



## **Derby Housing Market Area**

# **Strategic Housing Land Availability Assessment**

## **Overview**

**May 2010**

# **1 Derby Housing Market Area Strategic Housing Land Availability Assessment**

## **Introduction**

- 1.1 This report provides an overview of the preparation of the Strategic Housing Land Availability Assessment (SHLAA) for the Derby Housing Market Area (HMA). It was prepared at the request of the Derby HMA Local Housing Partnership (LHP) to assist in the process of seeking its endorsement of the SHLAA.
- 1.2 Section 2 of the overview below, sets out details of the background to the preparation of the SHLAA, including the requirement for local authorities to prepare SHLAAs in national planning policy guidance, the housing provision requirements of the East Midlands Regional Plan, local planning policies relevant to the assessment, and the need for undertaking a joint SHLAA across the HMA as a whole.
- 1.3 Section 3 provides a summary of the SHLAA methodology, which was endorsed at the start of the process by the Derby HMA LHP. A summary is provided of each of the 8 key stages which have been followed in the methodology and assessment process. Key issues are highlighted which have required further consideration and agreement by the SHLAA Sub-Group and where it has been necessary to seek further advice particularly from Planning Officers Society Enterprises (POS).
- 1.4 Section 4 provides a summary of the key findings of the SHLAA in terms of the land supply position and housing trajectories for the three local authorities, taking into account all the main sources of supply including sites identified as deliverable or developable in the SHLAA. A similar assessment is also provided for the Derby Principal Urban Area (PUA) and HMA as a whole. Section 5 provides details of the next steps in taking the SHLAA forward.
- 1.5 Full details of the SHLAA are available on Derbyshire County Council's website at the link below. This includes the Main Report, which incorporates an Introduction, the Methodology and the Land Supply and Housing Trajectories in Amber Valley, Derby City, South Derbyshire, the PUA and HMA as a whole; Appendices; and detailed assessments and plans for every SHLAA site in each of the three local authority areas.

[http://www.derbyshire.gov.uk/environment/land\\_premises/land\\_availability/SHLAA/default.asp?SuggestedLink=Derby%20Housing%20Market%20Area%20Strategic%20Housing%20Land%20Availability%20Assessment](http://www.derbyshire.gov.uk/environment/land_premises/land_availability/SHLAA/default.asp?SuggestedLink=Derby%20Housing%20Market%20Area%20Strategic%20Housing%20Land%20Availability%20Assessment)

## **2 Background to Preparation of the SHLAA**

- 2.1 A SHLAA is a process which identifies land with potential for future housing development. The preparation of a SHLAA is a Government requirement of local authorities to enable them to identify sufficient land to meet the housing needs of their area for at least 15 years of the development plan period. The Government requires that local authorities should regularly update and review their SHLAAs, which are seen as a key part of the evidence base underpinning the preparation of local authority Local Development Frameworks (LDFs).
- 2.2 It is important to note that the SHLAA is not an allocations document nor does it come to any conclusions as to whether sites will be granted permission or allocated. Site allocations will be made through local authority Core Strategies and Site Allocations Development Plan Documents. The SHLAA is a mechanism to identify sites with potential for housing; assess their potential in more detail; and assess when sites are likely to be developed and for how many dwellings.
- 2.3 This is the first SHLAA which has been prepared for the whole of the Derby HMA, which comprises the three local authority areas of Amber Valley Borough, Derby City and South Derbyshire District. In 2007, a SHLAA was commissioned and undertaken by Atkins consultants for the Derby PUA but more recent Government guidance requires SHLAAs to be prepared jointly or collaboratively by local authorities across whole Housing Market Areas.

### **Planning Policy Background**

#### *National Policy*

- 2.4 Government planning policy guidance on the need for local authorities to prepare SHLAAs was initially set out in Planning Policy Statement 3: Housing (PPS3) (November 2006). However, more detailed guidance was published by Communities and Local Government (CLG) in July 2007 in 'Strategic Housing Land Availability Assessments: Practice Guidance', which sets out a detailed methodology for carrying out a SHLAA. Key stages in this methodology require local authorities to assess the suitability, availability and achievability of sites for housing. The process involves the identification of constraints to development and an assessment of how these constraints can be overcome. From this assessment, local authorities are required to make judgements on whether sites are deliverable, developable or not currently developable.
- 2.5 This SHLAA for the Derby HMA has been undertaken in accordance with CLG's Practice Guidance but has been refined where necessary to reflect local circumstances.
- 2.6 Section 2 of the main SHLAA report sets out in detail the eight key stages which have been followed in preparing the assessment. All of

the key stages followed in the assessment are consistent with those set out in CLG's Practice Guidance.

### *Regional Policy*

- 2.7 The housing provision requirements for the Derby HMA are set out in the East Midlands Regional Plan. The Plan requires that between 2006 and 2026, a minimum of 36,600 dwellings should be provided across the whole of the Derby HMA, comprising 10,200 in Amber Valley, 14,400 in Derby City and 12,000 in South Derbyshire. The Plan further requires that at least 21,400 dwellings (58%) of the overall HMA total should be provided within or adjoining the Derby PUA, with the remainder of the provision to be provided mainly in and around the four main towns of Alfreton, Belper, Heanor and Ripley in Amber Valley and Swadlincote in South Derbyshire, including sustainable urban extensions as necessary.

### *Local Policy*

- 2.8 Saved adopted Local Plans are still relevant in Amber Valley, Derby City and South Derbyshire. The Amber Valley Local Plan was adopted in April 2006 and most of the policies in the Plan have been saved by Direction of the Secretary of State (SOS) until they are replaced by the Borough Council's Local Development Framework (LDF). The Plan includes a number of major housing allocations such as at Radbourne Lane, Mackworth.
- 2.9 The City of Derby Local Plan was adopted in January 2006 and most of the policies in the Plan have been saved by Direction of the Secretary of State until they are replaced by new ones as part of the City Council's LDF. The Plan includes a number of major allocations for housing development expected to be delivered beyond 2011.
- 2.10 The South Derbyshire Local Plan was adopted in 1998. The District Council's Local Plan Review was abandoned in 2006 due to the threat of legal challenge. However, the Secretary of State issued a Direction in September 2007 which saved most of the policies in the adopted Local Plan until such time as they are superseded by new policies in the District Council's LDF. A conjoined inquiry was held between May 2007 and January 2008 into applications for several major housing developments, which has had a major bearing on housing provision in the District. The SOS's decision on the inquiry was published in January 2009 in which planning permission was granted for three of the sites at Boulton Moor (1058 dwellings), Highfields Farm (1200 dwellings) and Stenson Fields (500 dwellings). Together these sites total 2,758 dwellings, which the SOS considered would be sufficient to meet the District's five year housing supply needs.

