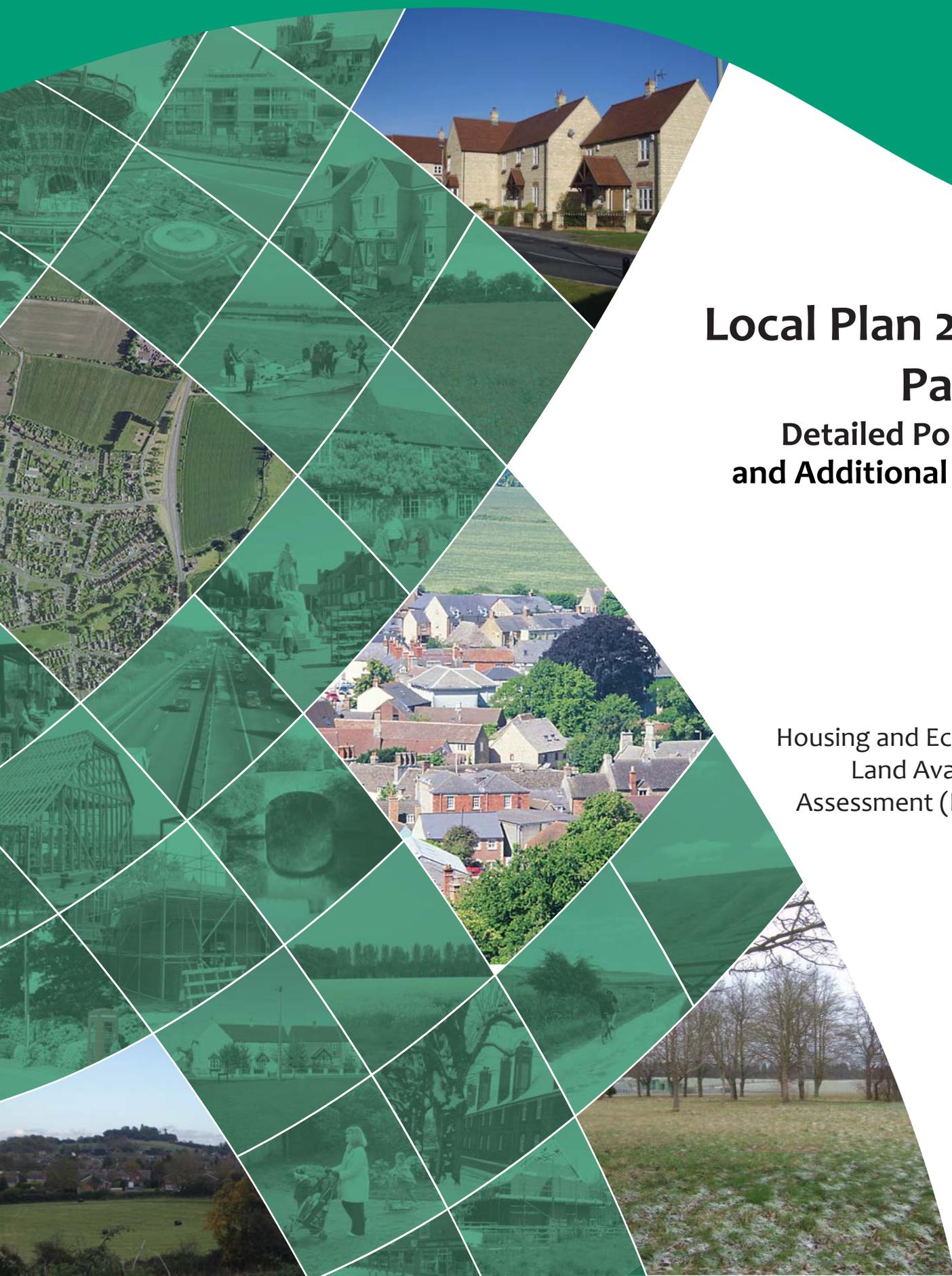




**Vale
of White Horse**
District Council

Consultation Draft
March 2017



Local Plan 2031 Part 2 Detailed Policies and Additional Sites

Housing and Economic
Land Availability
Assessment (HELAA)

Vale of White Horse District Council

Housing and Economic Land Availability Assessment (HELAA)

