




**Vale
of White Horse**

District Council

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Local Plan 2031

Part 2

Detailed Policies and
Additional Sites

Housing and Economic Land Availability Assessment (HELAA)

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1.0 INTRODUCTION

- 1.1 The Housing and Economic Land Availability Assessment (HELAA) is a technical study which forms part of the evidence base to inform the preparation of the Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites.
- 1.2 The HELAA is part of the process of assessing land availability for potential development within the district. The HELAA forms the first part of the process that informs the selection of sites for inclusion in the Local Plan.
- 1.3 It is important to emphasise that whilst the HELAA is an important evidence source to inform plan making, it does not in itself determine whether a site should be allocated for development, or that planning permission would be granted if an application was submitted for the site in question. It is the role of the HELAA to provide information on a range of site availability: it is for the plan making process to determine those sites suitable for allocation.
- 1.4 This report sets out the HELAA process, which is made up of two main stages:
 - a) identifying sites / broad locations; and
 - b) assessing sites / broad locations
- 1.5 The Report presents the findings of the HELAA process, which consists of a list of sites or broad locations that may have some development potential.

How does HELAA relate to ongoing plan-making?

- 1.6 The HELAA informs the preparation of the Council's Local Plan 2031 Part 2: Detailed Policies and Additional Sites. The Council has prepared a series of topic papers to summarise the plan making process. The **Site Selection Topic Paper** explains the process of identifying sites for allocation within the Part 2 plan. The Topic Paper explains that a stepped approach was followed with the HELAA as the first step in the process.

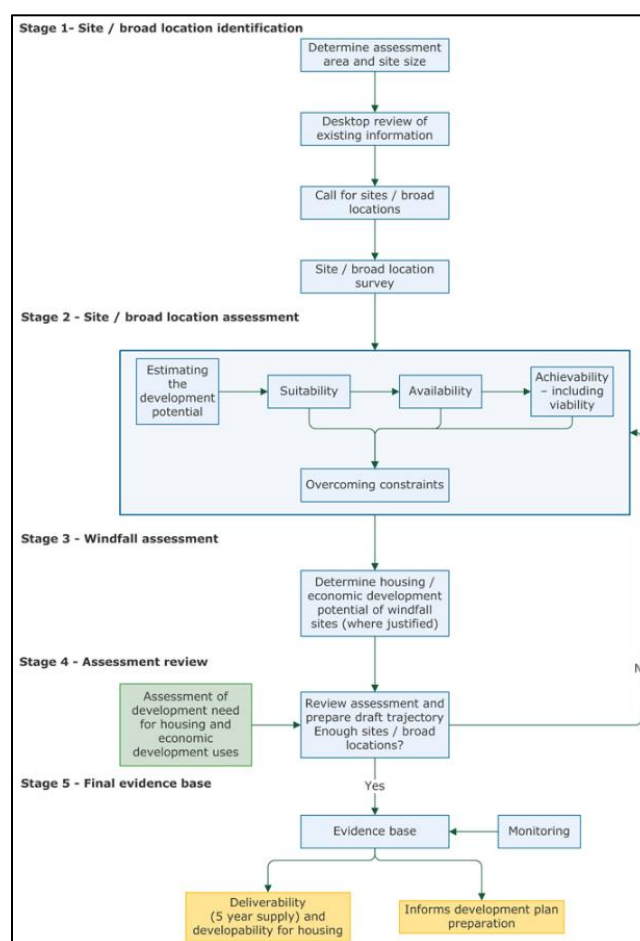
2.0 HELAA PROCESS

2.1 The HELAA comprises of two main stages, which align with Stages 1 and 2 of the methodology advocated by Government and set out in the National Planning Practice Guidance (PPG)¹. These are shown by **Figure 1** and consist of:

Stage 1) Identifying sites / broad locations; and
Stage 2) Assessing sites / broad locations.

2.2 Stages 3 to 5 of the Government methodology are discussed within the 'HELAA Outcome' part of this report. These stages form part of the more detailed site selection process the Council has followed to inform the selection of sites for inclusion within the Local Plan 2031 Part 2².

Figure 1: Government HELAA methodology³



¹ Government's Planning Practice Guidance is available at: <http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>

² Further information on the detailed site selection process informing Local Plan 2031 Part 2 can be found in the Site Selection Topic Paper.

