



Strategic Housing and Employment Land Availability Assessment (SHELAA) 2023 Update

Note: The inclusion of sites within the SHELAA does not mean they are likely to be developed, or that the Council would view planning applications on the site favourably.

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1. Executive Summary

- 1.1 The Strategic Housing and Employment Land Availability Assessment (SHELAA) for Stafford Borough has been produced each year as part of the Local Plan evidence base, as required by 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 and January 2018. This provided individuals with the opportunity to submit sites that they wished to be considered for allocation, and thus development, in the new Local Plan.
- 1.3 During June and July 2018, a consultation exercise took place on the methodology that would be used in order to assess the suitability of sites for development. The resultant SHELAA document was published in December 2018.
- 1.4 Since 2018 three updates to the SHELAA have been published in 2019, 2021 and 2022. Since the 2022 update was published, more sites have been submitted for assessment through the on-going Call for Sites process. Therefore, the SHELAA 2023 update is the latest version forming part of the Local Plan 2020-2040 evidence base.
- 1.5 It is worth noting that the SHELAA is a document which simply seeks to establish how much suitable land is available within Stafford Borough for housing and employment development. It does not make policy decisions on future land allocations. Therefore, inclusion of sites within the SHELAA does not mean they are likely to be developed, or that the Council would view planning applications on the site favourably.

2. Introduction

- 2.1 The Strategic Housing and Employment Land Availability Assessment (SHELAA) is a technical document which identifies 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 and 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 and employment needs, but it is for the Local 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 development being granted on that site through the planning application process.
- 2.4 The SHELAA sets out the findings of the site assessment, based on the methodology established for the process following the consultation exercise during June and July 2018 within the context of national policy. 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 of the Borough.
- 2.5 The Strategic Housing and Employment Land Availability Assessment (SHELAA) 2023 update supersedes all previous Strategic Housing Land Availability Assessments (SHLAAs) and SHELAA's prepared by Stafford Borough Council.

