

CHARNWOOD LOCAL PLAN EXAMINATION

Matter 7: Housing Land Supply

Submission from CPRE Leicestershire

June 2022

Representation Number: 340

Issue 1 Whether the Plan will provide for a sufficient housing land supply to deliver the planned housing growth over the Plan period and whether a deliverable five-year supply of housing will be available on adoption

Note – the Council's responses to these questions should include an updated housing trajectory, updated completions information for 2021/22, site proformas and the Statements of Common Ground with site promoters (referred to in EXAM2).

Supply over the Plan Period

Question 7.1

What assumptions have been made to inform the trajectory for the delivery of housing sites in terms of:

- a. Lead in times for planning permission being approved*
- b. Outline and reserved matters applications*
- c. Site preparation and ground works*
- d. Average build out rates and numbers of sales outlets*

1. CPRE has not considered all sites in detail. We do believe that the timescale for delivering the North East Leicestershire Urban Extension may be over-conservative. The current build-out rate of 200 dpa (from 2026-2033) would only need to be raised to approximately 300 dpa to achieve the full site development within the plan period.

2. We are also not clear why the build out rate for those years is deflated compared to 2024-2026 and 2034-2037.

3. The SHELAA proforma for the site (*Thurmaston PSH210/Examination Reference*) suggests a build-out rate of 200 dpa for 4 builders. It then goes on to say that:

'There is considered to be a reasonable prospect that development will be delivered within the timeframe shown (i.e., within the plan period) based on a judgement of the potential economic viability of the site and developer capacity to complete and let/sell the development over that period.'

4. That would suggest that the site could well be built-out within the plan period.

5. On that basis CPRE consider that the Council should be working with the developer to ensure development occurs within the plan period. This would increase supply and reduce the need for other greenfield sites, which would, of itself, one would expect allow development to progress more quickly. On that basis and with no prejudice to our views on specific development proposals we consider the plan should include the full 4,500 homes.

Question 7.2

Will the Plan identify a sufficient supply of specific, deliverable sites for years 1 – 5 of the Plan period and specific, developable sites or broad locations for growth for years 6 – 10 and where possible for years 11 – 15? What is the estimated total supply of deliverable and developable new housing from the following sources?

- a. Sites with detailed planning permission for 10 or more dwellings*
- b. Sites with outline or detailed planning permission for 9 or less dwellings*
- c. Windfall allowance*

6. A contribution to housing supply will inevitably also be found from windfall sites but we have not seen data from the Council which allows us to examine the historic small and large windfall sites performance.

7. The Leicester/Leicestershire Statement of Common Ground 2021 (SCG/1)¹ assumes 640 small windfalls (I assume under 10 dwellings although it is not defined in the tables) by 2031 or 1040 by 2036, In other words, 80 dpa. However, the Plan goes to 2037 so a figure of 1120 dpa would be correct by this calculation.

8. The current situation is also inconsistent with other Leicestershire Authorities such as Hinckley and Bosworth who are allowing for a windfall allowance in their local plan.

9. It is hard to tell without seeing the historic annual figures but this may be an underestimate depending whether it is based on 5 or 10 years of data because the recession post 2010 tended to dampen windfalls in those years. Further monitoring data from the Council may allow an upward shift in reliable Windfalls but it is hard to tell.

¹ [The Statement of Common Ground.pdf \(leics.gov.uk\)](#), Appendix A and Appendix B.

10. The 2021 Leicestershire Statement of Common Ground would therefore suggest that small scale windfalls should amount to 1,120 dwellings over the plan period, without any consideration of larger windfalls.

11. It is, of course, harder to predict future windfalls on larger sites. However, the Council could examine the likelihood of such sites coming forwards. The 16 Dec 2020 Government Statement (*Examination Reference*²) anticipates this in regards to the largest 20 cities, such as Leicester, but it may well be that Loughborough and other towns also see changes in retail, leisure and office needs.

12. CPRE, therefore, considers that the figure of 1,120 for windfalls would not only be robust, it would be likely to be an under-estimate.

Question 7.2 (continued)

d. Sites with outline planning permission for 10 or more dwellings

e. Site allocations

f. Sites on the brownfield register

13. CPRE has not considered each of these in detail. We may wish to comment on new evidence on this produced by the council, but we note that both our comments on the Urban Extension North and East of Leicester and on windfalls would increase delivery in all timeframes if included in the plan.

(In responding to this question, the Council should provide updated figures from the most recent monitoring information)

Question 7.3

What evidence is there to support the estimated supply from the above sources and is it robust?

14. As set out on Matter 4.3 we consider the supply side figures should be increased but assuming a failure rate of 5% for commitments. Using the 2014 ONS figures this would create an overall requirement of 19,023.

15. As well as adopting a 5% commitments approach, CPRE Leicestershire also argue that all the houses with planning permission on the North East of Leicester Urban Extension should be included in the plan adding an additional 1,295 to the supply (4,500 in total on both sites).

16. A further contribution as set out above of at least 1,120 homes from windfalls should be included.

² CPRE Matter 7 Government response to planning consultation 16 Dec 2020

17. Additional homes might further be added with a review of the yield of sites based on a modest increase in densities in line with the density policy CPRE is suggesting and in line with the Leicestershire Joint SHELAA Methodology (*Examination Reference*³) approach which assumes a density of 30 dph but 40 dph on 'sites within and adjacent to the Principal Urban Area and in selected Centres'. something the Charnwood SHELAA (EB/DS/1) does not assume despite the large number of sites on the edge of centres, including Loughborough itself.

18. We suggest the following Density Policy Wording (Similar to Hinckley and Bosworth Plan proposal (*Examination Reference*⁴))

The Density of development will be guided by good design principles and the prevailing character of the area rather than specific density targets. However, unless justified through principles of good design, to ensure the efficient use of land the following minimum densities apply to residential development:

- *At least 40 dwellings per hectare within and adjoining...*
- *At least 30 dwellings per hectare within and adjoining... and in Rural Villages and Rural Hamlets*

All developers will be expected to demonstrate that they have sought to use land efficiently.

19. Such a policy would not in our view be over restrictive as it would firmly put the emphasis on good design, although it would, at the same time, ensure developers needed to justify the approach taken in relation to density of development.

20. This would also be consistent with the approach suggested in the 16 Dec 2020 Government Statement which seeks to increase housing in Urban Areas.

21. Overall, taking account of this additional supply, we consider the excess housing needing to be allocated would then amount to 3,101 (ONS2016) or 6,005 (ONS2014). This would be robust, especially as it does not take account of any large-scale windfalls or increases in yield (for example from modest density improvements) which might be achieved.

22. This would reduce the need for housing to be accommodated on new Green Field sites across the Borough.

Question 7.4

How does the proposed annual requirement of 1111 dwellings in Policy DS1 compare with recent housing delivery?

³ CPRE Matter 7 SHELAA Joint Methodology Paper - 2019

⁴ CPRE Matter 7 Hinckley plan density extract from Hinckley and Bosworth, Consultation Draft Plan June 2021 https://www.hinckley-bosworth.gov.uk/downloads/file/7356/draft_local_plan_2020_-_2039

23. CPRE may wish to comment on this matter based on the new evidence put forwards by the Council.

Five Year Housing Land Supply

Question 7.5

What is the relevant five-year period on adoption and what is the requirement?

(The Council's response to this question should include a worked table of the five-year requirement and the deliverable five-year supply position against the requirement).

Question 7.6

Does past delivery and/or the Housing Delivery Test results have any implications for the appropriate buffer to be added to the five-year land supply?

Question 7.7

Is there clear evidence to support the delivery of sites in the relevant five-year period on adoption?

