



**Strategic Housing &
Employment Land
Availability Assessment
2018
Draft Methodology**

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1. Executive Summary

- 1.1 The Strategic Housing Land Availability Assessment (SHLAA) for Stafford Borough has been produced each year as part of the Local Plan evidence base, as a requirement of the National Planning Policy Framework (NPPF).
- 1.2 Following the initiation of the New Local Plan process in July 2017 the Borough Council carried out a 'Call for Sites' exercise between October 2017 & January 2018. As part of the New Local Plan evidence base a new Strategic Housing & Employment Land Availability Assessment will now be produced, based on the sites submitted through the Call for Sites exercise.
- 1.3 The purpose of this consultation exercise is to establish the methodology to be used in order to assess sites for housing and employment for the New Local Plan. Subsequently the SHELAA will be published in order to provide information on sites put forward by developers and landowners across the Borough which might be suitable for development. However the SHELAA does not make policy decisions on future housing allocations.
- 1.4 **The consultation deadline for response to the 'Strategic Housing & Employment Land Availability Assessment – Draft Methodology' is 12 noon on Tuesday 31 July 2018.**

2. Introduction

- 2.1 The Strategic Housing & Employment Land Availability Assessment (SHELAA) is a technical document which will identify a list of sites that might have potential for housing and employment development at some stage in the future. The SHELAA forms part of the evidence base to support the delivery of land for housing & employment in the Borough through the New Local Plan.
- 2.2 As explained in the national Planning Practice Guidance, the SHELAA is an important evidence source to inform plan making, but does not in itself determine whether a site should be allocated for development. This is because not all sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable). It is the role of the SHELAA to provide information on the range of sites which are available to meet housing needs, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.
- 2.3 The inclusion of sites in the SHELAA does not preclude them from being developed for other suitable purposes. In addition, the fact that a site is not included in the SHELAA does not preclude the possibility of permission for residential development being granted on that site.
- 2.4 The purpose of this report is to set out the draft methodology to be used in producing the SHELAA and subsequently presenting the findings of the assessment. The assessment makes realistic assumptions about the availability, suitability and achievability (i.e. likely economic viability) of land in order to meet the future development needs in the future.
- 2.5 Once the methodology has been finalised and applied to the latest Strategic Housing & Employment Land Availability Assessment (SHELAA) 2018 this will supersede all previous SHLAAs prepared by Stafford Borough Council.

3. Planning Policy

National Policy

- 3.1 The National Planning Policy Framework (NPPF) establishes a requirement for Local Planning Authorities to prepare a Strategic Housing & Employment Land Availability Assessment (SHELAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing & employment over the plan period.
- 3.2 The national Planning Practice Guidance provides further detail on how such a document should be produced. It states that the assessment should be thorough but proportionate, building where possible on existing information. It contains a flow diagram which identifies key stages Local Planning Authorities should carry out (as shown overleaf).

Local Planning Policy

- 3.3 The Plan for Stafford Borough was adopted in June 2014. The Plan identifies the objectively assessed housing need for the Borough, as set out in Spatial Principle 2. The need is for 500 net new dwellings per year. The Development Strategy of the Plan directs this housing growth through a sustainable settlement hierarchy (set out in Spatial Principle 4). The majority of development is to be provided at Stafford and Stone, with a small proportion of development to come forward at 11 Key Service Villages¹. The delivery mechanism relies on four Strategic Development Locations (SDLs), three at Stafford and one at Stone. These allocations will deliver the majority of new housing over the Plan period.
- 3.4 In addition, the adopted Plan focuses new employment land allocations at the Stafford and Stone Strategic Development Locations, Ladfordfields Industrial Estate and Raleigh Hall Industrial Estate whilst supporting future employment uses at Major Developed Sites in the Green Belt at Hadleigh Park, the former Meaford Power Station and Moorfields Industrial Estate. Furthermore employment growth is also encouraged within settlement boundaries, with limited opportunities for rural employment and diversification outside of these areas.

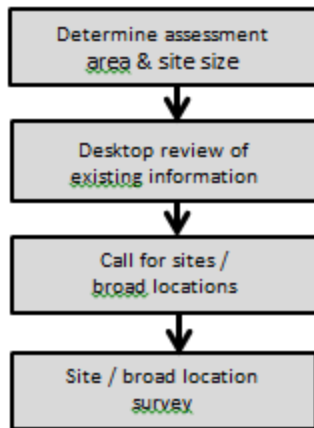
¹ Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield

- 3.5 Part 2 of the Plan for Stafford Borough sets out boundaries for the settlements of Stafford, Stone and the Key Service Villages, together with boundaries for the Recognised Industrial Estates (RIE). It also includes a policy on protecting social and community facilities, and the employment areas in Stafford and Stone. Part 2 was adopted in January 2017.
- 3.6 The New Local Plan for Stafford Borough was initiated in July 2017 to cover the Plan period 2020 – 2040 and is currently in the early stages of plan-making preparation. The Strategic Housing & Employment Land Availability Assessment will be a key element of the evidence base to support the New Local Plan.
- 3.7 Through the New Local Plan process the development strategy set out in the adopted Plan for Stafford Borough 2011-2031 will be replaced with a new approach in order to accommodate the Council's future objectively assessed needs for housing and employment. New criteria for judging suitability for housing site suggestions are set out in further detail later in this paper.

