

SOUTH WORCESTERSHIRE Development Plan

Strategic Housing Land Availability Assessment (SHLAA)

Fifth Edition : April 2015

Joint Report of Malvern Hills District Council,
Worcester City Council and Wychavon District Council

www.swdevelopmentplan.org

South Worcestershire Development Plan

Strategic Housing Land Availability Assessment Report

April 2015 (Fifth Edition)

It should be noted that the SHLAA report is a technical report. It is not a decision making document and does not allocate land for housing.

South Worcestershire Development Plan Background Evidence

Strategic Housing Land Availability Assessment Report

April 2015 (Fifth Edition)

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Disclaimer to the SHLAA

1. Paragraph 159 of the National Planning Policy Framework requires Local Planning Authorities to prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet identified need for housing over the period of a local plan. The SHLAA is one of a number of reports that contribute towards the evidence base of the Local Development Framework. Whilst the SHLAA will inform the process, it does not allocate sites for housing; that is done through more detailed planning assessment and consultation, and is a separate process carried out as part of the South Worcestershire Development Plan (SWDP) to determine which sites should be identified for residential development and according to which timescale. Thus policy decisions relate to the SWDP, not the SHLAA.
2. In relation to the information contained within this report, its appendices and any other report relating to the findings of the SHLAA, the identification of potential housing sites, buildings or areas in the SHLAA does not state or imply that the councils would necessarily grant planning permission for residential development. All planning applications will continue to be determined against the appropriate development plan and other relevant material considerations.
3. Identification in the SHLAA does not qualify the site for allocation through the SWDP for residential or any other type of development.
4. The SHLAA has identified suggested dwelling capacity for each site which has been included in the report. In arriving at these conclusions, officers have used an estimation of a site's potential yield based on the information available to officers at the time. Consequently, the suggested capacity that has been identified in this report does not mean that a similar capacity would necessarily be appropriate in a planning application, where more detailed site information will be available. Any application will continue to be assessed on its own merits, through the normal planning process.
5. The conclusions in the SHLAA are based on information that was available at the time of the study and the South Worcestershire Councils do not accept liability for any factual inaccuracies or omissions. The information included in this edition shows a snapshot of the data captured for SHLAA sites submitted at a point in time. Information has been compiled with all due care and attention, however inevitably discrepancies may occur. The document should therefore be considered as a live one that will be updated. Please inform the SHLAA team if an error is identified.
6. Users of the study's findings should know that there may be additional constraints on some sites that were not identified at the time of the SHLAA survey. Consequently, planning applications will continue to be treated on their own merits at the time of the planning application and not on the information contained in the SHLAA. Likewise, some of the identified

constraints may have been removed since the information was compiled. Issues may also arise during the course of a detailed planning application that were not identified at the time of this study e.g., the ground conditions of a site are not always fully known without intensive on-site investigations. Applicants will therefore have to carry out their own analysis of a site in order to identify any constraints and should not rely on any part of the findings in the SHLAA to support a planning application.

7. Economic conditions are susceptible to short and long term fluctuation, which can impact on the housing market. Consequently, the availability of sites and the delivery of housing are subject to short and long term variations in the economy and the housing market which it is not possible to accurately predict in this study. The SHLAA will be updated broadly on an annual basis and the most accurate economic judgement will inform these updates based upon the findings of the Valuation Office and Developability Panel at the time.
8. The categorisation of site availability in terms of when they may come forward is based on the views of officers, insight from the development industry and information submitted by landowners at the time of the study's preparation and the timing of any Developability Panel. Circumstances or assumptions may change which could impact on a site's development. The SHLAA gives an estimate of site availability as opposed to realistic deliverability.
9. The inclusion of potential housing sites, buildings or areas in the study does not preclude them from being considered for development for any other purpose(s).
10. The boundaries to sites, buildings and areas are based on the information made available at the time by agents and landowners. The SHLAA does not limit any amendment of these boundaries for the purposes of a planning application.

- **Executive Summary**

- .1 Background

The Strategic Housing Land Availability Assessment (SHLAA) is a joint report produced by the three South Worcestershire Local Authorities of Malvern Hills District Council, Worcester City Council and Wychavon District Council.

The SHLAA report provides background evidence on the potential supply of housing land in South Worcestershire. **It is a technical report and is not a decision making document and does not allocate land for housing.** It does however contribute to the South Worcestershire Development Plan (SWDP) which identifies land as potential site allocations. In line with government guidance it will continue to be monitored to ensure it continues to supply a pool of potential housing land for the duration of the development plan up until 2030.

- .2 Purpose & Scope of the SHLAA

This document represents the 5th edition of the SHLAA document, following regular updates. This edition builds on the previous SHLAA work and takes account of new and amended sites submitted after April 2012 and those sites submitted as part of the call for sites exercise up to 2 April 2014. Since 2007, the original methodology has been reviewed to accord with updated government guidance. The role of the SHLAA is to identify whether sites have potential for housing, assess the housing potential and determine when they are likely to be deliverable. The SHLAA has been prepared in tandem with the identification of potential housing allocations through the SWDP process.

- .3 Practice Guidance

As stated above, the National Planning Policy Framework (NPPF) emphasises the importance of preparing a SHLAA. In March 2014 the Government published The National Planning Practice Guidance (PPG), which includes a section on Housing and Economic Land Availability Assessments which has been taken into account for the publication of this edition.

- .4 Methodology

The methodology used for the SHLAA process was initially consulted on and published in 2007. This sets out the methodology for selecting sources of information, constraints to development, the potential for housing supply and the deliverability of sites. The methodology was further updated in 2009 and 2012 to include looking at new sites, and re-examining existing sites where further information had been made available. A further revision to the methodology was necessary in 2014 to take account of the new government guidance (PPG) and minor changes to the SHLAA process.

