

JOB NUMBER: 5074648.1525.001			DOCUMENT REF: Lancaster City Council SHLAA		
1	Methodology Review	LT	DB	LT	29/05/08
		Originated	Reviewed	Authorised	Date
Revision	Purpose	ATKINS			

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1.0 Background

- 1.1 Lancaster City Council (LCC) produced their draft methodology and approach for undertaking a Strategic Housing Land Availability Assessment (SHLAA) in January 2008. Atkins Limited (Atkins) and Lambert Smith Hampton (LSH) have been commissioned to undertake an independent review of the Draft Methodology prior to the commencement of the study by LCC in June 2008. The methodology and approach was developed in accordance with the SHLAA Practice Guidance issued by the Department of Communities and Local Government in July 2007 (DCLG Practice Guidance).
- 1.2 The Regional Spatial Strategy for the North West (RSS 13)¹ requires that the Lancaster District provides 400 dwellings per annum. Planning Policy Statement 3 'Housing' (PPS3)² requires that through their Local Development Documents, Local Authorities identify at least a 15 year supply of housing. Based on the RSS figure, this equates to a total of approximately 6,000 new dwellings over a 15 year period. The SHLAA will seek to determine where these new dwellings will be accommodated.
- 1.3 This report sets out details of Atkins and LSH's comments and recommendations on LCC's Draft Methodology.

2.0 Agreement of Key Assumptions

- 2.1 A number of key assumptions should be agreed at the methodology stage of the SHLAA. Atkins recommends that the following are considered:
- The exclusion from the Assessment of any sites which are currently designated for use as public open space unless specific oversupply issues exist;
 - The exclusion of sites which are wholly covered by nature conservation designations;
 - The exclusion of sites which are located within Flood Risk Zone 3 (1:100 year floodplain); and
 - The exclusion of sites currently in use for education purposes unless directed by Lancashire County Council's Education Department that the land is proposed for disposal.
- 2.2 It is recommended that current and emerging thresholds for existing and proposed S106 Contributions are agreed at the outset of the Assessment. This should include triggers

¹ 2003

² 2005

for public open space, affordable housing, primary school provision, secondary school place contributions etc. This information will be crucial when determining the housing potential of each site under Stage 6 of the Assessment as areas of land may need to be deducted from the overall site area to accommodate such provisions.

3.0 Consultation

3.1 Atkins believes that early consultation is key to undertaking a SHLAA. This ensures that sufficient time is made available to obtain all relevant information from statutory consultees and that all key stakeholders are involved in the process. Not only does this ensure the collection of accurate and detailed information, but it also ensures transparency and adds to the robustness of the Assessment.

3.2 A Stakeholder Partnership has been set up by LCC for the SHLAA. The Partnership comprises developers/organisations who expressed an interest in participating in a housing forum for the Lancaster District. The forum includes various house builders, representatives from English Partnerships, the North West Regional Assembly and the Government Office for the North West, the North West Housing Board and key Officers from various departments within LCC. The methodology proposes to consult with all members of the forum throughout the Assessment and key dates have been built into the SHLAA programme for doing this. Atkins recommends that during the finalisation of the methodology, LCC consider whether any other, appropriate bodies should be invited to join the forum. This may include:

- Representatives from neighbouring Authorities (South Lakeland District Council, Craven District Council Ribble Valley Borough Council and Wyre Borough Council);
- Representatives from LCC Housing Services;
- Representatives from the Lancaster & Morecambe Vision (particularly when considering potential employment to residential sites); and
- Representatives from other Urban Regeneration Forums/Partnerships.

3.3 Consultation with neighbouring Authorities will be useful if there are any sites which lie adjacent to, or straddle, District/Borough boundaries. If this is the case, such sites may need to be considered in conjunction with the neighbouring Authorities. This may also be the case if cluster sites are identified which may be developed in tandem and which may involve sites within more than one authority. It may therefore be appropriate to invite the relevant Authority to join the forum once any such sites have been identified.