³ Government's Planning Practice Guidance Methodology Flowchart is available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578755/land-availability.pdf

Stage 1: Identifying sites / broad locations

2.3 National Planning Practice Guidance sets out four parts to this stage of the HELAA methodology (**Figure 1**). These are discussed in more detail below.

i) Determine assessment area and site size

2.4 The PPG states that the **assessment area** should cover the Housing Market Area (HMA) and Functional Economic Area (FEA). For the Vale of White Horse, the HMA and FEA is Oxfordshire.

2.5 The Oxfordshire authorities work closely on matters relating to housing supply and are planning for meeting needs across the Oxfordshire HMA and FEA as a whole. Each of the local planning authorities agreed in November 2014 that the district Local Plans are sovereign and all strategic work should feed into Local Plans for them to determine the spatial future of the districts⁴. The HELAA therefore covers the geographical area of Vale of White Horse district.

2.6 With regard to **site size**, the PPG⁵ states that: *“the assessment should consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25 ha (or 500 m of floor space) and above.”* The council has incorporated this guidance into the HELAA. Sites are excluded from the assessment in accordance with the criteria set out in Table 1.

Table 1: Exclusion criteria used to inform a survey of potential development sites or broad locations

Site exclusion criteria
Sites are excluded from the assessment where they are not capable of delivering five or more dwellings or has an area which is less than 0.2ha.

ii) Desktop review of existing information

2.7 The PPG⁶ methodology is used as the basis for identifying a range of data sources to undertake a desktop review of existing information to inform the identification of sites and broad locations. The data sources that inform the Vale of White Horse HELAA are summarised by **Table 2** below.

⁴ See Appendix 3 of the Post SHMA Strategic work Programme – Final Report, available to view here:

http://mycouncil.oxfordshire.gov.uk/documents/s34709/OGB_SEP2616R03%20Appendix%20One%20Post%20SHMA%20Strategic%20Work%20Programme%20Final%20Report.pdf

⁵ National Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph 010 Reference ID: 3-010-20140306

⁶ National Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph 012 Reference ID: 3-012-20140306

Table 2: Summary of data sources that inform the identification of sites and broad locations within the Vale of White Horse

Data sources	Purpose
Formal 'Call for Sites' responses	Sites submitted to the council by developers/landowners/agents, including existing businesses
Sites submitted directly to the Council	
Responses to consultations that identify potential development sites	
Planning application records	Unimplemented planning permissions, undetermined planning permissions and applications that have been refused or withdrawn Pre-application enquiries (where not confidential)
Five Year Housing Land Supply Statement	
Local authority records	Land in the ownership of the local authority
Duty to co-operate discussions with Oxfordshire County Council	Surplus of public sector land
National register of public sector land	
Local authority empty property register	Vacant and derelict land and buildings
Employment land review	Land allocated (or with permission) for employment or other land uses which are no longer required for those uses
Ordnance survey maps, aerial photography and site surveys	Broad areas, potential urban extensions and new free standing settlements that might potentially be suitable for development, including sites where more productive use of under-utilised facilities might be envisaged.

- 2.8 A desktop review of the existing data led to the identification of around 400 sites or broad locations for assessment. The majority of these were previously considered in the preparation of the Local Plan 2031 Part 1 and are set out within the Strategic Housing Land Availability Assessment (SHLAA), published in February 2014.
- 2.9 A large number of sites or broad locations were identified by the Council directly, i.e. sites that had not been promoted to the Council. These are located on the edge of the five major settlements and larger villages in the district, using ordnance survey maps, aerial photography and site surveys.⁷

⁷ These are identified in the HELAA Appendices as sites where availability of the site is "No – Site has not been promoted for development".

- 2.10 The HELAA takes account of planning permissions which form part of the council's housing trajectory. As the principle for development has already been determined on these sites, they do not form part of this assessment but are reflected on the maps contained in **Appendix A**. This updated version takes account of planning permissions and resolutions to grant up to March 2017.

iii) Call for sites / broad locations

- 2.11 The primary means to identify new sites or broad locations is through a 'Call for Sites' consultation process. As such, the Council issued a 'Call for Sites' in June/July 2016. This resulted in approximately 150 sites being submitted to the Council for consideration and possible inclusion within the HELAA. A small number of additional sites were submitted through the more recent 'Preferred Options' consultation of the Part 2 plan in March/May 2017.