3. Planning Policy

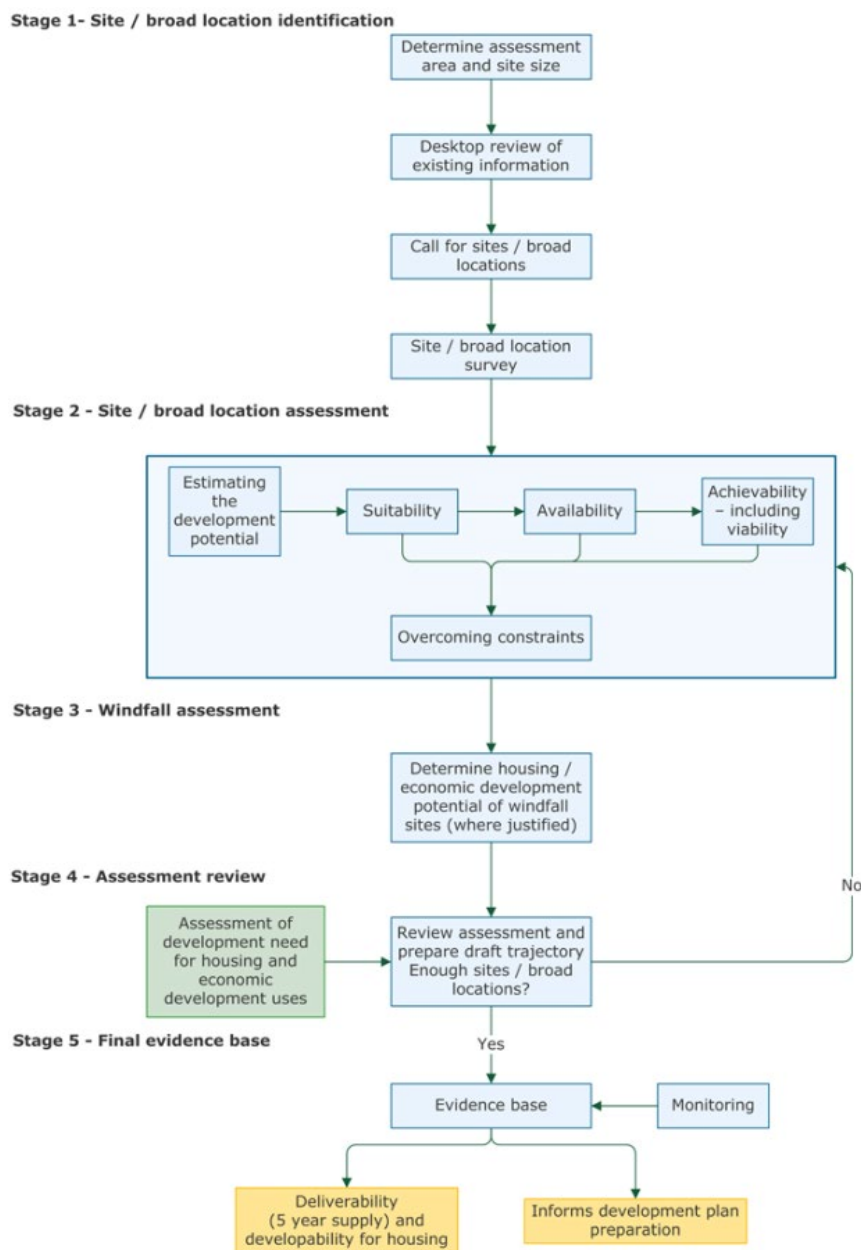
National Planning Policy

- 3.1 The National Planning Policy Framework (NPPF) establishes a requirement for Local Planning Authorities to prepare a Strategic Housing and Employment Land Availability Assessment (SHELAA), to establish realistic

assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing and employment over the plan period.

- 3.2 The national Planning Practice Guidance (PPG) 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. The PPG contains a flow diagram which identifies key stages Local Planning Authorities should carry out (see Figure 1).

Figure 1: Flow chart demonstrating how Local Planning Authorities should produce a SHELAA. Source: Planning Practice Guidance ([land-availability.pdf](https://www.planning.service.gov.uk/land-availability.pdf) ([publishing.service.gov.uk](https://www.planning.service.gov.uk/))).



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 proportion of development to come forward at 11 Key Service Villages (Barlaston, Eccleshall, Gnosall, Great Haywood, Little Haywood / Colwich, Haughton, Hixon, Tittensor, Yarnfield, Weston and Woodseaves). 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 requires 8 hectares of employment land to be delivered each year, focused on new 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, as well as immediately adjacent to Stafford Town, with limited opportunities for rural employment and diversification outside of these areas.
- 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 the publication version of the Plan is currently in preparation. The SHELAA is a key element of the evidence base to support the Local Plan.
- 3.7 Through the 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. The criteria for judging the suitability of proposed development sites suggested through the "Call for Sites" exercise is set out in further detail later in this paper, within the context of the adopted Plan for Stafford Borough 2011-2031.

4. Geographical Area

- 4.1 The SHELAA covers the whole of Stafford Borough. The Planning Practice Guidance suggests that SHELAAs should be produced to cover Housing Market Area (HMA) and Functional Economic Market Area (FEMA). Stafford Borough continues to be influenced by Stoke-on-Trent and Newcastle-under-Lyme districts to the north, and Cannock Chase and South Staffordshire districts to the south.
- 4.2 The Economic and Housing Development Needs Assessment (EHDNA) for Stafford Borough (prepared by Lichfields, published January 2020) demonstrates that over the past ten years or so, Stafford Borough has experienced a strengthening level of self-containment. The Borough now has a self-containment rate of 71% for in-migration, and 73% for out-migration when short household moves are considered. As such, and when considered against the indicators, the Borough exceeds the threshold for a self-contained HMA set out in the Planning Practice Guidance (PPG).
- 4.3 With respect to the FEMA, Lichfields considered a range of data alongside the HMA. This included the Local Enterprise Partnership geography, the ONS Travel to Work Area, the commercial market and service markets for consumers. On balance it was considered that the Stafford Borough FEMA predominantly aligned with the Borough's administrative boundary.
- 4.4 As such, for planning purposes, a key finding of the EHDNA was that the Stafford Borough administrative boundary also gives a good "best fit" for both HMA and FEMA. As such this SHELAA covers the relevant HMA and FEMA in their entirety.