.5 Settlement Categorisation

The Village Facilities & Rural Transport Survey (VFRTS) assesses the sustainability of rural settlements and this is a further part of the evidence base that helps inform the SWDP. The latest publication was produced in December 2012 to inform the submission version of the SWDP and there have been no further changes made to the categorisation of settlements and therefore this has no impact on this edition of the SHLAA.

.6 Analysis of Housing Supply

Evidence on housing growth in the South Housing Market Assessment 2012 and the South Worcestershire Development Plan – Objective Assessment of Housing Need 2014 (a result of earlier Examination of the SWDP) has informed the South Worcestershire locally derived housing provision of 28,370 dwellings during 2006-2030.

.7 Position Statement on Windfall Sites

NPPF replaces the previous guidance in PPS3 on Housing. The Framework does not preclude including an allowance for windfalls in the first 10 years. It is clear from housing land monitoring reports that in South Worcestershire windfall completions still provide a substantial number of houses every year.

Practice Guidance states that provided there is robust evidence, local authorities are able to include an allowance for speculative ‘windfall’ development over the period of the Local Plan. A windfall allowance has been accepted by the Inspector in the Interim Conclusions of the Stage 1 Examination of the SWDP.

Further information on windfall sites is detailed in the three South Worcestershire Councils (SWCs) 5 Year Housing Land Supply Reports and the Housing Trajectory 2014 (SWDP background paper).

.8 The SHLAA Process and Findings

Developability panels assessed those sites that were submitted between 2007 and 2012. Six rounds of panels were held on an annual basis. The panels brief was to consider SHLAA sites in terms of their suitability, availability and achievability for housing. Detailed information on the panel members and methodology of the Developability Panels is given in Appendices 2 & 8.

The SWDP Inspector’s Interim Conclusions in March 2014 concluded that additional dwellings were required in the SWDP to meet the objectively assessed housing need. In response to this and taking in to account the PPG, the South Worcestershire Councils (SWC) undertook a limited additional ‘call for sites’. We invited town and parish councils, neighbourhood forums, agents, developers, landowners, businesses, relevant local interest groups and others to

tell us of any further sites, land or buildings across south Worcestershire that could have the potential for housing. As a result of this exercise, nearly 600 sites were submitted which consisted of either new or amendments to existing SHLAA sites.

Therefore, due to the substantial number of sites that were submitted post 2012 were not subject to developability panels but were assessed by desktop analysis, findings from the Valuation Office and informed by officer judgement. Some of the sites had missed the earlier April 2012 deadline for SHLAA assessment, and others were submitted as part of the 2014 further “Call for Sites”. Appendix 13 shows the Call for Sites Site letter and Appraisal form that was sent out to interested parties.

Criteria in the methodology allow sites with severe development constraints to be assessed as Level 1 sites (high flood risk, national wildlife importance & Green Belt) and eliminated from further assessment (179 sites totalling 1,361ha in table 6).

The remaining 1,591 sites (6795 ha) referred to as Level 2 sites were assessed further by planning officers and a panel of representatives from the development industry (for sites submitted before April 2012) where sites matched sustainable location criteria. Sites were ruled out for a variety of reasons, including, size, location, access and duplication.

Of the 1,768 sites examined:

- 107 sites (1178ha) were in the Green Belt and ruled out as level 1 – Table 9
- 98 sites were in the AONB – Table 6
- 1528 sites were greenfield and 389 sites were brownfield (151 were in both categories)
- 93 brownfield sites were in Worcester,
- 53 sites were in Strategic locations (adjacent to the settlement boundaries of Worcester)
- 325 sites were in or adjacent to larger towns of Malvern, Droitwich Spa, Evesham, Pershore, and Tenbury Wells.
- 1031 sites were in village locations (cat 1-3)

Findings from the Developability Panels

Between 2007 and 2012 the developability panels (6 rounds of panels on an annual basis) considered 860 sites in terms of their suitability, availability and achievability for housing. The sites were prioritised in terms of their location to include city/town locations, strategic sites and Category 1-2 settlements. It should be noted that some category 3 village sites have been assessed at developability panels where village categories have changed over time.

Of the panel sites examined, 481 remained after appraisal for suitability within the terms of government guidance.

Of these 481 panel sites:

The site area was 2242 ha with a potential for 65,335 dwellings (unconstrained capacity):

- 60 sites were brownfield (110ha; 4054 dwellings), 385 sites were greenfield; 59,518 dwellings) & 36 were both (84ha; 1763 dwellings)
- 146 sites (888.76ha) were in or adjacent to main towns;
- The largest number of urban brownfield sites were in Worcester (18 sites; 13.2ha) but the largest area was in Evesham (11 sites; 57ha)

The panels used their judgement to categorise sites as to their availability. Table 12 & 13 show potential availability in relation to town sites:

- 104 ha (potential 2339 dwellings) were available now;
- 447ha (potential 11675 dwellings) were available in 1-5 years;
- 111 ha (potential 2945 dwellings) were available in 6-10 years;
- 125 ha (potential 3773 dwellings) were available in 11-15 years;
- 150 ha (potential 4143 dwellings) availability unknown

Tables 14 -17 show potential availability in terms of strategic sites and those in category 1-3 villages:

- Strategic sites have potential availability for around 154 ha of housing land or 4527 dwellings within 10 years (excluding unknown);
- Category 1 villages have potential for 576 ha or 16,115 dwellings within 10 years (excluding unknown);
- Category 2 villages have potential for 203ha or 4837 dwellings within 10 years (excluding unknown);
- Category 3 villages have potential for 40ha or 938 dwellings within 10 years (excluding unknown).

