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Peter Brett Associates

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EXECUTIVE SUMMARY

Peter Brett Associates LLP was commissioned in January 2016 by Hyndburn Borough Council to undertake a Strategic Housing Land Availability Assessment ('SHLAA'). The Council is currently preparing a new Local Plan, and requires a SHLAA to ensure that there is sufficient land for new housing in the Borough to cover the plan period up to 2033.

The SHLAA covers the entire area within the administrative boundary of Hyndburn Borough Council, and has been undertaken in full compliance with the National Planning Policy Framework of March 2012 and the Planning Practice Guidance of March 2014.

Approach

The SHLAA focussed on 206 sites identified by the Council and suggested as part of a 'call for sites' exercise in Summer 2015. The study base date is 1 April 2016, in line with the latest available housing data from the Council.

We recorded site characteristics and various other information for each of the 206 sites through a combination of desk-based research and site visits. Some 57 of the sites were subsequently excluded from the study for a variety of reasons, for instance being located within the Green Belt, leaving 149 sites as part of the assessment. In order to assess the number of dwellings that could theoretically be provided at each site, we took account of permanent features and appropriate gross to net ratios. Having identified the net developable area of each site, we then applied a density of 35 dwellings per hectare, which is based on current industry standards and is considered to be appropriate for a strategic study of this nature.

Using the information described above we subjected all of the sites to a comprehensive assessment against various 'suitability', 'availability' and 'achievability' criteria.

Through our assessments of suitability, availability and achievability, each of the 146 sites was placed into one of four 'Category' bands ('deliverable', 'developable' 'not currently developable' or 'undeliverable within the study period').

Summary of Findings

The headline findings from the SHLAA are as follows:

- The 149 sites could potentially yield around 3,774 dwellings.
- Of this theoretical capacity, 953 units (25 per cent) are from sites assessed as being 'deliverable' (i.e. Category 1), with a further 1,657 dwellings (44 per cent) 'developable' sites (Category 2) and 1,164 units (31 per cent) from sites which are 'not currently developable' (Category 3) but which could come forward at some point in the future.

- There are 93 previously developed sites in the SHLAA – in our assessment these could theoretically deliver 1,707 units (45 per cent), of which 172 dwellings could come forward in the first five-year period (Category 1). Beyond this, a further 684 units have been identified on ‘developable’ PDL sites (Category 2), and 851 units is derived from PDL on sites which are ‘not currently developable’ (Category 3).
- There are 56 greenfield sites in the SHLAA, with a total potential capacity of 2,067 units (55 per cent). Of these, 781 units are from sites assessed as being in Category 1 (‘deliverable’), with a further 973 units from Category 2 (‘developable’) sites. We have placed 13 greenfield sites within Category 3, with a potential capacity of 313 units that could come forward at some point in the future.

We then assessed the adequacy of this capacity against the identified 5, 10 and 17-year housing requirements for the Borough (using a 20 per cent ‘buffer’). In undertaking this exercise we also made an allowance for non-implementation and non-delivery of outstanding commitments/allocations.

The SHLAA confirms that outstanding planning commitments in the Borough are unable to meet the dwelling target for the first five years. To fully meet the five-year target, it will be necessary for a number of the 20 Category 1 sites and 53 Category 2 sites to be brought forward. The five-year target also cannot be met solely from planning commitments and sites on previously developed land, and so there is a need for greenfield sites to be used.

The 10-year target can only be met from a combination of outstanding planning commitments together with Category 1 sites in combination with some of the more constrained Category 2 and 3 sites.

The study identifies that there is insufficient land to meet the Borough’s 17-year dwelling requirement using planning commitments and assessed SHLAA sites. This would suggest that the release of Green Belt land may be required in order for the Borough to meet its housing requirement up to the end of the plan period.

Whilst the release of Green Belt land is beyond the scope of a SHLAA, the Council recognises that as part of the Local Plan process, there may be a need to look at Green Belt sites to meet the housing requirement over the plan period.

1 INTRODUCTION

Purpose of the Study

- 1.1 In January 2016, Peter Brett Associates LLP ('PBA') was commissioned by Hyndburn Borough Council to undertake a Strategic Housing Land Availability Assessment ('SHLAA') on behalf of the Council.
- 1.2 The Core Strategy was adopted in January 2012, setting the strategic policy framework for Hyndburn until 2026. The Council is in the process of producing a Site Allocations Development Plan Document ('DPD') to accompany the adopted Core Strategy and the emerging Development Management DPD.
- 1.3 The Council has undertaken a Strategic Housing Market Assessment which has recommended that the Objectively Assessed Housing Need in Hyndburn is in the range of 175 to 317 dwellings per annum. The findings of the SHLAA will form part of the evidence base necessary to inform the emerging Site Allocations DPD, which will need to ensure there is sufficient land for new housing in the Borough in order to accommodate the identified level of housing need.
- 1.4 The SHLAA study, which covers the entire area within the administrative boundary of Hyndburn, has been undertaken in full compliance with the National Planning Policy Framework ('NPPF') of March 2012 and the Planning Practice Guidance ('PPG') of March 2014, in particular the section on the assessment of land availability.
- 1.5 In accordance with the guidance, we have assessed whether each identified site is 'deliverable' (i.e. available now, suitable and achievable), 'developable', or 'not currently developable'¹.
- 1.6 At the outset it is important to emphasise that the SHLAA is a technical study which forms part of the development plan evidence base, together with a range of other technical studies. The SHLAA therefore does not represent a statement of Council policy and it does not have any bearing on the determination of planning applications. It should also be emphasised that the purpose of the SHLAA is not to allocate sites, and that this will be done through the Site Allocations DPD.

Structure of Our Report

- 1.7 The remainder of this SHLAA report is structured as follows:
 - Section 2 contains a review of the national and local planning policy contexts;
 - Section 3 describes the methodology that we employed for the study; and
 - Section 4 provides the results from the study and assesses whether the dwelling targets for Hyndburn can be achieved.

¹ Para 47 of the NPPF requires LPAs to identify a supply of 'deliverable' sites for the first five years, and a further supply of 'developable' sites for years 6-10 and, where possible, for years 11-15.

- 1.8 The SHLAA report is accompanied by a number of appendices that are contained in the separately bound Volume B. The appendices comprise a list of all sites that have been assessed in the SHLAA, a copy of the site assessment criteria note, individual site assessment records, and plans showing the location of each site and their categorisation.

