

Strategic Housing Land Availability Assessment (SHLAA)

Second Edition : January 2010

A Joint Report by Malvern Hills District Council,
Worcester City Council and Wychavon District Council

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Strategic Housing Land Availability Assessment Report

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Executive Summary

Introduction

This 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. This report is an update on the SHLAA sites submitted since the last SHLAA document was published in June & October 2008 respectively.

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 will however contribute to the South Worcestershire Joint Core Strategy which is currently being produced, by helping to establish whether broad directions for development growth up to 2026 is feasible in terms of land availability. It will also form part of the evidence base for the Site Allocations & Policies Development Plan Document, which will allocate smaller sites for development.

Regional Spatial Strategy Background

The Panel Report on the West Midlands Regional Spatial Strategy Phase Two Revision Examination in Public (EiP) was published by the Government Office for the West Midlands on 28 September 2009. The Phase 2 Revision (draft) put out to public consultation between January and December 2008 puts forward “option 2” housing targets for South Worcestershire, requiring 24,500 new dwellings to be built between 2006 and 2026. The Panel report has suggested a further 1,000 dwellings be provided in South Worcestershire, making a total of 25,500 dwellings to be found in the plan period. The Government’s response (Proposed Changes) to the Panel’s Report is yet to be published.

The Current Position

Land does not need to be found for all of the 24,500 dwellings (or 25,500 dwellings as suggested in the RSS Panel’s report). Housing completions since 2007, houses under construction and with planning permission, and allocated land within adopted Local Plans contribute to this target. Table 2 shows that completions, and commitments between 2006-2009 amounted to 6,881 dwellings leaving a requirement to provide a further 17,619 dwellings between April 2009 and March 2026.

Windfall housing sites are those sites that have not been identified in advance through development plans. The adopted Local Plans for the three South Worcestershire Local authorities contain a windfall allowance of dwellings likely to come forward in each area in addition to those on allocated sites. The figures used are based on past windfall completion

rates. The SHLAA report looks at these trends, especially in relation to sustainable locations. The report shows a figure for an average of 339 per annum total windfall completions for South Worcestershire, based on figures up to 2011.

The SHLAA process / findings

Essentially, the SHLAA Update has used the same methodology as for the first SHLAA assessment which was produced in April 2007 in line with emerging and up to date Government guidance. The methodology included re-examining known sites (e.g. Local Plan omission sites) i.e. sites put forward through the local plan process that were not allocated at that point. The process also included new sites put forward through invitation to Parish Councils, developers, and landowners; and desktop studies of sites within/adjacent to settlements. In total to date, 1042 sites have been considered.

Criteria in the methodology allowed sites with severe development constraints (e.g. flooding; national wildlife importance) to be assessed as Level 1 sites, and eliminated (73 sites), with no further work on appraising housing potential. Sites remaining were assessed further by officers and in some cases by developer panels. These are known as the Level 2 sites.

This left 969 Level 2 sites that were assessed for their deliverability and developability, either through initial officer assessment or through 'Developability' panels. Some sites were eliminated for public open space reasons, based on up to date "PPG17" audits and Local Plan assessments. A further 163 sites were eliminated for the above reasons and/or through duplication, as some sites (or parts of sites) were put forward more than once. For example, some sites could have been included as former Local plan omission sites, and then included again by the landowner or agent, or by different agents who have subsequently sought to ensure that a site is included.

Of the total sites examined:

- 73 sites (425.16 ha) were in flood zones 2 and 3 - Table 8;
- 75 sites (1,030 ha) were in the Green Belt- Table 9;
- 50 sites (180.6 ha) were in the Areas of Outstanding Natural Beauty (AONB) - Table 10;
- 783 sites (4,923.2 ha) were greenfield sites and 255 (840.2 ha) were brownfield sites (but note some sites in both categories);
- 11 sites (5.86 ha) were in Central Worcester-Table 14;
- 72 sites (383.49 ha) were in/adjacent to the larger towns of Evesham, Malvern, Droitwich Spa, Pershore, Tenbury Wells, Upton-upon-Severn;
- 399 sites (1,424.89 ha) were in village locations;
- 303 sites (1,691.36 ha) were in "all other sites".

"Developability" panel meetings were set up to consider a total of 610 sites in more detail in terms of their suitability, availability and viability for housing. The sites were prioritised in terms of city/ town locations,

strategic sites and Category 1 and 2 villages. Category 3 village sites were generally not considered by the panels at this stage.

The Panels considered sites in all three Districts.

Of the 610 sites examined to date, 267 were ruled out, as not being suitable, available, achievable (within the terms of Government guidance), leaving 343 sites to be considered further.

From the remaining 343 sites:

- These amounted to 2,118.9 hectares of land with a potential for 58,497 dwellings (indicative potential only);
- 116 sites (796.7 hectares) were in or adjacent to the main towns (26,106 dwellings);
- 2 sites (67.9 hectares) were in “other Strategic locations” (1,997 dwellings);
- 132 sites were in Category 1 villages (852 hectares; 24,622 dwellings);
- 63 sites were in Category 2 villages (243.2 hectares; 7,285 dwellings);
- 58 sites (56.3 hectares) were on brownfield land; 262 sites (1,975 hectares) were on greenfield land; and 23 sites (87.9 hectares) were a mixture of greenfield/brownfield land;
- The largest number of brownfield sites was in Worcester (15 sites, 9.09 hectares) but the largest hectarage was in Malvern (11sites, 17.28 hectares).