Findings for post 2012 sites

Of the 603 sites submitted after 2012, as part of the 'Call for Sites' exercise, there were 422 that were completely new sites, of this figure, 383 sites were level 2 sites and subject to a desktop analysis. Of the 383 sites, 164 sites were existing SHLAA sites and therefore 113 of these sites had already been assessed by panel but were re submitted as part of the Call for Sites exercise. Some of the existing sites were amended to reflect current ownership details or boundary changes. Following the desktop analysis and officer appraisal, 105 remained suitable in line with the SHLAA methodology.

Of the 105 suitable sites:

The total site area was 508 ha with a potential for 15,283 dwellings (unconstrained capacity);

- 29 sites were brownfield (35.2 ha; 1125 dwellings), 77 sites were greenfield; 14,568 dwellings)
- 34 sites (388 ha) were in or adjacent to main towns;
- The largest number of urban brownfield sites were in Worcester (24 sites; 15.4 ha)

Based on the site suggestion form submitted as part of the call for sites exercise, respondents were asked to detail the availability of their site. Table 12 & 13 show potential availability in relation to town sites:

- 111.73 ha (potential 2733 dwellings) (the number of dwellings is largely made up of an urban extension) were available now;
- 18.96 ha (potential 544 dwellings) (the number of dwellings is largely made up of an urban extension) were available in 1-5 years;
- 2.08 ha (potential 140 dwellings – were available in 6-10 years;
- No sites stated they were available in 11-15 years;
- 4.13 ha (potential 93 dwellings) availability unknown

Tables 14 - 17 show potential availability in terms of strategic sites and those in category 1-3 villages:

- Strategic sites have potential availability for around 332.8 ha of housing land or 9984 dwellings within 10 years (excluding unknown);
- Category 1 villages have potential for 6.32 ha or 1,216 dwellings within 10 years (excluding unknown);
- Category 2 villages have potential for 45.8 ha or 1578 dwellings within 10 years (excluding unknown);
- Category 3 villages have potential for 30.7 ha or 921 dwellings within 10 years (excluding unknown).

.9 Progress and Review

The SHLAA is a continuous process that will need to be updated on a regular basis. It provides a review of background information on the pool of potential housing sites to inform the South Worcestershire Development Plan (SWDP). It also provides background evidence for site allocations and monitoring of the 5 year land supply and with the extra requirement for an additional 5% housing buffer.

- **Introduction and Background to the SHLAA**

- 2.1 This is the fifth report of the Strategic Housing Land Availability Assessment which has informed the South Worcestershire Development Plan. It has been commissioned jointly by Malvern Hills District, Wychavon District and Worcester City Council.
- 2.2 National planning policy requires local planning authorities to prepare a SHLAA. The SHLAA is a technical assessment of sites to determine whether they may have the potential to be suitable for housing development. Sites which may have potential have also been subject to an assessment of their sustainability and together with other evidence the SHLAA has helped to inform which sites should be put forward for consideration as potential site allocations in the South Worcestershire Development Plan. The SHLAA is a background evidence document that has no policy status but it does provide a pool of potential sites to look at, upon which policy decisions can be made. Any subsequent planning decisions on sites will have been made following the full examination of all planning issues, not just on developability and availability issues.
- 2.3 The South Worcestershire Development Plan (SWDP) is the Local Plan for the future development of the Plan area, drawn up by the three Councils, in consultation with the community. It establishes the strategic priorities for the plan area, determining the scale of growth to plan for in South Worcestershire from 2006 to 2030. This includes strategic policies to deliver the homes needed in the area. Through the SWDP site allocation policies, the plan identifies the housing allocations, including strategic urban extensions, to deliver planned housing growth within South Worcestershire.

- **Purpose and Scope of the Strategic Housing Land Availability Assessment**

- 3.1 In line with NPPF the primary role of the SHLAA is to:
 - a) Identify whether sites have the potential for housing;
 - b) Assess their housing potential; and
 - c) Assess whether they are available, suitable, achievable and deliverable
- 3.2 The SHLAA has been produced in-house by the Planning Policy Teams of the South Worcestershire Councils (SWC) and has been informed by input from a Developability Panel (pre 2012 sites), an advisory group including local property agents, architects, and social housing providers who have informed the initial methodology and further elements of the assessment, particularly in relation to the availability of housing sites. The SHLAA report provides background evidence on the potential supply of housing land in South Worcestershire. It is a background technical study that provides a database of possible sites for residential development, an assessment of the development potential and broad deliverability to inform potential housing site

allocations. This document has provided background information to inform the SWDP which contains the planning policies and site allocations in one comprehensive plan. The SHLAA has been used to help inform the availability of sites at public consultation during the SWDP preparation. Consultation events are documented in the Statement of Consultation supporting the SWDP process. The most recent public consultation took place during October / November 2014 into the proposed uplift in housing numbers in the SWDP.

- 3.3 This 2015 review builds on the previous SHLAA work and takes account of new and amended sites submitted post April 2012 and those submitted as part of the call for sites exercise up to 2 April 2014. This also coincided with the SWDP Inspector's interim conclusions which concluded that additional dwellings were required in the SWDP. The SHLAA will continue to be kept up to date and any new sites submitted post April 2014 will be acknowledged and logged within our database. It is not possible to consider any new sites received post 2014 as potential allocations in the SWDP at this late stage as the intention is to adopt the development plan in Winter 2015. It will only be possible to consider the new sites as further allocations when the Plan is next reviewed or in the event that some of the potential allocations are not deliverable and this would require further appraisal and consultation.
- 3.4 Following the call for sites exercise, there have been a number of amendments to existing sites based upon updated information received from landowners/agents on the availability and/or site boundary changes. A further review of the status of individual sites has also been carried out with regard to site deliverability and where sites are no longer available, they have been ruled out as "not available or availability unknown".
- 3.5 Since 2013 the UK has seen a steady economic recovery, however there remains extreme caution about the state of the economy and this in turn has impacted upon the viability of development sites, particularly those which have severe development constraints and/or high development costs due to their location, site condition or size.

