

Strategic Housing Land Availability Assessment & Housing Trajectory

2009

2009 Update

The Housing Trajectory and Housing Delivery tables were last updated in 2008 to inform the Examination of the Core Strategy. The Inspector commented in her report that 'that housing land and supply has been subject to thorough examination.....I am satisfied that CBC is able to support its housing trajectory by a robust and credible evidence base. It has identified a fifteen year supply of housing land ... with a sufficient degree of flexibility.'

The current economic circumstances and lack of demand for smaller higher density dwellings were issues also raised by the Inspector. As a result a thorough assessment of housing land supply had to be undertaken. This involved discussions and meetings with developers, RSL's, landowners and other council officers. The result has been revisions to the trajectory, the key changes being;

- reduced numbers on those sites where it is expected that densities will be lower than originally envisaged
- slower delivery on sites
- later start dates for those sites considered difficult to deliver
- the removal of the small site allowance
- lower overall predicted completions over the next few years.

The overall numbers still achieve the targets required by the East of England Plan.

15 Year Supply

The housing trajectory and delivery tables have been updated to reflect this timescale and in fact run to the end of March 2024.

To clarify the housing requirements for Colchester following the publication of the East of England Plan, May 2008;

Minimum to build, 2001 – 2021 (RSS target)	17,100
Additional Core Strategy Plan Period (to 2023)	1,710 (855 pa x 2 years)
Minimum Housing Requirement, 2001-2023	18,810
Additional required for 15 year supply (2024)	885
Total Requirement, 2001 – 2024	19,665
Of which already built, 2001- 31.3.2009	8,169
Minimum still to build to 2024	11,496
 Total Completions projected to 2024	 20,764
Outstanding units at 1.4.2024	1,070
Total Supply 2001 – 2024	21,834

The Core Strategy was prepared to an end date of 2023. To ensure there is a 15 year supply the Housing Trajectory has been extended to March 2024.

A plan showing the sites for the first five years supply will be attached to the Housing Trajectory.

Background

Methodology of SHLAA in relation to Good Practice Guidance

The Strategic Housing Land Availability Assessment (SHLAA) Practice Guidance, produced by Communities and Local Government in July 2007, logically takes one through the steps required in order to produce a compliant SHLAA. These are addressed in turn below, in respect of the Colchester SHLAA, undertaken by Roger Tym & Partners (RTP) and subsequent updates.

The initial Core Strategy and Sustainability Appraisal work was based on the original HLAA (Feb 07). The HLAA was the appropriate evidence for housing capacity at the time that the Core Strategy was being prepared. In light of more recent changes to PPS3 and new guidance on SHLAA it was considered worthwhile to do additional work to ensure that the evidence base was as robust and recent as possible. This provided an update of the original HLAA (Feb 07) which involved more conservative assessments of housing capacity. The revised SHLAA provides a more realistic representation of housing capacity because targeted 'ground-truthing' was undertaken in particular areas. For example, the original HLAA assumed that large areas of land in East Colchester would not be developed due to flood risk, however further investigations in the SHLAA revealed that many developments were being approved and proposed that would address the flood risk and were highly likely to deliver housing during the plan period. 'Ground-truthing' discussions with Colchester DC officers and developers also revealed higher housing delivery expectations in the Garrison and other locations.

The Guidance states that "key stakeholders should be involved at the outset of the Assessment so that they can help shape the approach to be taken" (para. 12). The study methodology involved an initial Stakeholder Workshop. All key stakeholders (including house builders, major landowners/developers, agents, an RSL, statutory bodies, parish councils) were invited to attend this workshop and provide their input into the method used for the study. This included the HBF. Moreover, stakeholders were invited to provide further information throughout the study (including the HBF, who did not respond) and also to attend a second Stakeholder Workshop at which the preliminary findings were presented. This gave people the opportunity to input in advance of the final report. In addition the Council contacted all the major developers in the borough by telephone, email (during Autumn 2007) and at the Major Developers Forum (27.9.07) to discuss what sites they had, their delivery timetables and any constraints they were aware of. For those sites where the developer was not known or did not respond, information was gathered from development control officers who had met with developers and/or their agents or who had knowledge on the ground. The Council can therefore be confident

