

Strategic Housing Land Availability Assessment



2010 Review



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Disclaimer

THE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA) IS PURELY A TECHNICAL BACKGROUND DOCUMENT AND DOES NOT ALLOCATE SITES FOR DEVELOPMENT - THAT IS THE ROLE OF THE DEVELOPMENT PLAN DOCUMENT COVERING LAND ALLOCATIONS AND DESIGNATIONS UPON WHICH FULL CONSULTATION WILL TAKE PLACE AT THE APPROPRIATE TIME. THE POINTS BELOW EXPLAIN IN MORE DETAIL WHAT THE SHLAA IS AND IS NOT.

In relation to the information contained within this report (and any other report relating, or making reference, to the findings of Calderdale's Strategic Housing Land Availability Assessment) the Council makes the following disclaimer without prejudice:

- The SHLAA does not give any development or planning status to land
- None of the sites have any commitment or support from the Council and the SHLAA is not Council Policy
- The SHLAA is not an allocation document and does not put forward proposals that the status of land should change
- Whether any policy or designation should change is not for the SHLAA to address, but rather for the preparation of the LDF
- The identification of potential housing sites in the SHLAA does not imply that the Council will necessarily grant planning permission for residential development. Planning applications will continue to be treated on their merits against the appropriate development plan policies (currently to be found in the RSS and in the Replacement Calderdale Unitary Development Plan adopted 2006) and other material planning considerations. Sites which are, for example, currently in employment use or in the Green Belt still need to be assessed against the relevant planning policies that seek to protect employment land and the Green Belt.
- The identification of potential housing sites in the SHLAA which is a purely technical document does not imply that they will necessarily become residential allocations in the LDF.
- The inclusion of potential housing sites in the SHLAA does not preclude them being developed for other suitable purposes.
- The exclusion of sites from the assessment does not preclude the possibility of residential development being granted on them. Some sites may never have been identified whilst others have been discounted.
- Information relating to individual sites in the SHLAA is based on the best information available at the time of the assessment. Circumstances may change or there may be some omissions and/or factual inaccuracies, which the Council does not take liability for. There may be additional constraints to consider that were not identified at the time of the assessment. Likewise some constraints may no longer be applicable.
- The deliverability categories (short, medium and long term) are based on judgements made on the best information available at the time of the assessment. Circumstances or assumptions may change which may mean that sites come forward sooner or later than envisaged.
- Capacities and densities identified on sites either relate to the number of dwellings for which planning permission has been granted or are based on indicative assessments by employing density multipliers adjusted to take account of known constraints. They are indicative and may change.
- The status of sites and information relating to them may have changed since the last assessment. For example, an identified site may subsequently have been granted planning permission whilst other planning permissions may have lapsed. The study is updated annually and any changes including new information is input to the database at this point.

Glossary

Achievability – A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site, and the capacity of the developer to complete and sell the housing over a certain period (CLG Guidance 2008).

Allocation – Area of land identified in the Council's development plan. The allocation will also indicate the Council's preferred use for the land.

Annual Monitoring Report (AMR) – An annual assessment of the effectiveness of policies and proposals in the Local Development Framework and progress in preparing Local Development Framework documents.

Availability – A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This means that it is controlled by a housing developer who has expressed an intention to develop, or the landowner has expressed an intention to sell.

Brownfield – Land which is or was occupied by a permanent structure. Also referred to as 'Previously Developed Land'.

Call for Sites – Exercise carried out by the Council inviting interested parties to submit sites for consideration in the Strategic Housing Land Availability Assessment and the Local Development Framework.

Core Strategy – This is the key document in the Local Development Framework. It will set out the long term vision for the district and the policies and objectives required to deliver the vision. All other Development Plan Documents have to conform to the Core Strategy.

Deliverability – A site is considered to be deliverable if it is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within 5 years from the date of adoption of the plan.

Density – A measure illustrating the potential number of dwellings that can be accommodated within a defined area. (Usually measured as the number of dwellings per hectare). See also Gross Density and Net Density.

Density Multipliers – Measurement used to establish the potential capacity of each site.

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 and could be developed at a specific point in time.

Development Plan Document (DPD) – The documents that form the statutory development plan for the District (together with the Regional Spatial Strategy), these are subject to an independent examination. They include the Core Strategy, the Land Allocations and Designations, and the Proposals Map.

Employment Land Review (ELR) – The review provides information concerning the need for new employment sites within Calderdale and whether the existing ones are fit for current and future purposes.

Filtered Sites - Sites that did not have any potential for residential development.

GIS – Electronic mapping software.

Green Belt – An area of open land defined on the Proposals Map, in accordance with Government guidance (Planning Policy Guidance 2 : Green Belts) where strict controls on development are applied in order to check the unrestricted sprawl of large built up areas, safeguard the countryside from encroachment, prevent neighbouring towns from merging with one another, preserve the special character of historic towns and assist in urban regeneration.

Greenfield Land – Term used to describe land that has not been previously developed.

Gross Density – Applying the total area of a site to the Density measurement, before discounting any land for uses not directly associated with housing.

Held in Abeyance – Sites that are considered unlikely to be developed within the timeframe of the Strategic Housing Land Availability Assessment but should be re-assessed through the annual review to determine whether they could move forward into the period covered by the Strategic Housing Land Availability Assessment.

Housing Land Availability Database – Database containing information on all planning permissions for residential development and their status.

Housing Trajectory – Report comparing past housing supply performance against future rates of predicted supply.

Integrated Regional Strategy - A single Strategy that will be developed to replace the Regional Spatial Strategy, The Regional Economic Strategy and the Regional Housing Strategy.

Land Allocations and Designations Development Plan Document – The planning document that will provide land allocations and designations for the use and protection of land. This document will be required to be in conformity with the Core Strategy.

Local Development Framework (LDF) - The new development plan for Calderdale, made up of a number of individual documents that set out the Council's policies for the development and use of land.

Net Density - Measurement of the site's area that will be developed for housing and directly associated uses (i.e. discounting land for shops, major roads, wider open spaces).

National Land Use Database (NLUD)- Database of brownfield (or Previously Developed) land

New Growth Point – The Council has recently been awarded New Growth Point status, which means the Council can, if it decides to, access government funding to overcome infrastructure problems in return for agreeing to provide additional housing units over those required by the Regional Spatial Strategy.

Planning Officers Society – Body representing the most senior professionals and managers of public sector planning functions.

Planning Policy Statement (PPS) – Issued by Central Government to replace the existing Planning Policy Guidance notes in order to provide greater clarity and to remove from national guidance advice on practical implementation, which is better expressed as guidance rather than policy.

Regional Spatial Strategy (RSS) – The development strategy for the region for the next 15-20 years and possibly longer. The Regional Spatial Strategy identifies the scale and distribution of new housing in the region, indicates areas for regeneration, expansion or sub-regional planning and specifies priorities for the environment, transport, infrastructure, economic development, agriculture, minerals and waste treatment and disposal.

4 Glossary

Replacement Calderdale Unitary Development Plan (RCUDP) – The current land use plan for Calderdale. A single tier District Wide plan based on land issues at both the strategic and local level. The RCUDP has regard to legislation and strategic guidance issues by Central Government, but is otherwise prepared by the local planning authority.

Site of Special Scientific Interest (SSSI) – Areas designated by Natural England as being of special interest by reason of their flora, fauna, geological or physiological features and having statutory protection to preserve these features.

Strategic Flood Risk Assessment (SFRA) – A detailed assessment of flood risk areas throughout the district.

Strategic Housing Market Assessment – This study will estimate housing need and demand for both market and affordable housing across the district.

Suitability – A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. For sites not allocated for housing in development plans or having the benefit of planning permission for housing, policy restrictions, physical problems or limitations, potential impacts and environmental conditions should be considered.

Urban Audit – Database of sites that informed the Urban Capacity Study.

Urban Capacity Study (UCS) – Study that assessed the potential of the urban areas to accommodate further development (particularly housing) in order to inform the review of the UDP.

Windfall Sites – Sites that have not been identified in the local plan process and comprising previously developed sites that have unexpectedly become available.

Executive Summary

Planning Policy Statement 3 (PPS3) Housing requires local authorities to undertake Strategic Housing Land Availability Assessments (SHLAAs) in order to provide a pool of sites from which to select sites for allocation when preparing their Local Development Frameworks (LDFs), to inform the Core Strategy in terms of the overall spatial strategy to be adopted and to ensure that they maintain a 5-year supply of housing land in order to meet the need for new homes. It forms an important component of the overall evidence base underpinning the LDF.

The SHLAA is a purely technical exercise which precedes the plan making stages of the LDF, at which point a range of additional issues will require consideration such as, for example, competing land uses, sustainability appraisal and the outcome of statutory consultation. Sites included in the Assessment do not therefore have any planning status as explained in the Disclaimer at the beginning of this document.

The SHLAA and SHLAA Review have been undertaken in accordance with Practice Guidance published by the Department for Communities and Local Government (CLG) with the developability and deliverability of nearly 2,000 sites assessed, using a policy neutral approach at the local level. These included sites submitted in the 'Call for Sites' exercise, sites identified in the Calderdale Urban Capacity Study, sites in the National Land Use Database and additional sites identified in the field survey. The methodology involved a ten stage process leading to the delivery of the Core Outputs required by the Practice Guidance and was undertaken in partnership with a Working Group of relevant interests including house builders.

The Assessment found that there is the potential in the district to accommodate in the order of 17,500 dwellings over the next 17 years. This is spread over three deliverability periods with some 5,500 dwellings in the Short Term, over 8,000 in the Medium term and nearly 4,000 in the Long term. Sites already having planning permission or under construction have the potential to deliver some 3,201 dwellings. A further 6,055 dwellings could be provided by sites classified as Held in Abeyance should the reasons causing them to be placed in this category be overcome.

For the Short Term Deliverability Period the majority of sites are brownfield but this changes in the Medium and Long Term where there is a greater proportion of greenfield sites. This results from the significant number of planning permissions in the Short term category reflecting the advice in PPS3 regarding the priority of brownfield sites. Many sites in the Medium and Longer term require a policy change (such as those sites located within the Green Belt in the Replacement Calderdale Unitary Development Plan) and therefore cannot come forward before the relevant LDF documents are adopted.

Spatial analysis of the findings demonstrated that the proposed LDF Areas in the east of the district have the greatest capacity to accommodate additional housing. This is particularly relevant as these are the areas where the Regional Spatial Strategy (RSS) requires the majority of development to be located.

The forward housing trajectory from 2004 to 2027 shows that sufficient land has been identified in the Assessment to exceed the housing requirement figure in RSS. The annualised supply provides a figure of approximately 1,000 dwellings per annum over the 17 years covered by the Assessment compared with the RSS annual requirement of 670 dwellings per annum (the residual annual figure is lower due to delivery having exceeded the RSS figure in the early part of the RSS period). The Assessment also demonstrates that there is a 5-year supply of developable and deliverable sites.

In conclusion the Assessment demonstrates that the pool of sites to draw on when making development plan allocations in the relevant LDF documents is approximately double in size to the number of dwellings remaining to be met in the RSS housing requirement. This provides the necessary flexibility in determining the appropriate strategy to pursue in the Core Strategy and enables a range of options

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to be considered when for example, reviewing the Green Belt boundary or allocating land for other uses such as employment. Further work on the options for the Core Strategy is ongoing whilst the first issues and options consultation on the Land Allocations and Designations DPD is programmed for late 2011/early 2012. The SHLAA is reviewed annually when the opportunity is taken to not only add new sites but also to refine the information on existing sites. It is effectively a 'Living Document'.

1 Introduction

1.1 Planning Policy Statement 3 Housing (PPS3) requires local authorities to undertake Strategic Housing Land Availability Assessments (SHLAAs) in order to provide a pool of sites from which to select sites for allocation when preparing their Local Development Frameworks (LDFs) and also to ensure that they maintain a 5-year supply of housing land in order to meet the need for new homes. This is a purely technical exercise which precedes the plan making stages of the LDF and forms an important component of the wider evidence base underpinning it.

1.2 The first SHLAA, undertaken in 2009, broadly coincided with the commencement of work on the Core Strategy DPD thereby enabling it to inform the overall spatial options to be considered for eventual adoption in the Core Strategy. This 2010 SHLAA represents the first annual SHLAA review and will continue to inform the preparation of the Core Strategy and also the Site Allocations and Designations DPD expected to commence in 2011. It has been undertaken in accordance with practice guidance published by the Department for Communities and Local Government (CLG) with sites assessed through a structured and robust assessment of their developability and deliverability. The SHLAA has been undertaken in partnership with a Working Group comprised of relevant stakeholders and therefore the outcomes are not solely based on the views of the Council but also those of relevant interests such as house builders.