Planning Policy Context - National Policy

- 4.1 The National Planning Policy Framework (NPPF) published in March 2012 requires at paragraph 159 the preparation of Strategic Housing Land Availability Assessments (SHLAA) "to establish realistic assumptions about the availability, suitability, and likely economic viability of land to meet the identified need for housing over the plan period". At paragraph 158 it emphasises that Local Plans must be based on evidence that is proportionate, adequate, up-to-date and relevant.

Furthermore the NPPF requires local authorities to:

- Identify specific, deliverable sites for the first five years of a plan that are ready for development and to keep this topped up over time in response to market information;

- Identify specific, developable site for years 6-10, and ideally years 11-15, of the plan;
- Where it is not possible to identify specific sites for years 11-15 of the plan, indicate broad locations for future growth; and
- Only include an allowance for windfalls in the first 5 years of the plan if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.

Practice Guidance

4.2 Strategic Housing Land Availability Assessment: Practice Guidance (July 2007) was published by the Department for Communities and Local Government and is still relevant. It gives practical advice on:

- how to carry out an assessment to identify land for housing and assess the deliverability and developability of sites; and
- consideration of sites for possible urban extensions

Paragraph 7 of the Government's Guidance on Strategic Housing Land Availability Assessments (DCLG, July 2007), states that the aim should be to "identify as many sites with housing potential in and around as many settlements as possible in the study area".

4.3 In March 2014 the Government's Planning Practice Guidance (NPPG) was introduced. The Housing and Economic Land Assessment element of the guidance is reflected in this edition of the SHLAA.

5. Settlement Categorisation

5.1 Most rural settlements within South Worcestershire are categorised according to the local facilities and services available. This is to provide a comparative measure of the sustainability based upon the accessibility to services and level of public transport provision for the rural settlements. The Village Facilities and Rural Transport Survey (VFRTS) forms part of the evidence base for the SWDP and has informed decisions on the identification of sustainable rural settlements.

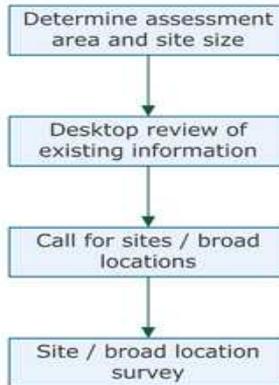
5.2 The latest publication of the Village Facilities & Rural Transport Survey (VFRTS) was published in 2012. There were a number of changes to the categorisation that influenced the previous edition of the SHLAA, however a review of the VFRTS has not taken place in time for this edition of the SHLAA and therefore there are no changes to the categorisation of villages. It should be noted that the settlement categorisations are based upon technical information and not policy considerations. A full copy of the VFRTS (December 2012) can be found as part of the evidence base on the SWDP website at: www.swdevelopmentplan.org.

6. Methodology

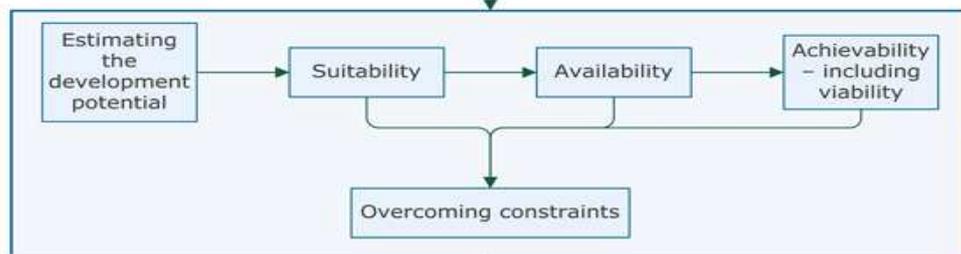
- 6.1 The production of the SHLAA has been broadly consistent in its approach since the first edition was published in 2007. The initial methodology is outlined in Appendix 14. The initial draft methodology was sent out for comments to a wide range of groups and the final document incorporated a number of suggested amendments. It was based upon Government guidance and so was not itself subject to public consultation, although Parish and Towns councils were informed about the process. The original methodology included re-examining known sites (e.g. Local Plan omission sites); and new sites put forward through invitation to parish councils, developers, and landowners. Since then, those sites that are known to be no longer available have been “ruled out” of the process. An amendment to the methodology has been produced in 2012 to take account of changing government policy guidance, but the principles remain the same. The updated methodology is set out within Appendix 14. Those sites where planning permission has been granted have been ruled out of the process. Those sites that are built out have been removed from the SHLAA database to prevent any double counting. A list of these sites is included in Appendix 1.
- 6.2 Since 2012 it has been necessary to make further minor refinements to the methodology to ensure the SHLAA results reflect the recent PPG publication. The approach set out in the PPG largely reflects the national guidance in 2007 set out on page 3 and Appendix 14, The guidance states that the SHLAA should identify a future supply of land which is suitable, available and achievable over the plan period. The key stages included in the PPG are summarised in the flow chart on page 12.
- 6.3 Based on the methodology recommended by the PPG, each stage of the process is summarised below and details how the SHLAA reflects this guidance. In some cases, elements of the PPG process are covered in other planning documents and are explained in para 6.10.