Draft

February 2017

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1.0 INTRODUCTION

- 1.1 The Housing and Economic Land Availability Assessment (HELAA) is a technical study which is part of the evidence base for the Vale of White Horse Local Plan 2031 Part 2.
- 1.2 The purpose of the HELAA is to assess the amount of land available for development in the district. On the basis of this assessment, sites can then be chosen for inclusion in the Local Plan, to meet housing and economic needs and deliver on wide ranging sustainable development objectives.
- 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.* It is the role of the HELAA to provide information on the range of sites available, whilst it is for the plan itself to determine which of these to allocate.
- 1.4 This report –
 - Presents the HELAA **process** – which amounts to
 - A) identifying sites / broad locations; and
 - B) assessing sites / broad locations
 - Presents the HELAA **outcome** – which amounts to a list of the sites / broad locations with development potential and a trajectory showing how many homes could be delivered, and when, under a hypothetical scenario whereby all these sites are allocated through the Local Plan.

How does HELAA relate to ongoing plan-making?

- 1.5 The Council is preparing Local Plan 2031 Part 2 (LPP2), and at the current time (February 2017) LPP2 Preferred Options are published for consultation. A ‘Site Selection Topic Paper’ is also published for consultation, to explain how the Preferred Options were arrived at. The Topic Paper explains that a step-wise process has been followed, with the HELAA as a stage in that process.
- 1.6 The council aims to give further consideration to the preferred package of sites, make amendments/refinements as necessary, and then publish the final draft (‘Proposed Submission’) version of the plan. Should new sites be submitted to the Council, then these sites will be passed through the site selection process, including HELAA. If necessary, this report will be updated for the next public consultation.

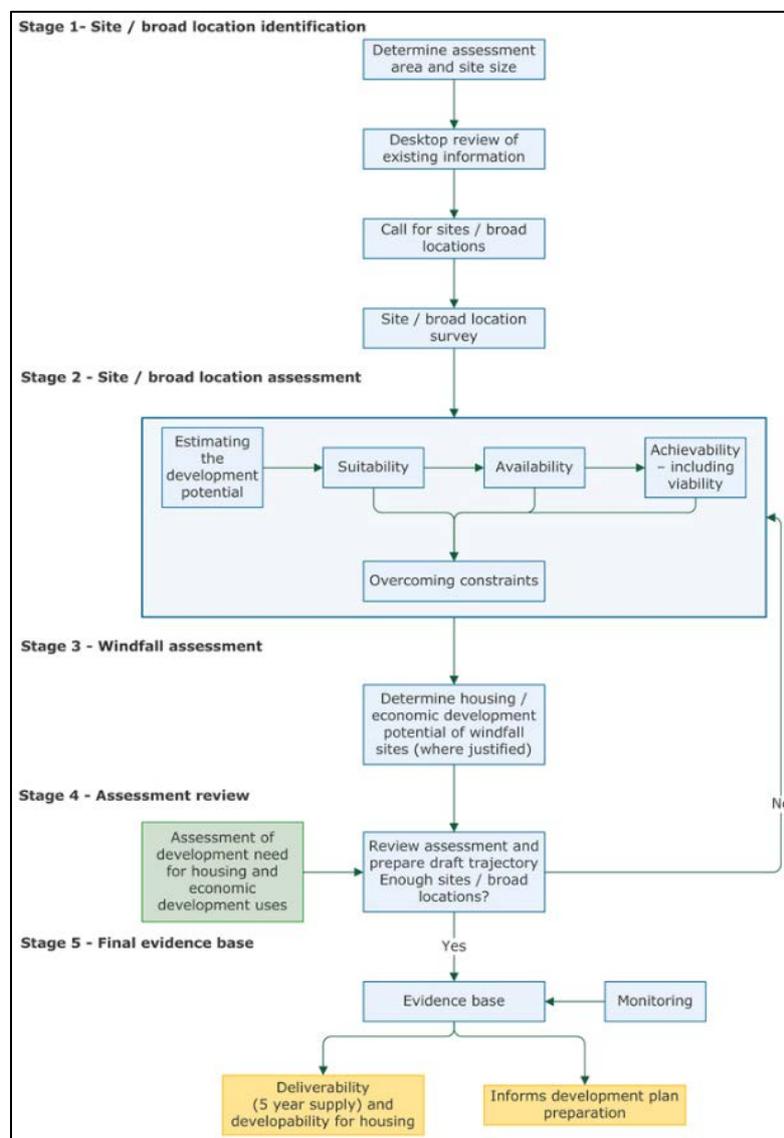
2.0 HELAA PROCESS

2.1 As discussed above, the HELAA process comprises of the following:

- 1) identifying sites / broad locations; and
- 2) assessing sites / broad locations.