Question 7.8

Based on a requirement of 1111 dwellings per year, would the Plan help to ensure a five-year supply of deliverable sites on adoption and over the Plan period?

24. CPRE may wish to comment on these matters based on the new evidence put forwards by the Council.

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Introduction

On 6 August 2020, the government published ‘Changes to the current planning system’. The consultation paper set out four policy proposals to improve the effectiveness of the current system:

- changing the standard method for assessing local housing need, to plan for the delivery of 300,000 new homes a year and plan for more homes in the right places;
- securing First Homes, sold at a discount to market price for first time buyers, including key workers, through developer contributions;
- temporarily lifting the small sites threshold below which developers do not need to contribute to affordable housing, to up to 40 or 50 units, to support SME builders as the economy recovers from the impact of the COVID-19 pandemic; and
- extending the current Permission in Principle to major development so that landowners and developers can secure the principle of development for housing on sites without having to work up detailed plans first.

The consultation closed on 1 October 2020.

This government response provides a response to the first of the four consultation proposals – changes to the standard method for assessing local housing need (the ‘standard method’).

We are carefully considering the responses to the other proposed policy changes covered in this consultation. In doing so, we will assess whether the small sites threshold and extending Permission in Principle are best addressed in the context of our proposals for wider reform. We will be responding to proposals to secure First Homes through developer contributions in the short term in the New Year.

The detailed conclusions set out in this response have been informed by the responses to the questions directly relating to the standard method, and the responses relevant to the standard method in the question on the equality impacts relating to the overall impacts of the proposals.

Overview

There were 2,398 responses to the Changes to the current planning system consultation. Not all respondents answered every question. All responses have been analysed for the changes to the standard method policy questions (questions 1 to 7) and the equality impact question (question 35) and given full consideration in the preparation of this response. We are grateful to everyone who took the time to respond. The table below provides a breakdown of the general consultation responses by type of respondent.

Type of consultation respondent	Number of responses
Local Authority (including National Parks, Broads Authority, the Greater London Authority and London Boroughs)	321
Government / Arms-length body	9
Non-Governmental Organisation (NGO)	29
Community Group / Parish Council / Neighbourhood Forum	507
Developer / construction	68
Landowner	1
Land agent / Land promoter	10

Type of consultation respondent	Number of responses
Architecture / Urban design	5
Housing charity / campaign	22
Housing Association	34
Business / Trade body	28
Planning / development consultancy	44
Digital technology organisations	0
Infrastructure provider	2
Other	138
Organisation total	1,218
Personal / independent responses	1,180
Total number of responses	2,398

This document provides a summary of the consultation responses received. It does not attempt to capture every point made. It sets out the proposed changes the government is making, having taken the consultation responses into account. Where the government has decided not to make further changes to the consultation proposals, the reasons are explained.

Proposed changes to the standard method for assessing local housing need

We do not propose to proceed with the specific changes to the standard method that were consulted on. The reasons for this are set out below. Instead we will proceed with a reformed standard method which reflects our commitment to levelling up and enables

regeneration and renewal of our urban areas as we recover from the COVID-19 pandemic.

In Changes to the current planning system, the government set out the importance of building the homes our communities need and putting in place measures to support our housing market to deliver 300,000 homes a year by mid-2020s. We set out that our proposed changes to the standard method were based on overarching principles as stated in paragraph 17 of the consultation. These were ensuring that the new standard method delivers a number nationally that is consistent with the commitment to plan for the delivery of 300,000 new homes a year, a focus on achieving a more appropriate distribution of homes, and on targeting more homes into areas where there are affordability challenges. We remain committed to these principles.

We have listened carefully to the feedback on our proposals, within the consultation and outside of this, including in Parliament, through discussions with stakeholders and in the media, have heard concerns that the distribution of need was not right. In particular, we heard that too much strain was being put on our rural areas and not enough focus was on the renewal of our towns and cities.

In addition, since we published the consultation, the way that the country lives, works and travels continues to change more rapidly than at any time since the war. This has implications, for example, on demand for commercial and retail floorspace in our cities and urban areas. We want our towns and cities to emerge from the pandemic renewed and strengthened – more beautiful, more healthy, more environmentally sustainable and more neighbourly places, with greater public and private investment in urban housing and regeneration.

More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places. But harm or homes is not a binary choice. We can plan for well designed, beautiful homes, with access to the right infrastructure in the places where people need and want to live while also protecting the environment and green spaces communities most value. If we do this well, we can achieve all this whilst giving a new

generation the chance to access the homes they deserve. The same chances generations before them were given. This is a matter of social justice and inter-generational fairness. It would be wrong for our built environment to respond only to the needs of older, wealthier people. We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.

A number of the concerns we have heard showed some misunderstanding about what was being proposed.

Many respondents to the consultation were concerned that the 'targets' provided by the standard method were not appropriate for individual local authority areas. Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in [Paragraph 11b of the NPPF](#) or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints. In order to make this policy position as clear as possible, we will explore how we can make changes through future revisions to the National Planning Policy Framework, including whether a renaming of the policy could provide additional clarity.

Next steps

Proposal

Having taken the responses into account, we have decided the most appropriate approach is to retain the standard method in its current form. However, in order to meet our principles of delivering more homes on brownfield land we will apply a 35 per cent uplift to the post-cap number generated by the standard method to Greater London and to the local authorities which contain the largest proportion of the other 19 most populated cities and urban centres in England. This is based on the Office for National Statistics list of Major Towns and Cities, ranked in order of population size using the latest mid-year population estimates provided by the Office for National Statistics.

As at the date of this government response and in order of size beginning with the largest as per the 2019 mid-year estimates (latest estimates), these places are: London, Birmingham, Liverpool, Bristol, Manchester, Sheffield, Leeds, Leicester, Coventry, Bradford, Nottingham, Kingston upon Hull, Newcastle upon Tyne, Stoke-on-Trent, Southampton, Plymouth, Derby, Reading, Wolverhampton, and Brighton and Hove.

The 20 authorities which contain the largest proportion of the city or urban centre's population will have the 35 per cent uplift applied. The cities and urban centres list was objectively determined using national datasets provided by the Office for National Statistics to determine the urban local authorities which contain the largest proportion of the 20 most populated cities and urban centres in England.

Our rationale for doing this is as follows.

Rationale for cities and urban centres uplift

In relation to the cities and urban centres uplift, we have heard representations that we can do more to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method. There are three strong reasons for doing so. First, building in existing cities and urban centres ensures that new homes can maximise existing infrastructure such as public transport, schools, medical facilities and shops. Second, there is potentially a profound structural change working through the retail and commercial sector, and we

should expect more opportunities for creative use of land in urban areas to emerge. Utilising this land allows us to give priority to the development of brownfield land, and thereby protect our green spaces. And third, our climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high-carbon travel. We have heard support for these objectives. We have chosen a 35 per cent uplift to ensure consistency with the government's Manifesto commitment to see 300,000 homes per year delivered by the mid 2020s. The Government is also keen to ensure that all areas plan for the right, size, type and tenure of homes, and in particular to ensure that appropriate numbers of family homes come forward, and would encourage these all places, but particular the urban centres, to consider carefully how they deliver the right mix for their communities. Getting this mix right will maximise the beneficial impact that the delivery of more homes can bring. For example, planning for the right size homes can help address affordability and planning for specialist housing such as older peoples' housing can have the knock-on effect of freeing up much needed family homes. In addition, planning for more routes into home ownership, such as First Homes and Shared Ownership, will help younger people make that important first step onto the housing ladder.