## **Need for Undertaking a Joint Assessment and Relationship with Emerging Local Development Frameworks**

- 2.11 Two factors have influenced the need for a SHLAA to be prepared for the Derby HMA as a whole. Firstly, although a SHLAA has previously been undertaken for the Derby PUA, Government advice in PPS3 and its Practice Guidance advocate the need for SHLAAs to be prepared collaboratively between local authorities and stakeholders covering whole housing market areas. Secondly, the three local authorities of Amber Valley, Derby City and South Derbyshire are currently preparing aligned Core Strategies to an agreed common timetable. The three authorities have also been working collaboratively to compile the evidence base to support the Core Strategy preparation. As the SHLAA is a key piece of evidence to inform the Core Strategies, both of these factors have given rise for the need for a joint SHLAA to be prepared for the Derby HMA.

### **3 SHLAA Methodology**

#### **The Need for a Partnership Approach and Joint Working**

- 3.1 CLG's Practice Guidance advocates a partnership approach to the preparation of SHLAAs, which should involve key stakeholders including house builders, social landlords, local property agents and local communities.
- 3.2 To meet this requirement, the SHLAA has been overseen by the Derby HMA LHP, which is made up of representatives from a wide spectrum of public and private sector organisations. The LHP endorsed the SHLAA methodology in September 2008 and endorsed the final findings of the SHLAA, subject to minor amendments, on 25 May 2010.
- 3.3 A SHLAA Sub-Group was established under the direction of the LHP, to take forward and oversee the more detailed work of the SHLAA, including developing the SHLAA methodology. The Sub-Group has also considered and agreed various detailed assumptions made in the SHLAA process such as the site size threshold to be applied and how sites within the Green Belt would be treated.
- 3.4 A small team of officers from the four partner local planning authorities has largely been responsible for undertaking the detailed day-to-day work in the SHLAA, particularly carrying out the detailed analysis of each site to assess their deliverability and developability. A Derby HMA Core Strategy Coordination Group has been established to take forward preparation of the three local authority Core Strategies, which has also been consulted throughout the SHLAA process to advise on and, where necessary, agree details of the SHLAA process.
- 3.5 Additional advice on the SHLAA process has been taken on board from Planning Officers Society Enterprises (POS), through its learning and dissemination workshops, particularly regarding key issues of the approach to be taken to Green Belt sites and the market viability and capacity testing of sites. Following POS advice and to assist this process, a Market Viability and Capacity Workshop was organised by the officers of the four local planning authorities in July 2009. Invitees to the event comprised representatives from various key public and private sector bodies and organisations, particularly representatives from a number of major house builders and property agents who were active in the HMA. Key outcomes and conclusions from the workshop have been applied in the assessment of the achievability of sites.

#### **The Detailed Methodology**

- 3.6 CLG's Practice Guidance requires that there should be five key outputs from a SHLAA:

- A list of sites with potential for housing, cross-referenced to maps showing locations and boundaries of specific sites;
- An assessment of the deliverability and developability of each site in terms of its suitability, availability and achievability;
- The potential quantity of housing that could be delivered on each site;
- Information on the constraints of identified sites;
- Recommendations on how the constraints can be overcome and when.

3.7 These key outputs have been produced in the preparation of the Derby HMA SHLAA (see Table 1 at the end of this Section).

3.8 CLG's Practice Guidance sets out in detail the key stages which should be followed in preparing the SHLAA. These key stages have been followed consistently in the methodology and preparation of the Derby HMA SHLAA with some minor refinements where necessary to reflect local circumstances in the HMA. Details are set out as appropriate below.

### **Stage 1: Site Identification**

3.9 The starting point for the SHLAA process was for officers from the three local authorities to identify sites for housing. There were two main sources - sites currently within the planning process and other sources of information.

3.10 Sites within the planning process included sites allocated for housing in adopted development plans or Supplementary Planning Documents; sites with extant planning permission; sites with permission and subject to Section 106 Agreements; and sites allocated for employment use or other land uses considered suitable for housing development.

3.11 Other sources of information used included sites identified or promoted in the Derby PUA SHLAA; sites identified for residential or employment uses in the Derby Cityscape Masterplan; sites included in the National Land Use Database or Brownfield Land Action Plan; sites identified in previous Urban Capacity Studies; sites which would have potential to be sustainable urban extensions to the built up area of Derby City; other sites currently being promoted or previously promoted for housing development in local plans or other plans; and other underused or vacant land and buildings.

3.12 A 'Call for Sites' consultation was undertaken by officers of each of the three local authorities between August and September 2008. Organisations, companies and individuals who were known by the

authorities to have an interest in housing land supply were contacted directly and additionally, the Call for Sites was advertised on each local authority's website. Respondents promoting sites were provided with a pro-forma and asked to provide as much detail about their site as possible, particularly about any constraints affecting the site; an estimation of the number of dwellings which could be accommodated; and when the dwellings might be developed i.e. within 5 years, 5 to 10 years, 10 to 15 years or beyond 15 years. Sites being promoted after the Call for Sites, were also accepted and included through the assessment process. Any sites which were promoted after the point where it was no longer practical to include them in the current assessment have been filed for inclusion in the next SHLAA review.

- 3.13 This consultation exercise generated the submission of over 600 sites across the HMA. Together with sites identified in the other two main sources above, a total of over 800 sites were identified for consideration across the HMA as a whole. A database was developed by officers to record the information on each site in each of the three authorities. Each site was given a reference number and the boundary of each site was plotted on a GIS.
- 3.14 At this stage a key issue in the process was to decide which sites would and would not be included in the SHLAA. CLG's Practice Guidance advises that certain types of land or areas may be excluded from the assessment but where this is the case, these need to be justified and agree by the Partnership. The Practice Guidance suggests, however, that except for more clear cut designations such as Sites of Special Scientific Interest (SSSIs) the scope of the assessment should not be narrowed down by existing policies designed to constrain development.
- 3.15 A number of types of site were initially agreed as being excluded from the assessment in the methodology endorsed by the LHP, because of their special protection. This included sites which are protected as wildlife sites, Sites of Importance for Nature Conservation and SSSIs; internationally or nationally important wildlife sites; and sites which are in use as public open space or allotments unless these have been promoted for development.
- 3.16 As the SHLAA progressed, however, more detailed consideration was also required on a number of other issues as set out below.