2 NATIONAL AND LOCAL PLANNING POLICY

National Planning Policy and Guidance

Requirement to Undertake a SHLAA

- 2.1 Paragraph 159 of the NPPF sets the requirement for LPAs to undertake a SHLAA, the purpose of which is to *'establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period'*.

Achieving Sustainable Development

- 2.2 The very first sentence of the NPPF, in the Ministerial Foreword, makes clear that the purpose of planning is to help achieve sustainable development. The Ministerial Foreword then states that *'sustainable development is about positive growth'* and that the planning system is about making this happen.
- 2.3 Paragraph 7 of the NPPF states that there are three dimensions to sustainable development: economic, social and environmental. We do not consider it worthwhile repeating in full what the NPPF says in relation to each 'dimension', but we note that under the economic dimension, the NPPF states that in order to build a strong, responsive and competitive economy, it is important to ensure that *'sufficient land of the right type is available in the right places and at the right time to support growth and innovation'*.
- 2.4 Paragraph 17 of the NPPF sets out 12 core planning principles. Again, we do not repeat those principles here but we note the third principle, which implores the planning system to *'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'*. The NPPF then goes on to emphasise the Government's commitment to securing economic growth.

Delivering a Wide Choice of High Quality Homes

- 2.5 Paragraph 47 of the NPPF advises that, in order to significantly boost the supply of housing, LPAs should ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. The same paragraph requires councils to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing, but it goes further than the precursor PPS3 which it replaced, stating that LPAs should provide sufficient land for an additional 5 per cent 'buffer', or a 20 per cent buffer where there has been a persistent record of under-delivery.
- 2.6 Paragraph 48 of the NPPF permits the use of a windfall allowance in the five-year supply, if there is 'compelling evidence' that such sites have made a consistent contribution to the supply and where there is confidence that such sites will continue to provide a reliable source of supply.

- 2.7 Paragraph 49 of the NPPF states that *‘Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites’*. Paragraph 14 of the NPPF advises that, where the development plan is absent, silent or relevant policies are out-of-date, planning permission should be granted for development proposals unless *‘any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed in this Framework taken as a whole’* or where specified policies in the NPPF indicate that development should be restricted.
- 2.8 It is therefore imperative that any sites which are assessed as being ‘deliverable’ are genuinely deliverable, so that they can be included within the Council’s five-year housing land supply statement of ‘specific, deliverable sites’. Failure to do so could result in a council facing pressure to release sites in an unplanned fashion.
- 2.9 We also wish to highlight paragraph 50 of the NPPF, which advocates a mix of high-quality housing that is capable of meeting the needs of different groups in the community. The same paragraph also advises LPAs to ensure an adequate supply of housing in terms of size, type, tenure and range.

