

Central Bedfordshire Council Local Plan (2015-2035)

Strategic Housing Land Availability
Assessment (SHLAA)
(January 2018)

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1. Introduction

1.1. What is the SHLAA?

- 1.1.1. This Strategic Housing Land Availability Assessment (SHLAA) is a key part of the evidence base for the Local Plan, informing strategy and providing a list of sites from which allocations can be chosen. This SHLAA has been written to support the Central Bedfordshire Local Plan. This Local Plan will cover the period 2015-2035 (hereafter referred to as the Plan Period).
- 1.1.2. The SHLAA identifies all the sites which could potentially be developed in the area, and then assesses them to ascertain their suitability for development, their availability and their achievability. The main output of the SHLAA is then a list of sites which are *suitable*, *available* and *achievable*. These sites are listed as either '*deliverable*', which means that they can be bought forward within the first five years of the Plan period, or '*developable*', which means that they can be bought forward within the Plan Period but outside of the first five years.

1.2. Policy and Guidance

- 1.2.1. The National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPAs) to have a clear understanding of housing needs in their area. To do this it requires LPAs to prepare a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA). The SHLAA is an important step in the preparation of a Local Plan; it should assess the availability, suitability and likely economic viability of land to meet the housing need identified over the plan period in the SHMA.
- 1.2.2. National Planning Practice Guidance on *Housing and economic land availability assessment* sets out the requirements in producing a SHLAA.
- 1.2.3. Importantly, as stated in the PPG, the SHLAA does not in itself determine whether a site should be allocated for development. **The SHLAA provides information on the range of sites which are available to meet need, leaving it to the Local Plan itself to allocate those sites that are the most appropriate to deliver the plan requirement.**
- 1.2.4. PPG guidance states that assessments of land availability should identify sites and broad locations with potential for development, assess their development potential, and then assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

1.3. Summary

- 1.3.1. This SHLAA assesses a total of **821** sites proposed for housing, however due to some overlapping site submissions, **65** sites were removed later in the process as they had been combined with overlapping submissions. This was to ensure that this SHLAA did not double-count any land. In total, this SHLAA finds **69** deliverable sites and **20** developable sites.
- 1.3.2. Despite these sites being identified as deliverable and developable on their individual merits, there is still further work to be done to determine which of these sites are appropriate for allocation through the Local Plan. **Not all sites which are identified as deliverable and developable will be appropriate for allocation; this is due to the need to take account of strategic issues and cumulative impacts on capacity and the Green Belt.**

2. Context

2.1. Housing Requirement

- 2.1.1. The Housing Need for Central Bedfordshire is identified in the Luton and Central Bedfordshire Strategic Housing Market Assessment (December 2017). This SHMA concludes that the Full Objectively Assessed Need for Housing in Central Bedfordshire is 32,000 homes over the 20 year period from 2015-2035.
- 2.1.2. In addition to the above Objectively Assessed Need (OAN), the emerging Plan, for the period 2015-2035, commits to accommodating 7,350 homes from Luton Borough Council's unmet housing need. This increases the Plan requirement to **39,350**.

2.2. Assessment area

- 2.2.1. This assessment covers the whole of Central Bedfordshire. Central Bedfordshire is a predominantly rural area with some large conurbations. It is characterised in the main by market towns and rural villages and benefits from direct access to London via road and rail.
- 2.2.2. Given the scale of existing urban areas across most of Central Bedfordshire, there is a limit to how much new growth can be accommodated either as infill, re-use of redundant sites, or in village or urban extensions. In some of these more rural locations, services and infrastructure might be unsuitable, or may not be easily upgraded, for any development beyond small scale additions.

3. Methodology

3.1. Identification of broad sites and broad locations

- 3.1.1. As discussed in Chapter 2, the assessment area of this SHLAA covers the entire administrative area of Central Bedfordshire.
- 3.1.2. This SHLAA does not consider sites capable of delivering fewer than 10 dwellings (at a density of 30 dwellings per hectare). Therefore during the Call for Sites the Council did not seek sites capable of delivering fewer than ten dwellings¹. This decision was made due to the large geographical area and the expected quantum of anticipated submissions following Call for Sites. Furthermore, this allows Neighbourhood Plan groups the opportunity to consider any sites delivering fewer than 10 dwellings as part of their Neighbourhood Plan. Whilst this approach does depart from SHLAA guidance, the guidance does allow plan makers to consider alternative site thresholds where appropriate. The Council's approach has been subject to consultation during both consultations on the site assessment criteria.