The increase in the number of homes to be delivered is expected to be met by the cities and urban centres themselves, rather than the surrounding areas. In considering how need is met in the first instance, brownfield and other under-utilised urban sites should be prioritised to promote the most efficient use of land. Development should align with the character of local neighbourhoods in urban areas and support the building of green homes. This is to ensure that homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the services they rely on, making travel patterns more sustainable. Local planning authorities should co-operate on that basis, notwithstanding any longer-term proposals set out in the Planning for the Future White Paper which explain that we intend to abolish the Duty to Cooperate. We will set out any decisions and any associated proposed implementation following from consideration of the responses to that consultation in due course

This cities and urban centres uplift is being implemented through revisions to the relevant planning practice guidance.

Rationale for retaining current approach

In addition, and having reflected on the points made through the consultation, the government has concluded that this approach will provide stability and certainty for plan-making and decision-making, so that local areas can get on and plan based on a method and level of ambition that they are familiar with. We know that change can cause uncertainty and delays and after a year of uncertainty due to COVID-19 it is particularly important that the standard method does not act as a barrier to planning for the homes needed. In particular:

- We will continue to use the 2014-based household projections. The government has carefully considered whether to use the 2018-based household projections and has concluded that, due to the substantial change in the distribution of housing need that would arise as a result, in the interests of stability for local planning and for local communities, it will continue to expect only the use of the 2014-based projections.
- The government wants to ensure that work continues to progress Local Plans through to adoption as soon as possible and, at a minimum, by the end of 2023 to help ensure that the economy can rebound from COVID-19.
- We will continue to specify that the most recent affordability ratios should be used ensuring relevant market signals continue to play a role.
- The government will retain the provision that caps increases in local housing need in each planning cycle at 40%, except for in areas where the cities uplift is applied.

London

It is clear that in London, in the medium term, there will need to be a much more ambitious approach to delivering the homes the capital needs. The Secretary of State for Housing, Communities and Local Government expects to agree the London Plan with the Mayor shortly. This new plan, when adopted, will set London's housing requirement for the next 5 years. The local housing need uplift we are setting out

today will therefore only be applicable once the next London Plan is being developed. In order to support London to deliver the right homes in the right places, the government and Homes England are working with the Greater London Authority to boost delivery through the Home Building Fund. Homes England has been providing expertise and experience to support the development of key sites in London. Sites like Old Oak Common, Nine Elms and Inner East London provide opportunities to deliver homes on significant brownfield sites. The Secretary of State for Housing, Communities and Local Government will consider giving Homes England a role in London to help meet this challenge, working more closely with the Greater London Authority, boroughs and development corporations to take a more direct role in the delivery of strategic sites in London and the preparation of robust bids for the new National Homebuilding Fund.

Transition

In providing the important clarity and certainty to enable places to rapidly progress with their plans, and making no changes to the existing standard method, there will be no direct impact on the majority of authorities. These should continue to bring forward plans as quickly as possible. However, there will be transitional arrangements for those cities and urban centres delivering the additional cities and urban centres uplift. From the date of publication of the amended planning practice guidance which implements the cities and urban centres uplift, authorities already at Regulation 19[2], will have six months to submit[3] their plans to the Planning Inspectorate for examination, using the previous standard method[4]. In recognition that some areas will be very close to publishing their Regulation 19[5] plan, these areas will be given three months from the publication date of the revised guidance to publish their Regulation 19 plan, as well as a further six months from the date they publish their Regulation 19 plan to submit their plan to the Planning Inspectorate for examination, to benefit from the transition period.

The standard method has a role not only in plan-making, but is also used in planning decisions to determine whether an area has

identified a 5 year land supply for homes and for the purposes of the Housing Delivery Test (where strategic policies are more than five years old). Where this applies, the revised standard method (inclusive of the cities and urban areas uplift) will not apply for a period of six months from the publication of the amended planning practice guidance. After 6 months, the new standard method will apply.

Question responses

Question 1

Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?

Question 1 response

There were 2,121 responses to this question, with 1,952 respondents providing a comment, and 1,546 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

20% of organisations supported this proposal, with 66% disagreeing and the remaining respondents (14%) not sure.

7% of individuals supported this proposal, with 83% disagreeing, and the remaining respondents (10%) not sure.

Overall, this resulted in 14% support for the proposal, 74% against and 12% not sure.

Points raised from those who commented include:

- Local authorities support the principle of bringing stability to the method, agreeing that it could spread housing more fairly across the country. However, they noted that stock is not a determinant of future housing need and acknowledged the volatility and unpredictability of household projections.
- Developers and the construction sector consider that the proposals would introduce a simpler method of quantifying the amount of housing an area needs. These respondents welcome a move away from the over-reliance on household projections, with some supporting a higher baseline figure for housing stock.
- There are merits in introducing an element of standardisation to assess housing need to reduce uncertainty and increase data transparency. The proposals were seen as a positive addition to allow local planning authorities to plan for growth more effectively, but did not go far enough to support the levelling-up agenda.
- Respondents acknowledge the known limitations of household projections from the consultation document but recognise it is a reliable and accessible dataset, and that the housing stock figure merely reinforces existing patterns of growth.

Government response

We are no longer proposing to take forward a stock element in the changes to the standard method and we propose to maintain the 2014-based household projections. The government has carefully considered whether to use the 2018-based household projections and has concluded that, due to the substantial change in the distribution of housing need that would arise as a result, in the interests of stability for local planning and for local communities, it will continue to expect only the use of the 2014-based projections. Please refer to the policy response, stated under [Proposed changes to the standard method for assessing local housing need](#) and [Next Steps](#).

Question 2

In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.

Question 2 response

There were 1,502 responses overall to this question with 1,240 respondents providing a comment and 1,293 providing a yes / no / not sure response. The percentages quoted below relate to those who provided a yes / no / not sure response.

18% of organisations supported this proposal, with 65% disagreeing and the remaining respondents (17%) not sure.

9% of individuals supported this proposal, with 71% disagreeing, and the remaining respondents (20%) not sure.

Overall, this resulted in 14% support for the proposal, 68% against and 19% not sure.

Points raised from those who commented include:

- Where the use of stock is supported, across a range of stakeholders there were suggestions that the level of stock should be higher, with suggestions ranging mostly between 0.7 and 1%.
- Linked to this were concerns from across the different groups about the different impacts the proposed level of 0.5% stock would have in different parts of England, including leading to more homes in London and the South East than the North, which does not sufficiently support the government's levelling up agenda.
- Those who are concerned felt that the focus on stock does not directly reflect need or demand. There are also concerns from local authorities, community groups and individuals, about the

potential detrimental impact on rural areas or areas with constraints.

Government response

We are no longer proposing to take forward a stock element in the changes to the standard method.

Please refer to the policy response, stated under [Proposed changes to the standard method for assessing local housing need](#) and [Next Steps](#).

Question 3

Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.

Question 3 response

There were 1,567 responses to this question, with 1,301 respondents providing a comment, and 1,382 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

31% of organisations supported this proposal, with 56% disagreeing and the remaining respondents (13%) not sure.

9% of individuals supported this proposal, with 74% disagreeing, and the remaining respondents (18%) not sure.

Overall, this resulted in 20% support for the proposal, 65% against and 16% not sure.

Points raised from those who commented include:

- For those supporting the measure, respondents suggest the workplace-based median house price to median earnings ratio is the most appropriate and relevant metric to use, although some respondents noted that renters were not taken into account in this ratio.
- Concerns about the effect of commuters on the affordability ratio, such as where high earners impact on local affordability especially in London and the South-East. Some respondents suggest the residence-based ratio could be used to overcome this. Comments also indicated that this could result in a geographical disparity between the north and south.
- That focus on affordability is too narrow, stating that house prices are affected by other factors than only supply (such as interest rates, economic growth) which can impact the affordability of an area.
- That there may be effects of COVID-19 on house prices and earnings, which could affect the affordability ratio going forward. Some respondents suggest using a longer period to overcome year-on-year volatility.