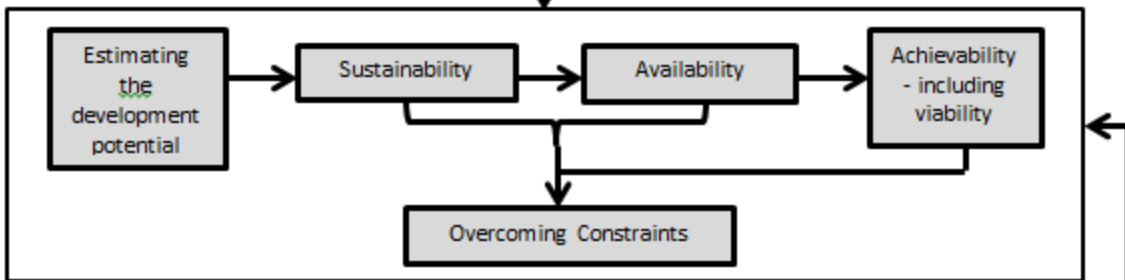
4. Geographical Area

- 4.1 The SHELAA will covers the whole of Stafford Borough. The Planning Practice Guidance suggests that SHELAA's should be produced to cover housing market area and functional economic market area. Stafford Borough is part of a wider housing and economic market area with influences from Stoke on Trent and Newcastle-under-Lyme districts to the north, and Cannock Chase and South Staffordshire districts to the south.
- 4.2 Due to the dispersed nature of the housing and economic market area, which covers several local authorities, and the difference in timescales of planning policy documents between these authorities, it is impractical to carry out and maintain a housing and economic market area wide SHELAA. Stafford Borough Council is committed to working with its neighbouring authorities through the Duty to Co-operate process to ensure that the SHELAA's for each District are compatible and coordinated. The Planning Practice Guidance will also ensure that the methodology and general approach used by each Council to prepare their SHELAA is consistent

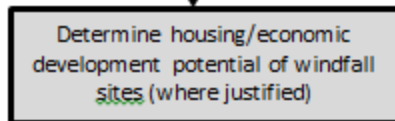
Stage 1 – Site/ Broad Location Identification



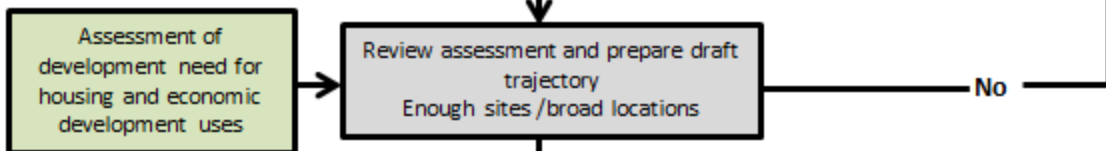
Stage 2 – Site/broad location assessment



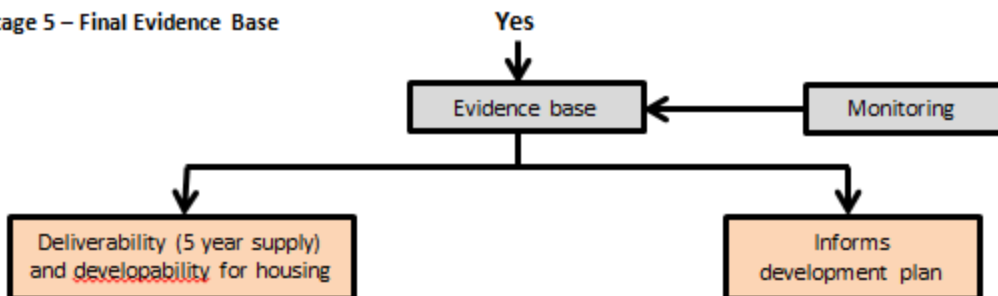
Stage 3 – Windfall Assessment



Stage 4 – Assessment Review



Stage 5 – Final Evidence Base



5. Draft Methodology

- 5.1 The Stafford Borough SHELAA will be produced in accordance with the methodology set out in the national Planning Practice Guidance.
- 5.2 The Planning Practice Guidance sets out 5 stages of assessment which correlate to the sections of this document:

Stage 1:	Identification of Sites
Stage 2:	Site / Broad Location Assessment
Stage 3:	Windfall Assessment
Stage 4:	Assessment Review
Stage 5:	Final Evidence Base