iv) Site / broad location survey

- 2.12 All the sites or broad locations are then mapped within a Geographical Information System (GIS) and recorded on an internal database. Following this, a survey is undertaken which considers a range of criteria.
- 2.13 The PPG states that, at this stage, sites *"should be assessed against national policies and designations to establish which have reasonable potential for development and should be included in the survey"*.⁸
- 2.14 "European Sites" such as Special Areas of Conservation (SAC) are designated under the Habitats Directive⁹, which protects habitat types and species considered to be most in need of conservation at the European level. The council considers it appropriate to discount sites where they predominantly or wholly contain land designated as a "European Site".
- 2.15 Sites of Special Scientific Importance (SSSI) relate to land designated by Natural England under the Wildlife and Countryside Act 1981, and are protected by law to conserve their wildlife or geology¹⁰.
- 2.16 The NPPF places a strong emphasis on conserving and enhancing biodiversity. It states that where *"proposed development on land within or outside a Site of Special Scientific Interest (SSSI) likely to have an adverse effect on a SSSI should not normally be permitted"*¹¹. The council therefore considers it appropriate to protect these sites at the earliest level of plan making. The council discounts sites where they predominantly or wholly contain land designated as a SSSI.

⁸ National Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph 014 Reference ID: 3-014-20140306

⁹ http://ec.europa.eu/environment/nature/natura2000/index_en.htm

¹⁰ <https://www.gov.uk/guidance/protected-areas-sites-of-special-scientific-interest>

¹¹ National Planning Practice Framework, Paragraph 118

- 2.17 The NPPF identifies scheduled monuments as designated heritage assets of the highest significance. It states that substantial harm to or loss of such assets “*should be wholly exceptional*”¹². For this reason, the council discounts sites where they predominantly or wholly contain a scheduled monument.
- 2.18 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Having regard to this, the council also discounts sites where they are significantly constrained by Flood Zones 2 and 3.
- 2.19 Having regard to the key constraints discussed above, **Table 3** lists the criteria applied to determine which sites have no realistic potential for development. This identifies only those sites with a ‘showstopper’ constraint, recognising that performance against other site suitability criteria requires assessment and may lead to them being unsuitable for development.

Table 3: Criteria to identify sites with no reasonable potential for development

Criteria	Justification
1) Site predominantly or wholly contains a European Nature Conservation Site (Special Area of Conservation - SAC)	Given legislative protection, no significant adverse effects could be tolerated.
2) Site predominantly or wholly contains a Site of Special Scientific Interest (SSSI)	Given legislative protection, no significant adverse effects could be tolerated. A conservative approach is applied, which assumes that sites intersecting by <50% could conceivably be designed to avoid effects.
3) Site predominantly or wholly contains a Scheduled Monument	Given legislative protection, no significant adverse effects could be tolerated. A conservative approach is applied, which assumes that sites intersecting by <50% could conceivably be designed to avoid effects.
4) Sites lying wholly or mostly (>50%) within flood zones 2 and 3	The functional flood zone is not developable as set out in the National Planning Practice Guidance: Flood Risk and Coastal Change ¹³

- 2.20 The proforma for each site contained in **Appendix A** highlights the constraints which would make the site unsuitable for development at this stage. The proformas also identify other constraints which do not impact upon the suitability of the site in this HELAA, but which would be considered in further detail at a later stage in the site selection process. More details on this is

¹² National Planning Practice Framework, Paragraph 132

¹³ Flood zones are designated by the Environment Agency, and published in the form of flood maps showing flood zones 2 and 3; however, information is not readily available on which parts of flood zone 3 are zone 3b (functional floodplain) as opposed to 3a. The decision was therefore taken to exclude sites entirely or mostly within in flood zone 2 and 3 (incorporating both flood zones 3a and 3b).

contained in the **Site Selection Topic Paper**, published alongside the Publication Version of Local Plan 2031 Part 2¹⁴.

- 2.21 After applying the criterion of Table 1 above, thirteen sites of the 401 sites were excluded from the HELAA assessment as they were not capable of delivering five or more dwellings. These are listed as follows:

Table 4: HELAA sites not capable of delivering five or more dwellings

HELAA Reference	Location
BLKN02	Land north of The Granary, Baulking
BLKN03	Barn north of Glentorre, Baulking
BHIL02	Land adjoining Half Acre, Boars Hill
COTH02	Land to the east of Blackhorse Lane, Cothill
EHAN02	Land to the rear of Saxon Gate, East Hanney
EHAN04	Land to the rear of Willow Barn, Ebbs Lane, East Hanney
EHAN19	Land north of Steventon Road junction with A338, East Hanney
LCOX01	Land behind Eagle Square Cottages, Little Coxwell
LCOX02	Land at The Old Slaughterhouse, Little Coxwell
LCOX03	Orchard at Manor Farmhouse, Little Coxwell
SPRS03	Land off West Street, Sparsholt
SPRS04	Land north of Church Way, east of Old Glebe House, Sparsholt
STEV11	Land at Manor Farm, Steventon