that the housing delivery information used to inform the SHLAA was factual and accurate. Specific questions were asked about deliverability of the sites. Sufficient flexibility is considered to exist within the Core Strategy and this has been further improved by the signing of statements of common ground enabling the growth area urban extensions to be developed before 2016 if monitoring proves this is necessary. Statements of common ground have also been signed to the effect that if additional housing development is required the growth areas provide appropriate broad locations for additional units (subject to appropriate infrastructure and environmental considerations.) The 'what if' scenarios are therefore considered to be adequately covered.

The Council has consistently taken a conservative approach to housing delivery to ensure that the minimum housing delivery requirements in the East of England Plan can be achieved with a high level of confidence. In summary the Borough Council has based housing capacity and delivery on the following conservative evidence:

- Housing capacity was based on the original HLAA (Feb 07) which involved more conservative assumptions than the SHLAA (Nov 07).
- Housing capacity was based on the default scenario rather than the 'scenario a' which involved higher density around transit corridors, even though the later is supported in the Core Strategy.
- Colchester BC excluded categories of housing capacity in the HLAA which could not be delivered with high confidence, including the 'windfall on employment land' and 'other windfall' categories.
- Furthermore, Colchester BC assumed that 10% of this housing capacity may not be realised due to unforeseen circumstances.

Methodology

Stage 1: Planning the Assessment:

CBC chose to put the original SHLAA study out to tender because of the substantial amount of work that was required, in particular the fieldwork, in order to complete the study. The study was project managed in such a way that CBC officers were effectively part of the consultant team, inputting on every aspect of the study. The overall management of the study was undertaken by CBC officers. Several iterations of presentations to stakeholders, interim reports and draft final reports were produced before the final version in order to ensure the highest quality of evidence.

Stage 2: Determining which sources of sites will be included in the Assessment

Figure 4 in the Guidance lists the types of sites that the Assessment should cover. All of these were included with the exception of free-standing settlements. As stated in the Guidance, this should normally have been identified by the RSS but was not, so was excluded.

In reality, some of the sources in the list did not yield any potential. However, the opportunity to bring forward such sites was in place through the Call for Sites process. In addition, when visiting sites, the consultants also looked for other unidentified opportunities elsewhere in the area.

Stage 3: Desktop review of existing information

This was undertaken and the list of sources in Figure 5 is compared to the approach taken in Table 5.1 of the SHLAA.

Stage 4: Determining which sites and areas will be surveyed

All sites identified in the desk-top review, and not eliminated by fundamental constraints, were visited. As stated above, the site survey enabled other sites to be identified on the ground.

The process for determining which sites had fundamental constraints is explained in the SHLAA at paras. 8.1-8.4.

The approach taken has been as thorough as is necessary for a borough such as Colchester. It has to plan for significant levels of growth (being a designated Growth Point) and the expectation is that much of this will be on large sites. Despite this, a threshold of just 0.2ha is used, with this reducing to 0.1ha in areas of very high or high public transport accessibility. This led to nearly 1,600 sites being identified. The borough is dominated by Colchester town rather than consisting of a number of smaller rural settlements. If it were a rural district then the Guidance states that all possible sites must be identified. Clearly in Colchester town, this is not possible.

As per the Guidance, mapping was also used to identify areas of potential, with a particular focus on town and district centres (the methodology identified the distance of each site from the nearest centre), principal public transport corridors (using the corridors identified in the emerging Core Strategy), specific locations within settlements (regeneration areas including the Garrison and the Hythe) and specific locations outside settlements (through the Register of Surplus Public Sector Land – para 7.8-7.10 of the SHLAA).

Stage 5: Carrying out the survey

The SHLAA database, as a minimum, records all the information required in the Practice Guidance.

