



Strategic Housing and Employment Land Availability Assessment (SHELAA) 2024 Update

Published December 2024

Disclaimer: The inclusion of sites within the SHELAA should not be taken as an indication that the site will be allocated or developed, or that the Council would view planning applications on the site favourably.

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1. Introduction

- 1.1 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 Stafford Borough through the new Local Plan process.
- 1.2 As explained in the national Planning Practice Guidance (PPG), 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. 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 to determine which of those sites are the most suitable to meet those needs.
- 1.3 The inclusion of sites in the SHELAA does not prevent them from being developed for other suitable purposes. In addition, the fact that a site is not included in the SHELAA does not prevent the possibility of permission for development being granted on that site through the planning application process.
- 1.4 During June and July 2018, a consultation took place on the methodology that would be used to assess the suitability of sites for development. Following the initiation of the new Local Plan process in July 2017, the Call for Sites consultation was launched in October 2017.
- 1.5 The Call for Sites consultation provided individuals with the opportunity to submit sites that they wished to be considered for allocation, and thus development, in the new Local Plan. 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.
- 1.6 Since 2018, updates to the SHELAA were published in 2019 and 2021, and further updates have been published annually since. Following the publication of the SHELAA 2023 Update, the Council has continued to receive Call for Sites submissions up until the 31 October 2024. The Council considers it necessary to update the SHELAA 2023 Update to include sites received since its publication.
- 1.7 The Strategic Housing and Employment Land Availability Assessment (SHELAA) 2024 Update supersedes all previous Strategic Housing Land Availability Assessments (SHLAAs) and SHELAAs prepared by Stafford Borough Council. Therefore, the SHELAA 2024 Update is the latest version forming part of the emerging Local Plan evidence base.

- 1.8 **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 should not be taken as an indication that the site will be allocated or developed, or that the Council would view planning applications on the site favourably.**