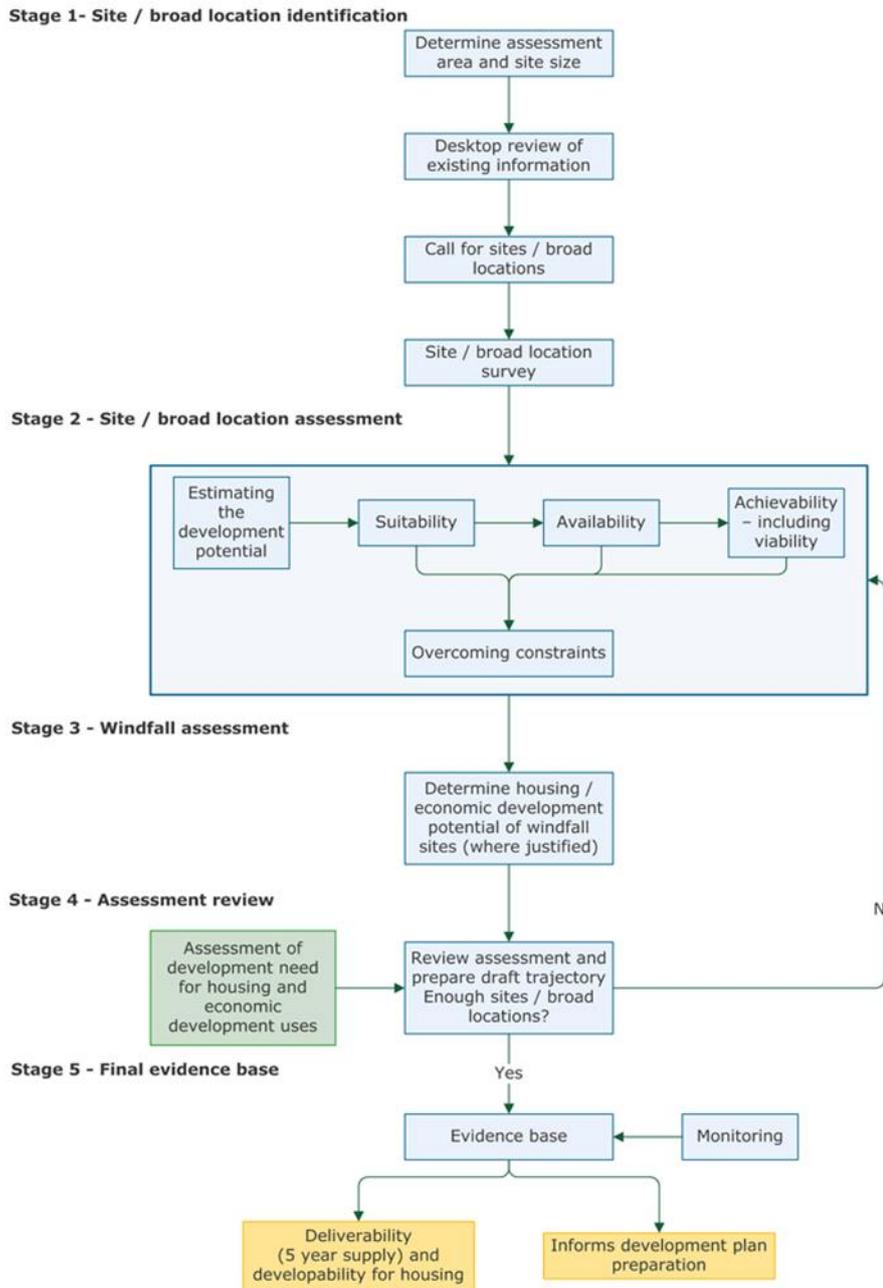
Planning Practice Guidance

- 2.10 On 6 March 2014, the DCLG launched the online Planning Practice Guidance (‘PPG’)² to provide additional guidance on a range of topics, including land availability assessments. The PPG advises that the assessment of land availability is an important step in the preparation of Local Plans and states that the purpose of the SHLAA is to:
- identify sites and broad locations with potential for development;
 - assess their development potential; and
 - assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 2.11 The PPG explains that the aim of a SHLAA is to identify as many sites with housing potential in and around as many settlements as possible in the study area. As a minimum, the SHLAA should aim to identify sufficient specific sites for at least the first 10 years of a plan, from the date of its adoption, and ideally for longer than the whole 15-year period. Where it is not possible to identify sufficient sites, the SHLAA should provide the evidence base to support judgements around whether broad locations should be identified and/or whether there are genuine local circumstances that mean a windfall allowance may be justified in the first 10 years of the plan.
- 2.12 The PPG is clear in advising that the SHLAA is an important evidence source to inform plan making, but does not in itself determine whether a site should be allocated for development. The role of the SHLAA is to provide information on the range of sites which are available to meet needs, but it is for the development plan preparation process to determine which of those sites are the most suitable to meet those needs.

² <http://planningguidance.planningportal.gov.uk/blog/guidance/>

- 2.13 The PPG contains a five-stage flow chart describing a methodology as to how a SHLAA should be undertaken at 'Paragraph: 006 Reference ID: 3-006-20140306' (reproduced below as Figure 2.1).
- 2.14 Stage 1 identifies that the area selected for the assessment should be the housing market area and functional economic market area. The PPG states that this can be the local planning authority area. The SHLAA is required to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate. The assessment is required to consider all sites and broad locations capable of delivering five or more dwellings.
- 2.15 Stage 2 involves an estimation of the development potential of each identified site, which should be guided by the existing or emerging plan policy including locally determined policies on density. The SHLAA should assess the suitability, availability and achievability of sites.
- 2.16 Stage 3 states that a windfall allowance may be justified in the five-year supply if a local planning authority has compelling evidence as set out in paragraph 48 of the NPPF. LPAs have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area.
- 2.17 Stage 4 requires that once sites and broad locations have been assessed, the development potential of all sites should be collated to produce an indicative trajectory, which should set out how much housing that can be provided, and at what point in the future. An overall risk assessment should be made as to whether sites will come forward as anticipated.
- 2.18 Stage 5 involves the collation of the final evidence base, which includes an assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable, in order to determine whether a site is realistically expected to be developed and when. Assessing the suitability, availability and achievability will provide the information as to whether a site can be considered deliverable, developable or not currently developable for housing.
- 2.19 In undertaking the SHLAA, we have followed this five-stage approach, as described in the following sections of this report.

Figure 2.1: PPG SHLAA Methodology Flow Chart



Source: Planning Practice Guidance

Local Policy Context

Adopted Core Strategy (January 2012)

- 2.20 The adopted Core Strategy contains a vision and strategic objectives for the Borough, as well as Core Policies that will set the basis for directing development within Hyndburn up to 2026.
- 2.21 The vision for the Borough states that *‘sufficient housing will be developed to meet the needs of the Borough and for those who may wish to move here. High quality family homes will be developed to provide a more balanced housing market*

comprising traditional and modern house types constructed using sustainable design principles. The majority of new housing will be developed in accessible locations on previously developed land within the urban boundary.'

- 2.22 Six strategic objectives for the Borough are identified. One of the strategic objectives is *'to provide for a greater choice and quality of housing'*. Beneath this heading the following sub-objectives are stated:
- *'To provide sufficient housing of the right size and type to meet local needs, including those in need of affordable and supported housing or requiring larger family homes, higher value homes and homes to cater for an aging population. This will provide a more balanced housing supply with a choice of property types and tenure.'*
 - *'To ensure that all new property will be built to high standards, in sustainable locations, making the best use of brownfield land and to designs which minimise carbon emissions and relate well to the local character.'*
 - *'To ensure that areas of low demand housing are regenerated with a wider range of improved and new housing and supporting facilities, including local health centres and public open spaces'*.
- 2.23 The Core Strategy identifies the nature and scale of housing and employment provision, the broad locations for new development, as well as the areas for regeneration, protection and enhancement. The Core Strategy also identifies sites for development where these are strategic in nature and essential for the delivery of the strategy.
- 2.24 Policy BD 1 sets out the Balanced Development Strategy which provides the overall spatial framework within which future development will take place in the Borough. The policy identifies that the existing settlement pattern and hierarchy of centres will be maintained and supported by concentrating development within the urban areas and in centres of a scale and type appropriate to their role. Accrington and its townships will accommodate the majority of new development. Modest growth is proposed in Great Harwood, and Rishton will develop in a manner consistent with its size and function. Development within the rural area will be limited to that supporting farm diversification and promoting leisure and recreational facilities whilst retaining landscape character. Within the settlements of Belthorn and Altham new development will be limited to that required to meet specific local needs that satisfy the requirements of Green Belt and rural policies.
- 2.25 Policy BD 1 goes on to state that the overall general extent of the Green Belt will be maintained and that priority will be given to developing brownfield land within the urban areas, focussing investment and improvement in key regeneration areas and attracting new development into Huncoat.
- 2.26 Paragraph 4.26 states that the provision of a balanced housing market within Hyndburn is a key priority and that this will be achieved primarily through the development of larger family homes in sustainable locations within the urban area. Paragraph 4.27 sets out the following distribution of housing, which accords with the Balanced Development Strategy set out in Policy BD 1:

- Accrington and Townships and Knuzden – 75 per cent of new housing
 - Great Harwood – 15 per cent of new housing
 - Rishton – 10 per cent of new housing
- 2.27 Policy H1 confirms that between the period 2011 and 2026 provision will be made for 3,200 additional net dwellings and that a five-year supply of deliverable sites for housing development will be maintained. Policies A1, GH1 and R1 reiterate the distribution of housing set out in Policy BD1.
- 2.28 The dwelling targets specified in the Core Strategy were based on the figures prescribed by Regional Spatial Strategy for the North West of England, which has now been revoked. The NPPF changed the means by which local authorities are expected to calculate housing requirements and the Objectively Assessed Need ('OAN') for Hyndburn is pointing towards an increased housing requirement in the Borough. One of the consequences of this is that there is likely to be a need to review the Green Belt boundaries as a means of ensuring that sufficient land is made available to meet future housing needs in full, as required by the NPPF.