The panels categorised sites as to their potential availability. Tables 14 and 15 show potential availability in relation to town sites:

- 17.14 hectares (potential 470 dwellings) were available now;
- 405.7 hectares (potential 10,743 dwellings) were available in 1-5 years;
- 88.78 hectares (potential 2,469 dwellings) were available in 6-10 years;
- 122.2 hectares (3,360 dwellings) were available in 11-15 years;
- 162.9 hectares (4,064 dwellings) availability was unknown.

Tables 17 & 18 show potential availability in terms of category 1 and 2 settlements:

- Category 1 villages have unconstrained potential for up to 503.9 hectares or 15,426 dwellings within 10 years¹
- Category 2 villages have unconstrained potential for up to 142.56 hectares or 4,210 dwellings within 10 years¹

¹By unconstrained potential we mean that an average density has been assigned to sites but this has not generally taken account of physical constraints to development or planning policy constraints, as detailed layouts have not been done.

No policy considerations have been overlaid on these figures, so this does not imply that this amount of development will take place on these sites.

Updating

The Strategic Housing Land Availability Assessment is a continuous process that will need to be updated on a regular basis and to date has been reviewed at least annually. It provides background information on a pool of potential housing sites that will inform the South Worcestershire Joint Core Strategy as to whether broad areas of housing growth can be delivered, and in what potential timeframe. It also provides background evidence for the subsequent Site Allocations and Policies Development Plan Document and monitoring of 5 year housing land supply.

Main Report

1. Introduction and Background

- 1.1 The Government priority is to ensure that housing land supply is not a constraint to the delivery of new homes. This policy stance is outlined in Planning Policy Statement 3: Housing (November 2006). Local planning authorities have always assessed potential housing land supply, for example, in the past through Urban Capacity Studies, and through monitoring the implementation of planning permissions through the Annual Monitoring Reports.
- 1.2 The Government has promoted the use of Strategic Housing Land Availability Assessments (SHLAA) to widen the geographical search for sites and to consider housing supply over a longer timeframe. This is the first full annual update of the SHLAA for South Worcestershire and is available in hard copy and on the SWJCS Web-site (www.swjcs.org). The SHLAA report represents an updated assessment as at 1st April 2009. The process is dynamic and the assessment will be subject to ongoing monitoring and revision as further sites are promoted or sites are brought forward for development, or updating results in assessment changes. Earlier reports are also available on the SWJCS Website. A follow up report will be made available later during 2010 to provide the 2009/2010 edition.

2. Purpose of Strategic Housing Land Availability Assessment

- 2.1 The purpose of the SHLAA is to identify sites with housing potential, make a broad assessment of availability, in terms of how many dwellings could come forward and when. This enables the Local Authorities to assess if there is potentially sufficient housing land available over a given plan period or whether there is a shortfall in the supply required to meet housing targets.
- 2.2 **The SHLAA is one of a number of reports that will provide background evidence to the Local Development Framework for South Worcestershire, and does not represent Council policy, nor is it a decision making document. Whilst the SHLAA will inform the Local Development Framework, it is for the Core Strategy and the Site Allocations & Policies Development Plan Documents to determine which sites should be identified for residential development and according to which timescale.**
- 2.3 The SHLAA is a technical report and is based upon the submission of information and sites put forward by land-owners, agents, planning officers and others (such as Parish Councils). The joint Councils cannot be held liable for the accuracy of information submitted by other parties and it is not possible to check the landownership of every site. (The Land Registry will hold information on sites where recent transactions have occurred, but will not hold information on all sites. The Land Registry also charges for ownership information).

However the councils will use reasonable endeavours to keep the information as accurate and up to date as possible using information put forward by third parties and through desk top research via GIS mapping facilities.

- 2.4 **An important point to emphasize however is that sites identified in the SHLAA are not guaranteed to be allocated for housing development or receive planning permission.**
- 2.5 The South Worcestershire Joint Core Strategy (SWJCS) authorities are required to demonstrate that there is a 5 year supply of available land for housing. The SHLAA sites can therefore contribute sites to top up the 5 year land supply. It is recognised that if a 5 year land supply cannot be shown to be available, then it may be necessary to consider approving planning applications for sites promoted by developers even if these are not in preferred locations. In accordance with Government guidance the SHLAA may also contribute unallocated brownfield sites to the calculation of such housing supply, if there is certainty that such sites will come forward. However, to date, none of the three South Worcestershire authorities have used these sites in their 5 year land supply calculations. The 5 year land supply is reported upon each year in each Council's Annual Monitoring Report.

3. Regional Spatial Strategy – Housing Targets

- 3.1 The West Midlands Regional Spatial Strategy forms part of the development planning framework for the South Worcestershire area. The West Midlands Regional Spatial Strategy is currently under review. The Phase 2 Revision Preferred Option draft was the subject of an Examination in Public by a panel of Government appointed Inspectors in June 2009. The Panel's Report was published in September 2009.
- 3.2 The West Midlands Regional Spatial Strategy contains the housing and employment land targets for local authority areas in the West Midlands. Within the West Midlands Regional Spatial Strategy Preferred Options Review, the South Worcestershire Authorities had been set a target of 24,500 additional dwellings to be provided between 2006 and 2026. The Panel report has suggested a further 1,000 dwellings be provided, making a total of 25,500 dwellings to be built in that plan period. The Government response to the Panel report is expected in early 2010.