2. Policy and Geographical Context

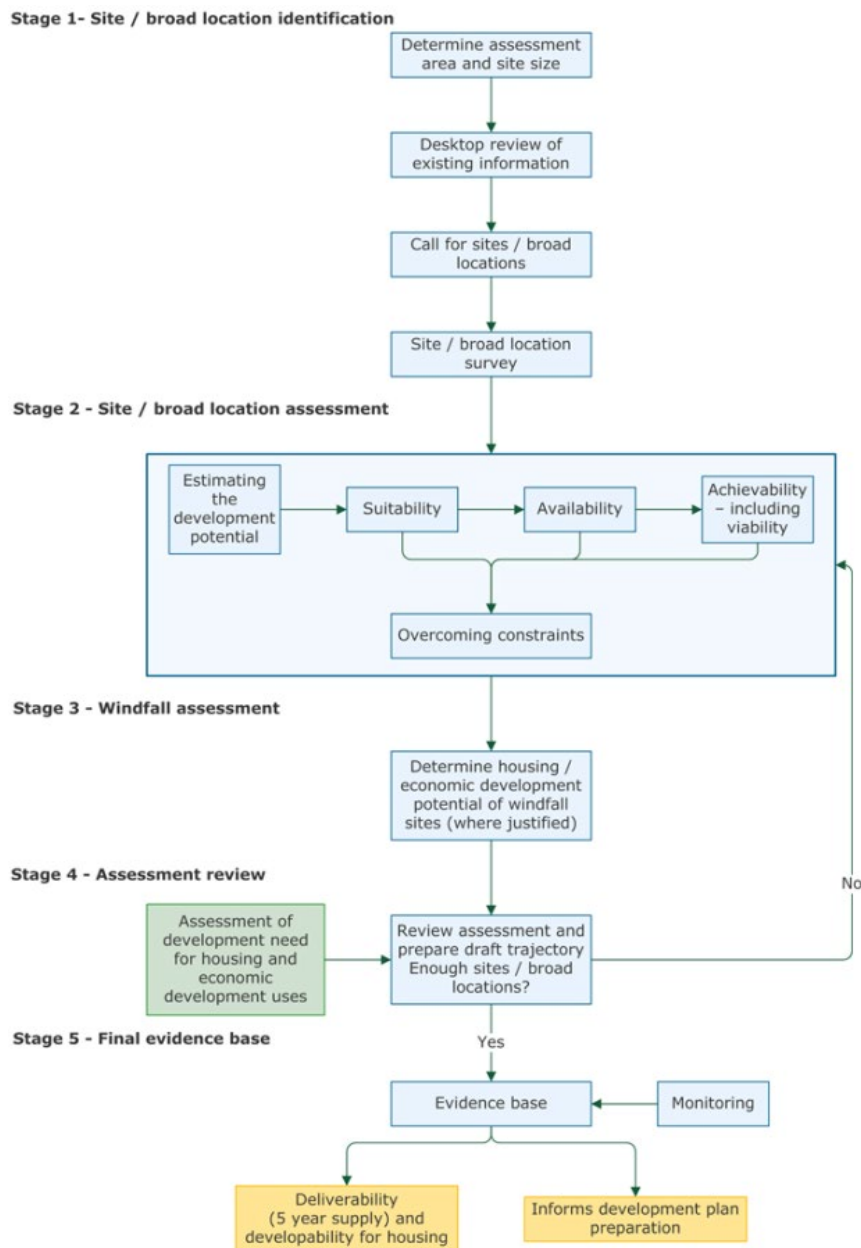
National Planning Policy

- 2.1 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.
- 2.2 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).

Local Planning Policy

- 2.3 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 delivered 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, which will deliver the majority of new housing over the Plan period.

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



2.4 In addition, the adopted Plan requires 8 hectares of employment land to be delivered each year. Delivery of this is focused on new allocations at the Stafford and Stone SDLs, 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. There are limited opportunities for rural employment and diversification outside of these areas.

- 2.5 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.
- 2.6 The new Local Plan for Stafford Borough was initiated in July 2017 to cover the Plan period 2020 – 2040. The SHELAA is a key element of the evidence base to support the Local Plan.
- 2.7 The development strategy set out in the adopted Plan for Stafford Borough 2011-2031 will be replaced with a new approach through the new Local Plan, 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 submitted through the Call for Sites consultation is set out in further detail later in this paper, with the sites being assessed against the adopted Plan for Stafford Borough 2011-2031.

Geographical Area

- 2.8 The SHELAA covers the whole of Stafford Borough. The Planning Practice Guidance suggests that SHELAA's 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.
- 2.9 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).
- 2.10 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.
- 2.11 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.

3. Methodology

3.1 This SHELAA update has been produced in accordance with the methodology set out in the national Planning Practice Guidance.

3.2 The Planning Practice Guidance sets out 5 stages of assessment which correlate to the following 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

Stage 1: Identification of sites

3.3 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 (as per the Council's calculation).
- For economic development uses / sites – location of 0.25 ha or above, or capable of accommodating 500m² or more of floorspace.

Sources of Sites with Potential for Housing and Employment:

3.4 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.

Stage 2: Site / Broad Location Assessment

- 3.5 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.
- 3.6 The purpose of Stage 2 is to establish whether the SHELAA sites are either deliverable, developable or not currently developable. Paragraph 69 of the NPPF (Dec 2023) sets out the national context for preparing strategic housing land availability assessments 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."

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

Yield

- 3.8 The yield 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 a greater proportion of land to deliver these ancillary areas. Whilst the submitted Call for Sites form provides the opportunity to indicate the number of dwellings on a site, the Council will calculate its own potential yield which is presented on the completed SHELAA forms.
- 3.9 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. However, it is important to recognise that yields will likely be affected by known constraints and 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.
- 3.10 In terms of housing land, the following net developable area assumptions have been used:

Table 1: Developable land ratio - Gross / Net assumptions

Gross site size (hectares; ha)	Developable Ratio
Less than 0.4 ha	100%
0.4 – 4 ha	70%
Greater than 4 ha	60%

- 3.11 For economic development, the site yield will be calculated using the total 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 total site area is a consistent and reasonable approach for the purpose of the SHELAA.

Housing Density

- 3.12 In determining the housing potential of sites, a number of factors need to be taken into account. The NPPF (Dec 2023), through bullet points (a) and (b) of paragraph 128, 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.
- 3.13 For the purposes of the SHELAA, assumptions will be made about the capacity of sites based upon the 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 assumption (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

- 3.14 Therefore the two-stage calculation used to estimate a site's potential housing yield is:
- 1. Gross site size x developable ratio = net developable area**
 - 2. Net developable area x density assumption = potential yield**
- 3.15 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. 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.

Assessing Deliverable and Developable Sites

- 3.16 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.
- 3.17 Making an assessment of whether a site is available, suitable 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.

Availability

- 3.18 This is an assessment of whether a site is available for development. Paragraph 69 of the NPPF (Dec 2023) 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”.
- 3.19 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 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.
- 3.20 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.

Suitability

- 3.21 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.

...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...”

- 3.22 The site’s suitability will be assessed against the relevant policies in the adopted Plan for Stafford Borough 2011-2031 and the NPPF. Currently the main policy constraint is location, i.e. whether the site is located within a settlement identified in the Sustainable Settlement Hierarchy as set out in Spatial Principle 3 of the Plan for Stafford Borough 2011-2031. Sites within the settlement boundary of Stafford, Stone or a Key Service Village not currently covered by another policy constraint will be considered suitable.