6. Stage 1: Identification of sites

- 6.1 In line with the thresholds indicated in the Planning Practice Guidance (PPG) and the Brownfield Register Regulations 2017, the assessment will consider the following:
- For housing - all sites that have an area of at least 0.25 hectares, or are capable of supporting at least 5 dwellings.
 - For economic development uses / sites - location of 0.25 ha or above, or capable of accommodating 500m² or more floorspace.
- 6.2 The PPG identifies various sources of sites that may have housing and employment potential, both within and outside the planning process. This has been used as a basis for determining how sites are categorised in the SHELAA. Opportunities for large scale redevelopment and redesign of existing residential or economic areas, potential urban extensions and new free standing settlements will need to be assessed in detail through the New Local Plan to meet future development needs.
- 6.3 Although the adopted Plan for Stafford Borough 2011 – 2031 identifies site allocations within the context of the Borough's settlement hierarchy within or, immediately adjacent to Stafford, Stone and the Key Service Villages (KSVs), in preparing the New Local Plan some sites which are currently disassociated from the adopted Plan's sustainable settlement hierarchy or adjacent to or within other villages and hamlets will now be subjected to more detailed investigation. This will result in the assessment of their capability to provide deliverable/developable housing and employment sites through the New Local Plan.
- 6.4 From October 2017 to January 2018 the Council carried out a "Call for Sites" evidence gathering exercise, which sought the submission of sites that may be

suitable for development by the respective landowners for consideration in the 2018 SHELAA. The Council will continue to accept new sites being submitted. A pro-forma for sites has been made available on the Council's website for the submission of new sites (see Appendix 1). Therefore as additional sites are put forward these will be assessed and included in future SHELAA's, updated on a regular basis as the New Local Plan progresses.

Sources of Sites with Potential for Housing and Employment:

Type of site
<ul style="list-style-type: none"> • Existing housing / employment allocations and site development briefs not yet with planning permission. • Planning permissions for housing / employment that are unimplemented or under construction. • Planning applications that have been refused or withdrawn. • Land in the authority's ownership. • Surplus and likely to become surplus public sector land (e.g. Staffordshire County Council and Stafford Borough Council owned land). • Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential). • Additional opportunities in established uses (e.g. making productive use of under-utilised facilities such as garage blocks). • Land for new employment / business requirements and aspirations. • Sites in rural locations. • Large scale redevelopment and redesign of existing residential / employment areas. • Sites in and adjoining villages or rural settlements and rural exception sites. • Potential urban extensions and new free standing settlements. • Sites from previous employment land studies which have been suggested for housing.

6.5 It should be noted that the SHELAA will not contain sites which have planning permission. Sites with planning permission will be listed in the Council's annual 5 Year Land Supply Statements and Land for New Homes, which set out the Council's land supply position in full. These documents need to be read collectively to provide an overall assessment of the housing & employment land availability across Stafford Borough.

7. Stage 2: Site / Broad Location Assessment

Assessment

- 7.1 Following on from the 'Call for Sites' exercise all sites submitted to the Council will be assessed against the SHELAA methodology, with the submitted site information used to establish the development potential of each SHELAA site.
- 7.2 The purpose of Stage 2 is to establish whether the SHELAA sites are either deliverable, developable or not currently developable. Footnotes 11 and 12 to paragraph 47 of the NPPF explain the definitions of deliverable and developable sites:

"Deliverable sites: to be considered deliverable, sites 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 and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

Developable sites: to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged."

- 7.3 The various assessments and assumptions used in deciding whether a site is deliverable are explained in more detail below.

Yield

- 7.4 Yield in this context is the amount of housing or employment which could be delivered from a SHELAA site. The gross area for all sites is shown in the assessment but when a site is developed some of the land will have to be used as access roads, gardens, public open space and other ancillary uses. The amount of land needed for these supplementary uses will differ depending on the size and nature / characteristics of the site in question. Larger sites usually have to reserve more land to deliver these ancillary areas.
- 7.5 It should be noted that the potential yield for a site shown in the SHELAA is not an adopted maximum or minimum figure; it is a desk based assumption of the

potential of that land. Where possible, known constraints have been taken into account in terms of yield. However, it is important to recognise that yields may also be affected by issues not currently evident, such as ground conditions in certain parts of sites. Incorporating existing features of the landscape such as trees and hedges may also affect layouts and yields. The yields derived for this assessment therefore have the potential to change for individual sites that progress through to the later stages of the planning process.

- 7.6 In terms of both housing and employment land, the following new developable hectares assumptions have been made:

Table 1a - Net developable land ratio

Gross Site Size	Development Ratio/ Net Developable Area
Less than 0.4 ha	100%
0.4 – 4 ha	70%
Greater than 4 ha	60%

- 7.7 Where there are specific site characteristics that may affect the net developable area, such as areas of flood zone or tree preservation orders, these reductions will also be taken into account.

Economic Development

- 7.8 For economic development, the site capacities will be calculated using the site area in hectares. This is because the proposed uses of some site submissions will be undefined or take in several different types of employment or retail use, which will all have different average floorspace figures (e.g. an office building, which would typically be multi-storey, would be expected to have a much larger assumed floorspace than a single-storey warehouse). Furthermore, using the site area is a consistent and reasonable approach for the purpose of the SHELAA. The SHELAA will note the proposed floorspace in circumstances where it has been specified in the site submission, although this will be for information purposes only.

Density

Housing

- 7.9 In determining the housing potential of sites, a number of factors need to be taken into account. The NPPF says that a local authority should set out its own approach to housing density to reflect local circumstances. Factors which impact on density may include presence of trees, topography, or the need for buffer zones and the existing built development. Dependent on the size of the site an

allowance needs to be made for open space, access roads, infrastructure and other uses to serve the community. However, whilst some Local Planning Authorities have adopted local density policies in their local plan, the Plan for Stafford Borough does not have any such policies.