1.3 SHLAAs must be reviewed and updated and this provides the opportunity not only to add new sites but also to refine and build up a more detailed picture of sites currently within the database.

2 Planning Policy Background

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National Planning Policy

2.1 National Policy on housing is set down in Planning Policy Statement 3 Housing (PPS3). This sets out the Government's objective of ensuring that the planning system delivers a flexible, responsive supply of land for housing with sufficient suitable land available to achieve housing delivery objectives. Local Development Documents are to set out policies and strategies for delivering the required level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption taking account of the level of housing required in the Regional Spatial Strategy (RSS). The SHLAA is one of the major means of identifying sites and broad locations. The supply of land is to be reviewed annually in order to ensure at least a continuous five-year supply of deliverable sites. In addition to identifying specific sites and broad locations local planning authorities are also required to:

- Identify those strategic sites which are critical to the delivery of the housing strategy over the plan period
- Show broad locations on a key diagram and locations of specific sites on a proposals map
- Illustrate the expected rate of housing delivery through a housing trajectory for the plan period

Regional Planning Policy

2.2 Policy H2 of the Regional Spatial Strategy (RSS) adopted in May 2008, requires local planning authorities to prepare SHLAAs in order to provide evidence for their Local Development Frameworks (LDFs).

Local Planning Policy

2.3 The statutory development plan for the district is the Replacement Calderdale Unitary Development Plan adopted in August 2006 (As amended by direction of the secretary of state 3rd August 2009). Following the Planning and Compulsory Purchase Act 2004, this is to be replaced by the Local Development Framework over the next few years. The first document to be prepared is the Core Strategy which is currently in preparation with consultation on Issues and Options having taken place between November 2008 and January 2009 and further consultation on refined options having taken place at the beginning of 2011. Being prepared in parallel with the Core Strategy but one stage behind is the Land Allocations and Designations Development Plan Document (DPD). The Local Development Framework must be underpinned by robust evidence and the SHLAA is just one piece of a much broader evidence base. Undertaking the SHLAA at the outset of the LDF process enables it to inform both the Core Strategy and Land Allocations and Designations DPDs as they are prepared.

3 Purpose of the Assessment

3.1 Strategic Housing Land Availability Assessments (SHLAAs) are required by national planning policy set out in Planning Policy Statement 3 Housing (PPS3). Whilst only one part of the evidence base underpinning Local Development Frameworks (LDFs), they form a crucial component of this evidence base. Their primary purpose as a technical exercise is to provide a strategic assessment of the potential for housebuilding across the district by exploring whether or not there is an adequate supply of housing land that is suitable, available and where development is achievable. The assessment must follow a structured approach and provide a robust assessment of potential. It will inform the strategy to be adopted in the Core Strategy by, for instance, providing the evidence to support policy changes (eg whether and where to amend the green belt boundary). SHLAAs do not however, seek to make policy decisions on which sites should be developed nor begin to formulate development plan policy but rather their role is to support decision making. They do not therefore pre-judge the strategic approach that the Core Strategy and Land Allocations and Designations DPDs will eventually take. Site selection will be determined through the plan making process when potential housing sites will need to be balanced against other policy considerations and when consultation and Sustainability Appraisal must be undertaken. SHLAAs are by definition strategic exercises in which the assessments of sites cannot be at the level of sophistication required when deciding on development plan allocations or when assessing planning applications.

3.2 Previous Government guidance in 'Tapping the Potential - Assessing urban housing capacity: towards better practice' ⁽¹⁾ required local authorities to undertake urban capacity studies and the Calderdale Urban Capacity Study was published in 2001 ⁽²⁾. However, whilst this study does provide a starting point for compiling a list of sites to assess in the SHLAA there are differences between the two types of study. They both explore the potential for housing growth in the district but whereas the urban capacity study made assumptions about the likelihood of sites coming forward, the SHLAA assesses the developability and deliverability of sites in greater depth, including those in locations not covered in urban capacity studies (such as sites in rural settlements, brownfield sites outside settlement boundaries and broad locations).

3.3 Essentially the purpose of the assessment is to meet the requirements of PPS3 which are repeated in the Practice Guidance published by CLG ⁽³⁾ and which can be condensed to the following main objectives:

- To identify specific, deliverable sites (as defined below) for the first 5 years of the development plan.
- To identify specific, deliverable sites for years 6 – 10 of the development plan
- To identify specific, deliverable sites for years 11 – 15 of the development plan or, if not possible, to identify broad locations for future growth
- To manage the supply to ensure a continuous 5-year supply of deliverable sites

3.4 Developable sites are defined in the CLG Practice Guidance as those in a suitable location for housing development where there is a reasonable prospect that the site is available and could be developed at the point envisaged.

3.5 Deliverable sites are defined in the CLG Practice Guidance as those that are:

- Available – the site is available now.

1 Tapping the Potential - Assessing urban housing capacity: towards better practice, DETR, 2000

2 Calderdale Urban Capacity Study, March 2001, CMBC

3 Strategic Housing Land Availability Assessments Practice Guidance, CLG, 2007

10 Purpose of the Assessment

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- Suitable – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities.
- Achievable - there is a reasonable prospect that housing will be delivered on the site within five years.

4 Outputs and Process Checklist

4.1 The Core Outputs required from SHLAAs together with the process to be followed are listed in the CLG Practice Guidance. Tables 1a and 1b below list these requirements and also how they are met in the Calderdale SHLAA.

Table 1a CLG Core Outputs

CLG's Core Outputs	Calderdale SHLAA
1. A list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations where necessary)	Appendices 1 and 2 to this SHLAA contain schedules of sites uniquely referenced. All sites are held within GIS and available electronically. In addition the Schedule in Appendix 2b (Other Sites) includes a plan of each site.
2. Assessment of the deliverability/developability of each identified site (ie. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed)	The sites listed in Appendices 1 to 3 have been assessed with regard to their suitability, availability and achievability and a conclusion reached on their developability and deliverability together with an assessment of when they may come forward. Additional information is held in the SHLAA database.
3. Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified)	The capacity of each site has been assessed using an agreed range of density multipliers adjusted to take account of known constraints and market factors.
4. Constraints on the delivery of identified sites	Constraints preventing sites coming forward or reducing capacity have been identified and recorded in the SHLAA database
5. Recommendations on how these constraints could be overcome and when	Where possible recommendations on how these constraints can be overcome have been recorded in the SHLAA database.

Table 1b CLG Process Checklist

CLG's Process Checklist	Calderdale SHLAA
1. The survey and assessment should involve key stakeholders including house builders, social landlords, local property agents and local communities. Other relevant agencies may include the Housing Corporation and English Partnerships (a requirement in areas where they are particularly active)	<p>The draft methodology was sent to key stakeholders for consultation (listed in Organisations consulted on Draft Methodology). A Working Group comprising representatives of the housebuilding industry, registered social landlords, adjacent local authorities and environmental groups was established to oversee and steer the assessment (membership listed in Appendix 7)</p> <p>The 'Call for Sites' exercise drew and continues to draw responses from a wide range of sources including housebuilders and landowners with substantial information provided in some instances. The surveys to determine the likelihood of older planning permissions proceeding</p>

12 Outputs and Process Checklist

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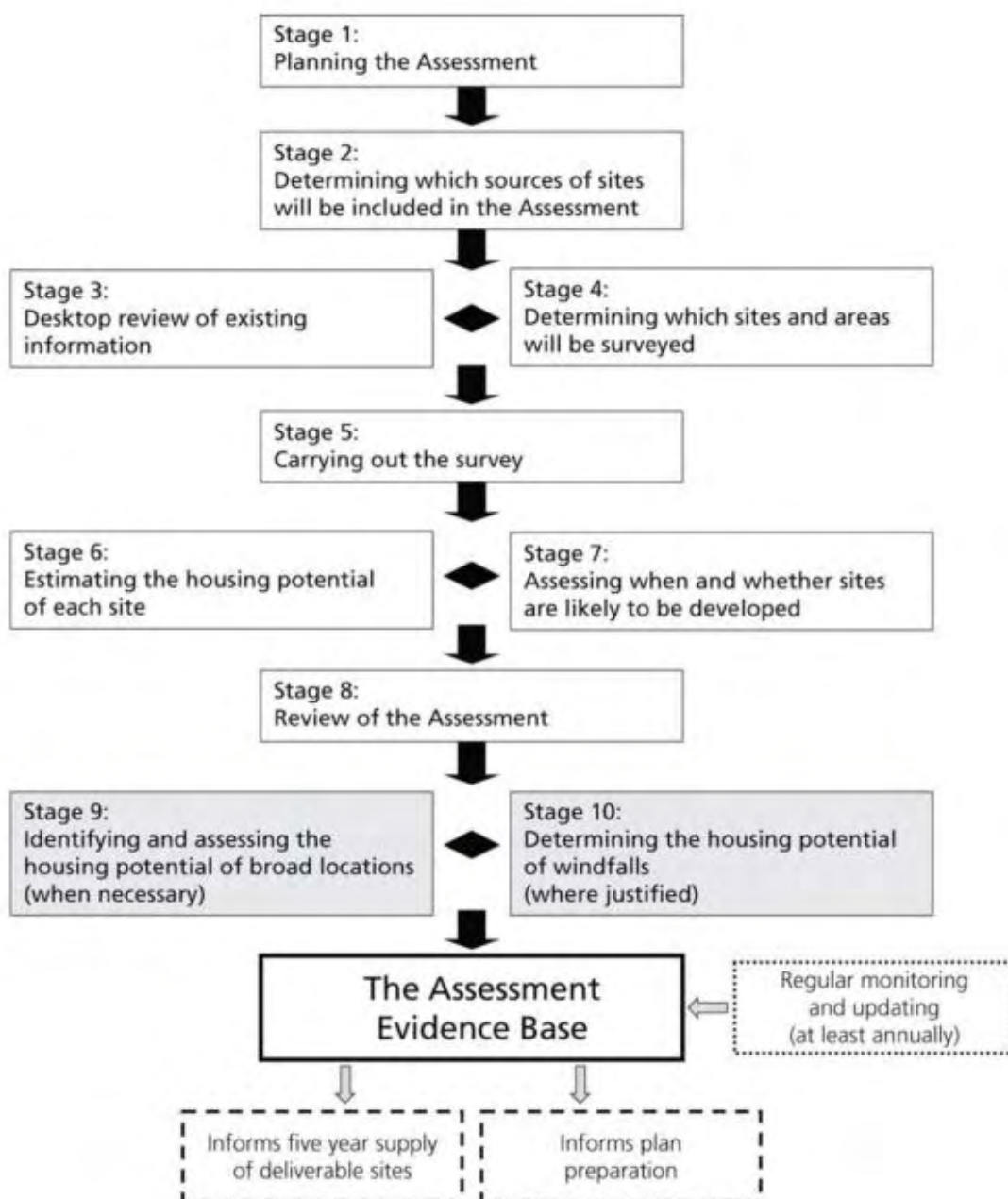
CLG's Process Checklist	Calderdale SHLAA
	<p>and the intentions of landowners provided more information from house builders, developers and landowners.</p>
<p>2. The methods, assumptions, judgements and findings should be discussed and agreed upon throughout the process in an open and transparent way, and explained in the Assessment report. The report should include an explanation as to why particular sites or areas have been excluded from the Assessment.</p>	<p>The Working Group set up to oversee and steer the Assessment discussed and agreed the methodology, assumptions, judgements and findings in an open and transparent way and these are explained in this report. Consultation on the draft methodology provided an opportunity for wider comment. Further advice on the methodology was provided by Arups and POS Enterprises Ltd.</p> <p>Appendix 4 (Filtered Sites) lists those sites excluded from the final assessment together with the reasons for this.</p>

5 Introduction

The Methodology

5.1 The Government published Practice Guidance in July 2007⁽⁴⁾ on undertaking SHLAAS and this has been followed in undertaking the Assessment. The Guidance has ten stages as shown in Figure 1 below.

Figure 1 Strategic Housing Land Availability Assessment Process



5.2 Additional guidance was prepared by Arups on behalf of the Yorkshire and Humber Assembly ⁽⁵⁾ and produced to assist the local authorities in the region in undertaking their SHLAAs. Its purpose was not to replace the CLG Practice Guidance but to add value to it. Regard was also had to the advice contained in this additional guidance in determining the methodology. Further advice published by the Planning Advisory Group (PAS) ⁽⁶⁾ ⁽⁷⁾ also influenced the detail of the methodology.