- 2.22 In addition to the above, eight sites were assessed and considered to be unsuitable for any form of development due to absolute constraints. These are listed as follows:

Table 5: HELAA sites considered unsuitable for development

HELAA Reference	Location	Reason for exclusion
ABIG09	Land south of Abingdon-on-Thames, west of Drayton Road	The majority of the site consists of a Scheduled Monument
EHAN05	Land at Poughley Farm (North), East Hanney	The majority of the site (60%) is within Flood Zone 2 and 3
EHAN08	Land at Poughley Farm (South), East Hanney	The majority of the site (78%) is within Flood Zone 2 and 3
FRIL02	Land at Frilford Golf Club (3)	The whole of the site is within Frilford Heath, Ponds and Fens Site of Special Scientific Interest (SSSI)
FRIL03	Land at Frilford Golf Club (4)	The whole of the site is within Frilford Heath, Ponds and Fens Site of Special Scientific Interest (SSSI)

¹⁴ Further information on Local Plan 2031 Part 2, including other evidence documents, can be found at www.whitehorsedc.gov.uk/lpp2

STEV02	Land south of Hanney Road, Steventon	The majority of the site (70%) is within Flood Zone 2 and 3
STEV05	Land east of Abingdon Road, south of Steventon community woodland	The majority of the site (76%) is within Flood Zone 2 and 3
SUTC12	Land to west of High Street (Rear of Hillyard Barns), Sutton Courtenay	The majority of the site (61%) is within Flood Zone 2 and 3

Stage 2: site / broad location assessment

2.23 This stage consists of five steps beginning with ‘estimating the development potential’ (**Figure 1**) and are discussed in turn below.

2.24 The overall aim of this stage is to achieve:

“An assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable to determine whether a site is realistically expected to be developed and when”¹⁵

v) Estimating the development potential

2.25 The PPG ¹⁶ states:

“The development potential is a significant factor that affects economic viability of a site/broad location and its suitability for a particular use. Therefore, assessing achievability (including viability) and suitability can usefully be carried out in parallel with estimating the development potential.”

2.26 To understand the development potential of each site in the HELAA, the assessment needs to consider their suitability, availability, and achievability. Each of these are discussed in turn below.

vi) Suitability

2.27 Information is recorded on a number of factors in accordance with the PPG¹⁷. These include:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation, and also positive impacts e.g. in respect of regeneration; and
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

2.28 Also, the type of likely development is considered at this point, in accordance with the PPG –

“Plan makers should assess the suitability of the identified use or mix of uses of a particular site or broad location including consideration of the types of development that may meet the needs of the community. These may include,

¹⁵ National Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph 028 Reference ID: 3-028-20140306

¹⁶ National Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph 017 Reference ID: 3-017-20140306

¹⁷ National Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph 019 Reference ID: 3-019-20140306

but are not limited to: market housing, private rented, affordable housing, people wishing to build or commission their own homes, housing for older people, or for economic development uses.”¹⁸

- 2.29 The assessment of suitability is a desk-based, **high-level** exercise. The outcome is that no additional sites have been ruled-out as unsuitable beyond those identified in Table 5 above. This is appropriate, given the potential to differentiate the relative merits of sites further through plan-making.
- 2.30 An example of this is where a site is within the Green Belt, this assessment does not consider how the site performs against the five purposes of the Green Belt¹⁹. Sites are also not assessed at this stage against Local Plan policies, such as the Settlement Hierarchy (Core Policy 3) and Meeting our Housing Needs (Core Policy 4). Such matters are looked at in further detail through the **Site Selection Topic Paper**, published alongside the Publication Version of Local Plan 2031 Part 2²⁰.

vii) Availability

- 2.31 In relation to this stage, the PPG states:

“A site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell... Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome. Consideration should also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.”²¹

- 2.32 The council’s approach is consistent with the PPG, as stated above. Information on availability is gathered from the Call for Sites consultation; sites promoted through the Preferred Options consultation and from the previous SHLAA.

viii) Achievability

- 2.33 The PPG states

¹⁸ National Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph 019 Reference ID: 3-019-20140306

¹⁹ As defined by Paragraph 80 of the National Planning Policy Framework

²⁰ Further information on Local Plan 2031 Part 2, including other evidence documents, can be found at www.whitehorsedc.gov.uk/lpp2

²¹ National Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph 020 Reference ID: 3-020-20140306

“A site is considered achievable for a development where there is a reasonable prospect that the particular type of development 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 the development over a certain period.”²²

2.34 Economic viability of housing schemes in the Vale is generally high, as demonstrated by the Viability Update accompanying the Publication version of the Local Plan 2031 Part 2²³. However, the density of housing has a bearing, and so there was a need to assign a density figure at this stage.