SHLAA Methodology Flow Chart

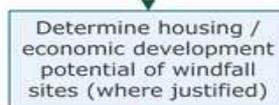
Stage 1 - Site / broad location identification



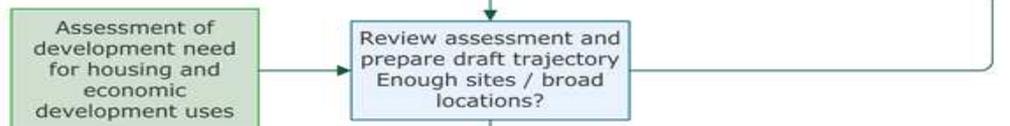
Stage 2 - Site / broad location assessment



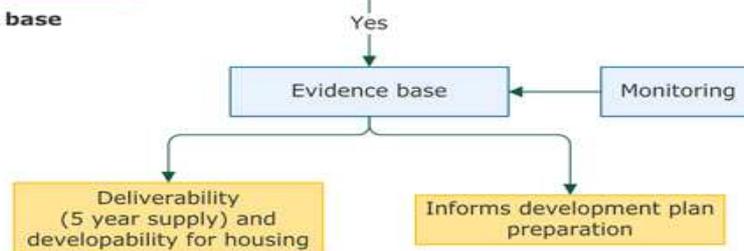
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



Source: National Planning Practice Guidance

Stage 1 – Site Identification

6.4 The study area is made up of the three South Worcestershire Councils. The SHLAA uses the settlement hierarchy contained in the adopted Wychavon District Council Local Plan and adopted Malvern Hills District Council Local Plan, and subsequent amendments in line with the VFRTS- see para 5.2 above. For Worcester City, the administrative urban area and areas adjoining the Worcester boundary will be used. In terms of the sources of housing

supply the SHLAA categorises the sites as large identified sites, large windfall sites and small windfall sites. Further detail about the assessment area and review of existing information is detailed in Appendix 14.

- 6.5 In addition to the sources of information identified in Appendix 14, a "Call for Sites" exercise took place in March/April 2014, as explained on page 4. Appendix 13 shows the Call for Sites Site letter and Appraisal form that was sent out to interested parties.

Stage 2 – Site Location Assessment

- 6.6 In terms of estimating the development potential of a site, initially the SHLAA sites have been split into 2 levels: Level 1 – sites unsuitable because of major planning/ physical constraints and Level 2 – all other sites. If a site is a Level 1 site it is unlikely to be included in the potential supply. However, Level 2 sites will be examined further. Based on the site area, and having regard to site constraint / surrounding land uses etc; the density based on the existing or emerging plan policy can be established. Further detail is explained in Appendix 14 and 15.
- 6.7 The PPG states that it is necessary to assess sites according to their availability, suitability and achievability. Since the publication of the methodology in 2007, the availability of sites is categorised in accordance with the Framework and PPG in that the site assessment form asks landowners/developers to stipulate whether their site could come forward now, within 5 years, within 6-10 years or 11 -15 years. This is detailed further in Appendix 14 and 15.
- 6.8 A further addition to the methodology is with regard to assessing economic viability of those sites that were submitted as part of the Call for Sites exercise in March/April 2014. As the SWDP is still at Examination, the Call for Sites needed to be conducted in a timely manner and it was considered that setting up developability panels would unnecessarily delay the process and that a different approach could be taken. Thus, the viability of these sites were assessed based on officer judgement, desktop analysis and feedback from Valuation Office on new sites submitted. This information was used to determine whether a site should be ruled in or out of the process, particularly in terms of viability.

Stage 3 – Windfall Assessment

- 6.9 Windfall sites are sites which are granted planning permission and that are built out for housing but have not been allocated in a development plan. Every year windfall housing sites come forward for development through planning permissions and local authorities monitor the number of these dwellings that are completed. It is clear from housing land monitoring reports that in South Worcestershire windfall completions still provide a substantial number of houses every year.

- 6.10 The Framework does not preclude including an allowance for windfalls in the first 10 years. The Framework (para 48) “allows Local Planning Authorities to make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens”. Reference for full details on the windfall allowance should be made to the Housing Trajectory Paper 2014 (SWDP Background Paper). The approach to windfall development has been endorsed by the Inspector at the SWDP Stage 1 Hearings.

Stage 4 – Assessment Review - Analysis of Housing Supply

- 6.11 Since the previous edition of the SHLAA, housing supply has seen a dramatic increase with a number of sites gaining planning permission. A review of housing land supply is detailed in the three South Worcestershire Council's Five Year Housing Land Supply Reports 2014, Housing Land Supply Monitor (2013/14) and Housing Trajectory Paper 2014.

Stage 5 – Final Evidence Base

- 6.12 The information for each site is recorded on a form, input onto the SHLAA database and linked to a map using the GIS system. The information requested is outlined in the example site appraisal sheet shown in Appendix 5 and 13. Further information about monitoring is detailed on page 25.

7. The SHLAA Findings

7.1 As of April 2014, 1768 sites have now been considered within the study. This amounts to a total of 8177ha. At a crude indicative or unconstrained density of 30 dwellings per hectare, this would deliver 255,618 houses.

Table 1 Distribution of all SHLAA sites by district				
Area	No. of post 2012 sites	Total hectares for post 2012 sites	Total no. of sites	Total hectares
Malvern Hills	203	1032.6	522	2685.08
Worcester City	43	41.2	145	608.1
Wychavon	357	1708.4	1102	4884.3
Total	603	2782.2	1768	8177.48

These sites were split into Level 1 and Level 2 sites as specified in the original methodology:

7.2 Level 1 Sites

Level 1 sites are those considered to be unsuitable for housing development due to major physical constraints including:

- Flood Zone 2 or 3 i.e. at high risk of flooding
- National conservation or wildlife designation constraint
- High levels of site contamination (where information is available) making them unsuitable for housing development
- Sites in the Green Belt

Criteria within the methodology has allowed sites with severe development constraints (e.g. flooding and national wildlife importance) to be assessed as Level 1 sites and eliminated (176 sites equating to 1,313 hectares of land). These sites have been ruled out with no further work on appraising housing potential. For sites where just part of a site is in flood zone 2/3, a judgement was made by officers as to how much of a constraint it would realistically be (that is, whether part of the site is still suitable) and whether these should be ranked as a level 2 site. The distribution of the Level 1 sites is shown below:

Table 2 Distribution of Level 1 sites				
Level 1 sites	Worcester	Wychavon	Malvern Hills	Total
No. of post 2012 sites	3	43	7	53
Post 2012 sites total hectares	0.5	336.5	3.6	340.6

Total no. of sites	14	142	22	178
Total area in hectares	204.1	1121.7	35.3	1361.1

7.3 Level 2 Sites

Level 2 sites include all other sites. The following constraints to housing development are recognised and sites can be ruled out as summarised below (see Appendix 14 regarding the methodology for fuller details):

- Sites outside key settlements/not adjacent to main urban areas (location);
- Established Employment sites (employment);
- Existing communities facilities where no replacement land/buildings are identified (community);
- Valued open space/sport/recreation sites identified for retention in up to date studies (PPG17);
- Site is in a prominent area of landscape value within the Area of Outstanding Natural Beauty (AONB);
- Site has important nature designation e.g. SSSI, Special Wildlife Site, Local Nature Reserve (Nature)
- Site is valued Garden land (formerly PPS3);
- Historic Environment constraints e.g. Conservation Area, Listed Building, Ancient Monument (formerly PPS5)
- Site within/edge of Category 4 villages (cat 4)

7.4 Garden land used to fall within the definition of brownfield land (previously developed land). The thrust of guidance contained within NPPF has effectively removed private gardens from the definition of “brownfield land”. Many sites containing garden land in reality fall below the size site threshold of 0.16ha so would not be included within the study.

7.5 Information on the historic environment and archaeology relating to sites has been gathered from the County Council’s Historic Environment and Archaeology Service. A desk top appraisal of level 2 sites has been carried out on all early SHLAA sites, as well as those that were put forward for the SWDP Preferred Options consultation and those that were consulted upon through the SWDP Significant Changes consultation. The assessment recognises that many sites’ sensitivity will be unknown, and all will require further evaluation should they be considered further as potential site allocations. The distribution of the Level 2 sites is shown in the table below. These sites remaining were assessed further by officers and in some cases by developer panels. There are a total of 1561 level 2 sites that were assessed for their availability and developability, either through initial officer assessment or through “Developability Panels”. The Site Appraisal Form is set out in Appendix 12. And indicates the information collected for each site.

Level 2 sites	Worcester	Wychavon	Malvern Hills	Total
No. of post 2012 sites	18	311	193	662
Post 2012 sites total hectares	25.5	1384	1025	2736.2
No. of sites	106	958	497	2757
Area in hectares	387.1	3758	2645.29	11983.29
Potential Yield	10,293	111247.4	92,435	113,855

7.6 There are a total of 1561 sites that went through to Level 2, the majority were not in flood zones 2 and 3. The table below identifies the number of sites by flood zone. None are wholly in the flood plain as they would have been categorised as Level 1 sites and excluded. Flood zone 1 refers to all other sites, generally at low risk of flooding in conformity with the Environment Agency's categories. Some sites are covered by more than one flood zone designation. It is important to note that the SHLAA database uses only a general flood risk assessment that is a desk top assessment only. At the time that the sites are appraised further as potential housing allocations, guidance is sought from the Strategic Flood Risk Assessment commissioned by the three Councils which is a far more detailed appraisal of actual sites, looking at fluvial run off and surface water drainage and this takes account of climate change factors. In addition, individual flood risk assessments will be required to accompany planning applications.

Flood zone	No. of sites	Hectares
1	1506	6364
1 & 2	12	32.97
1 & 3	31	535.94
2	21	280.46
2 & 3	24	275.375
3	16	205.29
1, 2 & 3	12	92.86
Total	1622	7,786.895

7.7 The table below shows how many sites in the SHLAA were in the Green Belt and due to the protocol on the Green Belt have been excluded as level one sites. A Green Belt Review of the existing Green Belt within South Worcestershire was published in July 2010 by external consultants to inform

part of the evidence base for the emerging South Worcestershire Development Plan and is available to view at: www.swdevelopmentplan.org

7.8 The Green Belt Review is relevant to the SHLAA due to the fact that a significant number of submitted landholdings lie within the West Midlands Green Belt. The Green Belt between Droitwich Spa and Worcester is particularly sensitive as it is so narrow. The evidence from the Review demonstrates that the boundaries of the Green Belt at Worcester are robust and defensible. There is a general presumption against inappropriate development, which is defined as development that is harmful to the Green Belt. The Government attaches substantial weight to the need to avoid harm to the Green Belt. More specifically, the NPPF indicates that most forms of development are inappropriate; there are some named exceptions to this that will be permitted as long as they meet certain criteria, such as maintaining the openness of the area and not conflicting with the purposes of including land in the Green Belt.

8.12 Consequently, South Worcestershire has now taken a robust stance on the role of the Green Belt and as such, it has been determined that all SHLAA sites within the Green Belt will be classified as Level 1 Sites and in this edition have been ruled out accordingly. However the AONB is not recognised in the SHLAA as a Level 1 constraint on its own (unlike Green Belt land).

Table 5 All sites in the Green Belt (Level 1 sites)		
	No. of sites	Hectares
Level 1 sites	107	1178.6

7.9 Some of the sites were also in the Areas of Outstanding Natural Beauty (AONB) as shown in the table below. The areas cover the Cotswolds and the Malvern Hills AONBs that are nationally recognised designations affecting Wychavon and Malvern Hills Districts.

Table 6 All sites in the AONB- by Level 1 and 2 sites		
	No. of sites	Hectares
Level 1 sites	1	9.23
Level 2 sites	98	260.7
Total	112	269.93

	No. of sites	Hectares
Greenfield sites	1375	6471.2
Brownfield sites	338	938.6
Mix of greenfield & brownfield sites	135	554.5
Total	1848	7964.3

7.10 The table above shows the Level 2 sites categorised by whether they are greenfield or brownfield sites. This illustrates there are predominantly more greenfield than brownfield sites. This is to be expected in a relatively rural area that has no history of large-scale industrial decline, and is an attractive area for residential development.