The Core Strategy Update (partial review)

- 2.29 The Council has committed to reviewing the Core Strategy towards the end of each five-year phase and has now updated its evidence base in relation to the OAN for the Borough. A partial review of the Core Strategy is therefore likely as the housing provision targets set out in the adopted Core Strategy are considered to be out-of-date following new evidence in relation to the OAN.

Strategic Housing Market Assessment and Housing Needs Study

- 2.30 A Strategic Housing Market Assessment ('SHMA') covering the Boroughs of Blackburn-with-Darwen and Hyndburn was completed in 2014. The 2014 SHMA identified a dwelling requirement range for Hyndburn of between 180 and 350 dwellings per annum ('dpa').
- 2.31 An update of the SHMA covering Hyndburn only was completed in December 2015³. By its nature, the SHMA Update report is very technical and detailed, and it contains a large number of scenarios. It is therefore not appropriate to cover the SHMA Update report at length here, but we do consider it worth highlighting some of the key findings of relevance to the SHLAA in order to set the context for subsequent sections of our report:
- In the 2012-based household projections for Hyndburn, there is significantly more net out-migration than in previous iterations, whilst natural change is also much lower.
 - The result is a projected overall population decline of around 48 persons over the 2012 to 2037 period.

³ The report is entitled 'Hyndburn Housing Needs Assessment: 2012-based Housing hold Projections Update'. For brevity, we refer to the report simply as 'the 2015 SHMA Update'

- As of 2014, Hyndburn was the second most affordable local authority in England in terms of house prices. The average (median) house price of just £85,000 is some 56 per cent lower than the national average house price (£195,000) and 37 per cent lower than the average for Lancashire as a whole (£134,950).
- Over the last 15 years, the 'affordability ratio' in England has been consistently lower than both Lancashire and England and as of 2014 the figure stood at just 3.14, making it the fourth most affordable local authority in England.
- Over the same period, house prices in Hyndburn have increased at a lower rate than Lancashire and England overall, and the rate of increase has been one of the lowest nationally.
- Average (median) monthly rents in Hyndburn have also risen slowly in recent years, and the average cost of renting is 30 per cent lower than nationally and 14 per cent lower than across Lancashire.
- The delivery of housing across the Borough has been low in recent years, with the relevant target achieved in only one year (2004/05) since 2003. There has been a recovery since 2013 following the prolonged economic recession, although the target is still not being met, the gross number of completions being insufficient to offset the impact of demolition in Hyndburn.
- There is consequently a significant accrued shortfall and so the level of housebuilding in the Borough will need to increase substantially in order to meet the Core Strategy dwelling target.
- Hyndburn Borough is very near to the bottom of the market signals comparator tables and the Borough has suffered from continuous job losses over many years⁴.
- Whilst there is a large amount of strategic employment land within Hyndburn, such as Whitebirk, Huncoat and Junction 7, this is likely to serve workers living across the wider area and so it will not necessarily create substantial housing needs within Hyndburn itself.

2.32 Taking account of all of the factors considered, the 2015 SHMA Update identifies an OAN range of between 175 dpa and 317 dpa for Hyndburn Borough over the period 2013 to 2033. Whilst this is quite a broad range, paragraph 5.26 advises that *'greater weight should be given to a figure towards the top end of the aforementioned range.'*

2.33 We have agreed with officers that, in advance of the specific dwelling target having been formally agreed, for the purposes of the SHLAA we will use the figure at the upper end of the OAN range (317 dpa) as the dwelling target. This is consistent with the approach taken in the Hyndburn Retail Study.

Other Local Market Evidence

2.34 As part of this study, we spoke to a number of local property market agents in order to obtain an informed understanding of the local housing market across Hyndburn.

⁴ These findings are also identified within the Hyndburn Employment Land Study (published January 2016)

The discussions were very informative and observations of greatest relevance to the SHLAA are highlighted below:

- There is pent-up demand from buyers within Hyndburn with residents wishing to relocate, but many existing homeowners are in negative equity, in many cases compounded by economic recession.
- Although there is a lack of new instructions coming onto the market, house prices have not increased significantly.
- Low affordability and low wage growth in the Borough is at the heart of the stagnation of the local housing market. A large rental stock in Hyndburn is also suppressing the market, which is compounded by low interest rates, with homeowners re-mortgaging rather than moving to other areas.
- There are few new-build residential schemes in Hyndburn, as large-scale house builders are choosing to develop around the Rossendale Valley and Ribble Valley areas. A key factor of housebuilders developing in these areas, rather than Hyndburn, is the perceived higher quality of schooling.
- National housebuilders are present in Hyndburn, but many are having to offer part-exchange deals to attract buyers because the market is stagnant with people not being able to sell their properties. Although similar deals are available from developers of new-build schemes at Rossendale Valley and Ribble Valley, they are not as common, because there is higher demand in these areas.
- Despite the generally negative picture outlined above, the agents considered that several national housebuilders would be interested in developing a strategic site (or sites) near the M65 corridor. This is because traditional family housing (3/4 bedrooms) is needed within the Borough but there are few large/strategic sites in the Borough.
- Land values across the Borough vary, but the average was said to be £200k per acre. Property values have generally not recovered since the recession, however pockets of areas in Accrington (Manchester Road towards Baxendale), Oswaldtwistle, Great Harwood and Clayton-le-Moors are performing more strongly.
- Development proposals often do not come to fruition as developers have problems securing finance and schemes have lower values than expected.
- There is a ceiling on achievable values in Hyndburn and so whilst aspirations for a 'step change' are understandable, the Council's aspirations need to be realistic.
- Employment in the Borough said to be 'fairly strong generally'. Whitebirk is a commercial success, Altham is also very successful and if a new road ('some sort of by-pass') could be provided then Huncoat would also be 'a real winner' for the Borough.

2.35 PBA is grateful to Caroline James of Trevor Dawson Chartered Surveyors and Edward Snowden of Mortimers Estate Agents & Chartered Surveyors for their invaluable input.

3 STUDY METHODOLOGY

- 3.1 As we explained in Section 2, the PPG provides details on the methodology for undertaking a SHLAA, which has five main stages.
- 3.2 At the outset we wish to emphasise that we have undertaken numerous SHLAA studies across the country and so we are extremely familiar with the requirements of the PPG. We have brought this experience to bear in the Hyndburn study, which is therefore wholly compliant with the PPG as well as the requirements of the NPPF.