Table 1 RSS Housing Proposals, 2006-2026		
Planning area	Proposed dwellings (net)	Annual average requirement 2006-2026
Malvern Hills	4,900*	245
Worcester City	10,500*	525
Wychavon	9,100*	455
South Worcestershire total	24,500	1,225

* Of the figure of 10,500 for Worcester, 3,200 will be within Worcester City, and 7,300 will be adjacent to the city within the surrounding districts of Malvern Hills and Wychavon. Source: West Midlands RSS Phase 2 Revision-Draft Preferred Option Dec 2007

3.3 The South Worcestershire Councils need to have regard to the above targets, however it should be noted that land does not need to be found for the entire 24,500 (or 25,000) dwellings. Housing completions since April 2006, houses under construction with planning permission and allocated land within adopted Local Plans contribute to this target. At April 2009, South Worcestershire authorities had 2,660 net completions and a total of 4,307 committed dwellings. A breakdown by authority is shown in table 2 below.

Table 2 South Worcestershire housing completions / commitments 2006- 2009			
Local Authority	Net Completions	Net Commitments	Local Plan Allocations (outstanding)
Malvern Hills D.C	734	1,074	55
Worcester C C	1,238	1,279	412
Wychavon DC	688	987	500
Total South Worcestershire	2,660	3,340	967

Sources: Housing Land Availability reports: Worcester City, Malvern Hills District and Wychavon District

The Current Position

3.4 The April 2009 Housing Land Availability figures indicate that there are 1,632 dwellings under construction and 1,604 dwellings with outstanding permissions within the three authorities. (see Table 3). The figures relating to outstanding planning permissions have been adjusted by 2% to allow for an element of non implementation (accounting for a small number of housing planning permissions that do not get built) giving a total delivery of 3,273. Using this figure along with net completion since April 2006 we can estimate the remaining number of homes to satisfy the draft

West Midlands Regional Spatial Strategy 24,500 target. At April 2009 the South Worcestershire area is required to find a further 18,567 over the next 17 years. A point to note is that a few of these outstanding sites with planning permission may be included in the SHLAA study so there may be a small element of double counting. The 2% lapse rate is an average of lapse rates referred to in the local plans (2% in Malvern Hills, 2% in Wychavon).

Table 3 Outstanding permissions / dwellings under construction at April 2009 across the three South Worcestershire authorities

As at April 2009	Worcester	Wychavon	Malvern	Total
No of dwellings under construction	628	110	912	1,650
No of outstanding permissions	625	858	140	1,623
Total	1,253	968	1,052	3,273

* Assumes lapse rate of 2%

Review of existing housing allocations in plans

- 3.5 All three Local Authorities have current Local Plans within which additional land is allocated for housing development. Appendix 1 shows those allocated sites remaining without planning permission. At April 2009 this represented 948 dwellings that still require the benefit of planning permission. This figure takes into account a 2% non-implementation rate, as has been assumed for outstanding permission (see paragraph 3.1 above). Thus taking into account all commitments and allocations there is a potential requirement to provide an additional 17,619 new dwellings to meet the draft West Midlands Regional Spatial Strategy target to 2026. (See table 4 below). This is over a 17 year period (2009 to 2026), giving a requirement across South Worcestershire of 1,036 new dwellings per year.

4. Position statement on Windfall Sites

- 4.1 Windfall housing sites are sites which are granted planning permission and that are built out for housing but that 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.
- 4.2 Historically local authorities in this area included an annual “allowance” for windfall housing in their Local plans that contribute to the total number of dwellings expected to be completed in the future, along with allocated (identified) housing sites. Government advice in Planning Policy Statement 3 (PPS3: Housing) says that such allowances should now be exceptional, and that local authorities will need to make a strong case to retain windfall allowances. The reason for this is that the Government considers that more thorough site identification through studies such as this Strategic Housing Land Availability Study will mean that more sites

can be identified in advance, and provide more certainty to developers, councils and the public.

Table 4 South Worcestershire- Current Windfall Allowance (Local Plans)		
District	Annual windfall allowance as in adopted Local plans- to 2011	Annual windfall allowance SWJCS Preferred Options paper Sept 2008, 2011-2026
Malvern Hills District	125	60
Worcester City	87	52
Wychavon	127	60
South Worcestershire Annual Total	339	172

Source- Malvern Hills adopted Local Plan 2006, Wychavon adopted Local Plan 2006, Worcester City adopted Local plan 2004, and SWJCS Preferred Options document, September 2008

- 4.3 Table 7 above shows the windfall allowance stated in the three South Worcestershire local authorities' Local Plans. This shows an allowance of 339 windfall completions per annum for the whole of South Worcestershire, up to 2011. Because of the advice in PPS3:Housing, the three authorities suggested effectively halving this allowance in the SWJCS Preferred Options paper (Table 3, p 29), to 172 dwellings per annum after 2011, as shown in column two above.
- 4.4 However it is clear that in South Worcestershire windfall housing completions still provide a substantial number of houses every year. Information from the Annual Housing Land Availability reports (HLA's) from the three local authorities shows the following windfall completion trends:
- 4.5 Of the 6,392 dwellings built between 2001 and 2008 in South Worcestershire, 4,452 (69.6%) were windfall completions. This is an average of 636 per annum for South Worcestershire. This is considerably more than either of the two windfall allowances above. The case for including a windfall allowance for South Worcestershire's housing supply figures was made at the Enquiry in Public into the West Midland Regional Spatial Strategy draft revision in June 2006. The panel report of the Examination in Public states at Paragraph 4.22 (p.96):

"We conclude that the issues of windfall housing land supply will need sophisticated handling at the local level, but does not lend itself to a

regional prescription in the RSS. Windfall development is, by definition, difficult to predict in terms of both its location and quantity”.