Government response

In relation to the issue of the most appropriate affordability assessment to use, workplace-based or residence-based, we intend to continue using the workplace-based earnings ratio, published annually by the Office for National Statistics. This compares the median salary earned in a local authority against the median house price in that same authority area. This ratio is used as people typically choose to live close to where they work – and therefore is a proxy for demand within the housing market.

Please refer to the policy response, stated under [Proposed changes to the standard method for assessing local housing need](#) and [Next Steps](#).

Question 4

Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.

Question 4 response

There were 1,430 responses to this question, with 1,113 respondents providing a comment, and 1,251 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

36% of organisations supported for this proposal, with 49% disagreeing and the remaining respondents (14%) not sure.

17% of individuals supported this proposal, 59% disagreeing, and the remaining respondents (24%) not sure.

Overall, this resulted in 27% support for the proposal, 54% against and 19% not sure.

Points raised from those who commented include:

- Those respondents who show support considered the 10-year change proposal to be reasonable, logical or proportionate. Comments were that it worked well alongside the 10-year household projections time period and would make the methodology responsive to longer term trends as well as sudden changes such as a recession.

- For some people the 10-year period was not appropriate and should be either longer (20 years), shorter (5 years, (most commonly suggested by local authorities)), or a rolling average.
- That proposals overcomplicate the calculation by double counting affordability, or conversely oversimplify the approach by not including other important factors – for example developers suggested including job density data as another factor.
- There is comment, including from planning and development consultancies, that this would not support the levelling up agenda between North and South.

Government response

We no longer propose to introduce this element to the standard method.

Please refer to the policy response, stated under [Proposed changes to the standard method for assessing local housing need](#) and [Next Steps](#).

Question 5

Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.

Question 5 response

There were 1,620 responses to this question, with 1,352 respondents providing a comment, and 1,178 providing a yes/no/not sure response. The percentages quoted below relate specifically to those

respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

22% of organisations supported this proposal, with 60% disagreeing and the remaining respondents (18%) not sure.

10% of individuals supported this proposal, with 66% disagreeing and the remaining respondents (24%) not sure.

Overall, this resulted in 16% support for the proposal, 63% against and 21% not sure.

Points raised from those who commented include:

- Affordability is given too great a weight in the proposals resulting in excessive uplift over the baseline, relative to other factors such as constraints, according to the majority of those opposed. Conversely, a very small number thought the weighting should be higher, with developers keen to ensure that constraints do not cause final figures to drop.
- Certain groups are more favourable to the proposals, particularly the development industry.
- Concern that the approach would skew housing need too strongly towards expensive regions such as London and the South East, and would therefore be detrimental in levelling-up the North. A related, less commonly expressed, concern is that development would be channelled towards expensive but sensitive rural areas and protected landscapes.
- More generally, a common view is that the additional dwellings delivered due to the affordability uplift would not actually have the desired effect of reducing house prices.

Government response

In recognition of concerns that affordability was over-emphasised in our proposals, the new approach will not put any additional weighting on affordability within the formula. The existing weighting will be maintained.

Please refer to the policy response, stated under [Proposed changes to the standard method for assessing local housing need](#) and [Next Steps](#).

Question 6

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination? If not, please explain why. Are there particular circumstances which need to be catered for?

Question 6 response

There were 1,309 responses to this question, with 994 respondents providing a comment, and 1,078 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

35% of organisations showed support for this proposal, with 41% disagreeing and the remaining respondents (23%) not sure.

19% of individuals supported this proposal, with 55% disagreeing and the remaining respondents (26%) not sure.

Overall, this resulted in 27% support for the proposal, 48% against and 25% not sure.

Points raised from those who commented include:

- A six-month transition period is felt to be too short by many respondents and should be extended. Suggestions included nine to twelve months, particularly in light of current

resourcing pressures faced by local authorities in meeting these timescales. They also consider that it would provide an opportunity to reflect on the COVID-19 crisis with the potentially substantial implications on the housing market, and the effects of a change to home working, as well as future use of office property, commuting patterns, demand for larger homes and access to green spaces.

- Developers consider that six months is appropriate in recognising the need for a transition period, although some felt it may be too long to ensure that housing numbers are brought up to date quickly. Comment also included that the transition period may create a period of uncertainty while areas process what the changes mean for them, potentially delaying delivery, while other plans might be rushed through ill-advisedly.
- There are concerns about the consequential impact of the new LHN in relation to calculations of the 5-year land supply, and the presumption in favour of sustainable development, and comment that further transitional arrangements should be applied here.

Government response

We anticipate that transitional arrangements will only apply to a small number of authorities. We intend to implement a transition period as proposed in the consultation (i.e. authorities already at Regulation 19 will be given six months from the publication date of the revised guidance to submit their plans to the Planning Inspectorate under the existing standard method). However, this transition period is only for those areas delivering the additional cities and urban centres uplift and will not apply to other areas. We recognise concerns expressed by some in the consultation that the six months transition period may be too short, but we feel that six months is appropriate to ensure that the country begins planning for the numbers of homes we need without significant delay.

In recognition that the standard method has a role not only in plan-making, but also is used in planning decisions to determine whether

an area has identified a 5-year land supply for homes and for the purposes of the Housing Delivery Test (where strategic policies are more than five years old), we want to be clear how the new standard method applies in these circumstances. For those areas with the additional cities and urban uplift, transitional arrangements will apply in decision-making in applying the standard method, to ensure that the 20 cities and urban centres are not immediately affected by increased land supply expectations. These transitional arrangements will apply for six months from the date of publication of the guidance. After six months, the standard method will apply.

Please refer to the policy response, stated under [Proposed changes to the standard method for assessing local housing need](#) and [Next Steps](#).

Question 7

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate? If not, please explain why. Are there particular circumstances which need to be catered for?

Question 7 response

There were 1,317 responses to this question, with 987 respondents providing a comment, and 1,084 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

33% of organisations supported this proposal, with 44% disagreeing and the remaining respondents (23%) not sure.

19% of individuals supported this proposal, with 54% disagreeing and the remaining respondents (27%) not sure.

Overall, this resulted in 26% support for the proposal, 49% against and 25% not sure.

Points raised from those who commented include:

- The significant constraints imposed by typical resourcing levels at local authorities, allowing for existing plan-making work, the practical circumstances of the COVID-19 pandemic, and the realistic ability of local authorities being able to progress a local plan to second stage consultation in the timescale proposed.
- Suggestions for a longer transition period, particularly from local authorities, to publish a second stage consultation. An extension from three to six months is generally the most common suggested, although other suggestions were that areas that have published a first stage consultation should benefit from transitional arrangements.
- Other alternatives include a shorter or narrower transition period (particularly suggested by developers), no transition measures at all, or considering wider modifications to the application of LHN in the planning process.

Government response

See section on transitional arrangements for specific details of how the transitional arrangements will apply. We recognise concerns expressed by some in the consultation that transition periods may be too short, but we consider that the detailed proposals set out are appropriate to ensure that the country begins planning for the numbers of homes we need without significant delay.

Please refer to the policy response, stated under [Proposed changes to the standard method for assessing local housing need](#) and [Next Steps](#).

Question 35

In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty? If so, please specify the proposal and explain the impact. If there is an impact – are there any actions which the department could take to mitigate that impact?

Question 35 response

This question did not ask for yes / no / not sure options. There were 845 comment responses to this question.

It should be noted that this question related to all the policy areas consulted on in the ‘Changes to the current planning system’ consultation - changes to the standard method; securing First Homes through developer contributions; temporarily lifting the small sites threshold; and extending the current Permission in Principle to major development.