5.3 Consultation with POS Enterprises Ltd on the proposed methodology involving a face to face meeting was also of assistance in determining the methodology, including the assumptions employed. This was viewed as particularly helpful and relevant given that POS Enterprises Ltd played a significant part in writing the CLG Guidance.

5.4 Prior to the first assessment commencing a draft methodology was published for consultation and sent to some 50 stakeholders. Only a limited number of responses were received and these are listed in Appendix 6. These comments were taken account of in determining the final methodology. Ultimately the final methodology, including the assumptions employed in the assessment, was agreed by the Working Group set up to oversee the study.

5.5 The same methodology was employed in the first review when built sites were removed from the assessment, others amended to reflect changed circumstances and/or new information and new sites added.

5.6 Each of the ten stages is now reported in turn.

5 Understanding Yorkshire and Humber's Strategic Housing Land Availability, Regional Practice Guide, Ove Arup and Partners Ltd, April 2008

6 Strategic Housing Land Availability Assessment and Development Plan Document Preparation, Planning Advisory Service, January/February 2008

7 Implementing Your Local Development Framework - Strategic Housing Land Availability, Planning Advisory Service, April 2008

6 Stage 1: Planning the assessment

6.1 The CLG Practice Guidance requires that a number of management issues be addressed at the outset of planning the assessment. These were consequently given detailed consideration in planning the assessment as follows:

Joint Assessment with the other local planning authorities in the housing market area

6.2 When planning the first SHLAA the neighbouring local authorities of Kirklees MC and City of Bradford DC were contacted in order to explore the possibilities of a joint study. However, following discussions with these neighbouring local authorities this approach proved impractical for the following reasons:

- The strategic housing market assessments being prepared by Ecotec on behalf of the Yorkshire and Humber Assembly were not complete and without which market areas had not been defined.
- The timescales for the production of the Core Strategy and Site Allocations DPDs are not the same in the local authorities of Bradford, Calderdale and Kirklees. With no plans for joint DPDs on housing the need for joint SHLAAs was reduced.
- The comprehensive approach undertaken for the earlier urban capacity study in Calderdale meant that the starting point and timescale for any land availability study was unlikely to be the same in districts where different approaches had been employed.

6.3 Whilst it was concluded that a joint study was not possible on this occasion, it was agreed that a consistent methodology should be employed to enable meaningful comparisons and aggregation of results, both for the market area and to inform the ongoing regional work on land availability. A consistent approach also enables collaboration on future SHLAA updates. Consultation therefore took place on each authority's proposed methodology. In addition attendance at neighbouring authority's Working Group meetings was encouraged with Bradford being present at Calderdale's Working Group Meetings. Further involvement with other local authorities in the Yorkshire and Humber region took place through attendance at their Working Group meetings and discussions on specific aspects of the assessment. Exchanges of information relating to databases, data sets and data format took place with neighbouring and other local authorities in the region.

6.4 When undertaking the first review of the SHLAA consideration was again given to joint working but many of the above factors still apply including the fact the the local authorities are working to different timescales. For example, when the first review of the Calderdale SHLAA commenced some authorities were still working towards completion of their first SHLAA. However, involvement in other local authorities' SHLAA preparation has continued to take place.

Working Group and Key stakeholders to be included in the study

6.5 As a housing market partnership did not exist to take the study forward the key stakeholders to be included in the study had to be determined. These are listed in Appendix 5 with representatives of each category consulted on the draft methodology. As advised in the CLG Practice Guidance key stakeholders were involved at the outset of the Assessment so that they could help shape the approach with comments received on the draft methodology taken into consideration in arriving at the final methodology.

6.6 In order to set up a Working Group those types of organisation referred to in the CLG Guidance were contacted. These included house builders, social landlords, local property agents and local communities. The regional office of the Home Builders Federation was contacted to provide representatives of the housebuilding industry. A number of invitations were sent out on several separate occasions in order to obtain the desired representation on the Working Group. A number

of those contacted were not able to commit to the Working Group and therefore some time was spent in obtaining membership. This was made more difficult by both the fact that other local authorities in the region were undertaking their SHLAAs and the economic downturn with some members having to withdraw from the group and replacements sought. However, a group including house builders, registered social landlords and neighbouring local authorities and capable of meeting the CLG Guidance requirements was convened to oversee and steer the Assessment. The full membership is given in Appendix 7.

6.7 The opportunity to obtain wider community involvement was taken with the 'Call for Sites' submissions made available on the Council's website and 1:10,000 maps showing these sites made available for viewing during the Issues and Options stage of the Core Strategy. The 'Call for Sites' was left open during the review year and a number of new submissions were received. The need to undertake a SHLAA, together with progress on the assessment was reported both to Members through the LDF Working Party and to the Strategic Housing Forum hosted by Housing Services. Prior to publication of the first SHLAA it was publicised with a full Member Briefing and presentations to all parish and town councils. Both prior to and following publication of the first SHLAA numerous communications were received from members of the public and at least one public meeting held. It was also discussed at several Ward and Area Forums. In order to provide the opportunity to submit information during the review year the SHLAA was left open for comments (as opposed to full consultation as is the case with statutory planning documents) on the Council's website where a number of comments were submitted.

Summary of comments received in relation to the first (2009) SHLAA

6.8 Comments were invited on the 2009 SHLAA, in order that the public and landowners could provide additional information that may assist with the assessment of sites during this review. The document attracted a large number of responses, mainly concerning a small number of sites; many of the comments were in the form of objection letters, with a smaller number supporting some of the sites assessed.

6.9 As well as objection and supporting letters, information was received concerning ownership and mapping accuracy; these allowed corrections in the database and GIS mapping files where necessary.

6.10 All comments received were recorded, and those objecting by letter or email received an acknowledgement letter, which explained the status of the SHLAA and how to be kept informed of progress on the Local Development Framework.

6.11 The issues raised most frequently included:

- Lack of Infrastructure - particularly the capacity of sewers, drainage networks, already congested roads to accommodate further development as well as the ability of gas, water & electricity supplies to meet additional demands. Concerns were also raised relating to the loss of amenity space, the impact additional infrastructure would have, the pressure GP surgeries would face, lack of capacity in schools and the lack of shops in certain locations.
- Wildlife and Habitats - A large number of comments related to the potential impact on wildlife and habitats including woodlands, with some respondents pointing out rare and protected species had been recorded on particular sites.
- Loss of Open Space - A number of comments were received from people concerned with the potential loss of both Green Belt and Open Spaces, and proposing the redevelopment of brownfield sites instead.

6.12 Other comments not made as frequently as those above included:

- Flood Risk;
- A loss of agricultural land;
- Access Issues;
- Impact of potential developments on the rural and urban landscape;
- Contaminated land;
- Impact on residents' amenity and house prices;
- Some areas have had their fair share of development;
- There has been over development;
- Further development would result in a loss of identity and result in a commuter town;
- Deeds prevent access for development;
- Some of the sites in exposed areas would be vulnerable to high winds; and
- Existing residents would not benefit from development and there would be a large amount of disruption during construction.

6.13 Whilst many of these comments related to the specifics of certain sites rather than the overall methodological approach, any factual information has informed the review and helped guide the gathering of further information, particularly on constraints.

Resources, Skills, Management and Quality Assurance

6.14 Within the local planning authority the primary resource was identified as the Spatial Planning Team (formerly the Planning Policy Team), members of which led the Assessment and provided the necessary input regarding the setting up of the database and GIS links together with compiling the list of sites to be assessed. The Working Group discussed and agreed the methodology with those members representing the house building industry providing input on the developability and deliverability of the identified sites.

6.15 In order to ensure that the Assessment was as robust as possible in terms of the methodology regard was had to the additional guidance and advice on SHLAAs produced by Arups, the PAS publications and the consultation undertaken with POS Enterprises Ltd discussed above.

6.16 The consultation with POS Enterprises Ltd on the proposed methodology referred to in paragraph 5.3 above and involving a face to face meeting was also of assistance in ensuring the methodology, including assumptions employed, was robust and that the assessment met the requirements set down in the CLG Practice Guidance. POS Enterprises Ltd in appraising the methodology considered that its stated intentions were faithful to both the process and the principles of the guidance.

6.17 Numerous checks of the data held in the database were carried out in order to ensure both that the data was as accurate as possible and to ensure consistency throughout the Assessment. Where doubts existed about any sites these were explored as far as practicable given the resources

18 Stage 1: Planning the assessment

6

and time available for the Assessment and those sites where uncertainty remained were categorised as Held in Abeyance and as such not included in the final list of sites but positioned to be reviewed on the planned annual updates.

6.18 These steps have ensured the quality of the Assessment, a matter the Government Office for Yorkshire and the Humber (GOYH), in responding to the draft methodology, advised be addressed. There is no expectation in the CLG Practice Guidance itself that there be independent quality control of a SHLAA.

Project timetable

6.19 The review will continue to both inform the preparation of the Core Strategy and provide information on the 5-year supply of housing land required by PPS3. It also provides a pool of sites for consideration as allocations in the Site Allocations and Designations DPD, programmed to commence in 2011. The Core Strategy is programmed for submission in Spring 2012 and adoption in December 2012, whilst the Land Allocations and Designations DPD is being prepared in parallel but one stage behind the higher level document. Given the programme for preparation of the DPDs information on sites for all categories of development has been submitted to the local authority at the same time as those specifically relevant to the SHLAA, particularly those relevant to the Employment Land Review (published December 2008). A project plan for the SHLAA was prepared and used to measure progress on the Assessment.

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

7.1 In determining the sources of sites for inclusion in the SHLAA, the CLG Practice Guidance together with the further advice in the Arup Guidance was followed. All of the sources of sites in the CLG Practice Guidance were included in the Assessment as shown in ⁽⁸⁾ with the exception of large urban extensions and new free standing settlements. The broad locations for these should normally have been identified in RSS but as none of these sources of sites were not included in the Assessment. Smaller urban extensions were included in the Assessment. In the case of existing residential areas potential opportunities within these were recorded as opposed to areas of large scale re-design and re-development.

7.2 Certain areas excluded from the UCS also had no potential for housing and these are excluded from the current study for the same reason. They include areas unacceptable for housing development and which are subject to protection because of their nature conservation value, or because they are uses that must be retained such as allotments, functional Open Space and Woodland (evidenced by the Open Space Study ⁽⁸⁾).

7.3 Regard was had to national and regional policies but a policy neutral approach taken at the local level, other than where policies related to clear physical features such as in the case of SSSIs. The most obvious implication of this approach was that no regard was had to the Green Belt boundary. However, sites lying within the Green Belt some distance from settlement boundaries were not included in the Assessment since such sites are clearly unsuitable in terms of location and sustainability implications. Such sites were recorded but not assessed further. This policy neutral approach at the local level enabled a larger pool of sites to be identified than would have otherwise been the case thereby providing the evidence to consider a range of strategies when developing the Core Strategy.

Table 2 Sources of sites with potential for housing in the planning process.

Sites in the planning process
Land allocated (or with permission) for employment or other land uses which are no longer required for those uses
Existing housing allocations and site development briefs
Unimplemented/outstanding planning permissions for housing
Planning permissions for housing that are under construction
Sites not currently in the planning process
Vacant and derelict land and buildings
Surplus public sector land
Land in non-residential use which may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of mixed use development
Additional housing opportunities in established residential areas, such as under-used garage blocks
Sites in rural settlements and rural exception sites

8 Open Space, Sport and Recreation Study, CMBC, 2006

Sites not currently in the planning process

Small urban extensions

8 Stage 3: Desktop review of existing information

8.1 A desktop survey of known sites was undertaken and produced varying amounts of information. The data sources used and the information they provided are listed in Table 3 'Information Sources'. All of the sites from the various sources were input to the SHLAA database and mapped using GIS. Sites from the various sources were rationalised to avoid duplication. Information relating to the sites was input to the database, including the more detailed information often provided with the sites resulting from the 'Call for Sites Exercise' (see Appendix 8 for pro forma used in 'Call for Sites' Exercise). Ordnance Survey Plans, aerial photographs and Google Street View were examined to confirm boundaries and provide additional information. The information held in GIS was downloaded to Handheld PCs for use in the field survey when it could be viewed at a range of scales.