#### *Site Size Threshold*

- 3.17 A site size threshold of 10 dwellings or 0.3ha was agreed in the final SHLAA methodology. This threshold was made clear on the Call for Sites advertisement sent out by the three local authorities. The assessment process has been carried out in the three local authority areas on the basis of the agreed threshold.



- 3.18 However, largely due to the rural nature of the area in South Derbyshire, a significant number of sites under the threshold were submitted for consideration. The site size threshold issue was therefore raised with the SHLAA Sub-group at its meeting on 27 March 2009, when it was agreed that these smaller sites should not be included in the assessment for South Derbyshire of the potential land supply in the area unless insufficient land on larger sites had been identified to meet the District's Regional Plan housing requirements. Sufficient land has been identified in the assessment on larger sites above the threshold to meet the District's housing requirements and therefore these small sites have not been included in the assessment. A list of these sites, however, has been identified separately in Appendix 12 of the SHLAA.

#### *Green Belt Sites*

- 3.19 The approach to Green Belt sites has been a major issue in the SHLAA process. The East Midlands Regional Plan does not envisage any major strategic review of the Nottingham-Derby Green Belt in that part of the Green Belt within the Derby HMA. However, the Regional Plan does acknowledge that in certain areas identified for growth, such as around the Amber Valley towns, development in the Green Belt may be necessary provided this avoids the most sensitive areas of Green Belt.
- 3.20 When the SHLAA methodology was originally agreed by the LHP, it was determined that Green Belt sites would be considered in the SHLAA process but would be ruled out as unacceptable due to the stringent policy constraints in the Regional Plan. Advice was sought on this issue from Planning Officers Society Enterprises (POS) in December 2008, which confirmed that this approach in the methodology was correct and that it would be appropriate to assess Green Belt sites but to give them a zero capacity because of their national policy protection. However, POS advised that this approach should be subject to the three local authorities demonstrating that adequate land was available on non-Green Belt sites to meet the Regional Plan housing requirements. If this wasn't the case then it would be appropriate to consider the capacity for new housing on Green Belt sites.
- 3.21 The Green Belt issue was therefore raised with the SHLAA Sub-Group at its meeting on 27 March 2009, which endorsed the approach advocated by POS. As the SHLAA subsequently progressed it became more apparent that in Amber Valley there was a likelihood that Green Belt sites may need to be considered to meet the Borough's housing requirements in the Regional Plan. The issue was therefore raised again with the SHLAA Sub-Group at its meeting in September 2009 in the context of the endorsement of the SHLAA Glossary and Definitions (see below). In this context, it was agreed by the Sub-Group that the approach to be taken in Amber valley would be that all alternatives would be explored to meet the Borough's housing requirements on non-Green Belt sites but should Green Belt release be necessary, it

was agreed that in terms of the definitions set out in the Glossary, sites in the less sensitive areas of Green Belt around the four main towns in the Borough would be considered as being 'potentially suitable' for development, subject to a review in the Borough Council's LDF process. Green Belt sites in Derby City and South Derbyshire have been considered as being not suitable and have been given a zero capacity.

### *Sustainable Urban Extensions*

- 3.22 The East Midlands Regional Plan requires that to meet the housing provision requirements in the Derby HMA, there is a need for sustainable urban extensions (SUEs) to Derby City, the four main towns in Amber Valley of Alfreton, Belper, Heanor and Ripley and Swadlincote in South Derbyshire. The Plan requires the three local authorities to work together to identify the most appropriate locations to meet these requirements.
- 3.23 The agreed SHLAA methodology considered that there was scope to consider SUEs in the assessment both in terms of specific sites and broad locations. However, the SHLAA Sub-Group agreed at its meeting on 27 March 2009 that broad locations should not be included in the assessment unless adequate long term supply could not be achieved through the identification of specific sites.
- 3.24 Accordingly, specific sites promoted in the SHLAA, which are considered to form SUEs to the Derby PUA, the four main towns in Amber Valley and Swadlincote in South Derbyshire, have been assessed as being suitable or potentially suitable for development, provided the sites are not covered by any national policy constraints which would deem them as being not suitable.
- 3.25 Since the SHLAA was commenced, the decision of the Secretary of State (SOS) was published in January 2009 on the conjoined public inquiry into applications for several major housing developments in South Derbyshire. The SOS granted planning permission for three of the sites at Boulton Moor, Highfields Farm and Stenson Fields, which together provided for over 2,750 dwellings. These sites have been promoted and included in the SHLAA.
- 3.26 Derby City Council has recently commissioned consultants on behalf of the three local authorities to undertake a sustainable urban extensions and strategic sites study of major sites identified in the SHLAA in and around the Derby PUA, the four main Amber Valley towns and Swadlincote in South Derbyshire. The study will look in detail at these potential SUEs and strategic sites, assessing them against a range of social, environmental and economic considerations, including viability and infrastructure requirements. Plans showing these sites are included in Appendix 13, 14 and 15 on the SHLAA website.

## **Stage 2: Desktop Assessment**

- 3.27 Having determined which sites would be included in the SHLAA, a desktop assessment of existing information sources was undertaken by officers of the three authorities to provide as much background information on each site as possible. A pro-forma was designed to record this information. Information was obtained from a wide variety of sources such as planning applications, details of site allocations in local plans, details from development briefs, details provided on sites in the Derby PUA SHLAA, Ordnance Survey maps, aerial photographs, the National Land Use Database and vacant property registers. The Call for Sites consultation also required promoters of sites to submit as much background information as possible on their sites, including the number of dwellings that they thought would be delivered and the time periods which they would be built over.

## **Stage 3: Site Surveys**

- 3.28 Because over 800 sites had been identified in the SHLAA across the HMA as a whole, it was considered impractical for officers of the three authorities to carry out site surveys of every site. Consequently, it was agreed by officers that only newly identified sites would be visited and surveyed by officers. Other sites which were previously known about in the planning process, such as sites with planning permission and allocations, were not visited unless it was considered necessary as a result of any changes in circumstances. Meetings with stakeholders, for example Derby Cityscape and Derby Homes, were also organised to gather site information and inform the assessments.
- 3.29 A pro-forma was designed by officers to ensure that information collected on site visits was recorded across the three authorities on a consistent basis. A wide range of characteristics on each site was recorded such as the current use of the site, access arrangements, flood risk, public transport provision, proximity to nearby services, physical constraints, surrounding land uses and relevant policy constraints.