- 3.4 Representatives from LCC's Housing Services department will be able to provide advice on their requirement's for housing within the Lancaster District and may also be able to identify specific housing renewal sites and initiatives which may need to be taken into account as part of the Assessment. Due to the role of such groups, it would also be beneficial to them to be involved in such a process so that they are fully aware of the potential future supply of dwellings within the Lancaster District and can therefore plan accordingly to meet their own objectives.
- 3.5 Atkins also recommends that LCC build into their SHLAA programme a period of consultation with key Statutory Undertakers and Consultees to obtain information regarding the provision of services to potential housing sites within the Lancaster District and identify problem areas or areas/sites with significant restrictions. This may include:
- National Grid (gas and electrical supply);
 - United Utilities (electricity & water supply);
 - E-on (electricity supply);
 - The Highways Agency;
 - Lancashire County Council Highway's Department; and
 - Lancashire County Council (land for disposal and school capacity levels).
- 3.6 Due to the number of sites likely to be involved in the Assessment, it is considered appropriate that information is gained at a general level from the utilities and service providers operating within the Lancaster District. This would enable any problem areas to be identified. Information can be obtained at a general level but it may also be appropriate to provide grid references for significant sites (e.g. sites capable of accommodating over 100/150 dwellings) in order to obtain more detailed information. Obtaining information from such services providers can take a significant length of time and so it is recommended that such discussions should commence as early as possible in the study. Such information can prove useful in determining the viability of sites under Stage 7 of the Assessment particularly where costs may need to be factored in for the provision of a new sub-station or other such contributions.
- 3.7 The involvement of representative's from the Highways Agency (HA) and Lancaster County Council's Highways Department at an early stage could provide invaluable information on specific sites, in particular sites identified for large-scale residential development. The HA and Lancashire County Council Highways Officers will have detailed knowledge of the road network throughout the Lancaster District and will be able to provide key advice on which roads are at or nearing capacity and where improvements are required. The HA will also be able to provide information on planned upgrades to the trunk road network. This will be particularly important for locations/areas where capacity may have been reached and therefore upgrades may be required (by

either the HA/Lancashire County Council or through developer contributions) before new residential development would be deemed acceptable. Such information will prove invaluable when determining the suitability and viability of sites under Stage 7 of the Assessment.

3.8 Consultation with Lancashire County Council's Education Department may be appropriate to identify whether the County Council has any identified programme for the disposal of surplus education land which may be suitable for inclusion within the Assessment. LCC may also consider that it is appropriate to obtain information from Lancashire County Council regarding primary and secondary school place capacity across the Lancaster District. Such information will provide details of where shortfalls in capacity may exist. This may have significant effects for future housing provision and can be taken into account when allocating sites through the LDF process through relevant provision in policies and development briefs. Such information may again prove important when determining the suitability and viability of sites under Stage 7 of the Assessment, particularly where land may need to be provided on a site for a new primary school or financial contributions may be required.

4.0 Advertising the SHLAA & Undertaking a Call for Sites

4.1 Atkins recommends that the undertaking of the SHLAA is advertised in the following ways:

- Through a press release on LCC's website. This could include a summary advert on the Home page detailing the launch of the SHLAA and links to further information on the LDF pages;
- Through a public notice in the local newspaper, the Lancaster Guardian;
- Through an advertisement in the Estates Gazette; and
- Direct mailing of Pro Forma to key stakeholders and known developer interests, including all parties in the SHLAA Partnership. This would also include all parties known to LSH as having interests in the area.

4.2 Each of these four mediums would provide a robust method of reaching a significant number of potential landowners/developers. The Estates Gazette will reach the type of audience already in the development field such as major landowners and developers, whilst the Lancaster Guardian will provide a method for reaching local landowners and potentially smaller developers. An example of the type of press release which Atkins has successfully utilised previously is attached at Appendix A.

- 4.3 Atkins and LSH have obtained costs for placing adverts in both the Lancaster Guardian and the Estates Gazette. The cost for an advert in the Lancaster Gazette would be approximately £405 plus VAT for a 15cm by 9cm advert. For an eighth of a page advert in the Estates Gazette, the cost would be approximately £500-600 plus VAT. The Lancaster Guardian is published weekly on a Friday and adverts must be submitted by noon on the Wednesday before. The Estates Gazette is a weekly publication and will require the advert 8 days prior to the publication date. A full list of prices for the Estates Gazette is attached at Appendix B.
- 4.4 LCC have designed a draft 'Pro Forma' document which landowners/developers can complete if they wish to put forward sites to be considered for inclusion within the SHLAA. All four advertising mediums can provide a link to this document to allow interested parties to download it from the Council's Website. It is recommended that a period of 21 days is provided for interested parties to put forwards any sites for consideration. This may need to be extended dependant upon the date of publication of the adverts in the Lancaster Guardian and the Estates Gazette. LCC would need to nominate a specific Officer, or set up a separate e-mail account as the 'post box' for Pro Forma submitted electronically.
- 4.5 Having reviewed the draft Pro Forma document produced by LCC, we would make the following comments/suggestions:
- 1) Under the explanatory text at the beginning of the pro-forma, we would recommend the inclusion of the following text:

Please submit information on sites that:

- Are likely to come forward for development/redevelopment in the next 15-20 years;
- Have a minimum site area of 0.15ha or are capable of accommodating at least 4 dwellings; and/or
- Are within, or straddle the Lancaster District.