3.2. Desktop review of existing information

- 3.2.1. The Housing Trajectory sets out the Council's estimated trajectory for future housing completions up to 2035. The Trajectory consists of specific sites that are deliverable or developable and therefore comply with the guidance contained within the National Planning Policy Framework (Section 6). The sites are either allocated, have planning permission or are sites which have a strong expectation of being granted permission. The Council updates its Housing Trajectory on a quarterly basis. Projected housing delivery is based on information received from developers and agents, discussions with Development Management officers, planning status and site visits. Where sites are no longer considered to be developable they are removed from the Trajectory.
- 3.2.2. The Housing Trajectory identifies the committed development for the plan period up to September 30th 2017. The latest Housing Trajectory was published in October 2017. It lists all sites of 15 or more dwellings and details their expected delivery. Since this Trajectory was published, a decision has been made to alter the thresholds so that they align with this SHLAA. A revised version of the October 2017 Trajectory has therefore been produced which lists all sites of

1.1.1. _____

¹Despite the increased threshold for SHLAA sites, the Call for Sites did allow for submissions for Brownfield sites of five or more dwellings to be fed into the Brownfield Register.

10 or more dwellings. The figures from this trajectory are set out below (Table 1: Summary of Housing Trajectory).

Table 1: Summary of Housing Trajectory Commitments

	Number of dwellings
Net Completions (April 1 st 2015- September 29 th 2017)	4,335
Existing allocations	7,742
Strategic Sites (with planning permission)	6,780
Large windfall (with planning permission)	4,023
Small windfall (with planning permission)	648
Total	23,528

- 3.2.3. The figures in Table 1 give a total of 23,528 dwellings already committed, with a remainder of 15,822 dwellings to be identified within the plan period. Past Housing Trajectories have also included an allowance for windfall; this allowance has been reviewed as part of this SHLAA process. Therefore this SHLAA must identify sufficient land to accommodate the remainder of the Plan requirement which is set out in the table below (Table 2: Residual dwelling requirement).

Table 2: Residual dwelling requirement

	Number of dwellings
Plan requirement	39,350
Commitments	23,528
Residual requirement	15,822

3.3. Call for Sites

- 3.3.1. The first Call for Sites was held between December 2014 and February 2015. This Call for Sites was intended to support the production of an Allocations Local Plan for small and medium sized sites (15-500 dwellings in size) to supplement the Development Strategy.
- 3.3.2. In November 2015 the Council formally withdrew the Development Strategy and embarked on a new Local Plan for Central Bedfordshire. It held a second Call for Sites between February 2016 and April 2016, asking for sites able to accommodate 10 dwellings or more, with no upper limit. Since it had only been a year since the previous Call for

Sites, it was agreed that all submissions from the previous Call for Sites would be carried forward; however some sites were resubmitted to provide more information.

- 3.3.3. Sites received during the 2014/15 Call for Sites were all given a reference code starting with ALP followed by a three digit number (e.g. ALP001). Sites from the 2016 Call used the prefix NLP (e.g. NLP001).
- 3.3.4. Since sites have been sourced from two different Call for Sites exercises, it has been necessary to filter out duplicate submissions where sites have been re-submitted. As those submitting sites were not informed of their reference code upon submitting, potential re-submissions were identified using Geographical Information Systems (GIS) and officers then checked for duplicates using the following criteria:
- Matching landowner details on both submissions;
 - Both sites had been submitted by the same person (or company if an agent was used);
 - The area of the sites, as measured on GIS, did not differ by 0.25ha or more (this was to allow for a margin of error in plotting).
- 3.3.5. Following the filtering of duplicates in May 2015 the Council published all submitted sites on its website. For each parish a map was published showing the submitted sites labelled with their reference code and major constraints such as the Area of Outstanding Natural Beauty. This was accompanied by a schedule which provided more details on site sizes and proposed uses. Once this information was published on the website, the Council emailed all of those who had made submissions and asked them to check that the maps and schedules were correct.
- 3.3.6. Despite this filtering of duplicates some sites remained in the process which, although not duplicates based on the criteria in 3.3.4, overlapped each other. However due to the slight boundary differences the most robust approach was considered to be to keep these in for the purposes of assessment, only combining them at a much later stage. This ensured that the full extent of land had been assessed, but that final figures weren't skewed by double counting. In total 65 sites were removed as they were combined with other sites during the assessment process.
- 3.3.7. In total, across the two Calls for Sites, CBC received a total of 874 sites, including those submitted at Regulation 18 consultation. However some of these submissions specifically stated that they only wished to be considered for other uses, such as Employment or Gypsy, Traveller and Travelling Show People pitches. These are considered in detail separately in the Employment Studies and the Gypsy and Traveller Accommodation Assessment. In total 821 sites are assessed for housing in this SHLAA, taking into account the 65

sites which were later combined as duplicates, this brings the grand total to 756 sites considered for housing in this SHLAA.

