



Assessment of land availability

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Planning Policy Team
Cheltenham Borough Council
PO Box 12
Municipal Offices
Promenade
Cheltenham
Gloucestershire
GL50 1PP

tel: 01242 264328
email: planningpolicy@cheltenham.gov.uk

www.cheltenham.gov.uk/planningpolicy

Please note that the assessment of land availability is a technical assessment to inform strategic planning. The inclusion or omission of a site, development type or development timescale should not be used to infer that planning permission would or would not be granted.

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1. Introduction

1.1 This assessment of land availability provides a snapshot of development potential in Cheltenham Borough on 31 December 2013. The assessment has been carried out in accordance with the government's emerging National Planning Practice Guidance¹:

An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment of land availability includes the Strategic Housing Land Availability Assessment requirement as set out in the National Planning Policy Framework.

It is an important step in the preparation of Local Plans. The National Planning Policy Framework identifies the advantages of carrying out land assessments for housing and economic development as part of the same exercise, in order that sites may be allocated for the use, which is most appropriate.

1.2 In order to meet current planning requirements the study has also been carried out in accordance with the National Planning Policy Framework and in the context of the Strategic Housing Land Availability Assessment (SHLAA) Practice Guidance 2007.

1.3 The assessment is part of the evidence base informing the Local Plan for Cheltenham. This will comprise the Joint Core Strategy (JCS) for Gloucester, Cheltenham and Tewkesbury, and the Cheltenham Plan. More information can be found online at www.cheltenham.gov.uk/planningpolicy.

1.4 The findings of the 2013 assessment will feed into the Publication (pre-submission) JCS by informing work on Strategic Allocations and also the 'district capacity' of Cheltenham Borough (refer to Table SP.2a of the Draft JCS which can be found at www.gct-jcs.org).

1.5 The assessment will also provide the basis for work on Cheltenham's non-strategic site allocations contained in the Cheltenham Plan (see www.cheltenham.gov.uk/localplan).

1.6 The assessment is an important piece of evidence for the preparation of a housing trajectory and five year supply of specific deliverable sites as required by NPPF paragraph 47. These will be published separately in association with the next stage of the JCS.

1.7 ***Please note that in order to take account of the emerging plan, the methodology employs certain assumptions relating to the Draft JCS evidence base and proposed Green Belt revisions. If in developing the Publication JCS these assumptions need to be revisited then site assessments and associated development potential will be reviewed and updated to inform the Publication JCS.***

1.8 Cheltenham Borough has been working with all Gloucestershire districts on an agreed methodology for site assessment. Dialogue is ongoing and further amendments/refinements may be made to the methodology in future versions of this report.

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/assessment-of-land-availability/what-is-the-purpose-of-the-assessment-of-land-availability/>

2. Methodology

Assessment process

- 2.1 The methodology in this section relates primarily to Stage 1 and Stage 2 of the assessment process described in the emerging National Planning Practice Guidance. Stage 1 is the identification of sites and stage 2 is the assessment of sites. Stages 3, 4 and 5 are covered by section 3 of this report.
- 2.2 The starting point for the assessment of land availability was the published Strategic Housing Land Availability Assessment 2012 and other work carried out by Cheltenham Borough Council on a Strategic Employment Land Availability Assessment. These assessments include sites that were either submitted to the Council or identified by officers in accordance with the 2007 SHLAA guidance.
- 2.3 Cheltenham Borough Council conducted a 'call for sites' between 15 October and 13 December 2015 which was sent to everyone registered on the Cheltenham Plan database including landowners, developers and agents. The call for sites was publicised in the local press and on the Council's website, resulting in around 15 new site submissions and updates to sites previously submitted.
- 2.4 In addition to the call for sites, meetings were held with officers at Cheltenham Borough Council and Gloucestershire County Council to identify any further sites and collect up-to-date local information. An extensive desk-based review was carried out to update the work of previous years which included site surveys. Interested parties were also contacted where necessary in order to obtain updates on proposals and delivery timescales.
- 2.5 Once all information had been collated it was shared with a Site Assessment Panel comprising of local agents, representatives of the development industry and local specific consultees. The terms of reference for the Panel are provided in Appendix 1 of this report. A Panel meeting was held at the Municipal Offices on 22 January 2014 in order to obtain feedback on the assessment methodology and collect information on the deliverability of sites. It should be noted that this was the second of two Panel meetings for the JCS authorities. At the first meeting, which was held on 12 December 2013 in Gloucester, a draft assessment methodology was shared with the Panel and information was collected on the deliverability of sites in Gloucester City and Tewkesbury Borough.
- 2.6 Following the Panel, comments received were reviewed and additional enquiries were made to establish the deliverability and development timescales for specific sites. The final results of the site assessments are provided in Tables 1 – 4 of this report.
- 2.7 To inform Cheltenham's housing trajectory and five year supply of deliverable sites it is necessary to collect information on developments that have already received approval as well as the potential development sites described above. Tables 5 – 7 therefore provide a list of:
- sites that have received planning consent for housing;
 - sites with a Council resolution to grant consent subject to completion of a Section 106 legal agreement; and
 - sites that have received approval for conversion of offices to residential use under permitted development rights.