4.6 Paragraph 4.20 states:

“The treatment of windfall sites needs to be seen in the context of the way the five year and 10 year supply will operate under PPS3. LDDs [Local Development Documents] are required to identify developable sites for 10 years worth of housing development to meet the trajectory for achieving an authority’s housing allocation. In monitoring the use of the 10 year provision, and the need to top up the five year supply, any windfall sites developed will count as part of the delivery. So if in practice windfall sites continue to come forward at historic rates and contribute , say, 50% of the delivery achieved, the reservoir of identified sites in the 5 year supply, or in the 10 year provision, will last longer- potentially up to twice as long, although this is unlikely under a rising trajectory”.

4.7 During the update of the SHLAA for South Worcestershire, emphasis has been made on identification of brown field sites within or on the edge of identified settlements. These are defined in PPS 3 and comprise previously-developed sites that have unexpectedly become available. These could include, for example; large sites resulting from, for example, a factory closure or small sites such as a residential conversion or a new flat over a shop.

4.8 Within the Planning Advisory Service guidance on SHLAA ² Para 55 makes it clear that,

“contrary to common usage, windfalls are now not simply defined as sites that are not allocated in plans. Sites identified and assessed in a SHLAA database are not windfalls, for the very reason that they have been identified; and as noted in paragraph 15-17 of this note, neither for the 11-15 year period are sites within broad locations where residential development is positively promoted by planning policy”.

4.9 The other point made by the guidance is that once a windfall site comes forward and has been granted planning permission, it becomes part of the housing supply and should be added to the SHLAA database when it is next updated.

²Strategic housing land availability assessments and development plan document preparation, July 2008: Planning Advisory Service.

³Implementing your local development framework strategic housing land availability assessment, Feb 2008: Planning Advisory Service.

- 4.10 The South Worcestershire Authorities consider that without the West Midlands Regional Strategy Statement support for a wider windfall allowance, a windfall allowance cannot be made for the first ten years of the Core Strategy from its adoption. Thus an allowance is suggested from 2021-2026 (5 years) at 172 dwellings per annum which equates to 860 dwellings.

5. Other Sources of Housing Land

- 5.1 The SHLAA methodology adopted by the three authorities lists a number of other sources of housing land, including car parking reviews; intensification of existing housing areas, flats above shops and seeking brownfield sites in municipal and private ownership. These have been explored but are not seen as significant additional potential areas for new housing development. New flats over shops are generally small in number in most of the town centres and will be picked up through monitoring. Where this type of development is likely to contribute higher housing numbers, it will generally have been picked up in plans for mixed use redevelopments, particularly in town centres.
- 5.2 Enquiries have been made through each Authority's housing officers and some of the housing associations and there are no current plans for large scale housing redevelopment of existing housing areas. Any gains are likely to be small in number.

6. The SHLAA Update Process & Site Assessment

- 6.1 To accord with Government guidance to regularly review the SHLAA and keep the document up to date, during spring 2009, further survey work took place by the 3 local authorities. There was publicity to inform land owners, agents and Parish Councils that further potential sites were sought to be included in the SHLAA, that were 0.16ha and/or those with a potential capacity of 5 or more dwellings. Sites smaller than this were not considered appropriate for the purposes of this study but may still come forward at a later stage as small windfall completions. In particular the Councils have sought additional sites on previously developed land (i.e. brownfield sites). A copy of the letter sent out to relevant parties is attached at Appendix 10 and an item was also placed upon the South Worcestershire Joint Core Strategy website to publicise the exercise.

- 6.2 The criteria adopted for further sites are:

- Sites capable of development of 5 dwellings or more (or 0.16ha or more to equate to up to 30 dwellings per hectare);
- Previously developed land and buildings comprising land which is or was occupied by a permanent structure including the curtilage of the developed land and any associated fixed surface infrastructure;
- Farm buildings abutting existing settlement boundaries;