- 7.10 For the purposes of the SHELAA, assumptions will be made about the capacity of sites based upon the Developable Land Ratios in Table 1a. Where no better information is available, these will be used alongside the below density assumptions to establish the potential site yield. These assumptions have been informed by the viability evidence as part of the work on the Community Infrastructure Levy.

Table 2 - Density Assumptions (dwellings per net developable hectare)

Village edge/isolated greenfield sites	30 dph
Sites within existing village envelope/brownfield sites	33 dph
Sites on the edge of an adjacent urban area (Stafford, Stone, Rough Close, Blythe Bridge, Meir Heath)	35 dph
Stafford Urban Infill	41 dph

- 7.11 It is recognised that the above assumptions can only be considered starting points for estimating site capacity. In reality a number of site specific factors may affect yield (e.g. Conservation Areas). Where the Council judges that better site specific information is available, such as a planning permission or an appropriate site brief, this will be used to estimate likely capacity in terms of deliverability. Using this approach gives a broad indication of likely yield which is appropriate for inclusion in the SHELAA.

Availability

- 7.12 This is an assessment of whether a site is available for development .The NPPF requires all local planning authorities to identify sufficient, specific “deliverable” sites to meet the housing requirement for the first 5 years of the plan (plus buffer), and sufficient “developable” sites for the subsequent 6-10 years, and where possible for years 11-15. If a site has constraints which mean it is not known how or when it might become available, then such sites need to be identified as “not currently developable”.
- 7.13 The availability of sites will need to take into account legal or ownership constraints, the existence of a willing landowner or developer, the delivery record

of the landowner or developer and the viability of the site. These questions were all asked on the "Call for Sites" pro-forma (attached at Appendix 1) along with questions regarding market interest in the land. Most land submitted to the SHELAA is owned by a developer or a landowner who has expressed an interest to sell or develop the land in question. The assessment of availability considers whether, on the most reliable information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. Unless information to the contrary has been submitted to the Council, it will be assumed that land submitted in the SHELAA is available for development.

- 7.14 In some cases, larger land parcels potentially suitable for new settlements or sustainable urban extensions may involve multiple land owners. In such cases, site promoters will need to demonstrate that there is an 'in principle' agreement to deliver the relevant scale of site from all relevant land owners in order for the area to be assessed as a single option.

Assessing Deliverable and Developable Sites

- 7.15 To be considered deliverable, a site should be available now, be in a suitable location for development, and be achievable with a realistic prospect that housing will be delivered in the site within five years. A deliverable site is not limited to sites with permission. A site can be deliverable even if it does not have current planning consent, but there is still a realistic prospect that housing can be delivered on the site within five years.
- 7.16 Making an assessment of whether a site is suitable, available and achievable will provide a basis for plan makers to consider whether the site falls within the categories of deliverable, developable or not currently developable.

Suitability

- 7.17 This is an assessment of whether a site is suitable for development. The PPG offers the following guidance on assessing suitability:

“Assessing the suitability of sites or broad locations for development should be guided by:

- *The development plan, emerging plan policy and national policy;*
- *Market and industry requirements in that housing market or functional economic market area.*

When assessing the sites against the adopted development plan, plan makers will need to take account of how up to date the plan policies are and consider the appropriateness of identified constraints on sites/broad location and whether such constraints may be overcome.

In addition to the above considerations, the following factors should be considered to assess a site's suitability for development now or in the future:

- *Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination*
- *Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.*
- *Appropriateness and likely market attractiveness for the type of development proposed.*
- *Contribution to the regeneration of priority areas.*
Environmental/amenity impacts experienced by would be occupiers and neighbouring areas”

Sites which will be considered suitable in accordance with the Development Plan

7.18 Relevant policies are contained in the adopted Plan for Stafford Borough and the National Planning Policy Framework. Currently the main policy constraint is location, whether the site is located within a settlement identified in the "Sustainable Settlement Hierarchy"² as set out in Spatial Principle 3 of the Plan for Stafford Borough. However the context for this policy constraint will change when the New Local Plan is adopted.

7.19 The assessment will also consider other policy constraints such as:

- Green Belt
- Environmentally protected sites e.g. Local Nature Reserves, National Nature Reserves, Sites of Special Scientific Interest, Biodiversity Alert Sites, Sites of Biological Importance, RAMSAR, Special Area of Conservation and Wildlife Sites
- Regionally Important Geological Sites
- Cannock Chase Area of Outstanding Natural Beauty
- Conservation Areas
- Article 4 Direction Areas
- Tree Preservation Orders / Areas
- Listed Buildings
- Scheduled Ancient Monuments
- Registered Parks & Gardens
- Public Rights of Way

7.20 Sites which would be considered suitable include land with planning permission until the permission expires, at which point their suitability will be reassessed. In addition sites within the settlement boundary of Stafford, Stone or a Key Service

² Stafford, Stone and the Key Service Villages

Village not currently covered by another policy constraint (e.g. current employment sites and open space designations) will be considered suitable.