Stage 1 – Site Identification

Study Area

- 3.3 The study area comprises the whole of the administrative area of Hyndburn. The NPPF and the PPG set a clear expectation that the supply of land for housing should be based upon specific sites and, where necessary, broad locations. Paragraph: 012 Reference ID: 3-012-20140306 of the PPG provides a list of possible sources for identifying potential housing sites. The list includes sites that are already in the planning process as well as sites that are not currently in the planning process.
- 3.4 Building on the work undertaken as part of the previous SHLAAs, the Council drew upon the sources identified in the PPG to identify an initial list of 206 sites that would form part of the updated SHLAA study.

Sites to be Excluded at Stage 1

- 3.5 The PPG is clear that the SHLAA should identify as many sites as possible and that sites should not be excluded from the assessment simply because of current policy designations. However, a number of designations are of national importance and represent a significant constraint to development. Accordingly, we identified a number of ‘absolute constraints’ in the Site Assessment Criteria Note (contained in Appendix 1), namely where the site:
- is located within the Green Belt;
 - contains scheduled or nationally important monuments (Local Plan Policy E.9); and/or
 - forms part of an Ancient Woodland or a SSSI (Local Plan Policy E.3).
- 3.6 Any sites put forward for assessment by the Council which were wholly or mostly affected by any of the above criteria were excluded from the assessment. Where only part of the site falls within one or more of these designations, only the part of the site outside of the designation was considered in the SHLAA (subject to the inclusion of a suitable buffer where appropriate).
- 3.7 The Site Assessment Criteria Note confirms that Green Belt is an ‘absolute constraint’ and so land that is located within the Green Belt was not subjected to a detailed site assessment, apart from the following two exceptions:

- If a site was only partially located within the Green Belt, then we assessed the part of the site that was located outside of the Green Belt.
 - Previously developed land in the Green Belt was not excluded from the assessment, although any greenfield land within the wider site was discounted. This reflects the advice contained in the final bullet point under paragraph 89 of the NPPF which states that limited infilling or the partial or complete redevelopment of previously developed sites, whether redundant or in continuing use (excluding temporary buildings), is not 'inappropriate development', provided it would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
- 3.8 Whilst it is important to note that Green Belt is a nationally important policy designation, and that its boundaries should only be amended in 'exceptional circumstances', various sites are located within the Green Belt and based on our knowledge of those sites we suspect that they are likely to be of greater interest to developers than many of the 'urban' sites that we assessed in the SHLAA. The Council also recognises that as part of the Local Plan preparation process, there may be a need to look at Green Belt sites to meet the housing requirement in full over the plan period.
- 3.9 The list of the 206 sites identified by the Council and suggested as part of a 'call for sites' exercise in Summer 2015 is provided in Appendix 2. We recorded site characteristics and various other information for each of the 206 sites through a combination of desk-based research and site visits and 57 of the sites were subsequently excluded from the study, leaving 149 sites as part of the detailed assessment. For ease of reference, the list of the 57 sites that were removed from the study is provided in Appendix 3.
- 3.10 A list of sites which have been amended to account for 'absolute constraints' is provided in Appendix 4. A list of previously developed sites that are within the Green Belt and therefore remain as part of this study is provided in Appendix 5.
- 3.11 Appendix 6 contains a schedule of the 149 main assessment sites which summarises the overall site category rating for each site, together with the theoretical dwelling yield. Appendix 7 contains a series of plans which show the location and boundary of each assessment site

The Survey of Identified Sites

- 3.12 We recorded site characteristics and various other information for each of the 149 SHLAA sites through a combination of desk-based research and site visits. In summary, the information collected included:
- site size in hectares and basic identifier information such as site name/address, and sources/references;
 - current land uses both at the site and in the surrounding area;
 - the surveyor's assessment of what proportion of the site is available for development, taking account of any on-site permanent features;



- details of any obvious physical constraints in relation to site access, drainage, ground conditions, and so on;
- bad neighbour uses, and the surveyor's assessment of the severity of the constraint;
- details of anything that might affect availability or achievability; and
- the surveyor's initial assessment of the site's suitability for housing.

3.13 It is important to emphasise that in a strategic study such as this, it is not possible to assess physical constraints, availability and deliverability/viability in particular detail. In assessing sites, we have therefore necessarily focused on obvious constraints, taking account of the information we collected during our site visits.

Stage 2 – Site and Broad Location Assessment

Estimating the Housing Potential of Each Site

3.14 In order to assess the number of dwellings that could theoretically be provided at each site, we applied a discount to take account of any permanent features on assessed sites and information on constraints provided by the Council. We then applied the gross to net ratios identified in the table below in order to determine a realistic calculation of the yield that could be achieved on each site⁵:

Site Area	Gross-to-Net Ratio
< 0.5ha	100%
0.5 – 0.9ha	90%
1.0 – 1.4ha	80%
1.5 – 2.0ha	70%
>2.0ha	65%

3.15 As a matter of course in SHLAA studies we also reduce the gross area of any sites that are partially covered by nationally important nature conservation designations, although in this case we have screened out these sites. This approach provides a much more robust and realistic assessment of housing delivery.

3.16 Having identified the net developable area of each site, we then applied a density of 35 dwellings per hectare to all sites. Where we have additional information (for example, through the 'call for sites' submissions) to justify an alternative density or dwelling yield then we have applied this manually.

3.17 The theoretical dwelling capacity of the study sites was therefore calculated on the following basis:

$$\text{Gross site area} \times \text{permanent features factor} \times \text{gross to net factor} \times \text{density}$$

⁵ The gross to net ratios are derived from 'Tapping the Potential' (DETR 2000), adapted by PBA to reflect our experience around the country, and the particular characteristics of Hyndburn.

- 3.18 We would strongly urge the Council to regularly monitor market conditions, which will provide an updated view of the housebuilding industry and potential changes in densities.

Assessing Suitability, Availability and Achievability

- 3.19 We subjected all of the sites to a comprehensive assessment against various 'suitability', 'availability' and 'achievability' criteria, as detailed in Appendix 1. The assessment criteria are closely related to the criteria referred to in the PPG. Our assessments thus provide a good indication of each site's performance against a broad number of important measures.
- 3.20 Where constraints were identified that impact on the suitability, availability and achievability of sites, our assessment considered what action would be needed to overcome the constraints, along with when and how this could be undertaken and the likelihood of sites locations being delivered.