2.35 Core Policy 23 (Housing Density) of the adopted Local Plan 2031 Part 1 states:

“On all new housing developments, a minimum density of 30 dwellings per hectare (net) will be required unless specific local circumstances indicate that this would have an adverse effect on the character of the area, highway safety or the amenity of neighbours. Higher densities will be encouraged in locations where it will result in the optimum use of land, where there is good access to services and public transport routes, and where it would contribute to enhancing the character and legibility of a place.”

2.36 For this assessment, a figure for each site / broad location is calculated by:

- identifying the ‘net developable area’, i.e. the area free from major constraints, notably Flood Zone 2 and 3, Scheduled Monuments, SSSIs, etc; and then
- assuming an average of 25 dwellings per hectare (gross) for sites other than within the built-up area of the market towns and local service centres. When allowances are made for public open space and any necessary infrastructure, this equates to a net density of around 30-35 dwellings per hectare;
- where sites are within a conservation area of a village²⁴ or where it contained one or more listed building, the density is reduced to 20 dwellings per hectare (gross) to allow for potential sensitivities;
- where sites are considered to be within the built-up area of the five major settlements in the district, the density is increased to 40 dwellings per hectare (gross).

2.37 This approach to densities is consistent with the assumptions underlining the Viability Update accompanying Local Plan 2031 Part 2²⁵ and ensures that HELAA sites that are suitable for further consideration, are also achievable.

²² National Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph 021 Reference ID: 3-021-20140306

²³ Vale of White Horse District Council – Viability Update, Local Plan 2031 Part 2 – February 2017

²⁴ No sites have been promoted within the conservation areas of the three Market Towns.

²⁵ Vale of White Horse District Council – Viability Update, Local Plan 2031 Part 2 – February 2017, Tables 3.4 and 3.5

- 2.38 As a final step, work is undertaken to reach an assumption on when sites / broad locations might be developed (were they to be allocated through the Local Plan). The PPG states -

“The local planning authority should use the information on suitability, availability, achievability and constraints to assess the timescale within which each site is capable of development. This may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year.”²⁶

- 2.39 When assessing timescales, account is taken of each sites suitability and availability.
- 2.40 Where sites are suitable for further consideration and promoted for development (available), we assume that the site is deliverable and can build up to 200 dwellings in the first five years. If a site is capable of delivering more than this, we assume that this will come forward in medium and long term (6 –15 years, and beyond).
- 2.41 Where sites are suitable for further consideration and are not promoted for development at this stage (not available), we assume that the site will not deliver any housing in the first five years, but there is potential for it to come forward for development in the medium and long term (6 –15 years, and beyond).

3.0 HELAA OUTCOMES

- 3.1 The preparation of the HELAA has identified that the Vale of White Horse District contains a large pool of sites that may have some potential for development.
- 3.2 On this basis, housing land availability is not a major constraint on development within the district. However, the HELAA does not consider individual site constraints in detail, nor does it seek to identify sites that may be suitable for allocation within the Local Plan 2031 Part 2, or other future development plan documents.
- 3.3 The detailed review of constraints, and Stages 3 to 5 of the Government methodology (as set out in **Figure 1**) form part of the more detailed process the Council has followed to inform the selection of sites for inclusion within the Local Plan 2031 Part 2. The **Site Selection Topic Paper** published alongside the Publication Version of Local Plan 2031 Part 2 summarises the Council's approach to identifying sites for potential allocation.
- 3.4 The **Appendices** accompanying this report contain a proforma for each site / broad location setting out the following information:
- Size, location and land use
 - Planning history
 - Site specific constraints
 - Suitability
 - Availability
 - Achievability
- 3.5 A settlement map is provided at the end of each Appendix.

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Please contact Planning on 01235 422600

Planning Policy Team
135 Eastern Avenue, Milton
Park, Abingdon, OX14 4SB

Email: planning.policy@whitehorsedc.gov.uk

www.whitehorsedc.gov.uk