Please do not submit information on sites that:

- Are allocated for residential development in Section 2 of the Lancaster Local Plan; and/or
- Already have planning permission for residential development, unless a new and different proposal is likely in the future.

- 2) It would be useful to provide a tick box response section for the role of the person submitting the response in order to gain the maximum possible information. An example is provided below.

What is Your Interest In the Land?	Please Tick
Land Agent	<input type="checkbox"/>
Registered Social Landlord	<input type="checkbox"/>
Planning Consultant	<input type="checkbox"/>
Developer	<input type="checkbox"/>
Land Owner	<input type="checkbox"/>
Other	<input type="checkbox"/>

- 3) It would be helpful to add a question asking ‘where are the nearest services/public transport?’
- 4) The Pro Forma asks whether there are any potential physical or economic constraints or sustainability issues. To ensure that detailed and consistent responses are obtained and to make it easier to complete, it may be useful to add a tick box and then leave room for other comments. An example is provided below:

Are there any Sustainability Issues, Physical, Environmental Economic Constraints which May Hinder the Development of the Site	Please Tick
Environmental Constraints (e.g. SSSI/Ecological Designations/Flood Plain,)	<input type="checkbox"/>
Conservation Designations (e.g. Conservation Areas/ Listed Buildings on the Site)	<input type="checkbox"/>
Physical Constraints (e.g. Topography, Contaminated Land)	<input type="checkbox"/>
Planning Policy Constraints (e.g. Allocated for Non-Housing Uses)	<input type="checkbox"/>
Site Located at a Distance from Basic Services, e.g. Bus routes, local shops etc	<input type="checkbox"/>
High Remediation Costs, Highway Improvements etc	<input type="checkbox"/>
If You Have Ticked ‘Yes’ to Any of the Above, Please Provide Details:	

- 4.6 The more accurate the information collected at the early stages, the more informed the decisions made at the later stages will be. For example, the clearer and more detailed the information collected during Stages 3-6, the better-informed Stages 7-8 will be.

5.0 Desktop Review

5.1 In addition to the documents listed within the methodology, Atkins also advises that the following documents are also reviewed during the desk-top assessment as they may indicate additional potential sites or provide other important baseline information:

- Lancashire Local Transport Plan;
- Lancaster & Morecambe Access & Transport Strategy;
- Lancaster Parks & Open Space Strategy;
- South Lakeland Local Plan & emerging LDF documents;
- Craven Local Plan and emerging LDF documents;
- Ribble Valley Local Plan and emerging LDF documents;
- Wyre Local Plan and emerging LDF documents;
- Historic Demolitions data for the Lancaster District; and
- Historic windfall data for the Lancaster District.

5.2 It is considered that the review of the above documents, combined with those set out in the methodology would ensure that a robust desk-top assessment is completed and that all potential sources of supply identifiable through this method are known. Important background information in respect of infrastructure etc may also be obtained.

6.0 Windfall Sites, Losses & Demolitions

6.1 The methodology sets out a wide range of types of housing sources to be included within the Assessment. The methodology does not however include consideration of Windfall sites during the initial assessment but refers to it as an additional consideration if deemed necessary at the end of the Assessment. Atkins considers that this source of supply should be included within the Assessment.

6.2 Windfall sites are defined by PPS 3 as those sites *'which have not been specifically identified as available in the Local Plan process...they 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 residential conversions or a new flat over a shop'*.

6.3 PPS3 advises that allowances for Windfalls should not be included in the first 10 years of land supply unless LPAs can provide robust evidence of genuine local circumstances that prevent specific sites being identified. However, the guidance accepts that Windfall contributions may be included in the 10 year plus supply.