Suitability

- 3.21 As we explain more fully in Appendix 1, we took account of planning considerations relating to:
- Suitability of location (i.e. whether the site is within or adjacent to the boundary of a defined settlement);
 - impact on Biological Heritage Sites;
 - impact on the High Pressure Gas Pipeline Buffer;
 - impact on AQMAs;
 - access;
 - National Rail constraints;
 - ground conditions;
 - bad neighbours;
 - Coal Authority High Risk Area;
 - flood risk; and
 - Hazardous Installations
- 3.22 If a site is affected by a constraint(s), it does not necessarily follow that the constraint could not be overcome, albeit certain core constraints are likely to delay the site coming forward until such time as it is possible, or worthwhile, to overcome the constraint.

Availability

- 3.23 In assessing the availability of sites, we also took account of anything that might affect availability, using known information. Sites held by a developer/willing owner/public sector – for instance, call for sites submissions, and sites being actively marketed – and sites where it is known that pre-application discussions are underway, fared better in the assessment than sites with established multiple uses or where there is thought to be particularly complex/multiple ownership issues.

Achievability

- 3.24 The PPG advises that 'achievability' is essentially a judgment about the economic viability of a site. For a strategic study such as this it is not necessary to undertake a detailed viability appraisal for each site. Instead our approach involves consideration of housing market issues at both the macro and micro levels, and other factors which are likely to influence/affect achievability, including known information relating to land values, geo-environmental factors, physical constraints, and so on. Our approach took into account:
- Market factors – such as the likely effect of adjacent uses, the attractiveness of the locality, and the likely level of potential market demand;
 - Cost factors – including potential site preparation costs relating to physical constraints, any exceptional works likely to be necessary, and
 - Delivery factors – including the developer's own phasing, the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates), whether there is a single developer or several developers offering different housing products, and the size and capacity of the developer.
- 3.25 Our assessment of achievability was informed by our discussions with locally active property market agents, as described in Section 2.

Stage 3 – Windfall Assessment

- 3.26 Windfall sites are those which have not been specifically identified in the SHLAA due to the local authority not being aware of them until a planning application is submitted. All sites assessed as part of the SHLAA process are considered to be identified sites and so are not windfall sites.
- 3.27 Paragraph 48 of the NPPF explains that windfall sites may be justified by the local authority as part of the housing land 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.'*
- 3.28 The Council has not included a windfall allowance in its recent housing land supply statements, because, due to the age of the existing Local Plan (1996), almost all developments in the Borough would be classed as windfalls. We therefore have no robust or reliable evidence to suggest that windfall sites will be a reliable source of housing supply going forward. On that basis we have not incorporated a windfall allowance as part of our assessment. However, this situation should be carefully monitored and should a significant number of dwellings consistently come forward from previously unidentified sites, then the Council may wish to consider applying an allowance for windfalls when updating the SHLAA.

Stage 4 – Assessment Review

Time Horizon and Study Base Date

- 3.29 The PPG states that once the sites and broad locations have been assessed, the development potential of all sites can be collated to produce an indicative trajectory, which sets out how much housing can be provided and when it might come forward. The PPG requires an overall risk assessment to be made as to whether sites will come forward as anticipated.
- 3.30 Paragraph 47 of the NPPF requires LPAs to identify a supply of ‘deliverable’ sites for the first five years and a further supply of ‘developable’ sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15. Each site was therefore assigned a reasonable expected timescale for delivery: 1-5 years, 6-10 years or 11-17 years (the latter period being 17 years, rather than 15 years, to bring the time frame of the SHLAA in line with the emerging Local Plan period). These timescales depend on the information known about each site in relation to its suitability and availability for housing at the time of the assessment.
- 3.31 We consider that 1 April 2016 represents an appropriate study base date, as this will ensure that the evidence presented on past completions and outstanding commitments is as up-to-date as possible. Accordingly, we have assessed housing potential for each of the forthcoming periods 2016 to 2021, 2016 to 2026 and 2016 to 2033. The SHLAA timeframe is therefore in line with the emerging Local Plan period.
- 3.32 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.

Stage 5 – Final Evidence Base

Site Categorisation

- 3.33 At this stage of the study we undertake our assessment of each site and/or broad location, looking at their suitability, availability and achievability, to determine whether a site is realistically expected to be developed and when.
- 3.34 Through our assessments of suitability, availability and achievability, each site was placed into one of four ‘Category’ bands⁶, as follows:
- Sites which perform well against the suitability, availability and achievability assessments, and are therefore affected by the fewest constraints, are considered to be ‘deliverable’ and were therefore placed into Category 1. 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 five years, and achievable.
 - Sites with a limited level of constraints such that they are likely to be available for delivery after the first five years were placed into Category 2. These ‘developable’

⁶ Our definitions are consistent with those specified in footnotes 11 and 12 on page 12 of NPPF.

sites may be suitable for development, depending on their individual circumstances and on specific measures being proposed to overcome their constraints within a 6-10 year time horizon.

- Sites allocated to Category 3 are classified as being 'not currently developable' and have more significant constraints. For these sites to be considered appropriate for development it would have to be clearly demonstrated that the significant constraints affecting these sites – which could relate to suitability, availability or achievability factors, or a combination thereof – can be mitigated or overcome to make them deliverable.
- Sites which face suitability, availability or achievability constraints which are likely to render them undeliverable within the plan period, have been placed into Category 4 ('undeliverable sites within the study period') and effectively excluded from the rest of the study.

- 3.35 The overall categorisation of a site therefore depends on the particular combination of constraints affecting it. The scores achieved by each site in the database under each criterion are used to determine why each site has been assigned to a particular Category band. Thus, it is immediately apparent whether a site is affected by particular constraints and, hence, what sort of intervention will be required in order to make the site deliverable. A summary table containing all 149 assessment sites and their categorisation rating is provided at Appendix 6.
- 3.36 Predicting when each site is likely to come forward for development is not an exact science. The placing of a site into one of the three Category bands is therefore 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 Site Allocations DPD.
- 3.37 However, the inclusion of a site in a higher Category band should not be taken to represent a recommendation that it should be allocated, as our 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.
- 3.38 An indicative trajectory of anticipated development and consideration of associated risks is provided within the following section.

4 STUDY FINDINGS (STAGE 5)

- 4.1 In this section we provide the results from the study and assess whether, and how, the identified dwelling targets can be achieved. In summary, our approach is to:
- identify the 5, 10 and 17-year dwelling targets (the latter period being 17 years, to bring the assessment in line with the end of the plan-period), taking account of any previous under-provision against the identified targets;
 - identify the supply from housing commitments;
 - establish the potential supply from Category 1 ('deliverable'), Category 2 ('developable') and Category 3 ('not currently developable') sites; and
 - assess whether the identified supply from outstanding planning commitments and the specific sites that we have assessed in the SHLAA is sufficient to meet the 5, 10 and 17-year dwelling targets.