The New Local Plan

- 7.21 The Borough Council initiated the new Local Plan in July 2017 to cover the Plan period 2020-2040 and is currently in the early stages of the preparation. In order to inform the Council's understanding of how much supply could potentially be delivered during the new Plan period, sites which may be considered 'unsuitable' under the existing planning policy regime will be now be assessed where they are adjacent to an existing settlement.
- 7.22 It is important to note that sites identified as 'potentially suitable' at this stage may later be shown to be unsuitable as the new Local Plan evidence base develops. For example, it may be the case that the infrastructure strategy reveals that a settlement does not have sufficient services and facilities to sustain further growth; or that upon examination of the landscape impacts of sites within the open countryside, that a site identified as potentially suitable in the SHELAA is not acceptable.

Physical Constraints

- 7.23 Some sites might be considered suitable for development subject to no other overriding physical or policy constraints being identified. For example sites containing a physical constraint which may prevent development on the site in its current form, such as lack of highway access, steep topography, telephone lines, ground conditions etc...
- 7.24 A range of physical limitations are also considered
- Flood Zones
 - Ancient Woodlands
 - Land contamination
 - Landfill
 - Minerals deposits
- 7.25 The presence of a suitability constraint on a SHELAA site does not necessarily render it automatically unsuitable. The assessment of suitability requires planning judgement to decide if the constraint is significant enough to make the site unsuitable. Some constraints, such as the presence of a Tree Preservation Order on site can be factored into the design and would not prevent the site being developed. On the other hand if the majority of the site is regarded as Flood Zone 3a or 3b it is unlikely that this could be appropriately mitigated for by design.

Achievability

- 7.26 The NPPG requires a site's potential viability to be considered as part of its achievability. This is an assessment of whether development of a site is achievable. It is essentially a judgement about the economic viability of the land.
- 7.27 The achievability of a site is affected by many factors including the viability of existing uses on site, the site preparation costs to overcome constraints and market interest in the site. The Council commissioned viability evidence as part of work on the forthcoming Community Infrastructure Levy (CIL). This evidence groups similar sites into a typology (e.g. STA1 - Large green field site Stafford town or RUR5 - smaller village infill) and then assessed the viability of each type of site in the Stafford Borough area. This is done using evidence based judgement informed by the relevant available facts such as the costs and the value of development in the local area, and an understanding of the operation of the market. A collaborative approach involving the business community, developers, landowners and other interested parties has been adopted to ensure robustness in the assessment.
- 7.28 It is impractical to undertake a detailed viability assessment on all SHELAA sites, and it is considered appropriate to analyse the SHELAA sites against modelled sites in the typology and associated viability assessments from the emerging CIL viability evidence. Each SHELAA site will be assigned a typology from the CIL viability evidence. The descriptions of the different modelled sites are contained in the table below. The CIL viability evidence modelled 19 different types of sites, only 10 of these were types of sites present in the SHELAA (those listed in the table below). The model takes into account the assumed costs of meeting all the Council's relevant adopted Plan for Stafford Borough policies relating to housing provision (such as affordable housing, open space requirements etc..).
- 7.29 In some instances the SHELAA sites do not fit neatly into one of the typologies listed below. In most cases this is because the SHELAA site submitted is of a much greater size than those assessed in the CIL viability work. The Council has engaged with the consultants commissioned to produce the viability work and is confident that the assumptions made in assigning a typology accurately reflect the viability of each site, even if the specifics of the typology description do not match perfectly the SHELAA site in question.

Table 2 CIL Modelled Sites Typology

Typology Code	Description	Details of CIL Modelled Sites		CIL Viability Conclusions
STA1	Stafford: Large green field site	Units	100	Development is considered viable
		Area (gross ha)	4.76	
		Density/ha	35	
STA2	Stafford: Medium green field site	Units	40	Development is considered viable
		Area (gross ha)	1.63	
		Density/ha	35	
STA6	Stafford: Urban infill Units	Units	7	Development is considered viable
		Area (gross ha)	0.17	
		Density/ha	41	
STO1	Stone: Large green field site	Units	100	Development is considered viable
		Area (gross ha)	4.76	
		Density/ha	35	
STO2	Stone: Medium green field site	Units	40	Development is considered viable
		Area (gross ha)	1.63	
		Density/ha	35	
STO3	Stone: Small green field site	Units	10	Development is considered viable
		Area (gross ha)	0.4	
		Density/ha	30	
RUR1	Village: Large edge site	Units	30	Development is considered viable
		Area (gross ha)	1.42	
		Density/ha	30	
RUR2	Village: Medium edge site	Units	12	Development is considered viable
		Area (gross ha)	0.57	
		Density/ha	30	
RUR3	Village: Small edge site	Units	7	Development is considered viable
		Area (gross ha)	0.25	
		Density/ha	28	
RUR5	Village: Smaller infill site	Units	5	Development is considered viable
		Area (gross ha)	0.15	
		Density/ha	33	

Constraint resolution

- 7.30 Having assessed the availability, suitability and achievability of each SHELAA site a conclusion can be made as to the deliverability of each site. Where a site is considered available, suitable and achievable it is a deliverable site. If a site fails one of these tests, it will be deemed either developable or not currently developable. The Council has indicated, if possible, how the constraint could be overcome, for example when policies are reviewed or by extraordinary mitigation measures.