The analysis below relates only to the equality aspects related to the standard method. Those issues related to the remaining policy areas will be considered separately.

Points raised from those who commented include:

- With regard to transitional proposals, the importance of ensuring everyone has sufficient opportunity to engage in any local plan consultation processes, particularly where internet

access or access to technology is an issue for some demographics and some areas of the country.

- Concern that Gypsies and Travellers are not sufficiently accounted for in the proposed overall housing numbers.
- That unrealistic housing targets might be created by not accounting for communal establishments.
- That proposals penalise those with equity saved in their homes, likely older people; prioritises homeownership which will benefit particular groups over others; and do not support the levelling-up agenda by not supporting economically deprived areas which have, for example, a greater proportion of BAME individuals.
- Perceived reduction in Local Authority influence on housing need and allocation under the proposals.

Government response

The equality impact question was focused on the impacts of the consultation proposals which were not taken forward. However, the final policy proposals were considered in light of a detailed assessment of the equality impacts as required by the Public Sector Equality Duty (PSED).

As part of the PSED we sourced the relevant population and equality data using mid-year estimates and Annual Population Survey data to understand the impact a cities and urban centres uplift would have on our existing policy, comparing data between the 20 cities and urban centres and the England average. We concluded that uplifting the housing numbers in these cities and urban centres would appear to support younger people proportionately more, as well as men and those not reporting as white UK national. This will help support those from different ethnic minorities and younger people to access a greater number of homes. In particular this will support younger people into home ownership. While this may also mean that older people, women and those reporting as white UK national are less likely to live in cities and urban centres, we feel that this is mitigated by the fact that those areas which will not have a cities and urban centres uplift will continue with the same standard method as

previously, so they do not experience a decrease in the number of homes being planned for. Please refer to the policy response, stated under [Proposed changes to the standard method for assessing local housing need](#) and [Next Steps](#).

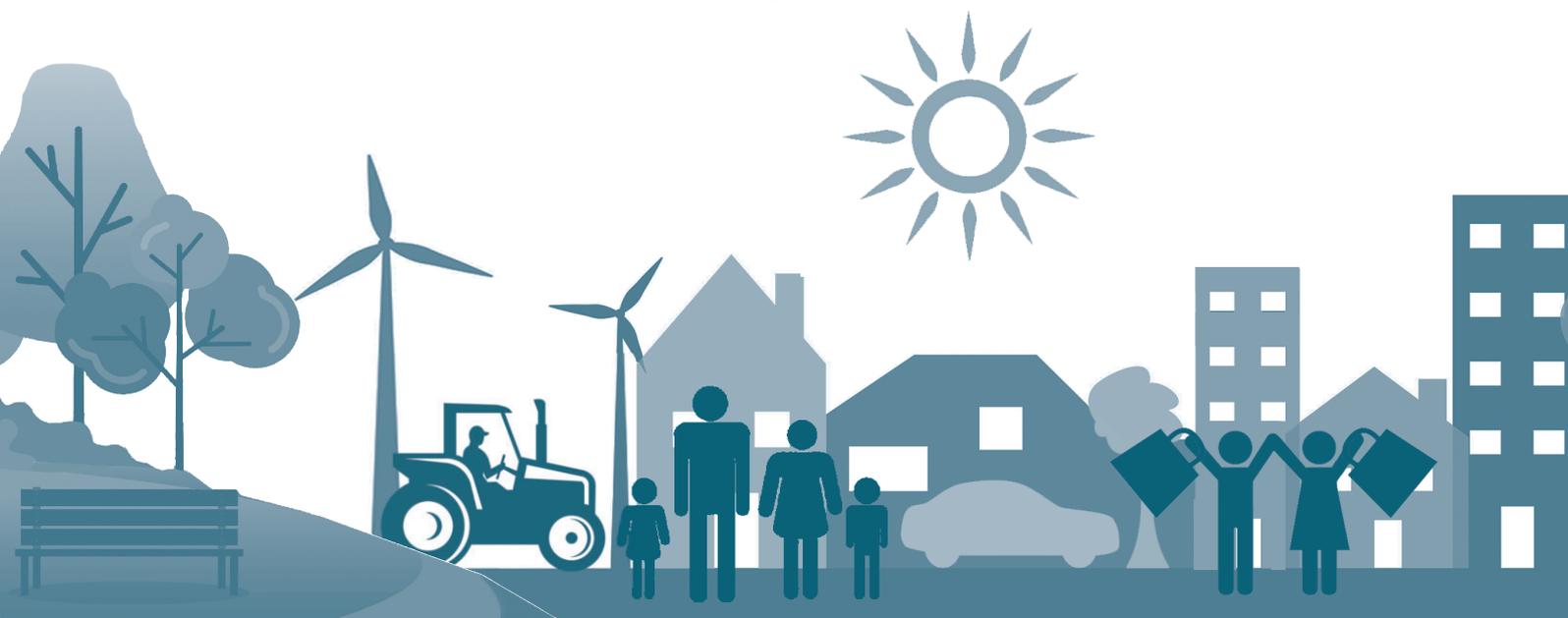
[2] For Spatial Development Strategies this would refer to consultation under s335(2) of the Greater London Authority Act 1999

[3] For spatial development strategies, 'submission' in this context means the point at which the Mayor sends to the Panel copies of all representations made in accordance with regulation 8(1) of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000, or equivalent.

[4] As contained housing and economic needs assessment planning practice guidance, published February 2019

[5] For Spatial Development Strategies this would refer to consultation under s335(2) of the Greater London Authority Act 1999

Hinckley and Bosworth Local Plan 2020-2039



Hinckley & Bosworth
Borough Council

Consultation Draft Plan
Regulation 18
June 2021

- Unit number;
- number of persons that can be accommodated (according to the number of single and double bedrooms);
- the number of floors in the dwelling;
- the minimum required floor space (according to NDSS); and,
- the proposed floorspace.

7.10 New residential development should also be designed with sufficient private external space to promote health and wellbeing. Further guidance on garden/private amenity space is provided in the Good Design Guide SPD (2020).

What evidence has informed the policy?

Measurement of dwellings permitted in Hinckley and Bosworth showing that a significant proportion do not meet the NDSS.

Research by RIBA, Shelter and Julia Parkes.

The local plan will also be subject to viability testing.

Which spatial objectives will the policy help deliver?

1 - Healthy Communities and Places

8 - Achieving Good Design

How will the policy be implemented?

Through decision making on planning applications

How will the policy be monitored?

Sample checking. Annual recording of exceptions where dwellings are permitted in the knowledge that they do not meet the NDSS.

Question 12: Do you agree that the nationally described space standards should apply to all new dwellings?

HO04 Housing Density

The Density of development will be guided by good design principles and the prevailing character of the area rather than specific density targets. However unless justified through principles of good design, to ensure the efficient use of land the following minimum densities apply to residential development:

- ***At least 45 dwellings per hectare within and adjoining Hinckley, Burbage, Barwell and Earl Shilton***
- ***At least 30 dwellings per hectare within and adjoining the Key Rural Centres, Rural Villages and Rural Hamlets***

7.11 The intention of this policy is to optimise the use of housing land so that no more land has to be used than is absolutely necessary. But drawing upon the National Design Guide the expectation is that good design, which responds effectively to context, accessibility, the proposed building types, form and character of the development, will be the principal determinant of appropriate density. The numerical density targets provide a back-up for proposed developments that lack a coherent design rationale based on the prevailing character of the surrounding area.

7.12 The standards are net residential densities which include residential plot areas, access roads and incidental open spaces, but not public amenity spaces and non-residential uses.

What evidence has informed the policy?