- 6.4 Windfall contributions are always likely to come forward, whether on small or large sites. Even with a detailed and robust SHLAA identification of sites, it is highly likely that additional sites will come forward which could not be predicted by the Assessment. For example completions from the conversion of existing large dwellings houses or the re-development of a site where a business has unexpectedly closed. It is therefore considered prudent that windfalls are considered as part of the Assessment. An assessment should be made as to the contribution which Windfall sites have historically made to the housing supply in Lancaster. A decision can then be made as to whether it is appropriate to include windfall contributions in the 10 year plus supply. Once the Assessment is complete, it may be deemed by LCC that sufficient supply exists from identified sites and therefore LCC may take a decision not to include Windfall contributions in the Assessment. Conversely, if historic data demonstrates that the annual contribution from windfalls within the District is significant, LCC may decide to include a contribution in the 10 year plus supply/trajectory.
- 6.5 If it is deemed appropriate to include Windfalls within the housing supply, it is recommended that an estimate of likely annual supply is made based on Windfall completions over the past 5-10 years. It would then be appropriate to allow a percentage reduction in the figure (e.g. 10%). This would give an overall, cautious approach to the likely Windfall contributions.
- 6.6 Even if Windfalls are not included as a contribution to overall supply, their consideration adds another level of robustness to the Assessment. This is because it can be demonstrated that historic data and intelligence has been considered to determine whether the inclusion of a Windfall allowance at any point in the trajectory can be justified. In addition, if the overall housing supply estimated by the Assessment turns out to meet or exceed the annual dwelling requirement for the Lancaster District and historic windfall completions are high, then it provides LCC with the knowledge that their annual targets could well be significantly exceeded during some years.
- 6.7 It is also recommended that an allowance is made within the overall supply for net losses as a result of demolitions. Again, the most appropriate method of estimating this figure would be through the consideration of annual historic trends.

7.0 Greenfield Sites

- 7.1 The DCLG Practice Guidance specifies that urban extension sites (primarily Greenfield sites) should be considered as part of a SHLAA and that such locations should be in line with those geographical areas identified by the relevant RSS. The current RSS 13 does not identify the need for such extensions in the Lancaster District. However, RSS 13 is currently being partially reviewed and housing provision forms a key element of the

review. It is therefore possible that the review could result in a dwelling provision increase for the District. It is recognised that LCC's Core Strategy follows the principle of urban concentration and therefore seeks to resist the development of urban extensions. However, as the Inspector's Report will not be available prior to the Assessment commencing, it is not known if the principle of urban concentration is considered to be sound or not. Both the review of RSS 13 and the Inspector's Report into the Core Strategy could therefore have implications for the requirement for urban extensions.

7.2 Based on the above, it is considered prudent that urban extensions/Greenfield sites are considered in the Assessment. This will add to the robustness of the Assessment by ensuring that all potential sources of supply are considered. If the Assessment finds that all of the required 6,000 dwellings can be accommodated on sites within the urban area, then LCC may take the decision to leave the assessed urban extension sites out of the overall supply and trajectory. If included, such sites would clearly be placed in the latter years of the trajectory once other, more preferable sites in the urban area have been developed. If on completion of the Assessment, a decision is taken to exclude urban extension sites from the overall supply, then comment can be made in the Assessment that these sites have been considered but not deemed as required at that time as an adequate supply exists on other sites. If the sites are included in the Assessment, these could be in the form of broad locations (incorporating the considered sites in groups) rather than specifically identifying sites. This would also be supported by the Inspector's Report into the Core Strategy if the principle of urban concentration is considered to be sound.

7.3 A significant number of sites will be considered as part of the Assessment. It is considered that the consideration of a relatively small number of potential urban extension sites would not add significantly to the work load and in the long term would probably be less resource intensive than undertaking a separate exercise for urban extensions at a later date if required.

7.4 If once the review of RSS13 is complete, the housing supply figures for the Lancaster District increase, then a significant proportion of work will already have been completed in terms of identifying suitable urban extension sites. This information will therefore be readily available and could be used easily to update the Assessment at the relevant time.

8.0 Site Assessments

8.1 Atkins recommends that all sites identified in Stages 2 (Determining Sources of Supply) and 3 (Desktop Review) are visited to determine their suitability for inclusion in the Assessment. This will ensure that up to date and correct information is obtained for each

site. Even if sites are known to Officers involved within the Assessment, site conditions can change quickly. Obtaining detailed and accurate information at this stage will also assist in undertaking Stage 7 (Assessing when and Whether Sites are Likely to be developed).

8.2 It is important that all Officers undertaking site visits are working in a consistent manner. The use of a standardised assessment checklist is crucial to this. Atkins has prepared a comprehensive site visit assessment checklist which we recommend be completed for each site surveyed. The site assessment checklist covers a wide range of site information which we consider is appropriate to gather for each site. A copy of this assessment is attached at Appendix C.