8. Windfall Assessment

- 8.1 Paragraph 48 of the National Planning Policy Framework states that local planning authorities may make an allowance for windfall sites³ in the five-year supply if there is compelling evidence that such housing sites have consistently become available in the local area, and will continue to provide a reliable source of supply.
- 8.2 Stafford Borough Council produces a separate 5 Year Housing Land Supply Statement with a base date of the 31st March each year. Previously this statement has not included an allowance from windfall sites in the 5 year supply. However, the Council has consistently permitted windfall sites and, in previous years, windfall sites have made up the majority of the Council's completions, as shown below:

Table 4 – Housing completions and windfall completions by Monitoring Year

Year	Number of Completions	Percentage of Completions on Windfall Sites
2005 - 2006	442	87%
2006 - 2007	449	92%
2007 - 2008	581	100%
2008 - 2009	518	100%
2009 - 2010	193	100%
2010 - 2011	220	100%
2011 - 2012	425	100%
2012 - 2013	306	100%
2013 - 2014	411	100%
2014 - 2015	428	90%
2015-2016	688	78%

³ Sites which have not been specifically identified as available through the Local Plan process.

- 8.3 The Council regards this track record of delivery as compelling evidence that windfall sites have consistently become available in the local area. A recent appeal decision in the Borough the Inspector commented that "*it seems irrational not to include a windfall element [in the 5 year and supply] given the Council's track record in that respect*"⁴
- 8.4 Paragraph 48 of the National Planning Policy Framework also requires Local Authorities to have regard to the SHLAA and expected future trends in estimating the contribution windfall sites may make to the 5 year supply.
- 8.5 It is the experience of the Council that not all windfalls delivered in the Borough are on sites that were previously identified in the SHLAA. In fact the majority of windfalls delivered in the Borough are on sites that were not identified in the SHLAA prior to delivery.

Table 5 – Past completions on SHLAA sites by Monitoring Year

Year	Number of Windfall Completions	Number of Completions on Windfall sites identified in the SHLAA	Average percentage of completions on windfall sites identified in the SHLAA
2010-2011	220	3	1.4%
2011-2012	425	102	24.0%
2012-2013	306	71	23.2%
2013-2014	411	115	28.0%
2014-2015	384	96	25%
2015-2016	539	268	49.2%
Total	2285	655	28.7%

- 8.6 Based on the past evidence of how many units are identified in the SHLAA as a total of how many windfalls were delivered each year, the Council considers that the deliverable land shown in the SHLAA (252 units) will result in further windfall site completions over the next five year period. However, some of the previously delivered windfalls on sites that were not in the SHLAA were barn conversions and it is acknowledged that there are a finite number of barns to be converted. In addition Part 2 of the Plan for Stafford Borough sets the settlement boundaries for Stafford, Stone and the Key Service Villages, and this will restrict the number of potential windfall sites coming forward outside of these boundaries.

⁴ Planning Inspectorate reference: APP/Y3425/A/14/2217578

- 8.7 Nevertheless, there has consistently been delivery of windfall units across the Borough, many in suitable locations. This trend is expected to continue, not least due to the recent changes to permitted development rights. In view of the historic windfall completion rates, anticipated deliverable land in the SHLAA, and the allowance for brownfield land development will continue to come forward within the sustainable settlement hierarchy.
- 8.8 Therefore it is proposed that the SHELAA will not make an allowance for windfall sites at this stage, as there is sufficient land available to deliver the Borough's housing and employment requirements, as detailed in the Stafford Borough Council Statement of Five Year Housing Land Supply.

9. Assessment Review

- 9.1 When the SHELAA is produced it will identify the total number of overall sites and housing units including a description of the relationship with the settlement boundaries within the adopted Plan for Stafford Borough and Part 2 of the Plan for Stafford Borough. The SHELAA will also categorise sites into 'deliverable', 'developable' and 'not currently developable', with an individual profile for each site prepared
- 9.2 The final stage of the SHELAA will consider the findings against the identified need for housing and employment, as set out in the adopted Plan for Stafford Borough. Subsequent updates will consider the future development needs arising through the New Local Plan for the period 2020 – 2040.
- 9.3 The Council's annual 5 Year Land Supply Statement, Land for New Homes and the Authority Monitoring Report sets out, in full, the Council's deliverable supply. Currently these reports demonstrate that, combined with the Strategic Development Locations in the adopted Plan, there are sufficient sites with planning permission to meet the Borough's needs for the next five year period. If this continues to be the case going forward the Council will not consider it necessary to re-assess sites submitted to the SHELAA in order to boost supply, although updated through the New Local Plan.

10. Final Evidence Base

- 10.1** It is intended that the SHELAA will be kept under review, and updates will be carried out to ensure it remains an effective and up to date evidence base. The proposed reviews will not alter the methodology followed, unless the national Planning Practice Guidance on SHELAA preparation is significantly amended.
- 10.2** It is proposed that the Council will continue to accept suggested sites for inclusion in future SHELAA reviews. Submitted sites will be kept on file and added to the SHELAA at the next review. Therefore the facility to submit a site for inclusion will remain open by downloading the pro-forma from the Council's website <http://www.staffordbc.gov.uk/strategic-housing-land-availability-assessment-shlaa1> and providing a map showing a red line boundary of the land in question. Alternatively the form is available at Appendix 1.

