downturn in the housing market as well as former planning policy within the Borough, rather than being reflective of a shortage of land.

#### **Supply and Requirements**

It is important to assess the housing requirements against the supply that has been identified either as current commitments or as potential sites coming forward, in order to assess whether sufficient supply can be broadly identified to meet the longer term housing requirements.

Table 3 - Housing Supply

Source of Supply	Number of Units	Years Supply (222 per yr)
Units on Sites Under Construction	443	2.00
Units on Sites with Planning Permission	143	0.64
Potential Housing Sites in SHLAA Category 1	1,327	5.98
Potential Housing Sites in SHLAA Category 2	6,805	30.65
Potential Housing Sites in SHLAA Category 3	7,544	33.98
Total	16,262	73.25

Table 3 (above) illustrates that there is the potential to accommodate 16,262 new dwellings between 2011 and 2026. This significantly exceeds the plan period requirement of 3,330, demonstrating that there is sufficient land for residential development to meet the Borough's short, medium and long term housing needs.

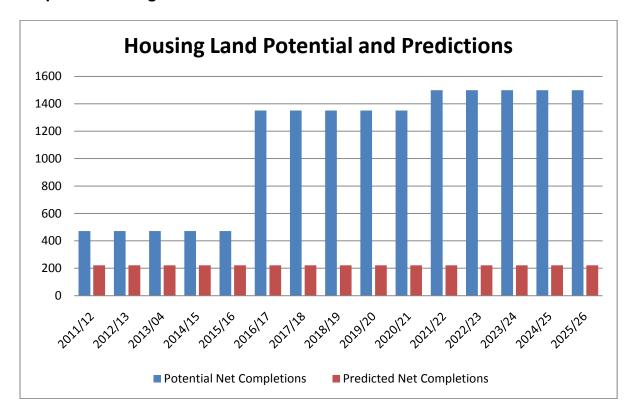
The Council is committed to ensuring that sufficient housing land is identified to meet Rossendale's housing requirements. The supply of housing will therefore be monitored over the plan period to ensure that housing sites are being delivered as envisaged in this SHLAA. This monitoring will determine whether or not additional sites need to be identified or released to meet the housing target.

From the sources of housing supply identified in section 3, the amount housing land to come forward over the plan period (2011-2026) can be summarised for the short, medium and long terms as illustrated in the following table.

Table 4 – Short, Medium and Long Term Housing Supply

Term	Period	Number Units	Years Supply
Short (5 years)	2011-2016	1,913	8.62
Medium (6-10 years)	2017-2021	6,805	30.65
Long (11-15 years)	2022 -2026	7,544	33.98

Graph 2 illustrates predicted annual completions between 2011 and 2026 against the amount of committed and potential housing land identified through this SHLAA that could be delivered over the first five, ten and fifteen years of the plan.



**Graph 2 - Housing Land Potential and Predictions** 

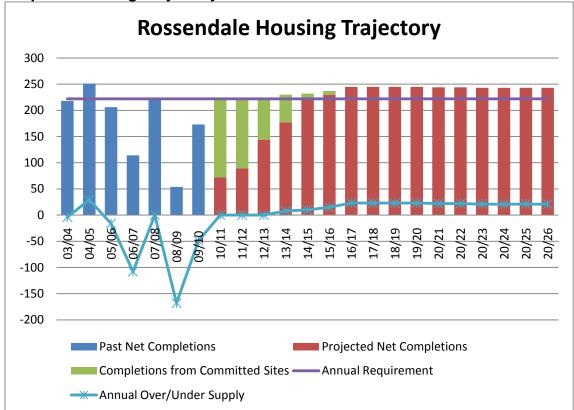
The graph above shows that there is a significant amount of potential housing land that could come forward in each of the five year periods, should all of the sites be developed for housing.

As is evident from the figures, sufficient land has been identified to meet the housing requirement for the Borough for 73 years at an annual delivery rate of 222 dwellings.

### **Housing Trajectory**

The housing trajectory shows the number of potential dwellings that can be accommodated on sites in the SHLAA to meet the annual housing requirement of 222 dwellings.

The Council's commitment to the PMM approach will seek to ensure that performance against the housing trajectory is kept under review. Any concerns identified through the monitoring process will be addressed through a review of the SHLAA and if necessary through appropriate Development Plan Documents.



### **Graph 3: Housing Trajectory for Rossendale**

### **Five Year Supply**

One of the main outputs of the SHLAA is to help demonstrate a rolling five-year supply of housing land to meet housing requirements as determined in the Core Strategy. The housing trajectory shows that an expected **1,143** dwellings will be delivered on sites that have been identified in the SHLAA over the next five years including predicted completions from sites under construction.

This supply of is only made up of those sites that are considered to be deliverable within the five year period (i.e. suitable, available and achievable) in line with the advice in PPS3.