Table 3 Information Sources

Information Source	Data Provided
Housing Land Availability (HLA) Database, published quarterly by CMBC .	Sites with planning permission including those under construction and housing completion figures
Replacement Calderdale Unitary Development Plan (RCUDP)	Allocated sites, particularly for housing, employment and mixed use
Employment Land Review (ELR)	Sites required for employment use
Calderdale Urban Capacity Study Database including earlier Urban Audit	Database of some 1200 sites resulting from field surveys
The National Land Use Database (NLUD), maintained by CLG and updated annually	Brownfield sites
'Call for Sites' Exercise undertaken to provide landowners and developers with the opportunity to put forward sites for consideration in the LDF.	Survey form ensured data supplied was relevant to the SHLAA tests of suitability, availability and achievability
Planning application refusals	Potential sites and possible constraints information
Lapsed Planning Permissions	Potential sites where principle of development previously accepted.
Ordnance Survey Maps	Updating of the UCS sites, drawing of boundaries, measurement of site areas, constraints
Aerial Photos	Updating of the UCS sites, current use, topography, whether brownfield or greenfield, site boundaries, constraints
Google Street View	New sites and updating of existing sites, current use, topography, whether brownfield or greenfield, site boundaries and constraints
Land and Property Services	Knowledge of Council owned sites including any plans for disposal and potential timescale
Site Briefs eg Copley Valley Regeneration Scheme	Assessment of housing numbers, constraints, timescale

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Information Source	Data Provided
Calderdale Open Space, Sport and Recreation Study	Whether land in open space use should be retained
Planning Permissions Survey (see Stage 7)	Potential from older planning permissions and time frame
Land Ownership survey (see Stage 7)	Availability of sites and time frame
Annual Monitoring Report (2009/2010) published by CMBC	Completion figures, housing requirement and trajectory

9 Stage 4: Determining which sites and areas will be surveyed

9.1 Whilst the RSS settlement network will clearly influence the allocation of sites at the plan making stages this did not generally constrain the areas surveyed in the SHLAA where the opportunity was taken to assemble as much information as possible about potential housing sites. This built on the approach taken in the UCS when an extensive field survey was undertaken and therefore as comprehensive a survey as resources would permit was also undertaken for the SHLAA. The experience of the UCS is that by using a street-by-street approach other sites not previously identified will be identified and therefore this approach was followed in the SHLAA. This in conjunction with the 'Call For Sites' exercise is considered to have at the very least provided reasonably comprehensive coverage. Thus all sites without planning permission, some 760 sites were visited in the field survey at the time of the initial SHLAA. For the review in the order of a further 100 sites were visited.

9.2 At the time of the initial SHLAA sites with the benefit of planning permission were not visited systematically due to the scale of the task with there being some 1060 such sites in the database. As explained in Table 3 'Information Sources' in the previous section the Housing Land Availability Database holds information on these sites. Where there were doubts about sites these were addressed through a questionnaire survey in the first SHLAA (see Appendix 10 and Assessment Stage 7). For the review questionnaires were not employed due to the relatively low response rate previously, rather site visits were undertaken where it was unclear as to how sites were progressing and where this was practicable given the large number of sites involved. Further information is provided in paragraph 12.4.

9.3 Historically smaller sites have been a significant source of housing supply in Calderdale and therefore a relatively small site size threshold of 0.1ha was agreed with the Working Group and employed in the Assessment. A minimum threshold was required since resources did not permit the assessment of sites below this size. Adopting this threshold was considered justified given the importance of small sites in Calderdale. Both the CLG Practice Guidance and further advice in the ARUP Guidance refer to including those sites that 'make a significant contribution to the delivery of housing'. This approach is further expanded on in the Arup Guidance where it is noted that some 'urban' authorities such as Calderdale also have significant rural areas where the dwelling requirement may have to be reconciled against identifiable sites adjacent to and within current small settlements. POS Enterprises Ltd advised that the UCS included a lot of potential from small sites which should logically be carried forward. Furthermore, a small site size will maximise the yield from the urban areas and correspondingly reduce the amount of Green Belt land release, an approach which is compatible with national planning policy. Adopting a threshold of 0.1ha also avoided the inclusion of most, but not all, land attached to existing houses ("garden sites") which would have both been time consuming to survey and stimulate interest in owners bringing such sites forward. This is not something the Council wishes to encourage because of the effect of over development and the number of such planning permissions in the recent past which have resulted in calls from Members and other interested parties to prevent this type of development. At the national level this issue resulted in private Members' bills seeking to change the status of gardens from brownfield to greenfield land and this was amended by the Coalition Government during the early stages of this review. The site size threshold was not applied to sites with planning permission since these already formed a part of the housing supply.

9.4 Whilst it is for each district to determine the sites making a significant contribution to their housing supply, for purposes of comparison the neighbouring districts of Bradford and Kirklees are employing thresholds of 0.4 ha and 0.2 ha respectively.

10 Stage 5: Carrying out the survey

10

10.1 The field survey for this review took place during the summer of 2010 with some 100 sites visited. All of those involved in the field survey were clearly briefed to ensure consistency in undertaking the survey and answer questions to ensure that the status and purpose of the Assessment could be clearly conveyed. Thus the surveyors, when questioned or indeed seeking information in the course of undertaking the field survey, made it clear that sites identified in the survey will not necessarily be allocated for housing but rather the assessment will determine the overall potential that exists for housing within the district. The actual inclusion of any sites in DPDs is for the plan making process itself which is subject to statutory regulations regarding public consultation.

10.2 The information recorded in the desktop review was checked and additional information gathered about the sites held in the database. All of the information was recorded on a form and subsequently input to the database. Hand held PCs were employed enabling the Ordnance Survey base to be viewed at a variety of scales. Given the proximity of many sites, the survey was undertaken by walking from one site to another which increased the opportunities for both finding additional sites and viewing known sites in their wider context. Where additional sites were found these were recorded and added to the database. A copy of the site survey form is provided in Appendix 9.

11 Stage 6: Estimating the housing potential of each site

11.1 Various means of assessing the housing potential of each site were considered by the Working Group. The preferred approach was to employ a range of density multipliers to provide an indicative density as a starting point. All of the identified sites were subsequently provided to the Working Group (schedule and A4 Plan) for their comments in relation to both stages 6 and 7. Capacities were adjusted by members of the Working Group to take account of constraints and viability factors. The capacities in the database were then amended accordingly and the reasons recorded.

11.2 The existing RCUDP Policy H10 was not considered sufficiently detailed in terms of providing a range of density multipliers but its overall principles in relation to density were respected. Prior to agreeing the density multipliers to employ, a range of density assumptions were considered by the Working Group in order to reflect site capacities as accurately as possible and without overstating the capacity. In determining the actual density multipliers to use the Working Group resolved to employ those quoted in "Tapping the Potential" ⁽⁹⁾.

11.3 The use of sample schemes was considered by the Working Group to supplement the approach of density multipliers on certain sites but concerns were raised regarding the number of assumptions inherent in this process together with the fact that a variety of schemes could be put forward by different developers for the same site.

11.4 The gross density multipliers were converted to net density multipliers using the ratios included in 'Tapping the Potential'. This document is based on recognised research into densities in relation to site size and carries considerable weight. The higher end of the ratios in 'Tapping the Potential' have been used as most of the sites in Calderdale are relatively small. Sites over 2 ha in rural areas came out below the 30dpa net density in PPS3 but there are probably few of these sites in rural areas, if any, in Calderdale. By varying the densities used an overestimate of potential should not result. However, whilst not wishing to overestimate the potential there was also the risk of underestimating it given that the definition of net density in PPS3 includes directly associated uses. The areas to which the relevant multipliers related were mapped in GIS in order to determine the appropriate multiplier for each site. One option for further refinement of the assessment, and particularly if the assessment were found to have identified insufficient land, would be to conduct sensitivity testing with regard to the density assumptions.

11.5 Those sites having the benefit of planning permission for new build apartments were re-assessed using the density multipliers in recognition of the fact that these are unlikely to be built given the collapse in the apartment market and revised planning applications received, most likely for houses. Sites where the only realistic option was conversion were not re-assessed, as is the case with many of the old mill buildings in the district .

Table 4 Density assumptions in relation to Site Size*

Location	Site Size	0.4ha	0.4 - 2ha	>2ha
	Gross to Net Ratio	100%	90%	75%
Town Centres (areas within 'blue' town centre notation in RCUDP)	Gross Density	60 dph	60 dph	60 dph
	Net Density	60 dph	54 dph	45 dph
Near Public Transport Nodes (eg Rail Station 750m)	Gross Density	50 dph	50 dph	50 dph
	Net Density	50 dph	45 dph	38 dph
Walking distance of town centres (750m from edge of 'blue' town centre notation in RCUDP)	Gross Density	50 dph	50 dph	50 dph
	Net Density	50 dph	45 dph	38 dph
Other urban areas (remaining areas shown as urban in RCUDP and sites immediately adjacent urban areas)	Gross Density	40 dph	40 dph	40 dph
	Net Density	40 dph	36 dph	30 dph
Rural areas (within and adjacent smaller settlements in green belt and Area Around Todmorden - washed over or inset in RCUDP)	Gross Density	35 dph	35 dph	35 dph
	Net Density	35 dph	32 dph	26 dph

*Based on research in 'Tapping the Potential'

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

12

An initial filtering of sites was undertaken with any clearly not having potential or being outside the parameters of the assessment filtered from the assessment and the reasons recorded. Filtered sites remain within the database and are listed in Appendix 4 (Filtered Sites) along with the reasons for filtering. The criteria for filtering were agreed with the Working Group and range from, for example, sites detached from any defined settlement to sites where unacceptable environmental conditions would be experienced by residents such as sites within general industrial areas, being below the study threshold of 0.1ha or as a result of rationalising overlapping and duplicate sites and boundaries. The tests themselves were undertaken in turn with any site not satisfying a test not necessarily continuing to the next test but being recorded as Held in Abeyance. On some occasions the opportunity was taken to retain the site and find out more information first.

In order to determine whether sites are developable and deliverable as required by PPS3 the three tests in the CLG Practice Guidance of Suitability, Availability and Achievability were applied to each site.

The CLG Practice Guidance defines what is meant by the terms developable and deliverable as follows:

Developable

- In a suitable location for housing development
- Reasonable prospect will be available and could be developed at a specific point in time

Deliverable

- Site is available now
- Offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within five years from the date of adoption of the plan

Not Currently Developable

- Not known when a site could be developed e.g. where one of the constraints is severe and it is not known when it might be overcome

As explained in the CLG Practice Guidance in practice it was the degree of availability and achievability which influenced the final site assessment. The factors to be considered for each of the tests are set out in the CLG Practice Guidance. These were expanded and agreed by the Working Group and further informed by the Arup Guidance. A simple scale was employed and agreed with the Working Group with the definitions of the selected categories provided in Appendix 12.

Stage 7a Assessing Suitability for Housing

12.1 The Practice Guidance provides the overall context for assessing suitability in paragraph 37 where it states, "A site is suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities."

12.2 Sites with planning permission or allocated in the RCUDP were generally considered suitable unless circumstances had changed altering their suitability. Other sites were assessed against a range of factors based on those suggested in the CLG Practice Guidance and summarised below, with their suitability recorded as "Yes", "Possibly" or "Not Currently Suitable" (see Appendix 12 for definitions).

- Policy restrictions - high level policy in the form of national and regional level policy was applied which in summary terms generally relates to the sustainability of sites and locations. As regards policy at the local level (principally in the RCUDP) generally a policy neutral approach was adopted. Account was only taken of those policies relating to physical features such as SSSIs with policies such as those relating to the green belt and rural area around Todmorden ignored. This is in accordance with the CLG Practice Guidance and ensures that the Council is in the best possible position when determining its overall strategy towards housing provision in the Core Strategy. This approach was also recommended by Arups in their advice given that the need for a review of the Green Belt in Calderdale had been recognised by the Inspector who held the Inquiry into the RCUDP and also the Secretary of State via RSS acknowledged that a strategic review of the West Yorkshire Green belt is required. The current development plan status of sites was recorded in the database making it clear that some sites will require a policy change.
- Physical problems or limitations - examples include access, infrastructure, ground conditions, flood risk, hazardous risks, pollution and contamination. With regard to flood risk, the advice produced by Arups is that sites within Flood Risk Zone 3b (functional flood plain) be considered unsuitable because PPS25 contains a presumption against any housing development in this zone. For the other flood risk zones the advice is that since the sequential test in PPS25⁽¹⁰⁾ is intended to balance flood risk against other policy objectives, such sites be included in the Assessment, otherwise the omission of such sites would prejudice the subsequent sequential test which more appropriately takes place as part of the plan making process. This advice was followed in the Assessment.
- Potential impacts - examples include effect on landscape features and conservation.
- Environmental conditions - such as those that would be experienced by prospective residents.