## **Stage 4: Assessment of Housing Potential of Each Site**

- 3.30 A number of different methods have been applied in the SHLAA process to assess the likely number of houses that could be developed on each site.
- 3.31 For sites with planning permission, the dwelling numbers and densities applied to the permitted scheme have been used in the assessment. As part of their ongoing monitoring processes, officers of the three local authorities have contacted all applicants and / or agents who have major sites with extant permission for information on the likely

implementation of the permissions and / or have used historical development knowledge to compile expected house building trajectories. This information has been used to inform the assessment of the deliverability and developability of sites.

- 3.32 For allocated sites in saved local plans and other planning policy documents, the dwelling numbers and densities of sites in these plans have been used where possible.
- 3.33 The Call for Sites consultation required site promoters to provide an estimation of the number of dwellings that could be accommodated on their sites and when these were likely to be developed. Where these assessments have been considered robust the numbers of dwellings and their delivery timescale has been applied in the assessment. Where officers have considered these estimations to be unrealistic, an assessment has been made by officers based on the nature of the area in which the site is located. As a minimum, 30 dwellings per ha has been applied to these sites but densities have been adjusted depending on whether the site is within an urban area, on the edge of an urban area or within or on the edge of a rural settlement.
- 3.34 The assessment process has been further informed by a Market Viability / Capacity event which was organised by the four partner local authorities. The event took place on 13 July 2009 at The Quad in Derby and was attended by representatives from the planning and housing departments of the four partner authorities, Derby Cityscape and major house builders and property agents active in the Derby HMA. The panel of representatives discussed a wide range of issues including general issues of market viability and capacity in the HMA and viability and capacity issues on specific sites in different types of location in the HMA including Derby City Centre, PUA extensions and brownfield and greenfield sites within and on the edge of settlements in Amber Valley and South Derbyshire. Further details of the event are provided in paragraphs 3.50 to 3.52 below.

### **Assessment of the Deliverability and Developability of sites**

- 3.35 A crucial part of the assessment process is to determine the deliverability and developability of sites. CLGs Practice Guidance provides advice on the factors which need to be taken into account to determine if a site is deliverable or developable. It sets out that these depend on judgements whether a site is suitable for housing, is available for housing and is achievable for housing. The Guidance provides details on how these are defined. The way these factors have been defined and applied in this SHLAA is virtually the same as set out in CLG's Practice Guidance but the definitions have been refined where necessary to reflect local circumstances in the HMA, particularly relating to the Green Belt issue.

- 3.36 A Glossary was therefore produced which sets out how these factors have been interpreted in the assessment. The Glossary was initially drafted by officers and was then considered and agreed subject to minor amendments by the Derby HMA Core Strategy Coordination Group. The Glossary was then circulated to members of the SHLAA Sub-Group in September 2009 for comments and endorsement.
- 3.37 The Glossary therefore indicates that to be considered deliverable, a site must be available now, offer a suitable location for housing development now and there should be a reasonable prospect that housing will be delivered on the site within five years. In essence, deliverable sites form the five year supply for each authority. The interpretation of deliverability is basically the same as in CLG's Practice Guidance. To be considered developable, a site should be in a suitable location for housing development and there should be a reasonable prospect that it will be available for housing and could be developed at a specific point in time. In essence, sites which have been deemed developable form the fifteen year supply. Again, this interpretation is basically the same as in CLG's Practice Guidance. These interpretations depend on an assessment of whether the site is considered to be suitable, available or achievable.

### **Suitability**

- 3.38 The issue of the definition of suitability has required careful consideration in the SHLAA, particularly in relation to the Green Belt issue outlined above. A site has been considered to be suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. In assessing the suitability of sites, consideration has been given to a number of factors including planning and corporate policy restrictions; physical problems or limitations such as flood risk, pollution, contamination, access or infrastructure; potential impacts particularly on townscape or landscape; and environmental conditions for future residents of any dwellings built on the site.
- 3.39 As much information on these factors has been obtained from the desktop assessment, the Call for Sites and the site surveys. Other sources of information have also been used such as Derbyshire County Council's Accession Model, which provides data on the accessibility of sites by walking, cycling and public transport to key essential services such as GP surgeries, pharmacies, post offices, primary schools, secondary schools, supermarkets and convenience stores.
- 3.40 In the site assessment process, it has been considered in the case of some of the large sites, that these sites may have the potential to accommodate new purpose built key services and facilities on site through Section 106 contributions where planning obligations might be required to meet the needs of new residents.

- 3.41 Having taken account of all the factors above, sites in the assessment have been defined as 'suitable', 'not suitable' or 'potentially suitable'. Sites which have extant planning permission for residential uses or sites which are allocated for uses including residential have automatically been considered suitable as long as factors affecting their suitability have not changed since permission was granted. Other sites have also been classed as suitable for residential development where this has been justified on the basis of the full range of evidence, including a site's location, policy restrictions, physical and environmental conditions and potential impacts. This is fully in line with CLG Practice Guidance.
- 3.42 A site has been considered to be not suitable for residential development if it would have an unacceptable adverse impact on interests of national or international importance (e.g. SSSIs), lies within flood zone 3b or is otherwise in a location which has been shown to be unsustainable on the basis of a full range of evidence.
- 3.43 As outlined above, a key consideration has been Green Belt sites and whether these should be considered suitable or not. Green Belt sites in Derby City and South Derbyshire have been assessed as being not suitable for development in the context of the policy restriction in the East Midlands Regional Plan. In Amber Valley, however, sites in the less sensitive areas of Green Belt around the four main towns have been considered as potentially suitable for development in the context of the policy approach to Green Belt in the Regional Plan and subject to a policy review in the LDF process.
- 3.44 Sites which do not clearly fall within the categories of being suitable or not suitable have been classed as 'potentially suitable'. This is because more information is required on these sites and particularly because constraints have been identified which need to be overcome in order for the site to be considered as suitable for development. Sites which have been classed as potentially suitable cannot form part of the 5 or 15 year land supply of deliverable or developable dwellings.