5. Methodology

- 5.1 The Stafford Borough SHELAA 2023 Update has been 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 of floorspace.
- 6.2 In October 2017, the Council launched a “Call for Sites” scheme, which ran until January 2018. This gave respective landowners the opportunity to submit sites that they considered might be suitable for development for assessment through the SHELAA process. However, the Council continued to receive and accept sites for inclusion in the 2018 SHELAA up until the end of September 2018. The deliverability of all submitted sites were then assessed, with the document being published in December 2018. An updated SHELAA was published in 2019, with further updates being published in October 2021 and August 2022.
- 6.3 Following the publication of the SHELAA 2022 Update, the Council has continued to receive “Call for Sites” submissions from interested parties up until the 29 September 2023. Having received a number of sites within this time period, the Council considered it necessary to update the SHELAA 2022 to include sites received since its publication.
- 6.4 The Council will continue to accept sites as the Local Plan progresses. These sites will be assessed and included in future SHELAAAs, which will be updated throughout the Local Plan process. A Call for Sites form is available on the Council’s website (www.staffordbc.gov.uk/call-sites-including-brownfield-land-consultation), to use for the submission of new sites.

Sources of Sites with Potential for Housing and Employment:

- 6.5 Type of site:
- 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, subject to each case.
 - Land in the authority’s ownership.

- Surplus and likely to become surplus public sector land (e.g. Staffordshire County Council, Stafford Borough Council, NHS and MoD 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 underutilised 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.

7. Stage 2: Site / Broad Location Assessment

Assessment

- 7.1 All sites submitted to the Council have been 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. Paragraph 68 of the NPPF sets out the national context for preparing strategic housing land availability assessments with footnote 34 requiring an appropriate buffer whilst the glossary provides definitions of deliverable and developable sites:

"Deliverable sites: to be considered 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. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites

have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

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

- 7.3 The various assumptions and factors used in assessing sites, together with the net developable area, are explained in more detail below.

Yield

- 7.4 Yield in this context is the amount of housing or employment which could be delivered on 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 for 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 greater proportion of land to deliver these ancillary areas. Whilst the Call for Sites form provides the opportunity to indicate the number of dwellings on a site, it should be noted that the Council will follow the approach set out in Table 1.
- 7.5 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 and land instability 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 net developable area assumptions have been used:

Table 1: Net developable land ratio

Gross site size (hectares; ha)	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 need to 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.

Density – Housing

- 7.9 In determining the housing potential of sites, a number of factors need to be taken into account. The NPPF, through bullet points (a) and (b) of paragraph 125, states that local authorities should optimise the use of land and meet as much of the identified need for housing as possible. This should include an approach to housing density to reflect local circumstances, with minimum density standards for town and other locations that are well served by public transport. 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.
- 7.10 For the purposes of the SHELAA, assumptions will be made about the capacity of sites based upon the net developable land ratios in Table 1. These will be used alongside the density assumptions in Table 2 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

Site location / type	Density (dwellings per 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 as a starting point 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. Paragraph 68 of the NPPF requires all local planning authorities to identify “specific deliverable sites for years one to five of the plan period; and specific, developable sites or broad locations for growth, for years 6-10, and, where possible, for years 11-15 of the plan”. If a site has constraints which means it is not known how or when it might become available, then such sites will 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 form 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 landowners. 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 landowners 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 (Paragraph: 018 Reference ID: 3-018-20190722) offers the following guidance on assessing suitability:

“A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.

When considering constraints, plan-makers may wish to consider the information collected as part of the initial site survey, as well as other relevant information, such as:

- national policy;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.