7.11 The table below shows the distribution of sites by their strategic location. Sites in Worcester are all sites within the city boundary. Sites on the edge of Worcester are in the “Strategic Location” even though they may be outside the city boundaries.

Description of location	No. of sites	Hectares
Central Worcester	103	328.1
Strategic location: Surrounding Worcester City/Urban extension	45	652.9
Towns (Malvern, Upton upon Severn, Tenbury Wells, Droitwich Spa, Evesham, Pershore)	296	1644.8
Edge (Astley Cross)	2	190.9
Cat 1 villages	348	1507.2
Cat 2 villages	320	905.2
Cat 3 villages	282	946.8
Cat 4a villages	58	245.1
Cat 4b villages	89	353
Open Countryside	20	24.1
Total	1561	6798

7.12 The table above shows that a large number of sites are outside of the main urban areas and villages, although a more significant number are within or on the periphery of villages. There are fewer sites but a larger hectareage within strategic locations, generally adjacent to the principal urban areas. As would be expected, the large spread of sites affects the main towns and category 1-3 villages which are the most sustainable locations, rather than that in category 4 and below. It should be noted that sites which affect category 4 villages or lie within an isolated position outside a built up settlement are generally ruled out due to their location.

South Worcestershire Developability Panels / Desktop Analysis / Valuation Office Comments

- 7.13 Up until 2012, level two sites progressing through the SHLAA appraisal process, as set out in table 13 were taken to a Developability Panel where they were considered to be in sustainable locations (within or adjacent to the towns/ and category 1 - 3 villages). It should be noted that some sites will already have been ruled out as being unsuitable for housing purposes. Many were ruled out as being duplicated, having been submitted for the same piece of land but through a different source. The three local authorities have conducted a regular series of Developability Panels to assess the new sites and some are revisited by the Panel. e.g. where a plot of land has been ruled out for reasons of scale but then a smaller more realistic plot of land has been resubmitted for re-assessment. The Developability Panels were held in October 2007, January 2008, November 2009, October 2010, and February & April 2012 to accord with the updates of the SHLAA document. Detailed information on the panel members and methodology of the Developability Panels is given in Appendices 2 & 8.
- 7.14 A total of 860 sites went through the panel process since the first SHLAA document was produced. During the latest SHLAA Update, a total of 125 sites went through the panel process. A summary of sites that went to Developability Panels and sites assessed by desktop analysis and the Valuation Office is set out below:

Table 9 Number of sites to Developability Panel / Desktop Analysis / Valuation Office				
Year	Malvern	Worcester	Wychavon	Total
2012	40	6	79	125
2007-2012	260	53	547	860
Post 2012	203	44	356	603

- 7.15 Those sites put forward in Category 3 and 4 villages have generally not been assessed by the panels as with so many sites to appraise, priority has been given to sites in the most sustainable locations. It is acknowledged that there have been some changes to the categories of some villages and some sites have been reviewed and taken to a Panel on this basis. Leigh Sinton was one of those villages that upgraded to Category 2 status.
- 7.16 A summary of all sites remaining after consideration by the developability panels and desktop analysis of new sites is shown in table 13. Based on the findings the following distribution can be summarised:
- 7.17 The grand total of remaining suitable panel sites and new sites equates to 586 sites, totalling around 2,750ha with the potential for in the region of 80,618 dwellings (using unconstrained densities); 180 sites are in or adjacent

to the main towns, covering 1277.2 ha, with the potential to deliver 35,508 dwellings;

Brownfield/Greenfield Split

7.18 The table 10 summarises the brownfield/greenfield status of suitable sites. Of the total remaining 586 panel and new sites, 97 are brownfield (16.5%) and a further 44(16.5%) are a mix of brownfield and greenfield, with the majority of sites (462) being greenfield (78%).

Table 10 Panel sites and Post 2012 sites: Brownfield/Greenfield			
	Number of sites	Hectares	Dwellings
Brownfield	97	144.9	5179
Brownfield/ Greenfield Mix	44	93.23	2045
Greenfield	462	2731.7	62,711
Total	603	2969.8	69,935

7.19 Table 11 shows a breakdown of brownfield/greenfield sites by town, with the largest number of wholly brownfield sites being in Worcester as might be expected, and the largest total area in Evesham, Wychavon District.

Table 11 Panel sites and post 2012 sites: Brownfield/Greenfield by Town			
	Number of sites	Hectares	Dwellings
Droitwich Spa	2	3.9	106
Evesham	13	59.3	2329
Malvern	11	15.6	478
Malvern Wells	2	0.96	14
Tenbury	1	4.2	104
Worcester	24	29.5	830
Urban Brownfield Total	53	97.86	3859
Evesham	3	25.3	277
Malvern	1	5.2	100
Worcester	3	2.6	98
Urban Brownfield/ Greenfield Mix Total	7	33.1	475
Droitwich Spa	14	171.2	3561
Evesham	24	128.1	3704
Malvern	47	369.7	9969
Malvern Wells	2	12.2	383
Pershore	18	1115.1	3321
Tenbury	3	6.6	164
Worcester	13	54.25	1438
Greenfield Total	121		22540

7.20 Table 12 shows the potential availability for development of the panel sites as assessed. Where information is unknown in terms of ownership, general developer interest or infrastructure constraints, sites are categorised as “unknown” in terms of availability. This does not mean these sites are excluded, as information maybe forthcoming on such issues at a later date in the future (this is likely to apply to some of the earlier sites in the SHLAA process). The timescale for availability are:

- Available now
- 0-5 years
- 6-10 years
- 11-15 years
- Unknown

7.21 The format of this appraisal is in line with the Government SHLAA guidance. Where information has been assessed by panels they have tried to assess how realistic this might be in terms of the need to deliver infrastructure first on some sites, but it is only based upon an estimated timescale and it should be considered that some of the panel data is becoming somewhat dated but is still a useful guide (Panels were between 2007 and 2012). Sites submitted post April 2012 were based on landowner and developer estimation of deliverability. The deliverability of these sites has been analysed further in the three South Worcestershire Council’s five year housing land supply reports.