In addition to the number of units that are expected to be delivered within the next five years, account also needs to be taken of completions in previous years since 2003 (the base date for the Regional Spatial Strategy for the North West). The Trajectory shows that there have been **1,238** units completed in the previous seven years, from 1<sup>st</sup> April 2003 to 31st March 2010, giving an average annual completion rate of 177. This represents a shortfall of 316 units against the RSS target of 1,554 units over this period, which is considered to be a reflection of the housing market and planning policy in the Borough, brought about by the Joint Lancashire Structure Plan (JLSP) rather than the supply of suitable and available housing land.

National Indicator 159: "Supply of Ready to Develop Sites", sets out how the Government considers five-year supplies should be calculated. Effectively this

involves calculating what the planned housing provision is over the next five years and comparing this to what the supply of deliverable housing is expected to be.

In terms of identifying the planned level of housing, this is done by multiplying the Core Strategy housing requirement (i.e. 222), by five years which gives a starting requirement of 1,110 for Rossendale. From this, excesses or shortfalls from completion rates in the previous years of the plan period (2003) should be either taken away or added to this requirement. However as the RSS is expected to be abolished, the decision has been taken not to carry forward the undersupply of 316 (as measured against the RSS) due to trends in historic completion rates and economic uncertainty. This gives a total rolling five-year requirement of **1,110**.

This then needs to be compared with the emerging five-year completion rate envisaged for Rossendale (i.e.**1,143**). The Government suggests that this should follow a basic calculation of dividing the amount of supply by the five-year requirement and then multiplying this figure by 100. This can then be translated into a percentage whereby the five-year requirement is being met if the percentage is 100% or more.

Rossendale's calculation is 1,143 divided by 1,110 giving a figure of 1.029. Multiplying this by 100 gives a percentage figure of **103%** which indicates that the five year requirement can be met by the supply of deliverable sites coming forward.

Historically, the level of housing supply was measured against the number of years supply there was against the housing requirement. It is considered to be a useful exercise for illustration purposes to identify what the 103% would equate to in terms of 'number of years'. On the basis that 100% equals five years then it follows that 20% is equal to 1 year. Therefore, 103 divided by 20 is effectively equal to **5.15 years supply**.

It is important to note that the 5.15 years supply is what is realistically expected to come forward and be delivered over the next five years. However, this expected delivery will come from the 8.62 year supply of deliverable sites identified through the SHLAA (see table 4), consisting of sites currently under construction, sites with planning permission and potential housing sites in category 1 of this update.

Therefore although the realistic delivery of housing is marginally over the five year requirement, the supply of deliverable housing land remains well above the requirement and as such demonstrates a sufficient supply of housing land for the next five years.

The Council is committed to continuing to monitor the supply of housing land to ensure that there is a rolling five-year supply of deliverable housing sites in line with the PPS3 requirements. This will include an annual review of this statement as the SHLAA is updated.

### 6. Conclusion

This document provides a snapshot picture of both the committed and potential housing supply in the Borough up to 2025/26 at 1<sup>st</sup> April 2010. The results of the SHLAA will primarily be used to help inform and support work on the Local Development Framework, including both the Core Strategy and the Site Allocations Development Plan Documents.

The sites and areas that have been identified in the SHLAA database are derived from a number of sources and have built on the previous work done by the Council in its annual original SHLAA 2009. It is important to note that certain assumptions have been made within the assessment based on general guidance in the CLG's guidance note and on professional judgement at a certain point at time. However, the SHLAA should be treated as a living document and the information will be subject to change over short periods of time, as sites move from one category to another, or as circumstances change on sites and as new sites come forward.

Consequently, planning applications for residential development will continue to be assessed on their individual planning merits in accordance with the development plan and other material planning considerations. Information that is contained within the SHLAA may act as a useful indication of opportunities or constraints on a site but applicants will still need to undertake their own detailed research to determine the full potential for residential development opportunities on sites within the SHLAA or indeed those that have not been identified.

It is clear from the findings in Section 4 and the analysis in Section 5 that there is potential for a considerable amount of residential development on previously developed sites within the urban area. In total, 416 sites were identified as having housing potential for 16,262 units, from both greenfield and brownfield sites.

These results will help form part of the Council's evidence base to support the Council's position in relation to the requirements of PPS3, in terms of both identifying a deliverable five-year supply to cover the first five years of the plan period and also identifying potential housing sites for the next ten years and beyond (to cover the period of Rossendale's LDF).

The full SHLAA report, including the detailed assessment and analysis of individual sites, can be viewed in the Duty Office at the One Stop Shop, Lord Street, Rawtenstall during normal opening hours. The SHLAA is available to view online for free at <a href="https://www.rossendalebc.gov.uk/corestrategy">www.rossendalebc.gov.uk/corestrategy</a>.

## **Produced by**

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Communications Section, Town Centres, Rawtenstall, BB47LZ