2.8 The housing trajectory and five year supply will also include an allowance for ‘windfalls’, i.e. sites that haven’t been specifically identified and become available unexpectedly. In Cheltenham, windfalls have historically been an important source of new housing delivery, particularly on smaller sites and through conversions and subdivisions. The JCS authorities are working together to develop an NPPF compliant windfall approach that is summarised in the methodology table below. To inform that work, a record of housing completions on small sites (1-4 dwellings) is provided in Table 8 of this report.

JCS authorities’ joint methodology

2.9 During 2013 the JCS authorities developed a joint methodology covering the main parameters involved in the assessment of land availability. This approach was shared with the two Site Assessment Panels and updated to reflect feedback from the panel.

2.10 The shared methodology is provided below and includes:

- the approach for identifying sites
- criteria for assessing whether a site is suitable, available and achievable for housing or economic development and other uses
- the approach to assessing site capacity
- the general approach to community involvement
- criteria for establishing the delivery timescale or phasing of sites
- an indication of the approach to windfalls to be used for work on housing trajectories and the five year supply

Supply component	Approach
Assessment sites from a range of sources:	Existing/draft/emerging development plan site allocations
	Submitted sites
(Nb: From 2013 onwards sites that could deliver 5 or more dwellings or covering 0.2ha are included in the assessment)	Officer-identified sites
	Assessment sites from previous years
	Expired planning permissions yielding 5 or more units from 2011/12 monitoring period onwards
Planning consents	All extant planning consents for residential use are included in the assessment as potential housing sites
Criteria	
Suitability	A site is considered suitable if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. The assessment focuses on the existence of physical and environmental constraints, based on available evidence. To reflect the fact that development plans are being reviewed, existing Local Plan policies which restrict the use of a site or area are not, in general, employed at this stage of the assessment. The key exceptions to this approach are designated Green Belt areas and the Cotswold Area of Outstanding Natural Beauty (AONB). The approach to sites in these areas is also set out below.

	<p>Assessment of the suitability of a site for development is also informed by local evidence including the existence of any relevant pre-application discussions, planning applications, Development Briefs, Supplementary Planning Documents etc. and evidence gathered from site assessment panels.</p>
Availability	<p>A site is considered available for development where there is confidence that there are no legal or ownership problems such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners, the land is controlled by a developer who has expressed an intention to develop, or the landowner has expressed an intention to sell.</p> <p>Where such constraints exist, a site may be considered available where the local authority considers that constraints can be overcome in a timely manner.</p>
Achievability	<p>A site is assessed as achievable where it is considered deliverable and viable and there is reasonable prospect of it being available at a point in time. This is essentially a judgment about the economic viability of a site and also its deliverability in relation to current and emerging planning policies where appropriate.</p> <p>It is the role of the Sites Assessment Panel to help advise on the viability of sites. This may be supplemented by the use of viability assessment tools such as the Planning Advisory Service (PAS) viability toolkit.</p> <p>A site cannot be considered achievable if it is identified as unavailable or unsuitable. Sites require a timescale for delivery where suitable, available and achievable, namely 1-5, 6-10, 11-15 years or 16-20 years.</p>
<p>Suitability for residential development</p>	
Green Belt	<p>A Green Belt site may be considered suitable where it is located within an area of Green Belt proposed to be removed by the emerging Joint Core Strategy.</p>
Cotswolds AONB	<p>A site may be considered suitable where it is sustainably located and is not in an area of 'high' landscape sensitivity (see landscape section below). However, in the absence of an evidence base relating to the landscape sensitivity of sites within the AONB a precautionary approach will be taken for the purpose of this assessment and sites will generally be considered unsuitable.</p>