Dwelling Targets

- 4.2 The adopted Core Strategy specifies a requirement for 3,200 net additional dwellings across the Borough over the plan period from 2011 to 2026 (equivalent to 213 dwellings per annum). This figure was based on the North West Regional Spatial Strategy which has since been revoked and does not follow the PPG approach to identifying OAN for housing.
- 4.3 As we explained in Section 2, the Council published an updated Housing Needs Assessment in December 2015, which identifies an OAN of between 175 to 317 dwellings per annum over the period 2013 to 2033. The Council has advised that for the purpose of the SHLAA the upper end of this range should be tested, and therefore we have used the figure of 317 net additional dwellings per annum in our assessment.
- 4.4 The latest available data from the Council shows that at 31 March 2016, 374 net additional dwellings had been delivered in Hyndburn between 2013 and 2016, which leaves a residual requirement of 5,966 dwellings for the remaining 17 years of the plan period (see Table 4.1).
- 4.5 As shown in Table 4.2 the accrued shortfall between 2013 and 2016 is 577 dwellings. In Table 4.3, this accrued shortfall is added to the basic five-year requirement for Hyndburn (1,585 dwellings). The Council accepts that housing delivery has persistently fallen below the dwelling requirement and therefore a 20 per cent NPPF 'buffer' should be added, which results in a total five-year requirement of 2,594 dwellings.
- 4.6 As shown in Table 4.4, the 10-year target is calculated by adding together the first five-year requirement including a 20 per cent NPPF 'buffer' and shortfall (2,594 dwellings) and the basic requirement for the second five-year period (1,585 dwellings). Table 4.5 confirms that the 17-year target is calculated by adding together the basic 17-year requirement (5,389 dwellings) and the accrued shortfall (577 dwellings).

Table 4.1 Total Housing Requirement

Total Housing Requirement	
'Upper' Annual OAN Target	317 dwellings
Total 'Upper' Requirement over the 2013 – 2033 Period	6,340 dwellings
Completions (2013 - 2016)	374 dwellings
Residual 17-Year Requirement (2016 - 2033)	5,966 dwellings

Table 4.2 Shortfall in Housing Delivery (2013 to 2016)

Shortfall (2013 - 2016)	
'Upper' Annual OAN Target	317 dwellings
Requirement from 2013 to 2016 (317 x 3)	951 dwellings
Completions (2013 to 2016)	374 dwellings
Shortfall 2013 to 2016 (951 minus 374)	577 dwellings

Table 4.3 Five-Year Housing Requirement (2016 to 2021) with 20% NPPF 'Buffer'

Five-Year Housing Requirement (2016 - 2021) with 20% NPPF 'Buffer'	
Basic Five-Year Requirement (317 x 5)	1,585 dwellings
<i>Add Shortfall (2013 to 2016)</i>	<i>577 dwellings</i>
<i>Add 20% 'buffer'</i>	<i>432 dwellings</i>
Total Five-Year Requirement plus 20% NPPF 'Buffer'	2,594 dwellings

Table 4.4 Ten-Year Housing Requirement (2016 to 2026) with 20% NPPF 'Buffer'

Ten-Year Housing Requirement (2016 - 2026) with 20% NPPF 'Buffer'	
Five-Year Requirement plus shortfall and 20% NPPF 'buffer'	2,594 dwellings
<i>Add Second Five-Year Requirement</i>	<i>1,585 dwellings</i>
Ten-Year Requirement with 20% NPPF 'Buffer'	4,179 dwellings

Table 4.5 17-Year Housing Requirement (2016 to 2033)

Fifteen-Year Housing Requirement (2016 - 2033)	
Basic 17-Year Requirement (317 x 17)	5,389 dwellings
<i>Add Shortfall (2013 to 2016)</i>	<i>577 dwellings</i>
17-Year Requirement	5,966 dwellings

Housing Commitments

- 4.7 The latest data provided by the Council indicates that there is a supply of 623 dwellings from sites under construction, extant commitments and specific deliverable sites. However, it is reasonable to assume that not all of the commitments will be delivered in their current form and that not all outstanding allocations will come forward. For instance, in some cases the developer will probably have to amend its intentions in order to make the scheme more viable because of current economic

circumstances. Other unforeseen factors often result in a degree of non-implementation (such as the developer going bust or the landowner changing its intentions), and some permissions for significant numbers of units might not be delivered in their entirety within five years. Similarly, not all outstanding allocations will necessarily deliver the expected quantum of housing, or come forward at all due to a variety of market and cost factors.

- 4.8 Consequently, to ensure a robust approach, we consider that there is a need to make an allowance for 'non-delivery' and 'non-implementation' of a proportion of the outstanding residential planning permissions and allocations. Applying a 'non-delivery rate' and a 'non-implementation rate' will ensure that the Borough's housing supply is not over-reliant on extant planning permissions and allocations, which may not all progress in practice.
- 4.9 Accordingly, in order to ensure that our assessment is as robust and realistic as possible, we have applied the following discounts to the dwelling yields from the sites that we have not assessed:
- A 'non-implementation' rate of 10 per cent to the total dwelling supply from commitments and allocations was applied. These dwellings are assumed to never come forward and are completely removed from the housing supply, which amounts to a reduction of 62 units, leaving a residual supply from this source of 561 units.
 - A 'non-delivery within five years' rate of 15 per cent to the supply from commitments and allocations – these dwellings are not lost from the supply, but are instead shifted into the 2021-2026 period on the basis that they might still come forward, but not in the first five-year period. This enables us to reach a more realistic picture of the likely five-year supply position. Thus, of the residual 561 dwellings, a further 84 dwellings are removed from the five-year supply, but then reinstated for the subsequent 10-year and 15-year periods, leaving 477 dwellings in the first five-year period from commitments and allocations.
- 4.10 We have used the adjusted supply figures described above in Table 4.6 when assessing the adequacy of housing supply from commitments/allocations and SHLAA sites.
- 4.11 Future updates of the SHLAA will provide an opportunity to update the number of outstanding residential commitments/allocations.