Plan-makers need to assess the suitability of identified sites or broad locations for different forms of development where appropriate, taking into account the range of needs for housing, economic and other uses.

When assessing 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 relevance of identified constraints on sites / broad locations and whether such constraints may be overcome. When using the emerging plan to assess suitability, plan-makers will need to account for potential policy changes or other factors which could impact the suitability of the site / broad location. For example, an emerging site allocation may enable development to come forward. This will have to be reflected in the assessment of achievability.

Sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability. This can be informed by a range of factors including the suitability of the land for different uses and by market signals, which will be useful in identifying the most appropriate use.”

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 2011-2031 and the National Planning Policy Framework. Currently the main policy constraint is location, i.e. whether the site is located within a settlement identified in the "Sustainable Settlement Hierarchy" (Stafford, Stone and the Key Service Villages) as set out in Spatial Principle 3 of the Plan for Stafford Borough 2011-2031. However, the context for this policy constraint will change when the Local Plan 2020-2040 is adopted.
- 7.19 The assessment will also consider other policy constraints such as:
- Green Belt
 - Environmentally protected sites, species, habitats and networks, 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 National Landscape (previously known as the Area of Outstanding Natural Beauty)
 - Conservation Areas
 - Tree Preservation Orders / Areas
 - Listed Buildings
 - Scheduled Ancient Monuments
 - Registered Parks and Gardens
 - Public Rights of Way and National Trails

- Green Infrastructure Network and Local Green Space
- Best and most versatile agricultural land
- Landscape character classification

7.20 Sites which would be considered suitable include land with planning permission until the permission expires, at which point their suitability will be re-assessed. In addition, sites within the settlement boundary of Stafford, Stone or a Key Service Village not currently covered by another policy constraint (e.g. current employment sites or open space designations) will be considered suitable.

The Local Plan 2020-2040

7.21 The Borough Council initiated the new Local Plan in July 2017 to cover the Plan period 2020-2040 and the Preferred Options stage of the Plan was consulted on between October to December 2022.

7.22 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 now be assessed in the context of preparing the new development strategy.

7.23 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, a site identified as potentially suitable in the SHELAA is not acceptable.

Physical Constraints

7.24 Some sites might be considered suitable for development subject to no other overriding physical or policy constraints being identified. However, sites may contain physical constraints which may restrict development on the site in its current form, such as lack of highway access, steep topography, telephone lines, ground conditions etc.

7.25 The range of physical limitations considered include:

- Flood Zones
- Ancient Woodlands
- Land contamination and instability
- Landfill

- Minerals deposits

7.26 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

7.27 The PPG 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.

7.28 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 (in 2015) as part of the work on the Community Infrastructure Levy (CIL). This evidence grouped similar sites into typologies, shown in Table 3 (e.g. STA1 - Large site Stafford town or RUR5 – smaller village infill), and then assessed the viability of each type of site in the Stafford Borough area. This was 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 was adopted to ensure robustness in the assessment.

7.29 It is impractical to undertake a detailed viability assessment on all SHELAA sites, so 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 has been 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 are present in the SHELAA (see Table 3). The model takes into account the assumed costs of meeting all the Council's relevant adopted Plan for Stafford Borough 2011-2031 policies relating to housing provision (such as affordable housing, open space requirements etc).

7.30 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 3: CIL Modelled Sites Typology

Typology Code	Description	Details of CIL Modelled Sites	CIL Viability Conclusions
STA1	Stafford: Large site	Units = 100 Area (gross ha) = 4.76 Density per hectare = 35	Development is considered viable
STA2	Stafford: Medium site	Units = 40 Area (gross ha) = 1.63 Density per hectare = 35	Development is considered viable
STA6	Stafford: Urban infill site	Units = 7 Area (gross ha) = 0.17 Density per hectare = 41	Development is considered viable
STO1	Stone: Large site	Units = 100 Area (gross ha) = 4.76 Density per hectare = 35	Development is considered viable
STO2	Stone: Medium site	Units = 40 Area (gross ha) = 1.63 Density per hectare = 35	Development is considered viable
STO3	Stone: Small site	Units = 10 Area (gross ha) = 0.40 Density per hectare = 30	Development is considered viable
RUR1	Village: Large site	Units = 30 Area (gross ha) = 1.42 Density per hectare = 30	Development is considered viable
RUR2	Village: Medium site	Units = 12 Area (gross ha) = 0.57 Density per hectare 30	Development is considered viable