8.3 It is recommended that a 'pilot day' takes place at the on-set of the site survey element of the Assessment to ensure that all Officers involved in the Assessment are surveying sites in a consistent manner and that Atkins and LSH can be certain that all information required to inform Stages 7 and 8 of the Assessment is obtained.

9.0 Determining Densities

9.1 Atkins & LSH agrees with the standard densities set out within the methodology. It is however recommended that caution is applied when using the densities of 50 dwellings per hectare and 70 dwellings per hectare for areas close to the town centre boundary and areas on the periphery of the town centre respectively. 50+ dwellings per hectare suggests developments in these locations would include a high percentage of flats/apartments and in the current climate such units are not proving to be popular. However, as there are likely to be some variations in the types of developments on these sites and also the popularity of some sites, it is considered appropriate to retain the densities for these two locations at this stage but to apply the densities with caution.

9.2 The take up of developments in these locations and the popularity and saleability of flats/apartments should however be monitored and then re-assessed during the first review of the Assessment. This would enable a view to be taken as to how the market fares in the current 'credit crunch' and also for the popularity and desirability of apartment and town centre living to be monitored.

10.0 Presentation of Sites

10.1 Atkins recommends that a detailed site summary sheet is prepared for each of the sites deemed as being suitable for inclusion within the Assessment. These summary sheets could be provided as an appendix to the assessment report and should summarise the information obtained during a site visit along with the following additional information:

- Site location plan;
- Site photograph;
- Aerial photo;
- Landowner or developer interest if known and not confidential;
- Estimated housing capacity;
- Estimated S106 requirements; and
- Estimated year of development.

10.2 These could be organised in the appendix by either housing supply type (e.g. Brownfield/Local Plan designations) or by proposed development year (i.e. years 1-5, 6-10 etc). It is not considered necessary to provide summary sheets for sites with planning consent or a resolution to grant planning consent subject to a S106 agreement.

10.3 An example summary sheet, which Atkins has successfully utilised previously, is attached at Appendix D.

11.0 Housing Trajectory

11.1 Atkins will produce a housing trajectory based upon the information gathered during Stages 2-7 of the Assessment inclusive. The trajectory will need to cover a minimum of 15 years to demonstrate that LCC have a 15-year supply of housing land from identified sites. This would be split down into the following three, 5-year periods:

- Years 0-5 (2008 – 2012);
- Years 5-10 (2013 – 2017) and
- Years 10-15 (2018 – 2022).

11.2 Dependant upon the findings of Stages 2-7 of the Assessment, the number of sites and dwelling capacity identified, it may be appropriate to include a fourth 5-year period within the trajectory for years 15-20 over the period 2023-2027. If a significant number of sites are identified, or sites which may require development over a long period of time come forwards, then this fourth period would be particularly relevant.

11.3 It is recommended that the trajectory for each 5-year period is illustrated within the overall Assessment report as shown overleaf:

TRAJECTORY PERIOD 1: YEARS 0-5 (2008-2012)			
Site Ref	Site Address	Housing Supply Source	Estimated Dwelling Contribution
Total Estimated Dwelling Contribution Over Period			
Annual Requirement			400
Total Estimated Annual Contribution			

11.4 This type of trajectory is easily up datable both over the 15 year period and beyond.

12.0 Key Dates

12.1 The completed SHLAA will represent a ‘snapshot in time’ of the housing land supply for the Lancaster District. Due to the sometimes rapidly changing nature of the housing market and levels of housing supply, Atkins recommends that the SHLAA is updated on a bi-annual basis and this should therefore be written into LCC’s methodology. This will ensure that the SHLAA is kept continually up to date and that the document itself will remain a reliable evidence base on which to base future decisions.

13.0 Summary of Recommendations

13.1 Atkins/LSH comments and recommendations set out in this methodology review can be summarised under the following headings:

- Agreement of key assumptions prior to the completion of Stage 1;
- Consideration of potential additional SHLAA forum members;
- Consultation with Statutory Undertakers and Key Statutory Consultees;
- Recommended advertising methods for call for sites process;
- Recommended amendments to SHLAA Pro Forma;
- Consideration of additional desk-top review documents;
- Recommendations for density caution;

- Recommendations for inclusion of windfall sites;
- Recommendations for consideration of urban extensions/Greenfield sites;
- Recommendations for undertaking site assessments;
- Recommendations for site assessment recording sheets;
- Recommendations for presentation of suitable sites;
- Proposed Housing Trajectory; and
- Recommendations for review and key dates.

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