Physical constraint: Flood Risk	<p>A site is assessed as unsuitable if entirely within flood zone 3a/b. This is informed by the Environment Agency Flood Zone Map, Strategic Flood Risk Assessment Level 1 (2008), Level 2 (2010) and Level 2 Additional Assessments (2013). A site's capacity will be adjusted where part of the site falls within flood zone 3a or 3b.</p> <p>Consideration will be given to whether the site includes a watercourse, culverted watercourse, or planned scheme to mitigate flood risk.</p>
Physical constraint: Access	A site is not suitable if not physically accessible and constraints cannot be overcome within the achievability considerations.
Physical constraint: Topography	A site is not suitable if the topography of the site is steeply sloping or deemed a physical constraint on development. A site's capacity will be adjusted where part of the site is physically constrained by topography.
Evidence: Landscape	<p>The Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis is used to assess landscape sensitivity around the JCS Broad Locations (2011). In general, a site is considered unsuitable where it is assessed as being of 'high' landscape sensitivity. It is accepted that this does not cover the entire JCS area, where other landscape designations exist these will be noted but will not necessarily affect suitability.</p> <p>Where local landscape analysis exists, this will also be used to inform assessments.</p>
Cordon Sanitaire	<p>A site is unsuitable if it falls within an identified cordon sanitaire.</p> <p>Nb. For Cheltenham areas of cordon sanitaire are identified within the adopted Local Plan as a Development Exclusion Zone.</p>
Contamination	The existence, or likely existence, or contamination will be considered in determining the suitability of the site. Where contamination is known to exist on a small site this may affect viability for residential use.
Suitability for economic development and other uses	
Employment development	<p>Sites are considered in accordance with the same criteria as residential development. The suitability of the site with regard to infrastructure requirements is also taken into consideration.</p> <p>A site can be considered suitable for both residential and employment uses.</p>
Other uses	Sites may be considered for other uses where appropriate to inform their development plans

Capacity considerations

Market adjustments to existing consents For sites with planning consent, housing development capacities may be adjusted, taking into account any planning applications, local delivery evidence and the views of the 2013 site assessment panel where the existing planning consent is considered unviable or undeliverable under current market conditions.

Density assumptions - residential The NPPF encourages local planning authorities to set their own approach to housing density to reflect local circumstances.

Site capacities are assigned based on evidence from promoters of sites, urban design principles and other local information.

Where evidence is unavailable, for Cheltenham and Gloucester, 40-50dph is generally used for the urban area and 30-40dph for areas outside of this. For Tewkesbury, 30-40dph is used for urban areas and 30dph for other areas.

To account for a proportion of the site that will be taken up by infrastructure and landscaping, a density multiplier is applied to achieve a net developable area based on the following assumptions:

Density Multiplier Assumptions

Site Size (ha)	Discounted site area	Area for housing
0-0.4	10%	90%
0.4-2	17%	83%
2+	37%	63%

Density assumptions - employment Site capacity is expressed as a developable area in hectares. Where necessary this can be used to calculate floor space and jobs capacity using guidance on densities.

It is for the plan making process to identify locations for specific types of employment development.

Cotswolds AONB When assigning development capacities to sites within the AONB, regard will be had to NPPF paragraph 116 which states that 'planning permission should be refused for major developments in these areas except in exceptional circumstances'.

Evidence: Conservation Heritage is identified as a potential constraint on capacity and where a listed building of scheduled ancient monument exists figures may be adjusted accordingly.

	Gloucester undertook a review of all sites with regard to impact on heritage constraints for 2012 and 2013.
Evidence: JCS Wildlife/Biodiversity	JCS Biodiversity Evidence is identified as a potential constraint on capacity where available but figures are not adjusted at this stage.
Evidence: Green Infrastructure	Green Infrastructure is identified as a potential constraint on capacity where available but figures are not adjusted at this stage.
Contamination	Contamination is identified as a potential constraint on capacity but figures are not adjusted at this stage.

Involvement of local communities

Community involvement	Community involvement includes any 'call for sites' carried out by a local authority as well as public consultation carried out as part of development plan preparation (for example the Gloucester City Plan sites consultation). Sites emerging from Neighbourhood Plan work will be incorporated into the 2014 assessment.
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Residential site phasing