- Other sites within category 1 & 2 settlements.
- 6.3 In addition, a desktop survey by officers of brownfield sites revealed a number of potential new sites, mainly within the built up area of the main settlements. In contrast, a number of large greenfield sites on the edge of smaller settlements were revealed and in accordance with the selection criteria, are not deemed appropriate in scale to the size of the settlement. This is an issue that has been addressed in the assessment process.
- 6.4 Information on a considerable number of new sites was received during spring/summer 2009 and new/amended information on land ownership/site boundaries of existing SHLAA sites. Any new sites received after the cut off date of the end of summer 2009 will be assessed within the next update of the SHLAA.
- 6.5 There was a high degree of duplication, with many sites being resubmitted with amended agent information or altered site boundaries. This is because different sections of the same piece of land have been put forward by different agents and land owners and these have all been added separately to the database to ensure that all sites have been captured. However the filtering process will ensure that there has not been any double-counting.
- 6.6 During the refresh of the SHLAA, a very small number of sites have been ruled out due to them having been recently built out. Further constraints such as public rights of way, and the presence of historic monuments on or near sites has been updated. There were a number of sites ruled out that did not go to the Developability Panels due to obvious site constraints such as high flood-risk or because they did not meet with the basic selection criteria set out above. This would include brownfield sites that were remote from any established settlement. The Developability Panels were set up to provide an independent appraisal group of property professionals to assess the suitability of sites for development in terms of viability. Further information about the Panels is set out in Appendix 2 & 3.
- 6.7 Site Appraisal Sheets were completed for all new sites (see Appendix 14). A joint database has been set up with information regarding all sites, which will be regularly updated as and when information becomes available in order to make the assessment dynamic, as advised in the guidance. In addition all sites have been plotted on a joint mapping system which has proved useful for visually identifying broader locations for development and to help identify site overlap and therefore double-counting.
- 6.8 A total of 1,042 sites have been included in the study to date, covering some 5,725 hectares of land. If a crude indicative density figure is used, at 30 dwellings per hectare, these sites could potentially deliver 171,750 dwellings.

Table 5 Distribution of all Sites by District		
Area	No. of sites	Hectares
Malvern Hills	255	1,833
Worcester City	82	559
Wychavon	705	3,283
Total	1,042	5,725

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

Level 1 Sites

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

- Flood Zone 2 or 3 i.e. at high risk of flooding;
- National conservation or wildlife designation constraint;
- High levels of site contamination making them unsuitable for housing development.

6.10 The development of these sites has been generally ruled out, and for the purpose of the SHLAA no more work into establishing developability is being undertaken. Where just a small part of a site is in flood zone 2 or 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 still be suitable) and whether these should be ranked as a level 2 site. A total of 73 sites were categorised as Level 1 sites, leaving 969 level 2 sites to be further assessed. The distribution of the Level 1 sites is shown below:

Table 6 Distribution of Level 1 Sites				
Level 1 sites	Worcester	Wychavon	Malvern Hills	Total
No. of sites	19	35	19	73
Area in hectares	296	87.4	41.76	425.16

Level 2 Sites

6.11 Level 2 sites include all other sites. The following constraints to housing development are recognised, although sites have not generally been excluded on one of these issues alone:

- Green Belt designation;
- Sites outside key settlements /not adjacent to main urban areas;

- Employment sites confirmed as appropriate in the most up to date Employment Land Review;
- High agricultural value (Grade 3a and above);
- Existing community/ health care facilities where no replacement land/ buildings identified;
- Open space/ sport/ recreation sites identified for retention in up to date PPG17 studies and / or Local plans;
- Sites in areas of high landscape value e.g. AONB;
- Sites of local nature importance e.g. Green Space (Worcester) Urban Greenspace (Malvern), Local Wildlife Importance (Wychavon);

6.12 Information on the historic environment and archaeology relating to sites is being gathered from the County Council's Historic Environment and Archaeology Service. They have initially looked at sites in and adjacent to the 7 main urban areas of Worcester, Evesham, Pershore, Droitwich, Malvern, Upton on Severn and Tenbury Wells. Initial appraisals provide a grading of sites by their sensitivity/ significance in terms of historic environment records, and historic landscape character, using an established scoring system. This then gives an overall assessment of Historic Environment Sensitivity. The assessment recognises that for many sites sensitivity may be unknown, and all will require further evaluation should they come forward for development. This work will be done for the villages/more rural sites as work on the SHLAA progresses.

6.13 The distribution of the Level 2 sites is shown in Table 7. The Level 2 sites have been assessed for their suitability for housing, and their availability and achievability. The Site Assessment Form in Appendix 4 shows the information collected for each site.

Table 7 Distribution of Level 2 Sites				
Level 2 sites	Worcester	Wychavon	Malvern Hills	Total
No. of sites	63	670	236	969
Area in hectares	263	3,196	1,791	5250
Potential Yield (average ha x 30dph)	7,890	103,944	53,730	165,564

6.14 Table 8 below shows that of the total of 969 sites that went through to Level 2, most were not in flood zones 2 and 3. 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 no, or extremely 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 uses a general assessment of flood risk. When housing sites come forward for development they will be subject to evidence from a more detailed

Strategic Flood Risk Assessment carried out for South Worcestershire. Planning applications will need individual flood risk assessments where appropriate.

Table 8 Sites by flood zone category (Level 2)		
Flood zone	No. of sites	Hectares
1	902	4,054.87
1 & 2	6	11.34
1 & 3	12	335.73
2	10	198.71
2 & 3	15	265.54
3	22	383
1, 2 & 3	2	1.35
Total	969	5,250

6.15 The table below shows how many sites in the SHLAA were in the Green Belt.

Table 9 All sites in the Green Belt- by Level 1 and 2 sites		
	No. of sites	Hectares
Level 1 sites	3	150
Level 2 sites	72	880
Total	75	1,030

6.16 A thorough trawl of potential sites has been carried out, with 7% of the 1042 sites are in the Green Belt. Sites have not been ruled out at this stage, just because they are in the Green Belt, as their suitability may depend on the results of a Green Belt Review which is being undertaken as part of the Joint Core Strategy by NPA Consultants.