### **Availability**

- 3.45 To be considered available for development sites must have no known legal or ownership problems which need to be overcome to develop the site such as multiple ownerships, ransom strips, tenancies or operational requirements. Sites with planning permission do not necessarily mean that the site is available as planning applications can be submitted by persons on land which they do not own so care has been taken in assessing these sites. Details of ownership have been obtained from a variety of sources, primarily through the desktop assessment and through the Call for Sites consultation, where promoters of sites were requested to provide details of who owned the

site and if there were any ownership constraints affecting the site and if so, how these could be overcome.

### **Achievability**

- 3.46 A site is considered to be achievable for housing where there is a realistic prospect that housing will be delivered on the site at a particular time. This means that the site must be economically viable and that the developer has the capacity to develop the site over a certain time period. Factors affecting achievability include economic and market factors, cost relating to any physical constraints or potential planning obligations. CLG's Practice Guidance recommends that the involvement of house builders and property agents should inform the assessment of achievability.
- 3.47 A key consideration for officers on this issue was whether consultants should be engaged to undertake the market viability and capacity testing of sites in the SHLAA. When the SHLAA methodology was originally agreed by the LHP in September 2008, it was envisaged that consultants might need to be engaged to undertake this work. However, given that over 800 sites had been identified across the HMA, a key consideration was the potential cost of commissioning a study of such a large number of sites and the length of time it would be likely to take, given procurement procedures, interviewing procedures and having engaged consultants, the time it would take to assess such a large number of sites.
- 3.48 Advice on this issue was therefore sought from POS in December 2008. POS advised that a rigorous and detailed process of market viability and capacity testing was not necessary or required and that a 'broad' assessment approach would be sufficient. Further investigation into this issue by officers revealed that a common approach to this issue taken by many local authorities across the country was for market viability and capacity testing to be carried out by a Local Housing Partnership together with other representatives from the property and development industry.
- 3.49 Officers considered therefore that a similar approach would be appropriate in the Derby HMA SHLAA and that a possible way forward would be to organise an event or workshop with members of the LHP and representatives from the local property and development industry. This issue was raised with the SHLAA Sub-Group at its meeting on 27 March 2009 at which the approach above was agreed as the most appropriate way of undertaking the assessment.
- 3.50 A market viability and capacity event was therefore organised by officers on 13 July 2009 at the Quad in Derby. A panel of representatives from the public and private sector were invited to the event, which included planning and housing officers from the four local

authorities, officers from Derby Cityscape and representatives from a number of major house builders, property developers/agents and consultants active in the HMA.

- 3.51 To ensure impartiality, the event was chaired by an officer from Erewash Borough Council. Given that the event could only take place over one day, it was considered essential that the output from the event was maximised. A key consideration was how over 800 sites could be considered at the event. It was decided by offers that this was totally impractical and therefore it was agreed that the event should be split into three main themes which included the state of the local housing market; general market viability / capacity issues; and market viability / capacity issues on specific sites. In the latter session, 23 specific sites were discussed in detail in a range of different locations in Derby City, Amber Valley and South Derbyshire including both brownfield and greenfield sites and were chosen to represent examples of development viability reflecting the full range of issues such as flood risk, infrastructure, contamination etc, which affects development in local areas.
- 3.52 By adopting this approach of considering general viability and capacity issues and then issues on specific sites, it was considered that the panel's conclusions on these themes could then be applied more widely across the HMA to the assessment of sites of a similar nature or in a similar location. Full details of the event are provided in Appendix 5 and 6 on the SHLAA website.

### **Stage 5: Overcoming Constraints**

- 3.53 For every site identified in the SHLAA a number of key constraints were identified and assessed including planning policy, environmental, physical, utilities, access and ownership constraints. Information on constraints was obtained from a wide variety of sources and an assessment was made on each site on how these constraints could be overcome, such as through the need for new infrastructure, the need to resolve ownership constraints, the need for environmental improvement or the need to amend planning policy which was currently restricting development. In some cases, the extent of potential constraints was not known. For example, some sites had the possibility of being contaminated through previous or existing uses. Ascertaining the full extent of possible contamination was deemed too costly and time consuming so the possibility of the constraint was identified through the assessment.

### **Key Definitions**

- 3.54 Taking into account all of the factors detailed above regarding the deliverability and developability of sites and the definition and interpretation of sites in terms of their suitability, availability and



achievability, all sites in the assessment have been categorised in the assessment as follows:

**Five Year Supply (Deliverable Sites) – Sites are available, suitable and achievable within five years.**

**Fifteen Year Supply (Developable Sites) – Sites are suitable and will be available and achievable at a certain point in time (developable sites automatically include deliverable sites).**

**Other Sites – Sites which are suitable or potentially suitable but it is not currently known if they will become developable. These sites are not within the five or fifteen year supply.**

**Not Suitable – Not within the five or fifteen year supply. (not developable)**

- 3.55 The above definitions and the reasoning behind them have been included in the Glossary at the beginning of the main SHLAA report. As indicated above, the Glossary was circulated to the SHLAA Sub-Group for comments and endorsement prior to being finalised and included in the main report.

#### **Stage 6: Review of Assessment**

- 3.56 Once the assessments for every site in the SHLAA were complete and as much information was collected as possible, the assessments were reviewed for robustness, amended where necessary and then used to provide a conclusion on the deliverability and developability of each site based on the key definitions above. From this the housing potential of each site was determined to produce a potential land supply and indicative housing trajectory which sets out how much housing can be provided and at what point in time. A land supply and trajectory was initially produced for the three individual local authority areas of Amber Valley, Derby City and South Derbyshire. Having completed these it was then possible to produce the land supply positions and housing trajectories for the Derby PUA and the HMA as a whole. Full details of the land supply and trajectories for each local authority, the PUA and HMA are provided in Sections 3, 4, 5 and 6 of the main SHLAA report on the website. A summary of the key findings is provided below.
- 3.57 At this stage in the process, CLG's Practice Guidance suggests that if any shortfalls in supply have been identified following the assessment, it may be necessary to seek further sites in broad locations or review the assumptions of housing potential for sites to attempt to remedy the shortfall. This is considered in more detail below.

#### **Stage 7: Need for Broad Locations**

- 3.58 CLG's Practice Guidance suggests that it might be necessary for local authorities to identify broad locations with housing potential within the assessment where specific sites cannot be identified. However, in terms of the assessment, specific sustainable urban extension sites have only been included if they have previously been granted planning permission, such as the South Derbyshire conjoined inquiry sites, have previously been identified in saved local plans or have been promoted in the Call for Sites. Broad locations have not been identified in the SHLAA as more than sufficient specific sustainable urban extension sites have been identified in the assessment. The possibility of the existence of other potentially strategic sites or broad locations is being investigated through a separate Sustainable Urban Extensions and Strategic Sites Study referred to in paragraph 3.26 above.