The National Model Design Code (Consultation Draft January 2021)³⁶ sets out density standards in Figure 10 and the Built Form section:

- Town Centres >200d/ha;
- Urban Neighbourhoods: 60-120d/ha;
- Suburbs 30-50d/ha
- Outer Suburbs 20-40d/ha

Densities achieved on major residential developments in the borough between 2006 and 2019 averaged 34dph (net) in urban areas and 24dph (net) in rural areas, although the averages mask some large variations between schemes, particularly in the urban areas. See RLA 2019 Appendix 15.

Higher densities are evident in the latter part of the period so the suggested densities of 45dph and 30dph are considered realistically aspirational in this context.

Which spatial objectives will the policy help deliver?

- 1 - Healthy Communities and Places
- 5 - Transport
- 6 - Natural Environment
- 7 - Climate Change
- 8 - Achieving Good Design

³⁶ [National Planning Policy Framework and National Model Design Code: consultation proposals - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code)

Blaby
District Council
the heart of Leicestershire


Charnwood
A Borough to be proud of


Hinckley & Bosworth
Borough Council


DISTRICT OF
HARBOROUGH
RURAL SOUTH LEICESTERSHIRE


Leicester
City Council


Melton
Borough
Council


Oadby and Wigston
Borough Council


North West
LEICESTERSHIRE
DISTRICT COUNCIL

Leicester & Leicestershire Housing Market Area

Strategic Housing and Economic Land Availability Assessment

Joint Methodology Paper
February 2019



Introduction

What are Strategic Housing and Economic Land Availability Assessments (SHELAA)s?

In accordance with the National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government 2018), Local Planning Authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability (paragraph 67).

The Planning Practice Guidance (Housing and economic land availability assessment, para 2) sets out that the assessments form a key component of the evidence base to underpin policies in development plans for housing and economic development, including supporting the delivery of land to meet identified need for these uses. From the assessments, plan makers will then be able to plan proactively by choosing sites to go forward in their development plan documents to meet objectively assessed needs.

This joint methodology paper provides guidance to the Leicester and Leicestershire Council's undertaking housing and economic development land availability assessments in accordance with the NPPF and Planning Practice Guidance, which together will provide their land availability assessment evidence.

Local Planning Authorities within the Leicester and Leicestershire Housing Market Area have agreed a joint approach to the preparation of housing and economic land availability assessments through this methodology and have agreed common working arrangements in line with Duty to Cooperate requirements. This will follow the requirements set out in the NPPF and the Planning Practice Guidance (PPG) and will include locally specific criterion as part of the methodology. Relevant parts of the methodology will be used to guide local authorities Housing and Economic Land Availability Assessments. This will ensure that each authority's individual document will follow the same broad methodology and appear in a similar format.

The approach set out in the methodology has been the subject of consultation with the development industry and informed by the views of house builders, land agents and land owners gathered through a number of sources including the plan making and development management processes, SHELAA submissions themselves and discussions at developer panel meetings.

Completion of a SHELAA will enable the Local Planning Authorities to:

- **identify sites and broad locations with potential for development;**
- **assess their development potential;**
- **assess their suitability for development and the likelihood of development coming forward (the availability and achievability).**

This approach ensures that all land is assessed together as part of the plan preparation process to identify which sites or broad locations are the most suitable and deliverable for a particular use (Planning Practice Guidance, para 1).

What are the core outputs of the Assessments?

A SHELAA report should enable the Local Authority to gather a wealth of information on sites and potential development locations. Key outputs include:

- A comprehensive list of potential development sites and broad locations with associated location /constraints maps
- An assessment of each site/broad location in terms of it's suitability, availability, achievability and therefore it's developability
- Detailed information on site constraints which show assessment outcomes have been clearly evidenced and justified
- An idea of the potential type and quantity of development, including reasonable estimates of build rates/densities, any barriers to delivery, potential mitigation methods or further need for consultation/clarity.

How will the SHELAA inform future plans?

The assessments will form a critical part of the evidence base for future Development Plan Documents and will help to inform other strategies for growth, infrastructure and investment.

The NPPF (para 73) notes that local planning authorities should update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement figure set out in adopted strategic policies. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of 5% to ensure choice and competition in the market for land; or 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan (to allow for any fluctuations in the market during that year); or 20% where there has been significant under delivery of housing over the previous three years (to improve the prospect of achieving the planned supply).

Please note that SHELAA's DO NOT represent planning policy and do not determine whether a site should be allocated or granted permission for development. The assessments provide information on the range of sites available to meet needs, but Development Plan Documents will determine which sites are most suitable to meet those needs. SHELAA's are just one of the key evidence base documents that provide details in relation to future growth.

Methodology

How will the SHELAA be carried out?

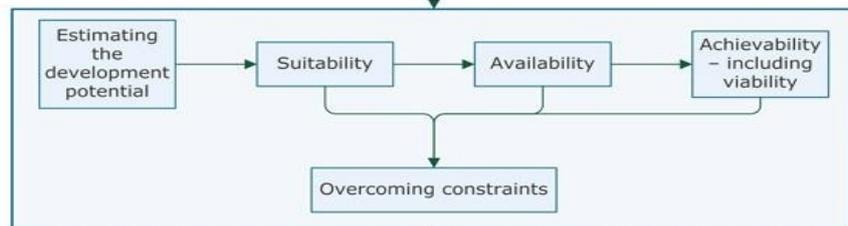
The flowchart below sets out the stages of the assessment as set out in the PPG. The guidance “indicates what inputs and processes should lead to a robust assessment of land availability. Plan makers should have regard to the guidance in preparing their assessments” but also provides the ability to depart from the guidance where this can be justified (Planning Practice Guidance para 5).

The Leicester and Leicestershire Local Planning Authorities will follow this standard methodology, unless local circumstances justify a change.

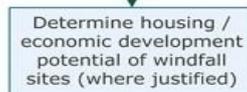
Stage 1- Site / broad location identification



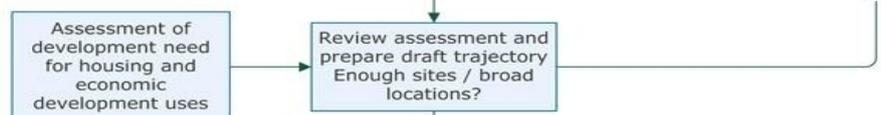
Stage 2 - Site / broad location assessment



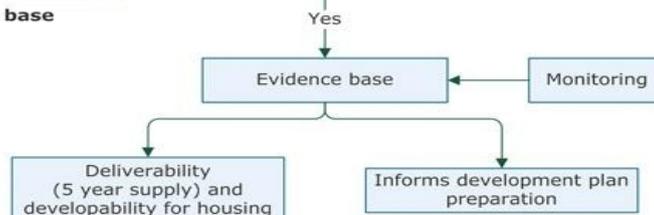
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



(Planning Practice Guidance para 6)

Every Local Planning Authority within the Leicester and Leicestershire area will undertake their housing and economic land availability assessments in accordance with this joint methodology paper as well as the relevant national guidance.

Methodology for the Leicester and Leicestershire Authorities

Stage 1: Site/Broad Location Identification.

Who should plan makers work with?

The following should be involved from the earliest stages of plan preparation, which includes the evidence base in relation to land availability:

- developers;
- those with land interests;
- land promoters; local property agents;
- local communities;
- partner organisations;
- Local Enterprise Partnerships;
- businesses and business representative organisations;
- parish and town councils; and
- neighbourhood forums preparing neighbourhood plans.

(Planning Practice Guidance, para 8)

The size of sites to be assessed

Plan makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate.

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 500m² of floor space) and above.

Where appropriate, plan makers may wish to consider alternative site size thresholds' (Planning Practice Guidance, para 10).