6.17 Some of the sites were also in Areas of Outstanding Natural Beauty (AONB) as shown in table 10 below:

Table 10 All sites in the AONB * - by Level 1 and 2 sites		
	No. of sites	Hectares
Level 1 sites	4	1.68
Level 2 sites	46	178.38
Total	50	180.06

*Malvern Hills AONB and The Cotswolds AONB

6.18 The table below shows the Level 2 sites categorised by whether they are greenfield or brownfield sites:

Table 11 Level 2 sites Greenfield/ Brownfield		
	No. of sites	Hectares
Green field sites	783	4,953.2
Brownfield sites	255	840.2

6.19 As the above table illustrates, there are predominantly more greenfield than brownfield sites. This might be expected in a relatively rural area that has no history of large scale industrial decline, and is an attractive area for residential development.

6.20 Table 12 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, Malvern or Droitwich Spa are in the Strategic Location-Worcester/Malvern/Droitwich Spa even though they may be outside the city/town boundaries.

Table 12 Sites by Strategic Location (Level 2)		
Description of location	No. of sites	Hectares
All other sites	303	1,691.36
Village location	399	1,424.89
Large towns: Tenbury Wells, Upton-upon-Severn, Evesham, Pershore	72	383.49
Strategic location: Worcester, Malvern, Droitwich Spa	184	1,744.93
Central Worcester	11	5.86
Total	969	5,250.53

- 6.21 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 hectarage within strategic locations, generally adjacent to the principal urban areas. It should be noted that site surveys may not have not been completed for the “All other sites” category at this stage where they may lie in an isolated position outside a built up settlement as it is considered that they are not in a sustainable location. In those cases where the sites are brownfield, they may have been examined by officers, but may have been ruled out from the SHLAA due to their isolated location.
- 6.22 As more information has been gathered on the sites as the SHLAA has progressed, other sites have been eliminated, as being unsuitable for housing. Reasons are given in the appendices against each site (see appendix 6). Many were ruled out as being duplicates, having been submitted for the same piece of land but through a different source. Others were eliminated through officers’ knowledge of sites, particularly those sites that have already been through the local plan process in each district, and have constraints, for example as public open space designations in areas where their retention has been justified through Local Plans and related Planning Policy Guidance¹⁷ open space audits. Out of the 969 level 2 sites, a further 163 sites were eliminated due to duplication or PPG¹⁷ reasons.

7. Determining deliverability and developability

7.1 The above analysis gives very basic, unconstrained figures* for the potential amount of housing land. However, in addition to baseline numbers, the SHLAA needs to look at the practicality of the sites in question, as to whether they are likely to be able to deliver houses at all, and if so, in what realistic time frame. The advice contained within SHLAA Practice Guidance: Strategic Housing Land Availability Assessments² puts forward that in order for sites to be developable they must be:

- **Suitable:** the site offers a suitable location for housing development and would contribute to the creation of sustainable mixed communities.
- **Available:** a site is considered available for development when, on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements or landowners. This means that it is controlled by a housing developer, or the land owner has expressed an intention to sell.
- **Achievable:** that there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the ability of the developer to complete the housing over a particular time period.

- 7.2 For those sites that have been suggested by developers, assumptions can be made about the landowner's attitude to development. However for sites identified as part of the desktop analysis, information regarding land ownership and attitude to development has not been very easy to determine at this stage. Although enquiries can be made to the Land Registry for information on land ownership, this may not be available, or may be out of date if sites have not been registered through recent sales (post 1974). Furthermore, the costs of enquiring on so many sites would be prohibitive. The view was therefore taken that Land Registry searches would not be done until sites had been more thoroughly assessed as to their suitability and sustainability to avoid unnecessary costs and work on sites that were not likely to be delivered.
- 7.3 Generally only previously unidentified sites were surveyed as all other sites had been surveyed in recent years as part of the earlier SHLAA reports or the District Local Plan or Urban Capacity Study process. Some sites that did not meet the criteria for selection set out in the methodology have been disregarded as they were not in sustainable locations (Housing Land Availability Assessment- Methodology – April 2007). For example developers and land owners put forward a number of sites that were outside the towns and Category 1-3 villages. Most of these will have been excluded unless they are brown field sites or they are considered to be in strategic locations (e.g. could be related to Worcester growth). In addition a desktop survey identified a number of potential new sites. These potential sites identified by officers relate well in size and location to the existing settlements, being inside or immediately adjacent to the settlement boundary and are in most cases appropriate for the size of the settlement for example, a small well-contained plot for a small settlement. However, this does not assume that such sites should be allocated.

8. South Worcestershire Developability Panels

- 8.1 The three local authorities have conducted a series of developer panels to assess the sites in more detail. Further panels have been held to examine the new sites that have been submitted during 2009. Previous to this, developer panels were conducted during October 2007 and January 2008. Detailed information on the panel members and the methodology of the Developability Panels is given in Appendices 2 & 3.
- 8.2 To date, a total of 610 sites have been through the panel process since the first SHLAA document was produced.
- 8.3 During the SHLAA Update, a total of 188 sites went through the panel process in Oct/Nov 2009. A further 99 sites (52%) were then ruled out. This left 89 sites from the original 188 remaining after the panel deliberations. The remaining 2009 panel sites amount to 284 ha of land, with a potential for 8,115 dwellings (constrained figures). The sites ruled out and the reasons for these are contained in Table 6. It should be noted that some panel sheets will show sites that have been ruled out because they were previously considered to be too small. However, with our new

search during the recent panels in 2009, some sites may have been ruled back in as under the new guidance, there is no longer a windfall allowance.