Stage 7b Assessing Availability for Housing

12.3 The factors taken into consideration were based on those in the CLG Guidance and included any legal and ownership problems arising from multiple ownerships, ransom strips, tenancies or operational requirements of landowners. A four point scale of "Yes", "High Possibility", "Low Possibility" and "No" was used to record a site's availability (see Appendix 12 for definitions). Essentially to be available a site had to be controlled by a housing developer who had expressed an intention to develop (either through applying for planning permission or the 'Call for Sites' Exercise) or the land owner had expressed an intention to sell.

12.4 The assessment acknowledged that the fact a site has planning permission does not necessarily mean it is available since planning applications can be made by persons who do not necessarily have an interest in the land. In addition sites can commence but then development can be halted. In order to determine whether sites with planning permission were generally available, those sites with planning permission older than 2 years or where construction had commenced more than 3 years ago but were not yet complete, were investigated. At the time of the initial SHLAA, where there were doubts about sites these were addressed through a questionnaire survey (see Appendix 10). For the review questionnaires were not employed due to the relatively low response rate previously, rather site visits were undertaken where it was unclear as to how sites were progressing. However, sites under construction for more than 3 years were placed on a schedule of future site visits to take place during the review year as these were too numerous to accommodate during review of the SHLAA. The same approach was adopted for lapsed sites to confirm their status for the HLA database and suitability for inclusion in the SHLAA.

12.5 Information for sites without the benefit of planning permission was sought in two main ways. For sites submitted as a result of the 'Call for Sites' exercise availability information was requested on the pro-forma and generally supplied. For other sites a survey to determine land availability was carried out. After obtaining ownership details from the Land Registry, 34 land availability questionnaires accompanied by a covering letter were sent to the respective landowners. This survey also provided two scenarios covering a 'normal' market and that created by the economic downturn in order to obtain as balanced a picture as possible. A copy of the questionnaire is included in Appendix 11. Some 34 questionnaires were issued with 15 responses or 44% returned. This exercise also resulted in a number of landowners contacting the Council when further information was often gathered.

Stage 7c Assessing Achievability for Housing

12.6 The CLG Guidance states that a site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and sell the housing over a certain period. The main factors taken into consideration in assessing achievability were based on those in the CLG Practice Guidance and can be summarised as:

- Market Factors such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and projected rate of sales
- Cost Factors such as site preparation costs in relation to any physical constraints, any exceptional works necessary, relevant planning standards or obligations and prospect of funding or investment to address identified constraints or assist development
- Delivery Factors such as phasing by the developer, realistic build out rates on larger sites, whether there is a single developer or several developers offering different housing products and size and capacity of the developer

12.7 In order to obtain as realistic a view as possible regarding the achievability and deliverability timescales of sites and taking the above factors into account much reliance was placed on the input of the housebuilder representatives on the Working Group. A schedule listing all identified sites together with an A4 site plan of each site and 1:10,000 plans showing the location of sites across the district together with a pro-forma (see Appendix 13) was sent to all members of the Working Group for their comments. The views of the housebuilders were particularly useful for determining whether sites were developable and when, together with views on their capacity. The comments returned on the pro-formas were input to the database and analysed to ensure agreement across the Working Group with a brief summary assessment undertaken of each site highlighting any salient factors. The additional survey seeking owners' intentions referred to in previous sections was also helpful in determining the achievability and deliverability timescale of sites. The achievability of sites was recorded on a 3 point scale of "Highly Likely", "Possible" and "Not Achievable" (see Appendix 12 for definitions).

12.8 The actual timing of sites coming forward was also assessed and recorded under a four point scale reflecting their deliverability of "Short term deliverable site", "Medium term deliverable site", "Long term deliverable site" and "Held In Abeyance" (see Appendix 12 for definitions). For larger sites the delivery period occasionally overlapped two of the deliverability categories with the predominant one being recorded in the database. Within these time periods completions were also allocated to years. This took account of the number of completions realistically possible on any one site based on information provided by the housebuilders and shown in Table 5 'Annual Delivery Rates - New Build' and Table 6 'Annual Delivery Rates - Conversions'. The timescale used was over 17 years in order to reflect the fact that this first SHLAA review has been produced around two years in advance of the programmed adoption date of the Core Strategy. This accords with the advice in PPS3 Housing that SHLAAs should cover at least the period of 15 years from the date of adoption of the Core Strategy. Whilst a degree of prioritisation based on selected delivery time periods is useful, clearly

this cannot be too precise when attributing to specific years further ahead. Sites will be moved between years on the annual reviews as more information becomes available and as they move closer to the present.

12.9 The Held in Abeyance category (18 years and beyond) is included to record those sites that it is less clear will be developed within the time period of the Core Strategy but should be re-assessed on the annual review to determine whether they could move forward. Only limited information is shown for many of these sites as they may have fallen at the first test and subsequent tests not carried out. Sites fall within this category for a number of reasons. For example, there may be constraints which cannot be overcome in the period of the Core Strategy or for which further information is required, it may be that the spatial strategy which is adopted in the Core Strategy makes sites currently unsuitable more suitable or other studies such as the Amenity Land Study (yet to be undertaken) will determine the most appropriate use for some sites. There are also a number of underused employment sites across the district where an alternative use may be more appropriate but unless these sites have been put forward in the 'Call for Sites' Exercise they have not been included in the SHLAA as the Council does not wish to prejudice the future of existing employment uses. The majority of the "Held in Abeyance" sites are developable but there is more uncertainty about the timing of any development.

12.10 At the end of the Assessment there were a small number of sites where views differed as to their developability and/or deliverability. In most cases this was the result of additional or more recent information and based on this information these sites were placed in the most appropriate Deliverability category. Usually this was the Longer Term Deliverable Site category due to there being a greater level of uncertainty about these sites.

Table 5 Annual Delivery Rates - New Build

Site Status	Site Size/ Number Units <50	Site Size/ Number Units >50	Notes
Under Construction Lead in time	N/A	N/A	
Under Construction Build Rate	30	30	Mid-point of 25-35 dwellings per annum range employed (range as advised by Working Group members). Build rate applied to residual of the agreed capacity not already built.
Full Planning Permission (PP)/Reserved Matters PP Lead in time	1.5 years	2.5 years	1 year for infrastructure etc + 6 months to first completion. For new build flats, a further 6 months is added to cover the period to re-apply for planning permission, assuming these will not come forward due to the oversupply in the market. Additional year allowed for sites over 50 dwellings.
Full Planning Permission (PP)/Reserved Matters PP Build Rate	30	30	Mid-point of 25-35 dwellings per annum range employed (range as advised by Working Group members).

Site Status	Site Size/ Number Units <50	Site Size/ Number Units >50	Notes
Outline PP Lead in Time	2.5 years	3 years	6 months to obtain Reserved Matters planning permission + 1 year for infrastructure etc + 6 months to first completion + additional 6 months to reflect current market conditions. Longer period for larger sites.
Outline PP Build Rate	30	30	Mid-point of 25-35 dwellings per annum range employed (range as advised by Working Group members).
PP sites subject of questionnaire survey (Initial SHLAA)			Lead in and build rates as per above rows, reflecting site status, and adjusted for questionnaire responses. Non-responses set to "Held in Abeyance"
Other Sites Lead in time			Based on information from Working Group site by site. Checked to ensure sites requiring policy change accord with LDS timetable
Other Sites Build rate	30	30	Mid-point of 25-35 dwellings per annum range employed (range as advised by Working Group members).

Table 6 Annual Delivery Rates - Conversions

Site Status	Site Size/ Number Units <50	Site Size/ Number Units >50	Notes
Under Construction Lead in time	N/A	N/A	
Under Construction Build Rate	40	40	Mid-point of 35 -50 dwellings per annum range employed (range as advised by Working Group members).
Full Planning Permission (PP)/ Reserved Matters PP Lead in time	1 Year	2 years	
Full PP/ Reserved Matters PP Build Rate	40	40	Mid-point of 35 -50 dwellings per annum range employed (range as advised by Working Group members).

Site Status	Site Size/ Number Units <50	Site Size/ Number Units >50	Notes
Outline PP Lead in time	2 years	2 years	
Outline PP Build Rate	40	40	Mid-point of 35 -50 dwellings per annum range employed (range as advised by Working Group members).
Other Sites Lead in time			Based on information from Working Group site by site. Checked to ensure sites requiring policy change accord with LDS timetable
Other Sites Build Rate	40	40	Mid-point of 35 -50 dwellings per annum range employed (range as advised by Working Group members).

Notes

Mixed use schemes - non-housing uses retained. Re-calculation applied to percentage of site granted planning permission for housing (from application drawings)

New Build Flats - assumed any planning permissions for new build flats would be re-negotiated. Therefore re-calculated for houses using density multipliers employed in Assessment (see Stage 6) and additional 6 months added to reflect need for obtaining revised planning consent.

Delivery Years calculated according to sites status e.g. sites with planning permissions based on decision date (sites taken from March 2010 HLA database)

Build rates quoted in tables are mid-points of ranges Working Group house builder representatives advised are achievable

For larger sites assumed more than 1 developer but output restricted to reflect market take up of dwellings

Stage 7d Overcoming Constraints

12.11 Where constraints were identified these were recorded in the database along with a description of the constraints, whether action was required to overcome them, the type of action required and whether this could be achieved in the time period covered by the Core Strategy. The views of the Working Group were important in assembling this information.

12.12 In terms of major constraints these can be broadly summarised as the A58/A644/A649 Junction at Hipperholme and the crossing of the Calder and Hebble Navigation in the vicinity of the former Sterne Mills at Copley.

12.13 During the annual review further more detailed information was sought on a number of both the existing and new identified sites. This was both as a result of information submitted during the review year and direct approaches to relevant bodies such as, for example, the Environment Agency.

13 Stage 8: Review of the assessment

13.1 The assessment of developable and deliverable sites was reviewed with an indicative trajectory produced in order to determine whether their combined potential was sufficient to provide a pool of sites to allow genuine choice about sites to allocate. The trajectory included sites for the whole of the period of the Core Strategy from its programmed date of adoption and for the preceding 2 years leading to adoption and indicated the points within this 17 year time frame when sites could be delivered. The actual number of dwellings identified in the assessment and the forward trajectory can be viewed in the Results and Analysis Section of this report. Since the actual number of dwellings that could potentially be delivered exceeded the RSS housing requirement it was considered that even if some sites did not come forward at the point envisaged the risk of insufficient sites being available to allocate was small and did not justify attempting to boost the supply by re-visiting matters such as the density assumptions or seeking further information on some of the sites classified as "Held in Abeyance" in order to move these sites into the period covered by the assessment. Rather, it was concluded that it was appropriate to conclude the review with a view to collecting further information during the review year since subsequent updates will continue to provide further information to help assess some of those sites "Held in Abeyance". Furthermore, with the economic downturn the risk of the supply diminishing significantly in the short term was considered unlikely.

13.2 The conclusions from this indicative trajectory meant that there was no need to undertake stages 9 (identifying and assessing broad locations) and 10 (determining the housing potential of windfalls) in this SHLAA review. However, whilst these stages have not therefore been undertaken, commentary is included under these headings in order to provide an overall context for the assessment and pointers for review.

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

14.1 As explained in the preceding section sufficient land has been identified to meet the requirements of the assessment and therefore there is not a need to identify and explore the potential of broad locations. Notwithstanding this fact, during the course of the assessment there are a number of areas that have been identified which could be considered as broad locations. These have been noted should there be a need to assess these areas at a future review of the assessment. Such areas include:

- constrained sites within the urban areas where a more comprehensive approach would enable these to come forward such as existing areas containing a number of older employment premises not suited to the needs of modern employers
- extensions to existing settlements, particularly where it is known that some of the land owners are interested in putting their land forward for development but where additional land is required to create logical planned extensions although in some cases there may be a need to avoid the coalescence of settlements.
- additional areas of land associated with the proposed New Growth Point.

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

15.1 PPS3 Housing states that allowances for windfalls (sites not specifically identified as available) should not be included in the first 10 years of land supply unless there is evidence of genuine local circumstances that prevent specific sites being identified. This point was also emphasised by both the Home Builders Federation and the Government Office for Yorkshire and the Humber in response to the draft methodology. As explained in relation to Stage 8, sufficient sites have been identified to negate the need to include an assessment of the contribution windfalls could make to the provision of housing. They have therefore not been considered in this Assessment.