If an individual authority considers it appropriate to include for assessment sites of a lower size to that indicated above a clear reason and rationale will be provided within their report / individual site assessment.

Types of sites and sources of data

The Planning Practice Guidance (para 12) states that the assessment should consider the types of sites in the table below. It also provides possible sources of information which have been supplemented where relevant by those in italics.

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning applications records Development briefs
Planning permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completions records
Planning applications that have been refused or withdrawn	Planning application records
Land in the local authority's ownership	Local authority records
Surplus and likely to become surplus public sector land	National register of public sector land, Engagement with strategic plans of other public sector bodies such as County Councils, Central Government, , National Health Service, Policy, Fire Services, utilities providers, statutory undertakers
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes e.g. offices to residential)	Local authority empty property register, English House Condition Survey, National Land Use Database, Commercial property databases (e.g. estate agents and property agents) Valuation Office database, Active engagement with sector <i>Prior Notification applications</i>
Additional opportunities in established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys <i>Call for sites</i>
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector <i>Call for sites</i>
Sites in rural locations	Local and neighbourhood plans
Large scale redevelopment and redesign of existing residential or economic areas	Planning applications Ordnance Survey maps Aerial photography Site surveys
Sites in and adjoining villages or rural settlements and rural exception sites	<i>Call for sites</i>
Potential urban extensions and new free standing settlements	

Call for sites

The Planning Practice Guidance notes that plan makers should issue a call for potential sites and broad locations for development, which should be aimed at as wide an audience as is practicable so that those not normally involved in property development have the opportunity to contribute (para 13).

What should be included in the site and broad location survey?

The comprehensive list of sites and broad locations derived from data sources and the call for sites should be assessed against national policies and designations to establish which have reasonable potential for development and should be included in the site survey. Plan makers should then assess potential sites and broad locations via more detailed site surveys to:

- ratify inconsistent information gathered through the call for sites and desk assessment;
- get an up to date view on development progress (where sites have planning permission);
- have a better understanding of what type and scale of development may be appropriate;
- gain a more detailed understanding of deliverability, any barriers and how they could be overcome;
- identify further sites with potential for development that were not identified through data sources or the call for sites.

(Planning Practice Guidance, para 14)

The assessment area

The following information and characteristics will be recorded when undertaking the desk-top review or carrying out the site survey:

- site size, boundaries, and location;
- current land use and character;
- land uses and character of surrounding area;
- physical constraints (e.g. access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure/ utilities) and whether these could be overcome;
- potential environmental constraints;
- where relevant, previous planning history or development progress (e.g. ground works completed, number of units started, number of units completed);
- initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development;
- planning policy;
- access/highways;
- access to local services; and

- the location of the site within a Mineral Safeguarding Area or within or in affecting distance of a Safeguarded Waste Management Facility as defined by the Development Plan.

A site may be restricted by a 'red' constraint'. This is a severe constraint to development that may make a site technically undevelopable and not appropriate for further assessment, unless the technical constraint has been overcome for example by the granting of planning permission. These constraints are listed in Appendix A. Where a site is partially affected by a red constraint, the individual SHELAA reports will set out assumptions in relation to whether the whole site is considered non-developable, or if the potential dwelling yield has been adjusted accordingly, dependent on the extent of the red constraint.

In respect of Mineral Safeguarding Areas and Safeguarded Waste Management Facilities consultation with the County Planning Authority by the District Planning Authorities will be necessary.

The SHELAA's will be 'policy off' in nature meaning that policy considerations should be taken into account but should not be used to exclude any sites from the assessment. Any policy designations should be noted, for example Green Wedge or Areas of Local Separation, but will not constitute a criterion against which sites are excluded. However, policy considerations may be taken into account to influence the timescales for development taking place.

Decisions on the allocation of sites for housing and/ or employment development will be made through each Local Authorities plan making processes and will take into consideration of national and local policies as well as other evidence base documents.

Stage 2: Site/Broad Location Assessment

Estimating the development potential of each site

The Planning Practice Guidance (para 17) sets out that;

“The estimation of the development potential of each identified site should be guided by the existing or emerging plan policy including locally determined policies on density, as below. Where the plan policy is out of date or does not provide a sufficient basis to make a local judgement then relevant existing development schemes can be used as the basis for assessment, adjusted for any individual site characteristics and physical constraints. The use of floor space densities for certain industries may also provide a useful guide.

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.”

Housing Sites

Throughout the Leicester and Leicestershire HMA, the following gross to net development ratios have been agreed based on site size. This allows for items such as roads, green infrastructure and sustainable drainage systems to be taken into account when identifying the developable land available on a site. These ratios have been drawn up in discussion with stakeholders at Developer Panels and successfully applied to past SHELAAs. Should further robust evidence be received, the ratios may be updated. Specific site considerations may provide individual authorities reason to deviate from the ratios below, and this will be clearly set out where necessary.

Site Size	Gross to Net Development Ratio
Up to 0.4ha	100%
0.4 - 2ha	82.5%
2 - 35ha	62.5%
Over 35ha	50%

Density is also used to calculate the housing potential of a site. For Leicester, densities within the city centre will normally be at least 50 dwellings per hectare (dph), with generally lower densities (30-50 dph) elsewhere in the city. Sites within and adjacent to the Principal Urban Area and in selected Centres will generally be 40dph, and all other sites will generally be 30dph. This may be altered by each local planning authority in some instances having regard to local circumstances, and where this is the case a clear explanation will be set out in the authorities SHELAA report. Where a developer or landowner provides a density figure individual authorities may choose to use this instead of the above agreed densities.

Where planning permission has been granted, the density provided will reflect the consented development scheme (therefore likely to deviate from the above indicative densities).

The estimated build rate indicates the average number of houses likely to be developed on a site within 1 year for a single sales outlet (usually a single builder). Assumptions about expected build rates will be made by each authority dependent on the evidence available, including discussions with the development industry using developer panel meetings, and through analysis of past build rates, and will be set out within the individual SHELAA reports. Estimated build rate will be reviewed on an annual basis to reflect market changes, and may differ depending on site specific circumstances.

Economic Development

Economic development sites to be assessed include retail, leisure, cultural, office, and warehousing sites. For the purposes of this assessment each site will be assessed in the context of its likely function and likely use class as set out in the Town and Country Planning (Use Classes) Order 1987 (as amended).

The NPPF (Annex 2: Glossary) defines main town centre uses as:

'Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities, more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)'.

Each authority will set out, within their SHELAA report, calculations for the potential capacity of sites for economic development uses as above (with the exception of B class uses as below) based on local evidence for the different type of land use.

Employment Sites (Use Class B1, B2 and B8)

The potential amount of development an employment site can deliver is dependent on the likely density of development. Calculations of employment potential are based upon plot ratios of gross floorspace to site area for different classes of employment use as outlined in the Housing and Economic Development Needs Assessment (HEDNA) (2017) and Strategic Distribution Study (SDS) (2014) as follows:

- 2.0 for B1a/b offices in Leicester City and 0.35 for B1a/b offices elsewhere in the HMA;
- 0.42 for B1c and B2 industrial uses; and
- 0.40 for B8 storage and distribution uses

An estimate of employment potential will be calculated for each site using the following formula:

Site area x plot ratio (for likely use class) = employment potential (m²).

In cases where a mix of B uses are assessed as potentially appropriate on a single site an average of the densities for the appropriate uses will be taken and multiplied by the site area.

Assessing when and whether sites are likely to be developed

Assessing the suitability, availability and achievability of a site will provide the information necessary to determine whether a site can be considered deliverable within the first 5 years of the plan period or developable at a particular point in time.