### **Stage 8: Need for Windfalls**

- 3.59 Government advice in PPS3 sets out a clear expectation that the supply of housing land should be based upon specific sites and, where necessary, broad locations. It states that allowances for windfalls should not be included in the first 10 years of land supply unless there is evidence of genuine local circumstances that prevents specific sites being identified. As indicated above, more than sufficient specific sites have been identified in the three local authority areas in the assessment and therefore in accordance with Government guidance, a windfall allowance has not been included in the land supply assessment for the first 10 years of the supply period.

### **Outputs, Reporting and Monitoring**

- 3.60 As indicated in paragraph 3.6 above, Government Practice Guidance requires that there should be five key outputs from a SHLAA. Table 1 below sets out these requirements and assesses how they have been met in this SHLAA.

**Table 1: CLG Core Outputs**

<b>CLG's Core Outputs</b>	<b>Derby HMA SHLAA</b>
1) A list of sites with potential for housing, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary).	A database of all sites included within this SHLAA has been developed and all sites have been given a unique reference number. All sites have been plotted on a GIS together with their corresponding site reference number. Each individual assessment and a set of maps are available in the main assessment on the SHLAA website.
2) An assessment of the deliverability / developability of each identified site in terms of its suitability, availability and achievability to determine when an identified site is realistically expected to be developed.	All sites in the assessment have been assessed with regard to their suitability, availability and achievability and conclusions reached on their deliverability and developability, together with an assessment

	of when they are likely to come forward for development. These assessments have been based on a detailed analysis of each site against a set of criteria identified on the site assessment pro-forma shown in Appendix 7.
3) The potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (if this can be justified).	The capacity of each site has been assessed on an individual basis using information obtained from a variety of sources including planning permissions, local plans, development briefs, area action plans and masterplans where appropriate; capacity estimates provided by site promoters in the Call for Sites; and from discussions and conclusions of the Market Viability and Capacity Event Panel (detailed in Appendix 6).
4) Information on the constraints of identified sites.	Information on constraints has been obtained from a number of sources including from the desktop assessment, individual site surveys, the Call for Sites, the Accession model and officer knowledge where appropriate. This information has been recorded on the SHLAA database and included on the Site Assessment pro-forma as shown in Appendix 7. More detailed work is ongoing which will look at specific constraints.
5) Recommendations on how the constraints can be overcome and when.	An assessment of how identified constraints can be overcome on sites has been made on the Site Assessment Pro-forma shown in Appendix 7.

3.61 CLG's Practice Guidance also sets out the basic process which local planning authorities are expected to follow in carrying out the SHLAA. Table 2 below assesses these requirements and how they have been met in this SHLAA.

**Table 2: CLG Process Checklist**

<b>CLG's Core Outputs</b>	<b>Derby HMA SHLAA</b>
1) The survey and assessment process should involve key stakeholders including house builders, social landlords, local property agents and local communities	The partnership and joint working approach to preparing this SHLAA is set out in Section 2. A Local Housing Partnership was established at the outset to oversee and endorse the SHLAA. A SHLAA Sub-Group was also established to oversee and agree the more detailed work, including developing the SHLAA methodology which was subsequently endorsed by the LHP. The Call for Sites process drew responses and submissions from many public and private sector organisations, groups and individuals, including house builders and landowners. Consultation has been undertaken with

	<p>applicants having extant permissions for housing to assess their intentions for implementing their permissions and the likely timescale. The Market Viability / Capacity Event Panel provided important information on the viability and capacity of specific sites and on general viability and capacity issues, which has been used to inform the assessment of the achievability of developing all the sites in the SHLAA.</p>
<p>2) The methods, assumptions, judgements and findings should be discussed and agreed upon throughout the process in an open and transparent way.</p>	<p>The methodology for the SHLAA has been developed through the SHLAA Sub-Group and endorsed by the LHP. The Sub-Group has helped address, advise and agree on specific assumptions and judgements made in the SHLAA, such as which sites are included and those which are not; site size thresholds; the treatment of the sites within the Green Belt; and the need to consider broad locations. The Sub-Group has endorsed the key definitions of deliverability, developability, suitability, availability and achievability used in the assessment process. The Derby HMA Core Strategy Coordination Group has also advised on key issues and assumptions made in the SHLAA process. Further advice on the methodology has been obtained from POS and an event was held in July 2009 with key public and private sector representatives, including house builders and property agents, to discuss key issues about the market viability and capacity of sites in the HMA.</p> <p>The results and findings of the SHLAA were presented to the Local Housing Partnership for consideration and endorsement.</p>

## **4 Key Findings of SHLAA: Land Supply and Trajectories**

- 4.1 Having followed the key stages in the SHLAA methodology summarised above, assessments were made by officers of the deliverability and developability of each site. These assessments enabled officers to calculate the overall land supply and housing trajectory in each of the three local planning authority areas of Amber Valley, Derby City and South Derbyshire. Details of the land supply and trajectories for each local authority are provided in Sections 3, 4 and 5 of the main SHLAA report on the website.
- 4.2 The analysis for each local authority area provides details of the number of dwellings expected to be delivered on sites defined as being 'suitable' in years 1-5, 6-10, 11-15 and 15 years onwards. Details of other relevant sites are provided, which includes other potentially suitable sites and sites which are considered suitable but are unlikely to be delivered. The latter particularly includes sites which have extant planning permission but which are considered unlikely to be implemented. Finally, an assessment is provided of the total land supply of deliverable dwellings (5 year supply) and developable dwellings (15 year supply) and whether these sources of supply are on brownfield, greenfield or a mix of brownfield and greenfield land.
- 4.3 In this context, it should be noted that in the document 'Regional Spatial Strategy and Local Development Framework Core Output Indicators Update 2/2008', CLG requires the 5 year supply to be calculated starting at the April after the current monitoring year (April 2010) and the 15 year supply to be set out to include the current monitoring year commencing in April 2009.