Typology Code	Description	Details of CIL Modelled Sites	CIL Viability Conclusions
RUR3	Village: Small site	Units = 7 Area (gross ha) = 0.25 Density per hectare = 28	Development is considered viable
RUR5	Village: Smaller infill site	Units = 5 Area (gross ha) = 0.15 Density per hectare = 33	Development is considered viable

Constraint Resolution

7.31 Having assessed the availability, suitability and achievability of each SHELAA site a conclusion can be made on 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.

Results

7.32 293 sites have been assessed in the SHELAA. Of the 293 sites assessed:

- 10 sites are deliverable.
- 66 sites are developable, subject to compliance with Policy C5 of the adopted Plan for Stafford Borough 2011-2031 and Paragraph 72 of the NPPF, regarding entry level exception sites for housing adjacent to a settlement boundary and of a proportionate size.
- 7 sites are developable subject to compliance with Paragraph 149, Section G, of the NPPF, regarding the re-use of previously developed land to meet an affordable housing need in the local area on Green Belt sites without causing substantial harm to the openness of the Green Belt.
- 2 sites are developable subject to compliance with Policy C6 of the Local Plan and Planning Policy for Traveller Sites 2015.
- 2 sites are developable subject to compliance with Policy N3 of the Local Plan and Paragraph 158 of the NPPF relating to renewable and low carbon development.
- 206 sites are not currently developable.

- 7.33 A summary table showing which sites are in the above categories can be found in Appendix 1 and the completed SHELAA forms for each site can be seen in Appendix 2, which are listed in alphabetical order based on their Site ID codes.
- 7.34 Please note since the publication of the SHELAA 2021 Update some of the sites have been recoded and renumbered to reflect Yarnfield and Cold Meece Parish separating from Swynnerton Parish.
- 7.35 A small number of sites that have been previously included, now have planning consent for the full site, as listed below. If development does not commence on a site prior to planning consent expiring the site will be added back into a future SHELAA.
- ECC16 – Eccleshall Police Station
 - STAFMB08 – Land at Burleyfields
 - STAFMB20 – Former GEC / Alstom Premises
 - STO09 – Stone Police Station
 - STO15 – Land off Saddler Avenue
- 7.36 Additionally, a small number of sites have planning consent which covers part of the site. The sites which have planning consent that covers a reasonable proportion of the site are listed below.
- BRA01 – Land at Mitton Road (part)
 - CRE01 – Redhill Farm (part)
 - CRE02 – Land allocation to north of Redhill (part)
 - HIX08 – Former Hixon Airfield (part, which may affect site access)
 - STO01 – Land adjacent to Lichfield Road (part)
 - WHI03 – Land north of Redhill Business Park (part)
- 7.37 A small number of sites have also been withdrawn by the landowner, meaning these are no longer available for development. These are listed below.
- ECC23 – Swynnerton Training Area
 - HIG10 – Land adjacent to the Croft, Woodseaves
- 7.38 Additionally, through the Preferred Options consultation, it was requested that the sites HIX01 and HIX04 were viewed as one site, which had previously been submitted separately and assessed as site HIX19. Furthermore, the sites WES02 and WES03 should be considered as one site, which has been reassessed as WES06. As such, the forms for HIX01, HIX04, WES02 and WES03 have been removed.