2.2 This process aligns with stages 1 and 2 of the methodology advocated by Government – see **Figure 1** below. Stages 3 – 5 of the Government methodology are discussed within the ‘HELAA Outcome’ part of this report and form part of the more detailed selection process which informs the allocation of sites for inclusion in Local Plan 2031 Part 2.

Figure 1: Government HELAA methodology¹



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

Site / Broad Location Identification

2.3 The Guidance (see Figure 1) adopts a four stage approach:

- 1) Determine assessment area and site size
- 2) Desktop review of existing information
- 3) Call for sites / broad locations
- 4) Site / broad location survey

2.4 Steps (1) to (4) are considered in turn below.

Determine assessment area and site size

2.5 The Guidance states that the **assessment area** should cover the housing market area (HMA) and functional economic area (FEA), which in the Vale's case would mean undertaking a joint HELAA with the other planning authorities in Oxfordshire.

2.6 The Oxfordshire authorities work closely on matters relating to housing supply, and therefore meet housing needs within the HMA as a whole. Each of the local planning authorities agreed in November 2014 that the district Local Plans are sovereign and all work should feed into Local Plans for them to determine the spatial future of the districts. It was also agreed that the final allocation of any development sites to meet a portion of unmet housing need from Oxford City will be up to individual Local Plans to take forward, taking into account wider detailed planning considerations².

2.7 With regard to **site size**, the Guidance (para 010) states that: "the assessment should consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m of floor space) and above." The council has incorporated this guidance into the HELAA.

Desktop review of existing information

2.8 The Guidance (para 012) was taken as the basis for identifying a range of data sources to review, when seeking to identify sites / broad locations. Table 1 below provides a list of those data sources reviewed.

² See paragraphs 51 and 54 of Appendix One 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

Table 1: Data sources reviewed, in order to identify sites / broad locations

Data source reviewed	... in order to identify...
Formal call for sites responses, site submissions and consultation responses	Sites submitted to the council by developers/landowners/agents, including existing businesses
Planning application records	Unimplemented planning permissions, undetermined planning permissions and applications that have been refused or withdrawn Pre-application enquiries (where not confidential)
Local authority records	Land in the ownership of the local authority
Duty to co-operate discussions, national register of public sector land	Surplus 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

- 2.9 A review of data sources led to the identification of c. 420 sites / broad locations, most of which were previously considered in the Strategic Housing Land Availability Assessment (SHLAA, February 2014).
- 2.10 A large number of sites / broad locations were identified through a review of non-promoted sites / broad locations around the edge of settlements that might potentially be suitable for development. Many these formed part of the previous assessment, however some new sites have been identified where it they have been considered reasonable to addressing the needs of Local Plan 2031 Part 2.
- 2.11 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**.

Call for sites / broad locations

2.12 The primary means by which to identify new sites / broad locations is through a call for sites. As such, the Council issued a call for sites in June-July 2016, which resulted in approximately 150 sites being submitted. The maps in **Appendix A** show all of the sites that have been promoted to the council. Further details of the sites promoted to the council are contained in **Appendix B**.

Site / broad location survey

2.13 Once all of the c.420 sites / broad locations had been mapped within a Geographical Information System (GIS) and recorded on an internal database, a desktop survey was conducted.

2.14 The aim was to identify sites / broad locations that categorically have no potential for any type of development, and so should not be taken forward for assessment (i.e. Stage 2 of the HELAA).

2.15 **Table 2** lists the exclusion criteria applied. The aim is to identify only those sites with a 'showstopper' constraint, recognising that performance against other site suitability criteria requires *assessment* (Stage 2 of the HELAA).

Table 2: Site exclusion criteria

Site exclusion 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 countenanced. 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 countenanced. A conservative approach is applied, which assumes that sites intersecting by <50% could conceivably be designed to avoid effects.
4) Site predominantly or wholly contains a Local Wildlife Site (LWS) or an ancient woodland.	Given national and local policy, no significant adverse effects could be countenanced. A conservative approach is applied, which assumes that sites intersecting by <75% could conceivably be designed to avoid effects.