Theoretical Dwelling Supply

- 4.12 We have identified the theoretical dwelling supply from the 149 SHLAA sites, each of which has been placed into one of the four Category bands:
- Category 1 (deliverable) – site is suitable, available and achievable and faces no constraints which might prevent it from coming forward within the first five-year period;
 - Category 2 (developable) – site faces some constraints of either suitability, availability or achievability and would not be expected to come forward within the

first five-year period, but could still be expected to come forward within the second five-year period;

- Category 3 (not currently developable) – site faces more significant constraints, and would not be expected to come forward within the first 10-year SHLAA assessment period, although it might be expected to come forward in the third seven-year period; and
- Category 4 (undevelopable) – site faces significant constraints, and considered to be unsuitable, unavailable and/or unachievable and therefore deemed unlikely to come forward for development within the study time-frame. For such sites, we have not calculated a theoretical dwelling capacity.

4.13 Table 4.6 below summarises the theoretical dwelling supply from SHLAA sites, broken down by category band and land type (greenfield or brownfield):

Table 4.6 Summary of Supply from SHLAA Sites

	Total		PDL Only		GF Only	
	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
Category 1 sites	953	20	172	7	781	13
Category 2 sites	1,657	53	684	30	973	23
Category 3 sites	1,164	26	851	16	313	10
Category 4 sites	0	50	0	50	0	0
TOTAL	3,774	149	1,707	93	2,067	56

4.14 From the table above, it can be seen that:

- The 149 sites could potentially yield around 3,774 dwellings.
- Of this theoretical capacity, 953 units (25 per cent) are on sites assessed as being ‘deliverable’ (i.e. Category 1), with a further 1,657 dwellings (44 per cent) on ‘developable’ sites (Category 2) and 1,164 units (31 per cent) on sites which are not currently developable (Category 3) but which could come forward at some point in the future.
- There are 93 previously developed sites in the SHLAA – in our assessment these could theoretically deliver 1,707 units (45 per cent), of which 172 dwellings could come forward in the first five-year period (Category 1). Beyond this, a further 684 units have been identified on ‘developable’ PDL sites (Category 2), and 851 units is derived from PDL on sites which are not currently developable (Category 3).
- There are 56 greenfield sites in the SHLAA, with a total potential capacity of 2,067 units (55 per cent). Of these, 781 units are sites assessed as being in Category 1 (‘deliverable’), with a further 973 units on Category 2 (‘developable’) sites. We have placed 10 greenfield sites within Category 3, with a potential capacity of 313 units that could come forward at some point in the future.

Adequacy of Housing Provision

- 4.15 In Table 4.7 below we assess whether the Borough-wide dwelling targets can be achieved through a combination of the 149 sites together with outstanding planning commitments.

Approach

- 4.16 The components of potential housing supply, as set out in Table 4.7 below, are referenced as follows:
- PC ('Planning Commitments') = dwellings under construction, with planning permission or to be built from specific deliverable sites at 31 March 2016 (having made an allowance for non-delivery and non-implementation, as described earlier in this section); and
 - C1, C2, C3 ('Category' bands 1, 2 and 3') = potential from the 149 sites in the SHLAA in Category bands 1, 2 and 3 respectively.
- 4.17 There is no definitive 'answer' and so, within each period, the theoretical yield from a combination of components is compared with the dwelling target for the period. Where a combination is sufficient to meet the target, the yield is highlighted in green. It is therefore immediately apparent to what extent the potential housing supply for a period is sufficient to meet the target. This approach is adopted for both the total yield and the yield on PDL.
- 4.18 Our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation, which are likely to include the broad sustainability of the total development pattern, impact on biodiversity and landscape, and strategic transport and other infrastructure capacity issues. Thus, we have not undertaken any analysis to consider whether the Category 1 supply is in the right place to meet strategic policy objectives. Similarly, we have not considered whether it would be better to remove the obstacles affecting Category 2 PDL sites and bring these sites forward in advance of Category 1 greenfield sites. These issues are beyond the scope of a SHLAA and will need to be considered through the plan preparation process.

Table 4.7 Adequacy of Cumulative Housing Potential in Hyndburn, Forthcoming 5, 10 and 17-Year Periods – With 20 per cent NPPF ‘Buffer’

Period	Component	Total		PDL	
		Yield	Additional Sites	Yield	Additional Sites
First 5 years	PC	477	0	477	0
	PC+C1	1,430	20	649	7
	PC +C1+C2	3,087	73	1,333	37
	PC +C1+C2+C3	4,251	99	2,184	53
	Dwelling Requirement	2,594			
First 10 years	PC	561	0	561	0
	PC +C1	1,514	20	733	7
	PC +C1+C2	3,171	73	1,417	37
	PC +C1+C2+C3	4,335	99	2,268	53
	Dwelling Requirement	4,179			
17 years	PC	561	0	561	0
	PC +C1	1,514	20	733	7
	PC + C1+C2	3,171	73	1,417	37
	PC+C1+C2+C3	4,335	99	2,268	
	Dwelling Requirement	5,966			

Summary of Findings

- 4.19 Table 4.7 confirms that outstanding planning commitments in the Borough (of 477 dwellings, after the non-delivery and non-implementation rates discussed earlier in this section have been applied) are unable to meet the dwelling target for the first five years of 2,594 dwellings (with a 20 per cent ‘buffer’). To fully meet the five-year target it will be necessary for a number of the 20 Category 1 sites and 53 Category 2 sites, to be brought forward. The table shows that the five-year target cannot be met solely from planning commitments and sites on previously developed land, if all Category 1, 2 and 3 previously developed sites are used and therefore there is a need for greenfield sites to be brought forward for development.
- 4.20 The 10-year target of 4,179 dwellings (with a 20 per cent ‘buffer’) can only be met from a combination of outstanding planning commitments together with Category 1 sites in combination with some of the more heavily constrained Category 2 and 3 sites. The target cannot be met using solely PDL sites. Table 4.7 shows that there is insufficient land to meet the Borough’s 5,966 dwelling 17- year dwelling target using planning commitments and assessed SHLAA sites.
- 4.21 The findings from the process above indicate that current outstanding permissions and commitments are insufficient to meet the five-year housing requirement. The 149 SHLAA sites which we assessed in the study, when considered together with outstanding planning commitments, are theoretically capable of providing sufficient dwellings to meet the 5-year and 10-year requirement, but unable to meet the 17-year requirement. This would suggest that the release of Green Belt land may be required in order for the Borough to meet its housing requirement of 5,966 dwellings by the end of the plan period.

4.22 Whilst the release of Green Belt land is beyond the scope of a SHLAA and will need to be considered through the plan preparation process, it is important to note that Green Belt is a nationally important policy designation, and that its boundaries should only be amended in 'exceptional circumstances'. The Council also recognises that as part of the Local Plan process, there may be a need to look at Green Belt sites to meet the housing requirement over the plan period.