Stage 6: Estimating the housing potential of each site

This used the housing densities put forward in the then emerging Core Strategy. It adopts a mid-point in each range of densities and it is made clear in the report that the total capacity identified represents the midpoint density of each site. So in reality, the density on any given site could be higher or lower.

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

Stage 7a: Assessing suitability for housing

The guidance lists all the criteria that could make a site unsuitable. All these are covered by the SHLAA, as explained in Chapter 5 and at the start of Chapter 8.

Stage 7b: Assessing availability for housing

All sites put forward as part of the Call for Sites provided information about the availability for development. Other sites identified by the consultants or put forward separately were investigated to determine their availability using the

best information available. Para 9.2 of the SHLAA states that actions to permit housing delivery may be required. This reflects the fact that the assessment has been based on the best information available, and inevitably there will be circumstances that will arise on some sites that could not be foreseen. For example, sites are sometimes contaminated even if they do not show up on the Contaminated Land Register. This cannot be known until a full contamination survey is undertaken.

Stage 7c: Assessing achievability for housing

This was undertaken in the SHLAA through consultation with developers of larger site proposals. Site discussions were had at the first Stakeholder Workshop (on methodology) and developers were subsequently contacted to provide more information where necessary on cost and delivery. In respect of market factors, discussions with developers revealed no problems at the time in completing and selling housing in the borough. This reflected the buoyant economic conditions at the time. On smaller sites, the assessment made was a judgement made by the consultants. However, analysis of past delivery of small sites meant that there was little to suggest that smaller sites could not come forward.

Stage 7d: Overcoming constraints

Table 5.2 in the SHLAA lists the range of constraints considered on each site. These address, as a minimum, all the factors listed in the Guidance. This was factored into the consideration of the potential for each site to come forward.

It is also worth noting here that all possible sites have been subjected to the same assessment of suitability, availability and achievability. This includes site allocations from the Local Plan, outline planning permissions and full planning permissions.

Stage 8: Review of the Assessment

The trajectory analysis of the sites has been undertaken by CBC and updated annually.

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

The analysis in the SHLAA demonstrates that further sites need to be found and that both sites on the edge of existing settlements and broad locations were considered.

Stage 10: Determining the housing potential of windfall (where justified)

For the purpose of clarification, the SHLAA does not include any windfall allowance on large sites. The term 'windfall' has been used in the SHLAA report in respect of large sites. However, it is used in the context of identified sites rather than making any allowance for unidentified potential. Therefore, its use in Table 9.2 for the headings "Potential windfalls on empl allocs" and "Other potential windfalls" should be read by excluding the word 'windfall' from both headings. This can be revised in updates to the SHLAA.

Previous versions of the Housing Trajectory included a small site allowance based on historical trends and information held on small sites taken from the

planning register and Urban Capacity Study. The small site allowance has now been removed for the first ten years of housing supply. Instead the small sites have been individually listed in the trajectory. The last five years however does include an allowance of 100 units as more sites are expected to come forward.

Chapter 7 of the SHLAA provides the justification for using a small site allowance. It is worth adding that further guidance provided by the Planning Advisory Service¹ emphasises what windfalls might consist of. It refers to the footnote to p.19 of PPS3, which states that windfall sites could include, for example, "...small sites such as a residential conversion or a new flat over a shop." Clearly it is almost impossible to identify such opportunities yet they are still happening in Colchester, as shown in Table 7.1 of the SHLAA.

An annual allowance of 100 dwellings has previously been included in the housing supply figures for development on small sites/sites not individually listed in the trajectory or delivery tables. This is a very conservative figure given the numbers developed on such sites in recent years. The details of these are as follows;

- 2000/1 – 440
- 2001/2 – 125
- 2002/3 – 140
- 2003/4 – 194
- 2004/5 – 138
- 2005/6 – 116
- 2006/7 – 132
- 2007/8 – 112
- 2008/9 - 166

¹ Planning Advisory Service (2008) *Strategic Housing Land Availability Assessment and Development Plan Document Preparation*, for Planning Advisory Service