Appendix 1

Call for Sites Pro-forma



CALL FOR SITES INCLUDING BROWNFIELD LAND REGISTER

Ref:

Date:

(For official
use only)

Please email return completed forms to: forwardplanningconsultations@staffordbc.gov.uk or alternatively send to

- Forward Planning, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ

Guidelines for Submitting a Site

Landowners, developers and other interested parties are invited to submit any of the following types of development for consideration: housing, employment, retail, leisure, health, and mixed use schemes.

This form has three parts:

Part A: Personal Details

The information that you provide will only be used to assist in the Councils review of its development policies in accordance with the Planning and Compulsory Purchase Act 2004. Your personal details may be shared with other departments to ensure our records are kept accurate and to keep you informed of future consultation documents. Please note that representations will be made available for public inspection, this means that with the exception of telephone numbers, private addresses, personal email addresses and signatures, your comments and other details that you provide will be publicly available for inspection and will also be published on the internet.

Part B: Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Where submitting a site for housing development, please ensure it could accommodate 5 or more dwellings before completing this form.
- Where submitting a site for economic development, please ensure that sites are a minimum size of 0.25ha (or 500sqm net additional floorspace) or above.
- Please attach an up-to-date Ordnance Survey based map at 1:1250 or 1:2500. This must outline the precise boundaries of the site in its entirety and the part that may be suitable for development (if this is less than the whole). **Without this mapped information we are unable to register the site.**

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Part C: Brownfield Sites – Call for Sites

In April 2017 the Government introduced a requirement on Local Planning Authorities (LPAs) to publish a Brownfield Land Register (BLR). A BLR is a list of previously developed sites that are potentially suitable for residential development. Any sites put forward concerning Brownfield Land as part of this Call for Sites exercise will be assessed for inclusion in the updated Brownfield Sites Register in 2018.

The BLR is to be kept in 2 parts:

- Part 1 will be for sites categorised as ‘previously developed land’ which are suitable, available and achievable for residential development.
- Part 2 allows LPAs to select sites from Part 1 and grant permission in principle (PiP) for housing led development.

The BLR will be maintained and reviewed at least once a year to ensure it is kept up to date. Landowners and other stakeholders are invited to submit sites which meet the National Planning Policy Framework (NPPF) definition of previously developed land that they consider have the potential to be used for housing led development.

However, a site’s inclusion on Part 1 of the Register does not confirm that it will be progressed to Part 2 and receive Permission in Principle.

To be included, sites should meet the definition of previously developed land as set out in the glossary at Annex 2 of the NPPF, which is:

‘Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time’.

Please complete section A, B (with the exception of B5), and C as fully as possible for each site.

Part A

<p>1. Personal Details*</p> <p>*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</p>	<p>2. Agent's Details (if applicable)</p>
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1. Personal Details

2. Agent Details (if applicable)

Title	<input style="width: 180px; height: 25px;" type="text"/>
First Name	<input style="width: 180px; height: 25px;" type="text"/>
Last Name	<input style="width: 180px; height: 25px;" type="text"/>
Job Title (where relevant)	<input style="width: 180px; height: 25px;" type="text"/>
Organisation (where relevant)	<input style="width: 180px; height: 25px;" type="text"/>
Address Line 1	<input style="width: 180px; height: 25px;" type="text"/>
Line 2	<input style="width: 180px; height: 25px;" type="text"/>
Line 3	<input style="width: 180px; height: 25px;" type="text"/>
Line 4	<input style="width: 180px; height: 25px;" type="text"/>
Post Code	<input style="width: 180px; height: 25px;" type="text"/>

Title	<input style="width: 180px; height: 25px;" type="text"/>
First Name	<input style="width: 180px; height: 25px;" type="text"/>
Last Name	<input style="width: 180px; height: 25px;" type="text"/>
Job Title (where relevant)	<input style="width: 180px; height: 25px;" type="text"/>
Organisation (where relevant)	<input style="width: 180px; height: 25px;" type="text"/>
Address Line 1	<input style="width: 180px; height: 25px;" type="text"/>
Line 2	<input style="width: 180px; height: 25px;" type="text"/>
Line 3	<input style="width: 180px; height: 25px;" type="text"/>
Line 4	<input style="width: 180px; height: 25px;" type="text"/>
Post Code	<input style="width: 180px; height: 25px;" type="text"/>

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Telephone Number

Telephone Number

Email address

Email address

Part B – Please Use a Separate Sheet for each representation

B1. Name/Organisation	
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B2. I am...			
Owner of the site	<input type="checkbox"/>	Planning Consultant	<input type="checkbox"/>
Parish Council	<input type="checkbox"/>	Land Agent	<input type="checkbox"/>
Local Resident	<input type="checkbox"/>	Developer	<input type="checkbox"/>
Amenity / Community Group	<input type="checkbox"/>	Registered Social Landlord	<input type="checkbox"/>
Other (please specify):			

B3. Site Information	
Site location (including address and post code)	
Grid reference (if known)	
Site area (hectares)	
Current Land Use If the site is vacant please advise its historic use	