### **Land Supply and Trajectory in Amber Valley**

- 4.4 Section 3 of the main SHLAA document provides a summary of the land supply position in Amber Valley. The Regional Plan requires that a total of 10,200 dwellings (510 p.a.) should be developed in the Borough between 2006 and 2026. Since April 2006, 1,417 dwellings have been completed in the Borough and a further 257 dwellings are forecast to be completed within the current monitoring period, leaving a remaining requirement for an additional 8,526 dwellings (533 p.a.) to be provided between 2010/11 and 2025/26.
- 4.5 The SHLAA has identified a deliverable dwelling supply of 815 dwellings and a developable supply of 2,399 dwellings in the Borough (the developable supply includes the deliverable supply). Section 3.6 of the main report, provides details of the housing trajectory and 5 and 15 year housing supply for the Borough. This indicates that taking into account sites identified as deliverable in the SHLAA, planning permissions and allocations, the total deliverable land supply of 815 dwellings would be adequate to meet 1.5 years of the Regional Plan requirement. The developable supply (15 year supply), which includes

sites identified as developable in the SHLAA, windfalls (post 2019) and losses, is 3,599 dwellings. Overall the trajectory shows that to meet the Regional Plan requirement of 10,200 dwellings by 2026, a further 2,383 dwellings will need to be identified beyond the current developable supply in the Borough.

- 4.6 The Regional Spatial Strategy for the East Midlands proposes that the majority of housing growth for Amber Valley to 2026 should be located in or around the existing built up areas of Alfreton, Belper, Heanor and Ripley. The majority of sites suggested through the SHLAA reflect the location of this proposed spatial growth for the existing towns. A small number of sites, some of which are relatively large, have been suggested in smaller settlements and rural areas, along with sites which will be considered as potential Sustainable Urban Extensions to Derby (see below).
- 4.7 As well as the deliverable and developable sites, land has been submitted with the potential for up to 38,074 dwellings on potentially suitable sites, which are to be considered for future housing needs. The majority of these sites are greenfield, with only 1,078 dwellings expected to be provided on brownfield sites. All of these sites will be considered through the LDF process to assess whether they provide the best sites on which to locate the required housing.
- 4.8 A number of major sites have been identified in the Borough with potential for housing and included in the SHLAA as follows:

<u>Site</u>	<u>No. Dwellings</u>
Derby Road, Alfreton	520
Mansfield Road, Alfreton	600
Birchwood Lane, Somercotes	680
Lilly Street Farm, Alfreton	1430
Derby Road, Swanwick	660
Hermitage Farm, Slack Lane, Riddings	2000
Nottingham Road, Ripley	930
Alfreton Road, Codnor	550
Codnor Common, Codnor	1600
Heage Road to Upper Marehay, Ripley	3000
Far Laund, Belper	1080
Mill Lane/Kilburn Road, Belper	820
Cinderhill, Denby	1300
Newlands, Heanor	4000
Hardy Barn, Heanor	795
Markeaton Stones, Derby	2000
Radbourne Lane, Derby	4860

- 4.9 These sites are currently subject to more detailed assessment as part of the Derby HMA Sustainable Urban Extensions and Strategic Sites Study, which is being undertaken by consultants.

## Land Supply and Trajectory in Derby City

- 4.10 Section 4 of the main SHLAA report provides a summary of the land supply position in Derby City. The Regional Plan requires that a total of 14,400 dwellings (720 p.a.) should be developed in Derby City between 2006 and 2026. Since April 2006, 2,632 dwellings have been completed in the City and a further 277 completions are forecast to be completed within the current monitoring period, leaving a remaining requirement for an additional 11,491 dwellings (718pa) to be provided between 2010/11 and 2025/26.
- 4.11 The SHLAA has identified a deliverable supply of 3,883 dwellings and a developable supply of 8,007 dwellings in the City (the developable supply includes the deliverable supply). Section 4.6 of the main SHLAA report provides details of the housing trajectory and the 5 and 15 year housing supply for the City. This indicates that taking into account sites identified as deliverable in the SHLAA, permissions on small sites and estimated losses, there is a total land supply of 4,073 dwellings deliverable in the 5 year supply, which would adequate to meet 5.7 years of the Regional Plan residual requirement. The developable supply (15 year supply), which includes sites identified as developable in the SHLAA, permissions on small sites, windfalls (post 2019) and estimated losses, is 8,875 dwellings. Overall, the trajectory shows that to meet the Regional Plan requirement of 14,400 dwellings by 2026, a further 4528 dwellings will need to be identified beyond the current developable supply in the City.
- 4.12 Derby City's urban nature, proportion of previously developed land and need for regeneration makes it considerably different to the other two districts in the Housing Market Area. There are a high number of known sites with development potential which have been identified through earlier plans, previous Local Plan allocations and discussions with developers. There are also large areas with regeneration opportunities including locations in and around the City Centre and the Osmaston area which have been subject to a degree of masterplanning to date.
- 4.13 The fact that Derby City Council is now developing a new Core Strategy which will be growth led and depend on a considerable amount of new housing has meant that a number of greenfield sites have been promoted through the SHLAA. The opportunity of policy review has seen some sites put forward which currently lie within green wedges. Three sites have also been promoted which cross the Derby-South Derbyshire boundary.
- 4.14 The sites promoted range from those which could provide small infill to significant strategic sites that could potentially deliver hundreds of dwellings (see below).

- 4.15 Of the 14,400 dwellings which the RSS requires to be provided as a minimum between 2006 and 2026, the SHLAA total potential supply for Derby City is 20,752 of which 2,632 have already been built between 2006 and 2009. Some of these sites are committed and some still need to be identified through the Core Strategy and Site Allocations Development Plan Document.
- 4.16 A number of major sites have been identified in the City with potential for housing development and included in the SHLAA as follows:

<u>Site</u>	<u>No. Dwellings</u>
Wragley Way	300
Pastures Hospital Extension	164
Hackwood Farm	980
Moorway Lane Green Wedge	1000
Rykneld Road	980
Chaddesden Sidings	1000
Osmaston Triangle	2500
City Centre (excluding Friar Gate Station)	2500
Boulton Moor	1200
Friar Gate Station	650
Manor/Kingsway Hospital	700

- 4.17 It should be noted that some of these sites straddle the administrative boundary between Derby City and South Derbyshire. The sites have been split up into their constituent parts and associated dwelling numbers which fall within each local authority area to avoid double counting. As above, these sites are currently subject to more detailed assessment as part of the Derby HMA Sustainable Urban Extensions and Strategic Sites Study, which is being undertaken by consultants.