3.4. Other sources of data

- 3.4.1. There are currently 30 designated areas for Neighbourhood Planning in Central Bedfordshire. Of these areas, only 3 groups have reached the stage of adopting a Neighbourhood Plan at the date of this SHLAA. However, none of these Neighbourhood Plans allocate sites for housing and therefore there are not any Neighbourhood Plan Housing Allocations to be fed into the Housing Trajectory at this time.
- 3.4.2. The Council will continue to monitor the progress of the Neighbourhood Planning groups and update the Housing Trajectory accordingly when Neighbourhood Plans are adopted which include Housing Allocations.
- 3.4.3. The Council has produced a Brownfield Register, and to inform this, the 2016 Call for Sites asked for details of brownfield sites that were able to accommodate five dwellings or more. Any brownfield sites identified through this review for the Brownfield Register will be added to the Housing Trajectory where appropriate upon completion of this study.
- 3.4.4. It was not considered necessary to do further studies on Council owned land as the Council's Assets team made submission to both Calls for Sites.

3.5. Collation of data

- 3.5.1. A detailed form was comprised to assist with site assessment. The collation of the information on each of these sites then allowed us to thoroughly assess each site for its suitability, availability and achievability. This formed our '*Stage A Assessment*' and the categories of assessment are detailed below in

3.5.2. Table 3. An exclusionary approach was adopted for the initial suitability and availability stages of assessment to ensure efficient use of officer time in the context of the vast number of sites to be assessed.

Table 3: Stage A Assessment

Stage	Assessment
Stage 1A (exclusionary)	Capacity Proportion of site at flood risk (fluvial and surface-water) Conflict with national designations
Stage 1B (exclusionary)	Relationship to settlements Risk of coalescence
Stage 1C (exclusionary)	Ability to provide critical infrastructure
Stage 1D (exclusionary)	Availability of site Planning History
Stage 1E (exclusionary)	<i>Note: assessment amended and section removed post Regulation 18 consultation in response to comments.</i>
Stage 2	Detailed assessment including consultation with internal experts on a number of different areas including: impact on settlement pattern, physical constraints, agricultural land quality, access to services/facilities, school capacity, environmental health and environmental constraints amongst others.
Stage 3	An initial judgement was made on viability (using typologies) and when the site could commence and complete.

- 3.5.4. The detailed Stage A assessment forms were published during Regulation 18 consultation, with the option for developers and members of the public to provide comments before the results were fed into Stage B of the assessment process.
- 3.5.5. Following this consultation, the way in which Green Belt sites were assessed was revised. Prior to Regulation 18, three sustainability criteria were used to filter out the most sustainable of the Green Belt sites and any Green Belt sites which didn't pass these three criteria were identified as not suitable. One of the criteria was the ability to provide 100 or more dwellings in the Luton Housing Market Area, as it was considered that sites of this size were more likely to be able to make a positive and sustainable contribution. The Luton Housing Market Area is predominantly in the Green Belt. Following Regulation 18 consultation, the decision was made to remove this stage of assessment, and instead assess the Green Belt sites in the same way as the non-Green Belt sites. Any sites which had failed this stage of assessment were subsequently re-assessed.

3.6. Site assessment

- 3.6.1. A 'Stage B Assessment' form was developed to be filled in for each of the sites which passed the initial Stage A assessment. For these sites

the Stage A Assessment form was used as sources of collated data on each of the sites. The *Stage B Assessment* form mirrored the SHLAA guidance, assessing the site's suitability, availability and achievability before drawing a conclusion on the development potential for any sites which were identified as deliverable or developable.

3.6.2. The Stage B Assessment form used a combination of data from the Stage A assessment forms, alongside further internal comments, the initial site submission forms and any information from site visits to draw a final and conclusion on whether the site was suitable, available and achievable. In addition to this, work was also commissioned by external consultants to advise on whether safe and suitable access for all modes of transport could be provided in line with the NPPF.