- 8.4 Those sites put forward in Category 3 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, firstly within and adjacent to the urban areas and then the Category 1 & 2 villages. It is acknowledged that a number of villages may have recently been upgraded to Category 2 settlements because of changes to the services and facilities provided, and therefore it maybe relevant to review those sites within these villages in the next SHLAA update during 2010.
- 8.5 A summary of all the sites remaining after consideration by the developability panels is shown in Table 13. In considering **all** sites that have been through the panel process, from the inception of the document, the following distribution can be summarised:
- The grand total of remaining panel sites equate to 357 sites, totalling 2,139.3ha, with a potential for 58,887 dwellings (using constrained densities);
 - 116 sites are in or adjacent to the main towns, covering 796.7ha, with a potential to deliver 21,106 dwellings;
 - 4 sites are in the defined “strategic locations” at Bevere and edge of Norton, covering 67.9ha with the potential to achieve 1,997 dwellings;
 - 139 sites are in category 1 villages, covering 857ha and with a potential yield for 24,916 dwellings;
 - 70 sites are in category 2 villages, covering 249.2ha and with a potential for 7,285 dwellings.

Brownfield / Greenfield Split

- 8.6 The table below summarises the brownfield/greenfield status of sites. Of the total 343 remaining panel sites, 59 are brownfield (16%) and a further 23 (6.7%) are a mix of brownfield and greenfield, with the majority of sites (275) being greenfield (77%).

Table 13 Panel sites: Brownfield/ Greenfield			
Panel sites remaining	Number of sites	Hectares	Dwellings
Brownfield	59	56.6	2,220
Brownfield/ Greenfield Mix	23	87.57	1,473
Greenfield	275	1,995.13	55,194
Total	357	2,139.3	58,887

8.7 The table below shows a breakdown of brownfield/greenfield sites by town, with the largest number of wholly brownfield sites being in Worcester, as might be expected, with the largest total area in Malvern Hills District.

Table 14 Brownfield/ Greenfield by Town			
Panel sites remaining	Number of sites	Hectares	Dwellings
Droitwich Spa	1	2.17	90
Evesham	9	8.69	416
Malvern	11	17.28	512
Malvern Wells	1	0.76	11
Tenbury	2	4.67	116
Worcester	15	9.09	708
Urban Brownfield Total	39	42.66	1,853
Worcester	1	0.19	8
Urban Brownfield/ Greenfield Mix Total	1	0.19	8
Droitwich Spa	10	186.45	3,555
Evesham	14	150.79	4,861
Malvern	29	261.62	6,559
Malvern Wells	1	6.97	174
Pershore	14	89.46	2,585
Tenbury	2	6.05	151
Worcester	6	52.51	1,360
Greenfield Total	76	753.85	19,245

Panel sites- Availability for development (i.e. those that are remaining after panel deliberations)

8.8 The table below show 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 that these sites are excluded, as information may be forthcoming on such issues at a later date that will mean they may be considered again in the future. The time scales shown for availability are:

- available now;
- 0-5 years;
- 6-10 years;
- 11-15 years, and
- unknown.

8.9 The format of this appraisal is in line with the Government SHLAA guidance. Where information on availability has been put forward by the landowner or developer, the panels have tried to assess how realistic this might be in terms of the need to deliver infrastructure first on some sites, or other constraints such as whether there is more than one owner.

Table 15 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	0	0	186	3,567	2.62	78	0	0	0	0
Evesham	2.9	60	123.2	4,075	1.55	86	3.32	140	28.52	916
Malvern/ Malvern Wells	5.7	205	22.26	673	22.14	719	113.7	3,077	122.82	2,582
Pershore	0	0	67.15	2,077	22.33	508	0	0	0	0
Tenbury	4.6	115	0.48	12	0	0	4.19	104	1.45	36
Worcester	3.94	90	6.62	339	40.14	1,078	0.98	39	10.11	530
Totals	17.14	470	405.7	10,743	88.78	2,469	122.2	3,360	162.9	4,064

8.10 The table above illustrates that of the sites assessed; only 17 hectares of land is considered to be available now within the towns, with a potential yield of 470 dwellings. (N.B. However, this generally excludes existing Local Plan allocations). To be available now, sites would need to offer no constraints to development, so it is not unexpected that this figure is quite low. However a potential of nearly 406 hectares, yielding 10,743 dwellings could be available in 1-5 years. A further 89 hectares, yielding 2,469 dwellings are assessed as available in 6-10 years. Assessments beyond 10 years are obviously more difficult to make but the panels have considered that a further 122 hectares, with a potential yield of 3,360 dwellings could be available in 11-15 years time in the towns. There is a further 163 hectares that is unknown in terms of site availability. This is summarised in the table below.