Purpose	To inform plan making and to provide evidence for the NPPF requirement for local authorities to produce housing trajectories and to maintain a 5 year supply of deliverable sites.
Time period	20 years
First five year period	Commences in 2013/14
Role of phasing	To give an indication of when dwellings on achievable development sites could be delivered, particularly during the first 5 years.
Small sites	The phasing of housing development on small sites will reflect the approach employed for the emerging Joint Core Strategy.
Green Belt sites	Where a site is proposed to be removed from the Green Belt by the emerging Joint Core Strategy it will not be included within the first 5 years unless some progress has been made in bringing the site forward.
Greenfield sites	All potential greenfield sites have been included within residential sites phasing against appropriate delivery times. A greenfield site can be included in the first 5 years against realistic delivery rates where some progress has been made in bringing the site forward.
Lapse rate	A lapse rate may be applied to extant planning permissions - to be justified by local authorities based on local circumstances.
Windfalls	For the purpose of the JCS housing trajectory an assumption about windfall development will be made in addition to the supply from planning consents and assessment sites. This will project past delivery trends

	forward for windfall sites of 0-4 dwellings, recognising that the majority of larger scale development will come forward through sites identified by Local Plans. The period of analysis will be ten years to encompass the economic cycle (2003 to 2013). Windfall development occurring on garden land will be excluded from the figure in accordance with NPPF Paragraph 48. The windfall allowance will be phased in following the first three years of the plan period to ensure that double counting of extant permissions does not occur.
Assessment Matrix conformity	<p>A site should only be identified to deliver within the first 5 years if it is considered 'deliverable' – i.e. suitable, available and achievable</p> <p>A site should be included within years 5+ where it is identified as developable in the longer term but not in the first 5 years. Delivery after the first five years is assigned to the time periods 6-10, 11-15 and 16-20 years.</p>
Delivery rates	<p>Delivery rates are justified based on local circumstances and evidence including that provided by developers. Where no developer update on residential sites phasing has been provided the following assumption is made:</p> <p>25 dwellings in the first year and 50 dwellings per annum per developer thereafter</p>
Lead-in periods	<p>For sites of less than 100 dwellings there is a 1 year lead-in from planning consent to completion of the first houses.</p> <p>For sites over 100 dwellings there is an 18 months lead-in period from planning consent to completion of the first houses.</p>

Further work and County methodology

2.11 This is an evolving methodology and will be updated in 2014 if necessary to reflect the final published version of the National Planning Practice Guidance. Work is also ongoing to develop a shared approach across the County of Gloucestershire to ensure that assessments within the Housing Market Area are compatible in order to comply with the emerging guidance.

2.12 Concern about the approach to sites within the AONB was raised at both the Cheltenham Sites Assessment Panel and County officers' meeting. During 2014, officers of Cheltenham Borough Council will continue to work with the County officers' group in conversation with local landscape officers and the Cotswolds Conservation Board to develop a better approach to these sites. It is important to recognise that further site specific work will be carried out to inform the Cheltenham Plan site allocations. The outcomes of this work may result in sites that are deemed 'unsuitable' by the current JCS methodology being carried forward for consultation as part of the emerging plan.

3. Next steps

Stage 3. Determining the housing potential of windfall sites where justified

- 3.1 According to the emerging National Planning Practice Guidance, Stage 3 of the assessment is determining the housing potential of windfall sites where justified. The methodology in Section 2 of this report summarises an approach to windfalls that is being developed by the JCS authorities to inform the Pre-submission JCS.
- 3.2 A record of all development completed on small sites (1-4 dwellings) between April 2003 and 2013 is included in Table 8 of this report. An analysis of this data to inform the Pre-submission JCS has identified that over the plan period approximately 82 dwellings per year should be expected from windfall development on small sites (nb. this calculation excludes development of residential gardens).

Stage 4. Assessment review

- 3.3 Stage 4 of the assessment involves bringing together the development potential of all sites to produce an indicative trajectory. Through the JCS process, Cheltenham is working with Gloucester and Tewkesbury in order to identify sites to meet development needs of the area. Indicative housing trajectories were therefore included in the Draft JCS Housing Background Paper. Further work will be carried out, informed by the findings of this assessment, to provide revised housing trajectories in the Publication JCS.
- 3.4 The emerging guidance states that an overall risk assessment should be made as to whether sites will come forward as anticipated. If there are insufficient sites then the assessment will need to be revisited in order to review assumptions and constraints. If, following this review there are still insufficient sites, then it will be necessary to investigate how this shortfall should best be planned for, including how needs might be met in adjoining areas in accordance with the duty to cooperate.

Stage 5. Final evidence base

- 3.5 Stage 5 of the emerging guidance relates to the use of the assessment as part of the evidence base for planning. This includes guidance on the identification of 'deliverable sites' in order to meet the five year housing land supply requirement contained in NPPF paragraph 47. Cheltenham Borough Council will publish its five year housing supply informed by the results of this assessment.

4. Site assessment tables

Table 1. Deliverable sites in locations identified by the Draft JCS as potential Strategic Allocations

Table 2. Deliverable sites (excluding locations identified by the Draft JCS as potential Strategic Allocations)

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