Site exclusion criteria	Justification
5) 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 ³

2.16 After applying the requirements of Table 2 above, nine of the 210 sites were excluded from the HELAA.

2.17 The low number of sites excluded from the HELAA is appropriate, given the potential to differentiate the relative merits of sites further at the assessment stage of the HELAA (and through sub-sequent plan-making). The fact that only a small proportion of sites are excluded is an indication that the criteria applied undoubtedly do indicate ‘showstopper’ constraints.

Site / Broad Location Assessment

2.18 Figure 1 indicates the need for a staged approach to assessment, beginning with ‘estimating the development potential’; however, the Guidance (para 017) 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.”

2.19 The sections below cover the assessment of suitability, availability and achievability in turn. In accordance with the Guidance (para 028), the overall aim 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;”

Suitability

2.20 In accordance with Guidance (para 019), information was recorded on -

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;

³ 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).

- 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.

2.21 Also, the type of likely development was taken into account at this point, in accordance with the Guidance (para 019) –

“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, 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.”

2.22 The assessment of suitability is a desk-based, **high-level** exercise. The outcome is that relatively few sites have been ruled-out as unsuitable. This is appropriate, given the potential to differentiate the relative merits of sites further through plan-making. Many of the sites deemed suitable in principle through the HELAA will be found to be unsuitable for allocation in-light of objectively assessed needs and plan-specific issues (‘policy on’ factors).

Availability

2.23 The Guidance (para 020)⁴ 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.”

2.24 The council’s approach is consistent with the guidance, using information received through the most recent call for sites, as well as evidence contained in the previous SHLAA in order to determine the availability of sites in the assessment.

⁴ http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/methodology-stage-2-sitebroad-location-assessment/#paragraph_020

Achievability

2.25 The Guidance (para 021) states –

“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.”

2.26 Economic viability of housing schemes in the Vale is generally high, as demonstrated by the Viability Study accompanying the preferred options consultation version of the Local Plan 2031 Part 2. However, the density of housing has a bearing, and so there was a need to assign a density figure at this stage.

2.27 Core Policy 23 (Housing Density) of the emerging LPP1 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.”

2.28 For this assessment, a figure for each site / broad location was calculated by:

- A) identifying the ‘net developable area’, i.e. the area free from major constraints, notably Flood Zone 3; and then
- B) 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.
- C) where sites are within a conservation area of a village or where it contained one or more listed buildings, the density is reduced to 20 dwellings per hectare (gross)
- D) 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)

2.29 As a final step, work was undertaken to reach an assumption on when sites / broad locations might be developed (were they to be allocated through the Local Plan). The Guidance (para 023) 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.”

2.30 When assessing timescales, account was taken of -

- suitability issues (e.g. when might constraints be overcome through infrastructure delivery); and
- availability issues (e.g. when existing tenants are required to have vacated the site by);

2.31 Where sites are suitable in principle 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 capable of delivering more than this, we assume that this will come forward in medium and long term (6-15 years, and beyond).

2.32 Where sites are suitable in principle 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

Housing Needs

- 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 potential for development. This is well in excess of the requirements needed to be addressed in Local Plan 2031: Part 2.
- 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 allocate sites for Local Plan 2031: Part 2 or other future development plan documents.
- 3.3 The Site Selection Topic Paper summarises the Council's approach to identifying sites for potential allocation in Local Plan 2031: Part 2, using the information contained in the HELAA as the starting point.
- 3.4 The **appendices** accompanying this report contain a proforma for each site / broad location setting out the following information:
- Size, location, land uses and boundaries
 - Suitability
 - Availability
 - Achievability

Self-build housing register

- 3.5 In total, seventy sites have been promoted to the council through the call for sites process which have expressed interest in self-build housing. These sites have been assessed alongside all other sites in the HELAA.

Economic Development Needs

- 3.6 Evidence informing Local Plan 2031: Part 1 has identified that there is already sufficient land allocated to meet the future employment needs of the district for the plan period.
- 3.7 A number of sites have been promoted for employment and other economic uses, including retail and hotels. Sites suitable for employment use only are labelled within the HELAA appendices.

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