- 7.39 Following the designation of the Settlement Boundaries in the Plan for Stafford Borough Part 2, some of the sites are dissected by the boundary of the sustainable settlement, and thus may be partly deliverable, depending on any other physical or environmental constraints. These sites are: CRE01, CRE02, GNO04, HIG08, HIX18, SRUR04, STAFMB18, SWY01, WHI03 and YCM01.
- 7.40 It is worth noting that some of the submitted site boundaries overlap each other, and thus the total yield of the sites combined will be less than the cumulative yields of each individual site.
- 7.41 The SHELAA shows that there are 10 deliverable sites. The proposed uses of these sites include both residential and employment. Combined, these sites have the potential to deliver 568 residential units and 141.7 hectares of employment land.
- 7.42 There are 66 sites that are potentially developable subject to compliance with Policy C5 of the adopted Plan for Stafford Borough 2011-2031 and Paragraph 72 of the NPPF, all being located adjacent to a sustainable settlement as identified in the Plan for Stafford Borough Part 2. Combined, these sites have the potential to accommodate 17,646 residential units. However, there are physical or environmental constraints on some of these sites, preventing the entire site from being developed. Therefore, the actual number of residential units these sites could provide is likely to be considerably lower than the aforementioned total. 4 of these 66 sites were submitted for use as employment land. These are situated adjacent to sustainable settlements and are therefore developable subject to a review of the settlement boundaries through the new Local Plan. These 4 sites could provide 33.96 hectares of developable employment land.
- 7.43 The 7 sites that are potentially developable subject to compliance with Paragraph 149, Section G, of the NPPF regarding the re-use of previously developed land to meet an affordable housing need in the local area on Green Belt sites without causing substantial harm to the openness of the Green Belt. Combined, these sites have the potential to accommodate 658 residential units. However, the combined developable areas of these sites will not be capable of accommodating this level of housing, as only the brownfield sections of these sites have the potential to be developable. Therefore, the actual potential yield will be lower than 658 units.
- 7.44 There are 2 sites which were submitted for use as a Gypsy and Traveller site. These sites have the potential to accommodate up to 25 pitches and are potentially developable subject to compliance with Policy C6 of the Local Plan and Planning Policy for Traveller Sites 2015.

- 7.45 Furthermore, there were 2 sites submitted for use as a Renewable Energy generation site and these two sites total 158.54 hectares. This is the first-time sites have been submitted to the SHELAA for this use. These are potentially developable subject to compliance with Policy N3 of the Local Plan and Paragraph 158 of the NPPF relating to renewable and low carbon development.
- 7.46 There are 206 sites that are not currently developable which are constrained for a variety of reasons. The primary reason that these sites have been assessed as not currently developable is because they are not within or adjacent to a sustainable settlement as identified in the adopted Plan for Stafford Borough. Environmental constraints can also result in a site being assessed as not currently developable. For example, a site that falls entirely within the Flood Zone or is designated as Green Infrastructure will not be suitable for development. Physical constraints can also affect the suitability of a site. For example, significant transport infrastructure separating a site from a sustainable settlement can restrict future development. If these constraints were overcome, a combined area capable of accommodating 68,464 residential units, 68.38 hectares of employment land and up to 5 Gypsy and Traveller pitches.

8. Stage 3: Windfall Assessment

- 8.1 Paragraph 71 of the National Planning Policy Framework states that local planning authorities may make an allowance for windfall sites in the five-year supply if there is compelling evidence that such 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 31 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, see Table 4 below (data has been sourced from the annual Land for New Homes document).
- 8.3 The Council regards this track record of delivery as compelling evidence that windfall sites have consistently become available in the local area. In a recent appeal decision in the Borough the Inspector commented that "it seems irrational not to include a windfall element [in the 5 year land supply] given the Council's track record in that respect" (Planning Inspectorate reference: APP/Y3425/A/14/2217578).