Assessing suitability

According to the Planning Practice Guidance (para 19):

“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 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 their own homes, housing for older people, or for economic development uses.”

To assess a site’s suitability for development, the guidance states that decisions should be guided by these factors:

- the development plan, emerging plan policy and national policy;
- market and industry requirements in that housing market or functional economic market area;

The guidance also states that the following factors should be considered:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas;

In addition to the above, whether a site has the benefit of planning permission, or is allocated in an existing development plan will also be used in determining whether it is considered suitable or not.

Assessing availability

The Planning Practice Guidance (para 20) considers a site to be 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”.

For the purposes of the above, legal/ownership problems can include unresolved multiple ownerships, ransom strip tenancies and operational requirements of landowners.

Land ownership details for sites will be obtained via desktop reviews and discussions with external sources, where necessary.

Assessing achievability

According to Planning Practice Guidance (para 21):

“A site is considered achievable for 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 and let or sell the site over a certain period.”

Achievability will be considered through discussions with external stakeholders, including through developer panels and individual correspondence with the parties that have submitted sites, where necessary.

Stage 3: SHELAA Windfall Assessment

With regards to housing windfall sites, the NPPF (paragraph 70) states that:

Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

Each Local Authority will be able to set out in more detail their individual approach to windfall sites in their assessments.

Stage 4: Assessment Review

The Planning Practice Guidance (para 25) provides advice on how the site assessments should be appraised, expressing that:

“Once the sites and broad locations have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing and the amount of economic development that can be provided, and at what point in the future. An overall risk assessment should be made as to whether sites will come forward as anticipated.”

If any shortfalls within the final projections are identified, then various elements of the scope of the assessment will be revisited.

An insufficient number of sites may require previously rejected sites and areas of investigation to be brought forward and included within the assessments. Any additional sites brought forward at this stage would be assessed by the same procedure as the sites originally included.

Identifying developable and deliverable sites

Paragraph 67 of the NPPF notes that planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and where possible, for years 11-15.

For a site to be considered as **deliverable, sites for housing should be available now**, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development and sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. (NPPF, Annex 2: Glossary).

For a site to be considered **developable** it should be in a suitable location for development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. (NPPF, Annex 2: Glossary).

Where a site is subject to a severe constraint to development in its entirety, i.e. a red constraint, then it will be classed as non-developable. Where a site is less than entirely subject to a red constraint, deliverability of the site will be assessed by each Authority by assessing the remainder of the site, with any yield adjusted accordingly.

Timeframe for Development

Each site will be classified based on their ability to come forward:

Within 0 - 5 years

Within 6 - 10 years

Within 11 - 15 years

Within 0-5 years

For sites to be allocated within the 0-5 year time frame they must be realistic development opportunities. Sites will be put in this time frame if:

They are under construction or have planning permission and the developer intends to develop;

OR

The site is suitable and available now and achievable within five years as set out in the previous criteria.

Within 6-10 years

Sites will be put in this time frame if:

The site has planning permission, but, after discussion with the applicant, it is no longer their intention to develop the site within 5 years;

OR

The site may only be available in this slightly longer time period or is more likely to be achievable or suitable later in the plan period due to existing policy or site restrictions, for example.

Within 11 - 15 years

Sites will be put in this time frame if:

The site may only be available in a longer timeframe or is more likely to be achievable or suitable later in the plan period due to existing policy or site restrictions, greater than those placed in the 6–10 years category as above.

Strategic Housing and Economic Land Availability Assessment Review

The assessments will be reviewed as and when required or where necessary. If evidence is provided which demonstrates that an identified constraint can be overcome, this will be taken into account in the review and may result in a sites assumptions and timeframe for development being changed.

Appendix A: Red constraints

Constraints that are considered “Red” - i.e. showstoppers that render the site undevelopable and unworthy of further consideration and assessment:

1. The Functional Floodplain (Flood Zone 3b) (as set out in the relevant
2. Strategic Flood Risk Assessment)
3. Scheduled Monuments (nationally important sites as listed by Historic
4. England)
5. Internationally and Nationally Designated Sites of Biodiversity and Geological Interest (SSSI, SPA) as designed by Natural England or the European Commission. *
6. Major Hazardous Facilities (as defined by the Health and Safety
7. Executive)

Sites will only be excluded where the whole of the site is affected by the red constraint.

** Where the site of biodiversity or geodiversity interest has a specific catchment area (for example a body of water), the red constraint will not apply to the whole catchment, but only to the site of biodiversity or geodiversity interest*

CHARNWOOD SHELA A SITE ASSESSMENT 2020

Site Description

Site Reference: SH155

Site name/location: Church Hill Road, Thurmaston

Site size: 7.88ha

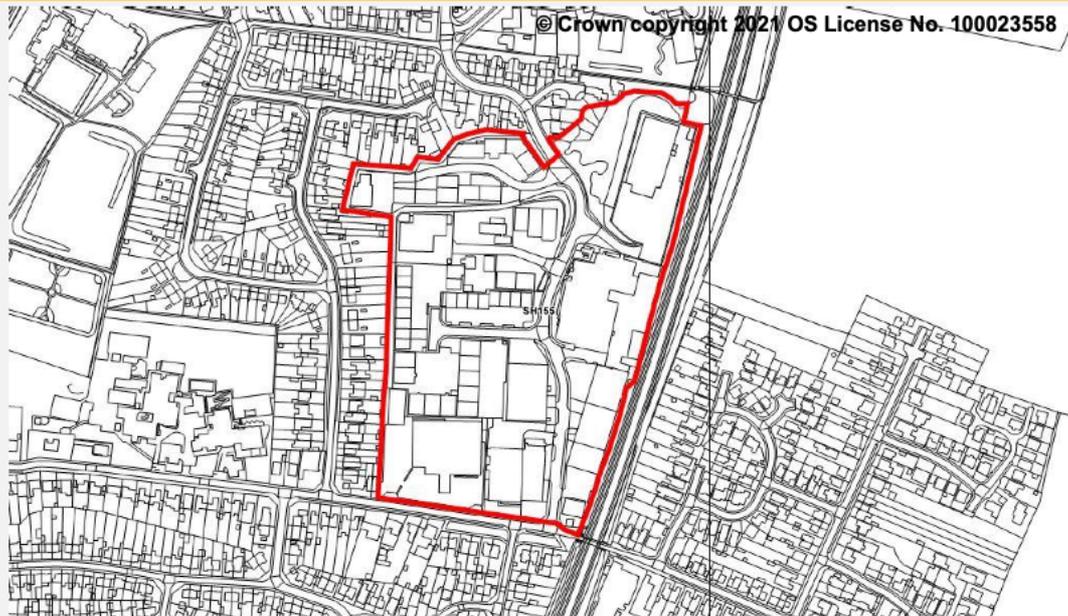
Parish: Thurmaston

Current land use and character: Mixed use of occupied industrial units

If site is currently being developed what progress has been made: N/A

Land uses and character of surrounding area Railway line on eastern boundary, residential properties to the north, south and west.

Site Boundary



Assessment of potential use of the site

Initial assessment of whether the site is suitable for a particular use or as part of a mixed-use development?

Residential

Assessment of constraints and potential impacts

Are there any physical constraints to development?

Not within flood risk zones.

Are there any environmental constraints to development?

Within the Earls Way landfill site and buffer zone.

What are the potential impacts of the development?

Some boundary hedgerows which form part of a biodiversity network.

Is the site affected by the development plan, emerging plan policy and national policy?:

Within the Limits to Development.

How appropriate and what is the likely market attractiveness for the type of development proposed?

Charnwood as a whole is seen as an attractive place to live and market homes.

Would the site contribute to any regeneration priority areas? No

What is the development potential of the site?

Dwellings / employment floorspace m2?

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