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Type of site	Greenfield	Brownfield	Mixed please provide the approximate area that is Brownfield land (HA)	If brownfield please provide number and type of buildings currently on site		
Existing trees and other landscape features on the site						
Availability of access to the site						
Ecological features and areas of biological importance						
Relevant Planning History (please include planning application numbers)						
B4. Proposed Use of Site - Residential						
Where a residential use is being suggested for the site, so long as it could accommodate 5 or more dwellings please provide details below (if known)						
Housing, consisting of (please tick all that apply)	Proposed housing Type	(x)	Estimated number of dwellings proposed on site	Proposed housing Type	(x)	Estimated number of dwellings proposed on site
	Market housing			Affordable housing		
	Self-build			Starter homes		

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	Sheltered housing			Residential institutions with care (C2 use)		
	Gypsy and traveller pitches			Live / work units		
	Other, please specify:					
Overall total estimated no. of dwellings proposed						

B5 Proposed Use of Site - All Other Uses (This section is not applicable for sites to be considered on the Brownfield Land Register)

What use are you suggesting for the site? Please put a cross (x) next to all that apply

YES (x)	Use	Detailed Use Type	(x)	Detailed Use Type	(x)
	Employment consisting of (please tick all corresponding detailed uses that apply)	Offices		Light industry	
		Storage / distribution		General industry	
		Other, please specify			
	Retail, leisure or community uses consisting of (please tick all corresponding detailed uses that apply)	Shops		Food / drink establishments	
		Leisure		Community facilities	
		Other, please specify			
	Any other use not listed above , please provide details				
Estimated floorspace for each use (m²) and total overall floorspace (m²) (excluding any proposed residential		Employment			m ²

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uses)	Retail / Leisure / Community		m ²
	Any other proposed use		m ²
	Not known at this stage. Please cross (x) if applicable		
	Total non-residential uses (if known)		m ²

B6. Site Ownership		
I (or my client)....		
Is the sole owner of the site	<input type="checkbox"/>	
Is a part owner of the site	<input type="checkbox"/>	
Does not own (or hold any legal interest in) the site whatsoever	<input type="checkbox"/>	
If Owner / Part-owner have you attached a copy of the title plan and deeds with this form?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If you are not the owner, or own only part of the site, do you know who owns the site or its other parts? (please provide details):		
Does the owner (or other owners) support future development on the site?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

B7. Market Interest		
Please choose the most appropriate category below and indicate what level of market interest there is / has recently been in the site.		
	Yes	Comments
Site is owned by a developer	<input type="checkbox"/>	

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Site is under option to a developer	<input type="checkbox"/>	
Enquiries received	<input type="checkbox"/>	
Site is being marketed	<input type="checkbox"/>	
None	<input type="checkbox"/>	
Not Known	<input type="checkbox"/>	

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B8. Utilities			
Please tell us which of the following utilities are available to the site			
	Yes	No	Unsure
Mains water supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mains sewerage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Electrical supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gas supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public highway	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Landline telephone / broadband internet	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Transport	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify):			

B9. Suitability Issues			
Please tell us if there are any of the following constraints			
	Yes	No	Unsure
Land in other ownership must be acquired to develop the site	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Restrictive covenants exist	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Current use needs to be relocated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Physical constraints (topography, trees, other)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Rights of Way cross or adjoin the site	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contamination / Land Stability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conservation Area / Listed Buildings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nature Conservation / Ecology	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Utilities (high pressure gas pipeline / electricity pylons / water infrastructure)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Green Belt	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Flood plain	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please provide any relevant information of likely measures to address any of the above that you have answered "YES" to:			

B10. Timescale for Availability		
Please indicate the approximate timescale for availability:		
		Comments – particularly if you have indicated that the site is not immediately available, please explain why:
Immediately	<input type="checkbox"/>	
Up to 5 years	<input type="checkbox"/>	
5 - 10 years	<input type="checkbox"/>	
10 – 15 years	<input type="checkbox"/>	
Beyond 15 years	<input type="checkbox"/>	

B11. Other Relevant Information – Please use the space below for additional information or further explanations on any of the topics covered in this form (any additional information should be limited to 3 sides of A4):

Signature:.....

Date:.....

Part C - Brownfield Land Register

C1. Meeting The Definition of Previously Developed Land

To ensure the land meets the definition of previously developed land as provided in the Glossary to the NPPF, please confirm the following by ticking all the boxes where you believe the statements are fulfilled.

The land is or was occupied by a permanent structure.	<input type="checkbox"/>
The land is within the curtilage of a permanent structure and does not include any land that is not curtilage land.	<input type="checkbox"/>
The land is not or has not been occupied by agricultural or forestry buildings.	<input type="checkbox"/>
The land is not a formal minerals or waste disposal site with restoration conditions.	<input type="checkbox"/>
The land is not a residential garden, park, recreation ground or allotment in a built up area.	<input type="checkbox"/>
The land may have been previously developed but the remains of the permanent structure have not blended into the landscape in process of time.	<input type="checkbox"/>

C2. Adjacent Land Uses

Please tell us the adjacent land uses