3.6.3. The Stage B Assessment collated information under the following headings:

Suitability

3.6.4. This section uses the information previously collected at Stage A alongside further comments from internal consultees to conclude on whether the site is suitable. Specifically, it reviews:

- Physical limitations/ problems
- Potential impacts
- Appropriateness/ market attractiveness
- Environmental/ amenity impacts for occupiers/ neighbouring areas.

Availability

3.6.5. This section uses the information previously collected at Stage A alongside any additional information received since to conclude on whether the site is available. Specifically, it reviews:

- Legal/ ownership issues
- Intention to develop
- Delivery record of site/developer.

Achievability

3.6.6. This section uses the information collected at Stage A and Stage B alongside viability input from consultants to conclude on whether the site is achievable. Specifically, it reviews:

- Viability (informed by assessment of typologies)
- Capacity of developer to complete/ sell.

Overcoming constraints

3.6.7. This section of the assessment presents the constraints and mitigation identified to make the site suitable, available and achievable. It also estimates the timeframe that this may require to inform judgements on deliverability or developability.

Estimating the development potential of sites

3.6.8. Central Bedfordshire has a varied and diverse character with a range of densities. For this reason there is not a policy specifically guiding density in the emerging Local Plan, rather applications will be assessed on a case by case basis with regard to the guidance in the Central Bedfordshire Design Guide. For sites passing the above assessment process, a methodology was devised to estimate their dwelling capacity.

3.6.9. In order to calculate the net developable area, a deduction for infrastructure requirements of 40% on all sites over 2ha in size, and of 20% on all sites between 0.4ha and 2ha in size has been applied. Sites below 0.4ha in size did not have any deductions made for infrastructure requirements.

3.6.10. Three density scenarios have been applied:

- 30 dwellings per hectare – The standard density. The majority of sites in the detailed site schedule fall under this category.
- 40 dwellings per hectare – This has been applied where it is considered that there are opportunities for sustainable higher density development, i.e. where a site is located within or immediately adjacent to a Major or Minor Service Centre, and / or where a site has walking access to a mainline railway station. Regard has also been had to the density and character of existing and committed development in the vicinity of a site. In these instances densities have been increased if a site is in proximity to a planning permission or existing development demonstrating a higher density.
- 50 dwellings per hectare – Very urban sites, density and character of existing and committed development. Opportunities for high-rise development.

Timescales

3.6.11. An estimation of timescales is presented alongside the summary box for those sites which passed. This is based upon the information provided by the site promoter on the submission form, but is also informed by assessment of the site and in particular any mitigation required that might affect the time-frame. This was used to inform the site delivery figures presented in the Housing Trajectory. Where further work is required, the site has often been put outside of the five-year supply. This is because the Council is acutely aware of the need to maintain a robust five-year supply of housing.

Deliverability assumptions

- 3.6.12. When assessing land availability it is important to understand when a site may commence delivering housing. In order to ensure a robust trajectory, an exercise looking into the time taken from the submission of outline and full applications to the first dwellings completions on site has been undertaken (see Appendix D). This exercise focused on sites which were under construction at the time to ensure it reflected the most current practices. The exercise found that it takes approximately 3 years and 6 months from the registration of an outline application to the first completions on site and 2 years and 2 months from the registration of a full application to the first dwellings completions on site. It is reasonable to assume that a large proportion of the new sites allocated by the Local Plan will receive Full planning permission rather than Outline followed by Reserved Matters permission. This is because the principle of development will already be established and supported by the Local Plan. It is also expected that the use of Planning Performance Agreements will continue to make the planning application process more efficient. For many sites in the Housing Trajectory the Council has received site specific evidence on delivery from house builders and agents.
- 3.6.13. This exercise provides benchmark lead in times for those sites where there is no site specific evidence on delivery. These sites mainly consist of the new allocations. When entering first completions into the Trajectory for new allocations, unless other information indicates otherwise, dwellings completions should not be expected before the latter part of 2020/21.
- 3.6.14. In order to estimate realistic annual completion rates in the SHLAA, an assessment of delivery on sites of 10 or more dwellings over the past three years has been undertaken. The results of this assessment are presented in Table 4 below. Annual delivery rates from all sites of 10 or more dwellings over the past six years have been used to estimate average annual expected completions for sites of different sizes.

Table 4: Average annual delivery rates on sites in Central Bedfordshire over the past 3 years

Site size	Annual average dwellings delivery
10-20	Completed in 1 -2 years
21-50	21
51-100	44
101-200	46
201-500	87

3.6.15. The above figures discard the first and last years of delivery as these do not represent a full 12 months. It is clear from this assessment that we can expect a greater number of annual completions on larger sites. These figures have been rounded and used to estimate the delivery of those new sites in the Trajectory where we do not have site specific information on delivery rates.