15.2 Historically windfalls have made a significant contribution to housing provision in Calderdale and therefore for information purposes only, Table 7 has been included to demonstrate the number of dwellings delivered from windfall sites over the last six years and which have averaged 796 dwellings per annum for brownfield sites over this period. However, whilst it is acknowledged that the identification of sites in the SHLAA process will preclude these sites from being classed as windfalls in the future, the contribution of windfalls to the delivery of housing is expected to continue. For example, sites below the study threshold of 0.1ha will come forward and this is confirmed by a number of such sites being put forward by land owners in response to the 'Call for Sites' exercise. Some employment sites are also likely to continue to come forward for development but not included in the Assessment because they are currently being used for employment purposes. Future reviews of the SHLAA windfalls will monitor and record windfalls to reflect the identification of such sites in this process. Once windfalls have planning permission they will become part of the housing supply and be added to the SHLAA database on the next update.

Table 7 Dwellings from Windfall Sites 2004 to 2010

Year	Brownfield	Greenfield	Total
2004/2005	637	40	677
2005/2006	862	52	914
2006/2007	1139	43	1182
2007/2008	1045	23	1068
2008/2009	565	7	572
2009/2010	531	27	558
Total	4779	192	4971

15.3 The relevant DPDs, once adopted, will set out how to manage housing provision following the plan, monitor and manage approach advocated in PPS3 Housing. Phasing of the supply will be influenced by contributions from windfalls which could result in some allocated sites not being required at the point originally envisaged.

16 Land Supply Demonstrated by Assessment

16.1 Appendix 1 contains the detailed Schedule of Sites with Planning Permission whilst Appendix 2a provides the Indicative Locational Maps for the Schedule of Other Sites (those sites without planning permission) included in Appendix 2b. Sites categorised as Held in Abeyance are listed in Appendix 3 along with the reason why they cannot be included in the Assessment at this time. A summary of the district's housing potential is provided in the tables below. For ease of reference the definitions of the various deliverability periods are repeated, together with the actual years they relate to, in this second published SHLAA.

Table 8 Definition of Deliverability Periods

Deliverability Period	Assessment Years	Years
Short Term Deliverable Site	1 -7	20010/11 - 2016/17
Medium Term Deliverable Site	8 - 12	2017/18 - 2021/22
Long Term Deliverable Site	13 -17	2022/23 - 2026/27
Held In Abeyance	18+	2027+

Site Status by Deliverability Category

Table 9 Deliverability - All Sites

	Dwellings	Hectares	No. Sites
Short Term	5550	180.97	849
Medium Term	8182	259.06	109
Long Term	3771	149.30	77
Total	17503	589.33	1035
Held In Abeyance	6055	224.04	420

16.2 Overall the Assessment demonstrated a potential capacity in the district for 17,503 dwellings on 1,035 sites comprising 589 ha following the policy neutral approach at the local level as explained in the methodology. This is spread over the 3 deliverability periods with some 5,500 dwellings in the Short Term, over 8,000 in the Medium Term and nearly 4,000 in the Long Term. A further 6,000+ dwellings on 420 sites could be provided by sites Held in Abeyance should the reasons causing them to be placed in this category be overcome. There are further sites classified as Held in Abeyance but where no capacity figure was recorded, usually due to these sites not being the subject of all 3 tests having failed one of the earlier tests.

16.3 The following tables separate out the data from Table 9 'Deliverability - All Sites' by the status (type) of site; sites under construction, sites with Full/Reserved Matters planning permission, sites with Outline planning permission, sites where planning permission has lapsed, sites allocated in the RCUDP, and 'Identified' sites.

Table 10 Deliverability - Sites under construction

	Dwellings	Hectares	No. sites
Short Term	1332	66.11	410
Medium Term	220	11.63	5
Long Term	0	0	0
Total	1552	77.74	415
Held In Abeyance	54	2.03	14

16.4 The majority of sites under construction are Short Term Deliverable sites, some 410 sites. A few sites under construction have been classified as Held in Abeyance due to the information provided in response to the older planning permissions questionnaire survey, this was detailed in the first published SHLAA. An additional 11 sites have appeared under this category in this review due to uncertainty over their likely completion.

Table 11 Deliverability - Sites with Full/Reserved Matters Planning Permission

	Dwellings	Hectares	No. sites
Short Term	1581	38.72	314
Medium Term	68	0.42	5
Long Term	0	0	0
Total	1649	39.14	319
Held in Abeyance	263	7.06	81

16.5 Sites with full or reserved matters planning permission fell largely within the Short Term Deliverable category, although a number were classified as Held in Abeyance based on the older planning permissions survey.

Table 12 Deliverability - Sites with outline planning permission

	Dwellings	Hectares	No. sites
Short Term	460	13.33	68
Medium Term	259	1.39	2
Long Term	0	0	0
Total	719	14.72	70
Held in Abeyance	153	1.94	16

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16.6 The number of sites with outline planning permission fell largely within the short term period, however a significant number are also within the medium term period reflecting the fact that these sites were not expected to progress in the short term despite the benefit of outline planning permission. Those sites in Held in Abeyance again reflect the survey returns, or lack of a response, to the older planning permissions survey.

Table 13 Deliverability - Sites where planning permission has lapsed

	Dwellings	Hectares	No. sites
Short Term	1	0.01	1
Medium Term	0	0	0
Long Term	99	1.60	5
Total	100	1.61	6
Held in Abeyance	391	7.41	114

16.7 The Assessment includes a number of sites which have previously had the benefit of planning permission but where this has now lapsed without being implemented. In theory these sites are likely to be developable and deliverable at some point, given they have received planning permission in the past (subject to any subsequent policy changes). As it is generally unclear when such sites may come forward they have largely been assigned to the Held in Abeyance deliverability category.

Table 14 Deliverability - Sites Allocated in RCUDP

	Dwellings	Hectares	No. sites
Short Term	42	1.15	1
Medium Term	167	4.33	3
Long Term	499	15.66	7
Total	708	21.14	11
Held in Abeyance	188	5.86	6

16.8 A greater proportion of the potential capacity from allocations in the RCUDP were placed in the Long Term deliverability period with a relatively high number also classified as Held in Abeyance. This reflects the mixed use nature of many of these sites.

Table 15 Deliverability - Identified Sites

	Dwellings	Hectares	No. sites
Short Term	2134	61.65	55
Medium Term	7468	241.28	94
Long Term	3173	132.04	65

	Dwellings	Hectares	No. sites
Total	12,775	434.97	214
Held in Abeyance	5006	199.74	189

16.9 The majority of the Identified sites (those sites without planning permission and whose source was the UCS, NLUD, the 'Call for Sites' Exercise or the field survey) were classified as Medium Term deliverable sites reflecting the fact that there was interest in bringing these sites forward but they could not come forward immediately. A large number of these sites (some 189) capable of accommodating in the order of 5,000 dwellings were classified as Held in Abeyance. Clearly if the reasons requiring these sites to be Held in Abeyance can be overcome there is a significant further source of potential here.

Brownfield and Greenfield

16.10 The following tables provide a summary of the relative amounts of brownfield and greenfield land by Deliverability category. In the Short term Deliverability category the majority of sites are brownfield, with the potential to produce 66% of the capacity identified for this period. This changes in the Medium and Long Terms where greenfield sites dominate and account for 69% and 56% respectively of the overall capacity. This pattern reflects the fact that there are a significant number of planning permissions in the Short Term category where the advice in PPS3 regarding the priority of brownfield sites will have been important. Many Medium and Longer term sites require a policy change and cannot therefore move forward before the relevant LDF documents are adopted. For the sites Held in Abeyance category, whilst greenfield sites predominate in terms of capacity (as opposed to number of sites of which the highest number are brownfield), the spread is more even.

Table 16 Short Term Deliverable Sites - Brownfield & Greenfield Summary

Site Type	Dwellings	%	Hectares	No. Sites
Brownfield	3690	66	108.90	755
Greenfield	1453	26	60.96	83
Mix of Brownfield /Greenfield	407	7	11.10	11
Total	5550	100*	180.97	849

* Figures may not sum to 100 due to rounding

Table 17 Medium Term Deliverable Sites - Brownfield & Greenfield Summary

Site Type	Dwellings	%	Hectares	No. Sites
Brownfield	1180	14	29.38	34
Greenfield	5669	69	182.69	59
Mix of Brownfield /Greenfield	1333	16	46.99	16
Total	8182	100*	259.06	109

* Figures may not sum to 100 due to rounding

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Table 18 Long Term Deliverable Sites - Brownfield & Greenfield Summary

Site Type	Dwellings	%	Hectares	No. Sites
Brownfield	981	26	28.54	26
Greenfield	2109	56	75.82	38
Mix of Brownfield /Greenfield	681	18	44.93	13
Total	3771	100*	149.30	77

* Figures may not sum to 100 due to rounding

Table 19 Sites Held in Abeyance - Brownfield & Greenfield Summary

Site Type	Dwellings	%	Hectares	No. Sites
Brownfield	2032	34	70.58	267
Greenfield	3207	53	122.13	125
Mix of Brownfield /Greenfield	816	13	31.33	28
Total	6055	100*	224.04	420

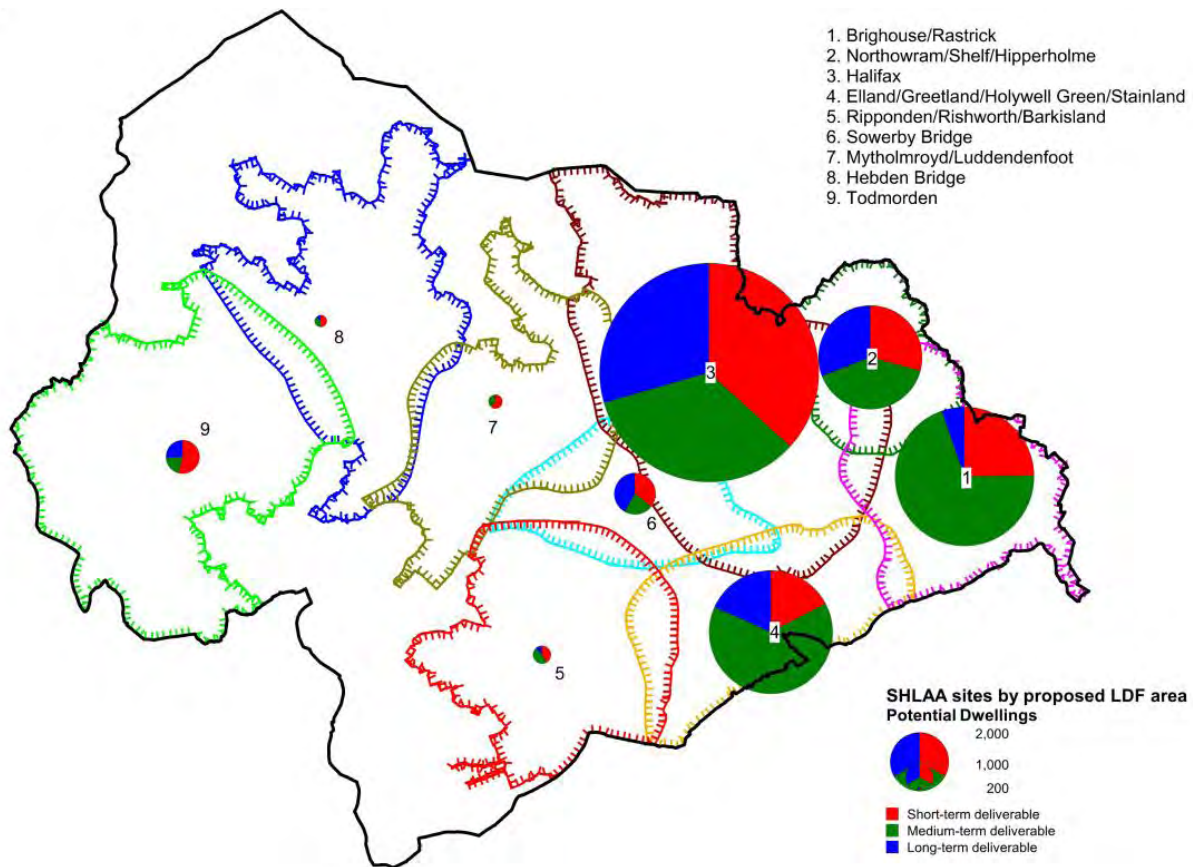
* Figures may not sum to 100 due to rounding

Spatial Analysis

16.11 A breakdown and spatial analysis of the findings has been undertaken based on the 10 areas that are proposed in the LDF Refined Issues and Options Core Strategy consultation document (CMBC, January 2011). These areas supersede the greater town areas that were used in the analysis of the 2009 SHLAA results.