Table 12 Panel sites and post 2012 sites availability (dwellings/area) by Town

	Available now		1-5 years		6-10 years		11-15 years		Unknown	
	ha	dwlgs	ha	dwlgs	ha	dwlgs	ha	dwlgs	ha	dwlgs
Droitwich	2.49	75	175.2	3589	2.62	78	0	0	0	0
Evesham	43.95	808	137.74	4463	2.29	86	3.32	140	28.74	916
Malvern/ Malvern Wells	68.37	2146	72.21	1568	39.56	1175	114.55	3454	108.5	2581
Pershore	91.01	1752	68.27	2077	22.33	508	0	0	0	0
Tenbury	4.6	115	2	50	0	0	4.19	104	1.45	36
Worcester	5.63	176	10.94	466	46.02	1238	2.66	75	15.77	703
Totals	216.05	5072	466.38	12213	112.74	3085	124.72	3773	154.46	4236

7.22 Table 12 above illustrates that of the sites assessed, at this stage in the development plan process, in the region of 216 hectares of land is considered to be available now in/adjacent to the towns with a potential yield of 5072 dwellings (unconstrained density). This generally excludes existing Local Plan allocations.

Table 13 Summary of Towns Availability		
Availability	Hectares	Potential Dwellings
Available now	216.05	5072
1-5 years	466.38	12213
6-10 years	112.74	3085
11-15 years	124.72	3,773
Unknown	154.46	4236
Total	1074.3	28379

7.23 Table 14 shows the summary of strategic sites. This refers to those sites in strategic locations adjacent to the Worcester City boundary such as Hindlip and Bevere. In general terms, approximately 20% of sites are set out as being available immediately, fewer than 43% available in 1-5 years and 10% in 6-10 years. Understandably, it is difficult to predict more than 10 years ahead of the process and there are a proportion where availability is unknown (14%).

Table 14 Strategic Sites Availability		
Availability	Hectares	Potential Dwellings
Available now	136.94	4054
1-5 years	34.5	992
6-10 years	35.44	9465
11-15 years	0	0
Unknown	46.26	1037
Total	533.14	15548

7.24 The assessment of availability of sites in villages is summarised below in tables 19, 20 and 21 for Category 1, 2 and 3 villages respectively. Generally the SHLAA has not applied any policy considerations to sites, but particularly in the smaller villages, this will be important in terms of judging the relationship of sites to the village and the open countryside.

Table 15 Category 1 villages		
Availability	Hectares	Potential Dwellings
Available now	52.34	1456
1-5 years	303.18	8165
6-10 years	260.97	7710
11-15 years	239.09	7169
Unknown	65.21	1677
Total	920.79	26177

Table 16 Category 2 villages		
Availability	Hectares	Potential Dwellings
Available now	54.07	1328
1-5 years	158.388	4023
6-10 years	28.36	613
11-15 years	12.83	625
Unknown	103.9	3022
Total	357.54	9611

Table 17 Category 3 villages		
Availability	Hectares	Potential Dwellings
Available now	5.19	88
1-5 years	49.88	1346
6-10 years	3.9	82
11-15 years	0	0
Unknown	8.79	217
Total	67.76	1733

7.25 The tables above show that the majority of land judged to be available is within the towns. This is expected given that the town locations are the most sustainable and are more likely to have the required infrastructure for development to go ahead. Category 3 villages are likely to be smaller than Category 1 and 2 villages and have least land available.

7.26 The total capacity is in the region of 2,953 hectares of land which would have an unconstrained density exceeding 81,448 potential dwellings. This would far exceed the amount of housing provision set out in the SWDP. However, this is all sites 'available', without further policy consideration. It includes sites at locations remote from or not reasonably close to the settlements in the settlement hierarchy. It should be noted that 452 sites were ruled out where the availability of a site was unknown. Of these, 385 sites were level 2 sites. 6 sites were ruled out as the landowner had informed us that the land was unavailable.

Discounting on Sites

7.27 SHLAA practice guidance states that the assessment of constraints is inherently judgmental and therefore it is important that this takes place only once the unconstrained capacity has been identified. It also states that based upon the experience of previous studies, it is clear that in reality, following the assessment, the unconstrained figure is reduced quite substantially in some cases by up to 50-60%. That is, out of the full range of sites and opportunities identified early on in the assessment, a much smaller number are likely to

offer a realistic prospect for housing development. Thus, of the 1768 sites, many have been excluded, either by the developability panels or by planning officers, in terms of defining Level 1 or Level 2 sites leaving a potential 586 sites or 33% of the original total.

- 7.28 The site allocation process within the SWDP involves a further more rigorous sifting of the remaining sites when planning policy constraints are overlaid and a planning assessment takes place.

8. Progress and Review

- 8.1 Practice Guidance on the role of the SHLAA sets out that the SHLAA database should be kept under review and updated on a regular basis. The South Worcestershire Councils are publishing this report as background evidence to provide information to inform the South Worcestershire Development Plan. This report does not allocate housing sites for development. Site allocations have been produced from a further sift of sites which are available and have been deemed to be suitable for development following the application of further site suitability criteria.
- 8.2 Information on SHLAA sites will need to be regularly updated. A full re-survey of sites will not be necessary, but information on new sites can be updated. All new sites will be included but detailed assessments will only take place where they are considered to be in sustainable locations and meet the other criteria outlined in this report and information can be provided on their developability. However once the Development Plan is adopted, the SHLAA will continue to provide background information at the review stage and increasing play more of a monitoring role.