3.7. Windfall Assessment

3.7.1. A Windfall Topic Paper has been produced to support this SHLAA. This paper concludes that there is compelling evidence for windfall allowance, not only in the first five years, but in years 6-15.

3.7.2. Analysis of past trend data tells us that on average 478 dwellings are completed on non garden land windfall sites per annum. This is a significant proportion of Central Bedfordshire’s annual housing delivery. The paper concludes that an allowance for small windfall sites only would be appropriate in the five year supply period. Beyond the five year supply period an allowance for all windfall is supported by past trend data. The windfall allowance for years 6-15 has been calculated by identifying broad locations as required by Planning Practice Guidance. The Windfall Topic Paper recommends that a notable discount is applied to any allowance to take account of any impact on delivery from large allocations.

3.7.3. The amount of windfall which is recommended to be included within the SHLAA and Housing Trajectory is set out below in table 5.

Table 5: Windfall allowance

Windfall type	Annual Average Delivery	Proposed Plan allowance
Small Windfall (five year supply period only)	148	140
All windfall from broad locations (years 6-15 only)	478	287

3.7.4. In addition, it is important that any allowance for windfall does not double count with the quantum of committed windfall sites within the Housing Trajectory. Therefore any allowance should discount those windfall sites which are already listed and, reductions must be made for those years when committed windfall sites are scheduled for delivery. The reduced figures are set out in full in the Housing Trajectory and are summarised below in Table 6: Windfall allowance over the Plan period.

Table 6: Windfall allowance over the Plan period

	2017 to 2018	2018 to 2019	2019 to 2020	2020 to 2021	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025	2025 to 2026	2026 to 2027	2027 to 2028	2028 to 2029	2029 to 2030	2030 to 2031	2031 to 2032	2032 to 2033
Small windfall allowance			15	71	102	119										
Windfall allowance (Based on broad locations)							133	250	283	284	205	287	287	287	287	287

4. Outcomes

4.1. Results of assessment

- 4.1.1. Following the assessment of all sites a significant number were discounted on the basis that they were not suitable, available or achievable. Appendix B details the sites which have been discounted, including the reasons for their removal from this process.
- 4.1.2. The table below summarises the quantum of sites which have passed the assessment process and been identified as deliverable or developable. These are presented in detail in Appendix A. As shown, of the **756** sites assessed a total of **89** were identified as deliverable or developable.

Table 7: Developable and Deliverable Sites

Assessment Outcome	Number of sites	Total number of dwellings
Sites which have failed		
Sites not deliverable or developable	667	N/A
Sites which have passed		
Deliverable	69	
Developable	20	
Total which have passed	89	28,278*
Windfall Allowance		
Windfall	N/A	2,897
Grand Total	N/A	31,175
* A number of these dwellings would fall outside of the Plan Period, particularly on strategic sites.		

- 4.1.3. The outcomes of the assessment demonstrate that there is sufficient land to accommodate the residual requirement of **15,822** as set out in Table 2 of this SHLAA. It is therefore not necessary to undertake a reassessment of any of the sites.
- 4.1.4. The sites identified as deliverable or developable will now be fed into the Housing Implementation Paper to allow the formulation of an allocations strategy.

5. SHLAA Conclusion

5.1. Results of Housing Trajectory review

- 5.1.1. This SHLAA has concluded that a total of **69** sites are deliverable and **20** sites are developable, this equates to **28,278** dwellings. It is recognised that these figures represent the capacity of the sites and not necessarily what could be delivered within the Plan period. However due to the quantum of housing that these sites could deliver, it is concluded that there is sufficient deliverable and developable land to meet the residual requirement. A full updated Housing Trajectory is provided in the Housing Implementation Strategy.

5.2. Results of individual site assessments

- 5.2.1. In conclusion, this SHLAA has identified that there are sufficient deliverable and developable sites in Central Bedfordshire to meet the emerging plan requirement of **39,350** dwellings. However, it is important to note that not all of these sites will be appropriate for development.
- 5.2.2. These sites have been assessed on their own merits. However, due to settlement capacities and effects of cumulative delivery, it would not be conducive to sustainable development for all the sites listed as deliverable and developable in this SHLAA to be developed. For this reason many of these sites will not be appropriate for allocation in the Plan. It is recommended that the most suitable of the available sites, when looking on a settlement by settlement basis, are those that are selected for allocation.