16.12 The spatial distribution is shown in Map 1 'Potential delivery and number of housing units by proposed LDF area' and Table 20 'Spatial Distribution of Capacity - Short/Medium/Long Term Deliverable Sites'. It is clear that the majority of potential deliverable sites are located in the Halifax area (some 43% of the total for Calderdale), with other areas of eastern Calderdale showing the largest areas of potential. Least capacity was found in the Hebden Bridge, Mytholmroyd/Luddendenfoot and Ripponden/Rishworth/Barkisland areas, all having around 3% or less of the total housing potential identified in the Assessment.

Map 1 Potential delivery and number of housing units by proposed LDF area



NOTE: The totals presented in Table 20 'Spatial Distribution of Capacity - Short/Medium/Long Term Deliverable Sites' do not add up to the sum of all areas (set out in Tables 21-29) due to the overlapping nature of the proposed LDF areas - the total figure in Table 20 'Spatial Distribution of Capacity - Short/Medium/Long Term Deliverable Sites' is taken from Table 9 of this report.

Table 20 Spatial Distribution of Capacity - Short/Medium/Long Term Deliverable Sites

Area	Dwellings	% all dwellings	Hectares	No. Sites	Held in Abeyance Sites (Dwellings)
Brighouse/ Rastrick	4,764	27.2%	165.620	150	1285
Northowram/ Shelf/ Hipperholme	3,560	20.3%	123.560	106	682
Halifax	7,458	42.6%	249.640	399	2,052
Elland/ Greetland/ Holywell Green/ Stainland	4,198	24.0%	129.070	135	1,060
Ripponden/ Rishworth/ Barkisland	581	3.3%	26.696	82	269
Sowerby Bridge	1,404	8.0%	66.480	110	456

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Area	Dwellings	% all dwellings	Hectares	No. Sites	Held in Abeyance Sites (Dwellings)
Mytholmroyd/ Luddendenfoot	496	2.8%	17.905	76	387
Hebden Bridge	404	2.3%	12.724	71	660
Todmorden	1,156	6.6%	41.891	121	713
Protected Moorland	0	0	0	0	0
Totals (Table 9)	17503				6055

16.13 The following tables show the distribution by each LDF area in relation to the deliverability periods employed in the Assessment, including Held in Abeyance sites. The tables demonstrate that in most areas the majority of sites are either classed as short or medium term deliverable, with the Calder and Ryburn valleys showing the greatest proportion of sites as short term with fewer medium or longer term ones in particular.

NOTE: Primary and periphery areas broadly reflect the existing urban areas (primary) and the more rural/semi-rural hinterlands (periphery). These are defined and set out in the Core Strategy Refined Issues and Options report (CMBC, January 2011).

Table 21 Potential Capacity - Brighouse/Rastrick area

Deliverability Period	Primary area only			Primary & periphery area		
	Dwellings	Hectares	No. Sites	Dwellings	Hectares	No. Sites
Short 2010/11 - 2016/17	492	16.55	80	1183	38.72	120
Medium 2017/18 - 2021/22	2380	85.81	16	3328	118.53	25
Long 2022/23 - 2026/27	99	3.16	2	253	8.37	5
Totals	2971	105.53	98	4764	165.62	150
Held in Abeyance 2027+	722	22.23	34	1285	43.13	58

Table 22 Potential Capacity - Northowram/Shelf/Hipperholme area

Deliverability Period	Primary area only			Primary & periphery area		
	Dwellings	Hectares	No. Sites	Dwellings	Hectares	No. Sites
Short 2010/11 - 2016/17	893	27.63	56	1038	33.31	77
Medium 2017/18 - 2021/22	1155	40.45	14	1419	48.42	18
Long 2022/23 - 2026/27	1063	40.57	10	1103	41.83	11
Totals	3111	108.65	80	3560	123.56	106
Held in Abeyance 2027+	429	12.70	23	682	23.70	32

Table 23 Potential Capacity - Halifax area

Deliverability Period	Primary area only			Primary & periphery area		
	Dwellings	Hectares	No. Sites	Dwellings	Hectares	No. Sites
Short 2010/11 - 2016/17	1651	41.49	202	2740	75.92	317
Medium 2017/18 - 2021/22	2074	56.72	34	2517	73.87	44
Long 2022/23 - 2026/27	863	30.13	18	2201	99.85	38
Totals	4588	128.34	254	7458	249.64	399
Held in Abeyance 2027+	1637	59.00	112	2052	84.43	162

Table 24 Potential Capacity - Elland/Greetland/Holywell Green/Stainland area

Deliverability Period	Primary area only			Primary & periphery area		
	Dwellings	Hectares	No. Sites	Dwellings	Hectares	No. Sites
Short 2010/11 - 2016/17	599	15.76	71	730	20.66	103
Medium 2017/18 - 2021/22	1203	31.90	13	2697	84.85	20
Long 2022/23 - 2026/27	743	22.76	11	771	23.56	12
Totals	2545	70.42	95	4198	129.07	135
Held in Abeyance 2027+	775	35.20	39	1060	51.93	56

Table 25 Potential Capacity - Ripponden/Rishworth/Barkisland area

Deliverability Period	Primary area only			Primary & periphery area		
	Dwellings	Hectares	No. Sites	Dwellings	Hectares	No. Sites
Short 2010/11 - 2016/17	154	13.012	30	240	16.780	71
Medium 2017/18 - 2021/22	184	4.598	2	268	7.437	5
Long 2022/23 - 2026/27	42	1.514	5	73	2.479	6
Totals	380	19.124	37	581	26.696	82
Held in Abeyance 2027+	63	3.016	10	269	11.411	22

Table 26 Potential Capacity - Sowerby Bridge area

Deliverability Period	Primary area only			Primary & periphery area		
	Dwellings	Hectares	No. Sites	Dwellings	Hectares	No. Sites
Short 2010/11 - 2016/17	338	10.916	59	498	16.740	87
Medium 2017/18 - 2021/22	320	9.704	8	320	9.704	8
Long 2022/23 - 2026/27	500	37.622	12	586	40.036	15
Totals	1158	58.242	79	1404	66.48	110

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Deliverability Period	Primary area only			Primary & periphery area		
	Dwellings	Hectares	No. Sites	Dwellings	Hectares	No. Sites
Held in Abeyance 2027+	171	6.620	28	456	19.634	46

Table 27 Potential Capacity - Mytholmroyd/Luddendenfoot area

Deliverability Period	Primary area only			Primary & periphery area		
	Dwellings	Hectares	No. Sites	Dwellings	Hectares	No. Sites
Short 2010/11 - 2016/17	206	6.438	37	297	10.814	70
Medium 2017/18 - 2021/22	192	6.912	5	192	6.912	5
Long 2022/23 - 2026/27	7	0.179	1	7	0.179	1
Totals	405	13.529	43	496	17.905	76
Held in Abeyance 2027+	256	8.003	24	387	11.649	34

Table 28 Potential Capacity - Hebden Bridge area

Deliverability Period	Primary area only			Primary & periphery area		
	Dwellings	Hectares	No. Sites	Dwellings	Hectares	No. Sites
Short 2010/11 - 2016/17	132	3.193	23	198	7.112	62
Medium 2017/18 - 2021/22	125	3.348	5	150	4.135	6
Long 2022/23 - 2026/27	51	1.341	2	56	1.477	3
Totals	308	7.882	30	404	12.724	71
Held in Abeyance 2027+	506	12.887	28	660	18.810	37

Table 29 Potential Capacity - Todmorden Area

Deliverability Period	Primary area only			Primary & periphery area		
	Dwellings	Hectares	No. Sites	Dwellings	Hectares	No. Sites
Short 2010/11 - 2016/17	579	19.786	82	624	24.406	104
Medium 2017/18 - 2021/22	229	8.240	5	229	8.240	5
Long 2022/23 - 2026/27	279	8.496	11	303	9.245	12
Totals	1087	36.522	98	1156	41.891	121
Held in Abeyance 2027+	564	15.981	51	713	22.132	60

17 Housing Requirement and Trajectory

The Housing Requirement

17.1 The RCUDP provides for 450 dwellings per annum over the period of the plan (2001 - 2016) which accorded with the housing requirement set for the district in the Regional Spatial Strategy (RSS) current at the time. Subsequently RSS was reviewed and a new RSS adopted in May 2008. This Plan contains a housing requirement for Calderdale of 500 dwellings per annum from 2004 to 2008 and 670 dwellings per annum from 2008 to 2026 and replaces the requirement in the RCUDP. The base date for this first review of the SHLAA (1st April 2010) means that the proposed changes to RSSs by the Coalition Government and put forward in the Localism Bill published December 2010, have been put forward during the period of undertaking this first review.

17.2 The provision of housing must also be viewed against the backdrop of Government Policy as set out in PPS 3 Housing (amended 2010) and the previous Government green paper, "Homes for the Future: more affordable, more sustainable" (2007) ⁽¹¹⁾ in which the Government made clear their intention to significantly increase the amount of housebuilding nationally to achieve 3 million new homes by 2020. In order to attain this ambitious target the previous Government created a number of new growth points around the country, including in Calderdale where additional funding can be accessed to assist with infrastructure provision. This in turn requires Calderdale and other districts with New Growth Point status to provide above the RSS requirement. In Calderdale this could raise the requirement to 800 new dwellings. However, these Growth Points must first be tested through the development plan process.

17.3 Since the start of the RSS period in 2004, up to the 2007/2008 monitoring year, a significant number of dwellings were delivered annually above the requirement in RSS (2008) as shown in the table below. This is in line with Government policy at the time which required RSS requirements to be viewed as a floor above which housing levels could go rather than as a ceiling for housing provision (providing the locations are in accordance with the core approach in the adopted RSS).

Table 30 Net additional dwellings from start of RSS period (2004)

Year	Net Additional Dwellings
2004/2005	811
2005/2006	1176
2006/2007	1356
2007/2008	1307
2008/2009	550
2009/2010	561
TOTAL	5761

The Housing Trajectory

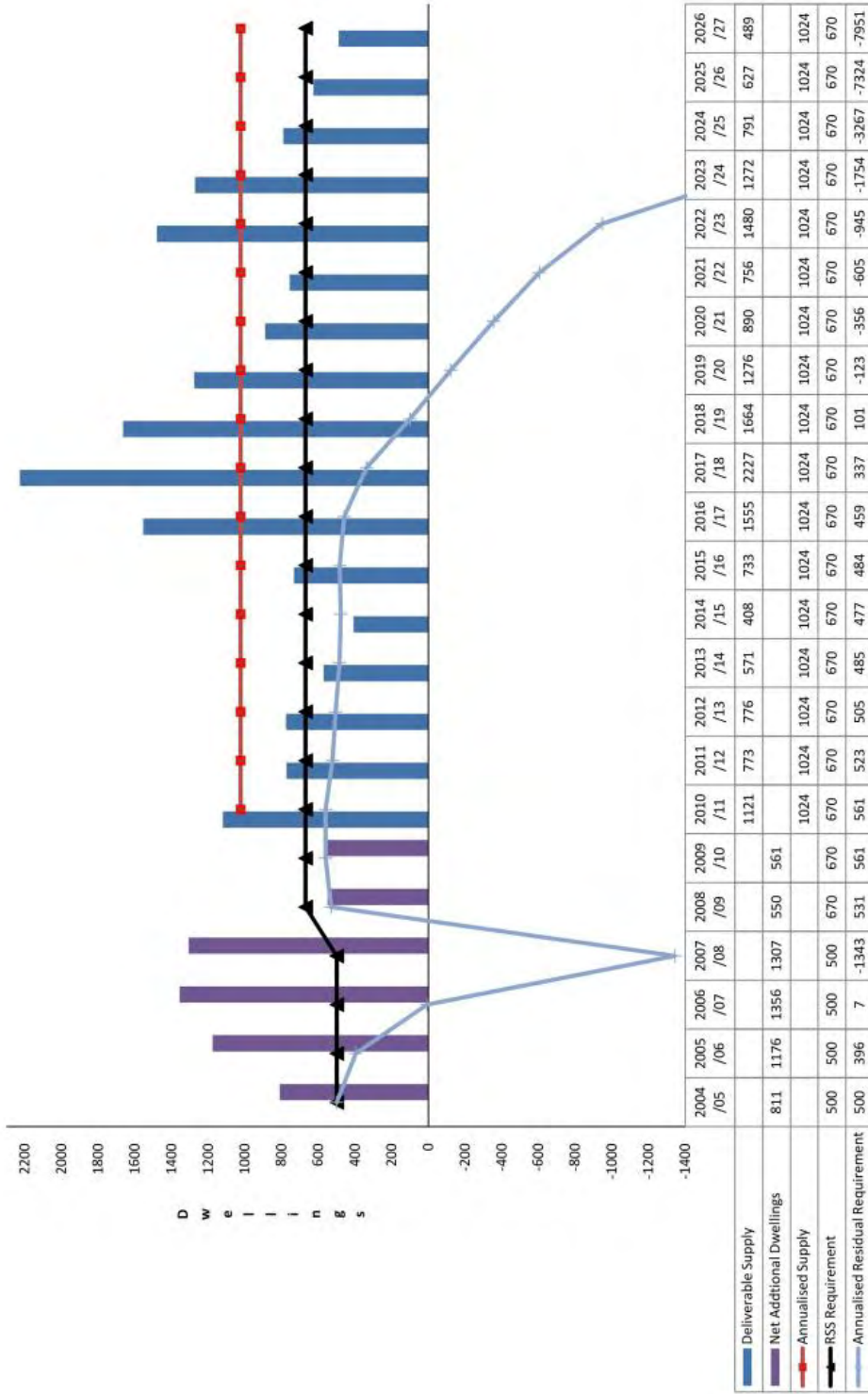
17.4 The housing trajectory for the period of the RSS (2004 to 2026) is shown in Figure 2 'Housing Trajectory 2004 to 2027' and shows that overall the delivery of net additional dwellings for the period 2004 to 2008 was above the RSS annual requirement. The oversupply in relation to the first part of