- 8.4 Paragraph 71 of the National Planning Policy Framework indicates that Local Planning Authorities should consider the suitability of windfall sites submitted in their Strategic Housing and Employability Land Availability Assessment. The contributions windfall sites could have on the future housing forecast, including the 5 year land supply, can then be assessed.
- 8.5 Of the 10 sites that were assessed as deliverable, 2 of the sites are partly allocated for employment in the Local Plan. These sites are CRE02 and WHI03 both of which have been submitted as land for potential employment development. CRE02 is 113.5 hectares, and of this, 12.9 hectares are allocated for employment in the adopted Local Plan and a further 9.5 hectares has permitted planning permission, which totals 22.4 hectares. Therefore, CRE02 is capable of delivering 91.1 hectares of windfall employment land. The site WHI03 overlaps with CRE02 and is subject to the same employment land allocation in the Local Plan and permitted planning permission. With these removed, WHI03 is capable of delivering 3.9 hectares of windfall employment land.
- 8.6 There are 2 sites, that have been submitted for housing, which have been assessed as deliverable that are divided by the settlement boundary of a Local Plan settlement, these are HIG08, at Woodseaves, and HIX18, at Hixon. The area inside the settlement boundary is deliverable with the remainder being potentially developable based on compliance with Policy C5 of the Local Plan and Paragraph 72 of the NPPF. If these were fully developed these 2 sites would deliver a total of 77 residential units.
- 8.7 The remaining 6 sites are all completely inside a settlement boundary identified in the Local Plan. These have been identified as deliverable residential sites and are all windfall sites and could provide a potential combined yield of 491 residential units.
- 8.8 In previous years, not all windfall sites were delivered on sites that were assessed in the SHELAA. In fact, the majority of windfall sites delivered in the Borough are on sites that were not identified as deliverable in the SHELAA.
- 8.9 The historic delivery of residential units that have been assessed through previous SHELAA's indicates that it is not likely the sites assessed as being deliverable in this SHELAA will result in future windfall completions. At present, the availability of potential windfall sites is restricted due to the constraint of settlement boundaries, as identified in Part 2 of the Plan for Stafford Borough.
- 8.10 However, in previous years there has been a consistent delivery of windfall units across Stafford Borough, and this is a trend that is expected to continue.

This is in part likely to be due to recent changes in planning legislation including prior approval for a proposed change of use of agricultural buildings to a dwelling house and prior approval for a proposed change of use of a building from office use to a dwelling house.

- 8.11 The historic windfall completion rates, the range of deliverable land assessed in the SHELAA and the continued allowance for brownfield development suggests that development opportunities will continue to present themselves within the sustainable settlements identified in the adopted Local Plan.

Table 4: Completions and windfall completions by Monitoring Year

Monitoring Year	Number of Net Completions	Percentage of Net Completions on Windfall sites
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	497	90%
2015 – 2016	688	78%
2016 – 2017	1010	77%
2017 – 2018	863	64%
2018 – 2019	699	56%
2019 – 2020	752	53%
2020 – 2021	614	49%
2021 – 2022	506	44%
2022 – 2023	631	32%

9. Stage 4: Assessment Review

- 9.1 This stage considers the findings of the SHELAA against the identified need for housing. The housing needs for Stafford Borough were established in the Strategic Housing Market Assessment (2012) and enshrined in Spatial Principle 2 of the Plan for Stafford Borough 2011-2031, the need is for 500 units a year.

- 9.2 The Plan for Stafford Borough indicates that the majority of the housing need will be met through the delivery of 4 Strategic Development Locations (SDLs). The delivery of these sites is progressing well with most sites having delivered a number of completed units. Furthermore, outline, reserved matters and full applications remain extant on part or all of the sites. The trajectory for the delivery of these sites is set out in the Council's annual 5 Year Land Supply Statement and Land for New Homes (the Council's housing monitor).
- 9.3 The Council's annual 5 Year Land Supply Statement and Land for New Homes sets out in full the Council's deliverable supply. The 5-year land supply statement shows that, combined with the SDLs, there are sufficient sites with planning permission to meet the Borough's needs for the next five year period. Therefore, the Council does not consider it necessary to re-assess sites submitted to the SHELAA in order to boost supply.

10. Stage 5: Final Evidence Base and Conclusion

- 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 As a result, 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. If you would like to submit a site for inclusion please download the form from the Council's website (www.staffordbc.gov.uk/call-sites-including-brownfield-land-consultation).