Table 16 Summary of Towns Availability		
Time period	Hectares	Potential dwellings
Available now	17.14	470
1-5 years	405.7	10,743
6-10 years	88.78	2,469
11-15 years	122.2	3,360
Unknown	162.9	4,064
Total	796.72	21,106

8.11 The assessment of availability of sites in villages is summarised below in Tables 17 and 18 for Category 1 and 2 villages. Immediate availability is fairly modest with the bulk of the land being available within 1-5 years, 6-10 years, and subsequently in for 11-15 years. Generally the SHLAA has not applied any policy constraints to sites, but particularly in the smaller villages, this will be very important in terms of judging the relationship of sites to the village and the open countryside.

Table 17 Category 1 Villages		
Availability	Hectares	Potential dwellings
Available now	54.89	1,576
1-5 years	221.2	5,936
6-10 years	240.77	8,204
11-15 years	240.96	7,225
Unknown	109.22	1,975
Total	867.04	24,916

Table 18 Category 2 Villages		
Availability	Hectares	Potential dwellings
Available now	41.23	1,135
1-5 years	66.33	2,002
6-10 years	40.01	1,148
11-15 years	12.83	625
Unknown	87.87	2,450
Total	248.27	7,360

8.12 The availability of sites from the panels is summarised in Table 19 below. This shows that the majority of land judged to be available now or in 1-5 years is in town locations, (405.7ha of land, potential for 10,743

dwellings). This is expected given that the town locations are the most sustainable and are most likely to have the required infrastructure for development to go ahead. This is followed by sites in and adjacent to Category 1 villages (221 ha of land, 5,936 potential dwellings in 1 to 5 years). However, the largest amount of land where availability is unknown is also in town locations.

Table 19 Summary of availability: Panel Sites					
Availability		Towns	Strategic sites (Bevere, Hindlip etc.)	Category 1 villages	Category 2 villages
Available now	ha	17.14	66.24	54.89	41.23
	dwellings	470	1948	1,576	1,135
1-5 years	ha	405.7	1.65	221.2	66.33
	dwellings	10,743	49	5,936	2,002
6-10 years	ha	88.78	0	240.77	40.01
	dwellings	2,469	0	8,204	1,148
11-15 years	ha	122.2	0	240.96	12.83
	dwellings	3,360	0	7,225	625
Unknown	ha	162.9	0	109.22	87.87
	dwellings	4,064	0	1,975	2,450
Total	ha	796.72	67.89	867.04	248.27
	dwellings	21,106	1,997	24,916	7,360
Grand total	1979.9ha	55,379 potential dwellings			

Discounting on Sites

8.13 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 of constraints on sites, assessments are likely to find that the unconstrained figure is reduced quite substantially, in some cases by up to 50% or 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, although this will depend on the time period under consideration. Thus of the original 1,042 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 357 sites or 34% of the original total. The high original figure will have been skewed further by the fact that 10% of sites were duplications: that is 103 of the original 1,042 sites.

9. Settlement Categorisation

- 9.1 All rural settlements within South Worcestershire are categorised according to the facilities and services contained within them based on the current planning policy framework. This is to provide a comparative measure of the sustainability of settlements. The previous SHLAA document (June & October 2008 editions) used information based upon the settlement categories set out in the relevant development plans i.e. Wychavon and Malvern District Local Plans (sites in Worcester City are unaffected).
- 9.2 In November 2009, the Village Facilities Survey and the Rural Transport Survey was carried out by the Councils to enable the various settlements within the Districts to be set within an updated sustainability hierarchy that could form the basis of the development strategy for the South Worcestershire Joint Core Strategy and subsequent Local Development Framework documents.
- 9.3 Information on the location of sites within the current SHLAA document has been updated using the revised settlement hierarchy, based upon the 2009 survey. As a result of the changes in facilities and services, a number of settlements have been re-categorised and this has resulted in some settlements being upgraded or downgraded in terms of their sustainability. As a consequence, a number of SHLAA sites in or adjacent to former category 3 settlements that have been upgraded to category 2 settlements have not been considered by a SHLAA developability panel. In the light of the categorisation change, it will be necessary to review these sites during the next update. Please refer to Appendix 13 for a summary on how the settlements have been recategorised. **It should be noted that the settlement categorisations are based on a technical exercise, not policy considerations.**

10. Progress and Review

- 10.1 Planning Practice Guidance on SHLAA implementation² (July 2008) suggests that the SHLAA report should be published as part of the approach to public participation on the development plan document. It also says that the planning authority should make it clear that any representations relating to sites in the SHLAA should relate to the plan-making process itself. Therefore, any representations made on the sites outlined in this report will not be considered as part of this report, but may contribute to the plan making process at a later date.
- 10.2 As explained earlier, **this report does not allocate housing sites for development. The South Worcestershire Local Authorities are publishing this report as background evidence to provide information to feed into the South Worcestershire Joint Core Strategy.** Broad locations or strategic sites for the development of housing will be considered through the Joint Core Strategy planning

process. Smaller more detailed site allocations will be made through the Site Allocations & Policies Development Plan Document. Early public consultation on this Development Plan Document commenced in the autumn 2009, and SHLAA sites were publicised as part of the consultation events.

- 10.3 As stated before, information on sites will need to be updated regularly and at least annually if possible. A full re-survey of sites will not be necessary on an annual basis, but information on new sites can be updated and published as necessary. New sites will only be included where they are considered to be in sustainable locations, meet the other criteria outlined in this report, (e.g. in terms of size of site, not in high flood risk area, nor areas of national wildlife importance etc) and information can be provided as to their developability.