11 Homes for the Future: more affordable more sustainable, CLG, 2007

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the RSS requirement (before it stepped up) is clearly shown. In order to accommodate the 17 year period of the SHLAA review the trajectory has been extended one year for which the RSS annual housing requirement has been extrapolated. The supply of developable land for housing is above that required to meet the RSS housing requirement which could be met around 2019. The annual figures and 5, 6 and 17 year totals are also shown in Table 31 'Supply of land for housing as illustrated in the forward trajectory'. Annualising the supply provides a figure of 1024 dwellings per annum over the 17 years covered by the Assessment which includes the period before and after the programmed adoption date for the Core Strategy. The trajectory shows a number of peaks and this reflects the positioning of sites based on current knowledge. Showing the actual yearly figures rather than averaging capacity for the Deliverability periods takes the Assessment a little further than PPS3 requires it to go but this is considered useful as it helps to illustrate the position over the whole of the trajectory. Clearly there is less certainty about the actual timing of sites coming forward in the later years of the trajectory and information relating to sites in this part of the trajectory in particular, will be refined on the annual review. Since the larger sites occasionally straddle more than a single deliverability period, the yearly figures do not sum exactly to those of the deliverability periods discussed in the previous section. The trajectory also forms part of the Council's Annual Monitoring Report (AMR).

Figure 2 Housing Trajectory 2004 to 2027



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Table 31 Supply of land for housing as illustrated in the forward trajectory

Year	Timescale	Dwellings
1	2010/2011	1121
2	2011/2012	773
3	2012/2013	776
4	2013/2014	571
5	2014/2015	408
6	2015/2016	733
7	2016/2017	1555
8	2017/2018	2227
9	2018/2019	1664
10	2019/2020	1276
11	2020/2021	890
12	2021/2022	756
13	2022/2023	1480
14	2023/2024	1272
15	2024/2025	791
16	2025/2026	627
17	2026/2027	489
18+	2027+	6159
5 year total		3649
6 year total		4382
17 year total		17409

The 5-Year Supply

17.5 The requirement to maintain a rolling 5-year supply of deliverable land for housing is set out in PPS3 Housing with further advice provided by CLG and the Planning Inspectorate⁽¹²⁾. This advice note was cancelled during the period of the review and following the election of the Coalition Government in May 2010. However, the note does provide useful advice and has therefore helped inform the identification of a 5-year supply of housing land. There are three main stages:

12 Demonstrating a 5 Year Supply of Deliverable Sites, Department for Communities and Local Government and the Planning Inspectorate, March 2010

1 Identify the level of housing provision to be delivered over the following 5 years

17.6 Housing provision figures in adopted Development Plans are to be used, adjusted to reflect the level of housing that has already been delivered within the lifetime of the current plan. The RCUDP adopted in 2006 has now been superseded by the RSS adopted in 2008, for the purpose of determining the current housing requirement as explained in the Annual Monitoring Report. This Plan sets an annual requirement of 500 dwellings for the period 2004 to 2008 which increases to 670 for the period 2008 to 2026, giving an overall requirement of 14,060 dwellings between 2004 and 2026, a period of 22 years.

17.7 The requirement for the 5 years 2010/11 to 2014/15 based on the annual requirement is therefore 3350 dwellings (670 x 5). However, this has to be adjusted to reflect the level of housing provided earlier in the Plan period which, as shown in Table 30 'Net additional dwellings from start of RSS period (2004)', was 5761 net additional dwellings. The RSS requirement for this period was 3340 (500 x 4 + 670 x 2). This is 2421 dwellings above the level required to meet the requirement for this period (3340 - 5761). Deducting this figure from the total remaining requirement of 10,720 (670 x 16 - 2421) leaves 8,299 dwellings over the remaining 16 years of RSS, a rate of 519 dwellings per annum. The requirement for the next 5 year period is therefore 2595 dwellings (519 x 5).

2 Identify sites that have the potential to deliver housing during the following 5 years

17.8 These are made up of the following:

- Sites Under Construction
- Sites with Planning Permission not yet implemented
- Housing allocations in the RCUDP
- Unallocated brownfield sites with the potential to make a significant contribution to housing delivery during the 5 year period.

3 Assessing the deliverability of the identified potential sites employing the 3 tests of Suitability, Availability and Achievability

17.9 The assessment of sites categorised as falling within the 5-year supply was the same as that employed for all sites in the SHLAA as explained in Stage 7 of the Assessment. Specific comments relating to each category are as follows:

Sites Under construction and with Planning permission

17.10 The Housing Land Availability Database (March 2010 version) provided the initial list of sites with planning permission or under construction. In order to ensure as accurate a reflection as possible as to sites which will come forward in the 5 year supply period, those sites with planning permission older than 2 years or where construction had commenced more than 3 years ago but were not yet complete, were investigated as explained in Stage 7 of the Assessment (paragraph 12.4).

Allocated Sites

17.11 Input from the Working Group in undertaking the Assessment of sites provided as accurate a picture as possible regarding the deliverability time-scales for the remaining housing allocations in the RCUDP. Only one site, a mixed use site, has been included in the 5-Year supply as the other sites were considered unlikely to come forward in the next 5 years. However, there remains the possibility that some could do so, particularly if there is an upturn in the economy when both housing allocations and mixed use allocations (including housing) may be developed. Interest has been expressed in a number of sites but for a variety of reasons the timescales for delivery could be beyond the period of the 5-Year supply.

Unallocated Sites

17.12 As with the allocated sites, input from the Working Group regarding the developability and deliverability timescales of these sites ensures that as accurate a picture as possible as to when these sites may come forward, including market factors, is provided in the Assessment. The now cancelled CLG/Planning Inspectorate note advised that only unallocated brownfield sites that will make a significant contribution to housing delivery be included in the 5-Year supply. Stage 4 of the Assessment (paragraph 9.3) explains what type of sites make a significant contribution to housing supply in Calderdale. Only 15 unallocated brownfield or mixed brownfield/greenfield sites identified in the SHLAA are included in the 5-year supply. Of these sites 2 include smaller areas with planning permission and it is only these elements that have been included in the 5-year supply. Whilst the Working Group considered that there were a number of greenfield, including green belt, sites which could come forward in the first 5 years of the trajectory, these sites were allocated to the following years in order to ensure compliance with the previous CLG/PINS advice note. This could potentially result in an underestimate of the current 5-year supply.

17.13 The housing trajectory and Table 31 'Supply of land for housing as illustrated in the forward trajectory' demonstrate that there is in excess of a deliverable 5-year supply of land for housing. Dividing the deliverable supply by the 5 year housing requirement demonstrates a 5-Year supply of 141% ($3649/2595 \times 100$). Given the historic importance of windfalls in the district, whilst not included in the forward trajectory resulting from the Assessment, these will continue to come forward and increase the supply of deliverable housing land as explained in Stage 10 of the Assessment (paragraph 15.2).

A large number of sites under construction for more than 3 years were removed from the supply due to the uncertainty surrounding their likely eventual completion. The potential for these sites to actually add to housing delivery requires further investigation. This is currently ongoing but given the number of sites involved and the need to visit many of them this is too large an exercise to undertake during the course of a single review and will therefore also inform future reviews. The number of units removed from the supply for this purpose represents some 33% of the total units with planning permission at the commencement of the review. This is a significant proportion since 10-15 % is a more common range of units to discount. The 5-year supply can therefore be viewed as a conservative estimate.

17.14 In order to demonstrate a continuous forward land supply, a 6-year supply figure has also been calculated giving a figure of 124%. This makes it easier to demonstrate a 5-year supply remains, once the first year has commenced and prior to the annual review taking place. This will be important for demonstrating a deliverable 5-year supply in the case of, for example, planning appeals.

The Strategic Housing Market Assessment (SHMA)

17.15 A Strategic Housing Market Assessment (SHMA) is being undertaken as required by PPS3 Housing and will compliment the SHLAA. This study will estimate housing need and demand for both market and affordable housing across the district. It will consider future demographic trends and identify the accommodation requirements of specific groups such as first time buyers and older people.

17.16 The research will support the authority in developing a strategic approach to housing by assessing the key drivers and relationships within the housing market. The Study will provide the bulk of the evidence required for local authorities to appraise strategic housing options and to ensure the most appropriate and cost-effective use of public funds. The study is programmed to be completed Spring 2011.

18 Annual Review

18.1 Given the low response rate in relation to the draft methodology, together with the fact that there is no requirement to consult on the SHLAA, it was determined that once the first SHLAA had been agreed by the Working Group the final report be published. This is the approach followed for the review which now updates the SHLAA component of the wider evidence base for the LDF and is available to view on the Council's website. With the major stakeholders represented on the Working Group, additional comments received during wider consultation generally related to specific sites rather than the overall approach. However, the SHLAA is updated annually (April) and feeds directly into the Annual Monitoring Report (particularly the trajectory produced as part of Core Output Indicator H2c).

18.2 As well as adding new sites, the information on existing sites will be refined to build up as firm and up-to-date a picture of each site's developability and deliverability as possible. Information which it was not possible to obtain at the time of the previous assessment will be sought in advance of the review date including that relating to those sites recorded as "Held in Abeyance". The Council's website invites comments on the published SHLAA and any comments received will inform the annual review. In effect the SHLAA is a 'Living Document'.

18.3 In addition the annual review provides the opportunity to take into account any new or changes to existing high level policy in applying the suitability test and any changes to market conditions for applying the achievability test.

19 Conclusions

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19.1 The Assessment has been undertaken in accordance with the CLG Practice Guidance and demonstrated that the pool of sites to draw on when making development plan allocations in the relevant LDF documents is approximately double in size to the number of dwellings remaining to be met in the RSS housing requirement. This provides the necessary flexibility in determining the appropriate strategy to pursue in the Core Strategy and enables a range of options to be considered when for example, reviewing the green belt boundary or allocating land for other uses such as employment. The pool of sites increases further when the potential from the sites Held in Abeyance is also considered. Further work to progress the Core Strategy is programmed for 2011, whilst the first issues and options consultation on the Land Allocations and Designations DPD is programmed for late 2011.

19.2 The Assessment has also demonstrated that the Council has a 5-year supply of developable and deliverable housing land. It will also be of assistance in completing the AMR.

19.3 The Assessment is reviewed annually when information on specific sites will be updated and other influences such as changes in market conditions assessed as part of the overall review of the position in relation to housing land supply. This is undertaken in conjunction with a Working Group of key stakeholders and will effectively be a 'Living Document'.

19.4 As explained in the Disclaimer at the start of this report the SHLAA remains a technical exercise exploring the potential scale of housing land supply in the district and as such is just one part of the evidence base being prepared to underpin the LDF. Sites identified in the Assessment do not have any planning status and applications for planning permission will be considered against the Replacement Unitary Development Plan (as amended by direction of the Secretary of State August 2009) and any other material considerations.