### **Land Supply and Trajectory in South Derbyshire**

- 4.18 Section 5 of the main SHLAA report provides a summary of the land supply position in South Derbyshire. The Regional Plan requires that a total of 12,000 dwellings (600 pa) should be developed in the District between 2006 and 2026. Since April 2006, 1,618 dwellings have been completed in the District and a further 383 completions are forecast to be completed within the current monitoring period, leaving a requirement for an additional 9,999 dwellings (625 pa) to be provided between 2010/11 and 2025/26.
- 4.19 The SHLAA has identified a deliverable supply of 3,165 dwellings and a developable supply of 4,346 dwellings in the District (the developable supply includes the deliverable supply). Section 5.6 of the main SHLAA report, provides details of the housing trajectory and the 5 and 15 year housing supply for the District. This indicates that, taking into account sites identified as deliverable in the SHLAA, permissions on small sites and estimated losses, there is estimated to be a total deliverable



supply (5 year supply) of 3,475 dwellings, which would be adequate to meet 5.56 years of the Regional Plan residual housing requirement for the District. The developable supply (15 year supply) which includes sites identified as developable in the SHLAA, permissions on small sites and estimated losses, is 4,596 dwellings. Overall, the trajectory shows that to meet the Regional Plan housing requirement of 12,000 dwellings by 2026, a further 5796 dwellings will be required to be provided beyond the current developable supply in the District.

- 4.20 In South Derbyshire the submission of sites related quite well to the East Midlands Regional Plan requirements, with many sites in the PUA and at Swadlincote. Further to these there were also a significant number of sites submitted in more rural areas, including Hilton, Aston-on-Trent, Repton and near to the administrative boundary at Burton-upon-Trent.
- 4.21 Sites of all sizes were submitted to the District Council. However, officers have filtered out those of less than 0.3ha in size. These will be kept on record but were not deemed appropriate to be fully assessed in the SHLAA. The majority of sites submitted were on greenfield land, as is to be expected given the nature of the many large scale urban extensions submitted for the District Council's consideration. As well as the deliverable and developable sites there was land submitted for 43,197 dwellings on potentially suitable sites and there is a further supply of 101 dwellings on suitable sites where the delivery is unknown. All of these sites will be considered through the LDF process as to whether they provide the best sites on which to locate the required housing.
- 4.22 A number of major sites have been identified in the District with potential for housing and included in the SHLAA as follows:

<u>Site</u>	<u>No. Dwellings</u>
Wragley Way	1000
Stenson Fields (east of Railway Line)	500
Stenson Fields (west of Railway Line)	3000
Pastures Hospital Extension	2602
Newhouse Farm	2128
Hackwood Farm	2040
Boulton Moor Site 1	700
Boulton Moor Site 2	1058
Aston on Trent sites	1740
Stenson Fields (east of Railway)	413
Highfields Farm	1200
Highfields Farm Extension	1850
South West of Chellaston	2140
Repton	1229
North East of Burton	1392
Drakelow Power Station	2239

Sites West of Swadlincote	950
Land South of Church Street	374
Woodville AAP site	800
Butt Farm	400
Goseley Hill Estate Sites	1231
Sites at Hilton	3194
Mount Pleasant Extension	492

- 4.23 It should be noted that as in the case of Derby City above, some of these sites straddle the administrative boundary between Derby City and South Derbyshire. The sites have been split up into their constituent parts and associated dwelling numbers which fall within each local authority area to avoid double counting. As with Amber Valley and Derby City, these sites are currently subject to more detailed assessment as part of the Derby HMA Sustainable Urban Extensions and Strategic Sites Study, which is being undertaken by consultants.

### **Land Supply and Trajectory in Principal Urban Area and Housing Market Area as a Whole**

- 4.24 Finally, Section 6 of the main SHLAA report provides a summary of the land supply position in the PUA and HMA as a whole. The Regional Plan requires that a total of 21,400 dwellings (1,070 p.a.) should be developed in the PUA between 2006 and 2026. Since April 2006, 2,640 dwellings have been completed in the PUA and a further 277 dwellings are forecast to be completed within the current monitoring period, leaving a requirement for an additional 18,483 dwellings (1,155 p.a.) to be provided between 2010/11 and 2025/26.
- 4.25 The SHLAA has identified a deliverable supply of 6,031 dwellings and a developable supply of 11,463 dwellings (the developable supply includes the deliverable supply). It is not considered appropriate to calculate a five and fifteen year land supply for the PUA, however, paragraph 6.8 of the main SHLAA document sets out details of the potential developable supply of dwellings which includes completions since 2006, developable dwellings identified in the SHLAA and other potentially suitable brownfield, greenfield and mix of brownfield and greenfield sites identified in the SHLAA. The total potential supply from these sources is calculated to be 48,598 dwellings.
- 4.26 For the HMA as a whole, the Regional Plan requires a total of 36,600 dwellings (1,830 p.a.) to be provided between 2006 and 2026. Since 2006, 5,667 dwellings have been completed in the HMA and a further 917 dwellings are forecast to be built in the current monitoring period, leaving a requirement for an additional 30,016 dwellings (1,876 p.a.) to be provided between 2010/11 and 2025/26.
- 4.27 The SHLAA has identified a deliverable supply of 7,863 dwellings and a developable supply of 14,752 dwellings in the HMA as a whole (the

developable supply includes the deliverable supply). Similar to the PUA, it is not considered appropriate to calculate a five and fifteen year land supply for the HMA, however, paragraph 6.16 of the main SHLAA report sets out details of the potential developable supply of dwellings which includes completions since 2006, developable dwellings identified in the SHLAA and other potentially suitable brownfield, greenfield and mix of brownfield and greenfield sites identified in the SHLAA. The total potential supply from these sources is calculated to be 111,904 dwellings.

## **5 Next Steps**

- 5.1 The purpose of this overview was to assist in the process of seeking comments on, and endorsement of, the Derby HMA SHLAA from the Derby LHP. Comments made by the LHP have been taken into account and amendments made to the assessment where necessary in finalising the SHLAA.
- 5.2 Because the SHLAA is not a one off study and should be reviewed regularly, any other interested parties will be able to send comments on the assessment to the relevant local authority. They can suggest changes to the assessments that have been made, indicate other sites which they feel should be included or make general comments about the methodology. Although there is no formal consultation period for the SHLAA, the assessment will then be updated to take any relevant representations on board and to include the most up to date information. A revised assessment will be published before the submission of the Core Strategies for each local authority which are programmed to take place in June 2011.