- 3.23 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

3.24 Furthermore, the following physical limitations will also considered include:

- Flood Zones
- Ancient Woodlands
- Land contamination and instability
- Landfill, including historic landfills and buffers
- Minerals deposits and buffers

3.25 The location of the site in relation to the Sustainable Settlement Hierarchy and any policy / physical constraints for each site are highlighted through this assessment.

3.26 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.

3.27 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

3.28 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 site.

- 3.29 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.
- 3.30 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.
- 3.31 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
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

Site Status

- 3.32 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. In these cases, the Council has indicated what policies the site could abide by to be developed or what policies would require reviewing to allow for potential development.

Stage 3: Windfall Assessment

- 3.33 Windfall sites are defined as sites not specifically identified in the development plan. Paragraph 72 of the NPPF (Dec 2023) states that:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”

- 3.34 The Council consistently permits windfall sites, and the Council regards this track record of delivery as compelling evidence that windfall sites have consistently become available in the local area. In a relevant 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).
- 3.35 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. Therefore, it is unlikely that the sites assessed as being deliverable in this SHELAA are guaranteed to 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.
- 3.36 There has been a consistent delivery of windfall units across Stafford Borough, and this is a trend that is expected to continue. However, the percentage of net completions that are on windfall sites is generally declining each year as more and more completions are being delivered on the allocated sites, particularly the SDLs. This trend can be seen in Table 4.

Table 4: Completions and windfall completions by Monitoring Year

Monitoring Year	Number of Net Completions	Percentage of Net Completions that are on Windfall sites
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%
2023 – 2024	423	34%

- 3.37 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.
- 3.38 The proposal of including a windfall allowance in the emerging Local Plan will be considered through the Local Plan preparation process.

Stage 4: Assessment Review

- 3.39 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.
- 3.40 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). Available on the Council's website (www.staffordbc.gov.uk/monitoring).

- 3.41 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.

Stage 5: Final Evidence Base

- 3.42 The core outputs of the assessment are presented in section 4 of this document alongside supporting appendices.

4. Assessment Outputs

- 4.1 The SHELAA 2023 update included 293 sites which had been previously submitted since the Call for Sites process began in 2017. As this process had now been running for over 7 years, in Autumn 2024, it was decided to undertake a review of all the sites that had previously been submitted. Every agent / landowner who had previously submitted a site which was included in the SHELAA 2023 update was contacted either via email, letter or phone to ask them if they wished for their site to remain in the SHELAA as available for development.
- 4.2 Of the 293 sites in the 2023 update, 212 sites have been confirmed as still available for development. The remaining sites have either; received permitted planning permission, been requested to be removed by the landowner, no response was received from the agent / landowner so the assumption was made these sites are no longer available, or the agent / landowner could not be contacted.
- 4.3 Additionally, there have been 32 new submissions to the Call for Sites process since the SHELAA 2023 update was published. Therefore, a total of 244 sites have been assessed in this SHELAA 2024 Update.
- 4.4 Of the 244 sites assessed:
- 8 sites are deliverable
 - 58 sites are developable subject to compliance with Policy C5 of the adopted Local Plan and Paragraph 73 of the NPPF (Dec 2023)
 - 4 sites are developable subject to compliance with Paragraph 154, Section G, of the NPPF (Dec 2023)
 - 2 sites are developable subject to compliance with Policy C6 of the adopted Local Plan and Planning Policy for Traveller Sites 2015
 - 2 sites are developable subject to compliance with Policy N3 of the adopted Local Plan and Paragraph 163 of the NPPF (Dec 2023)
 - 170 sites are not currently developable

- 4.5 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 (see separate documents).
- 4.6 The following section details the cumulative potential yield for residential units or hectares of employment land for deliverable, developable or not currently developable sites. 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.

Deliverable sites

- 4.7 There are 8 deliverable sites. These sites have the potential to deliver 123 residential units and 127.97 hectares of employment land.
- 4.8 Please note 2 of these sites, HIG08 and HIX18, are divided by the settlement boundaries of Woodseaves and Hixon respectively. 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 73 of the NPPF. These sites have been assessed as deliverable and if fully developed these 2 sites would deliver a total of 77 residential units. However, the total deliverable units for the area with the settlement boundaries will be significantly lower than 77 units.

Developable sites

- 4.9 There are 58 sites that are potentially developable subject to compliance with Policy C5 of the adopted Plan for Stafford Borough 2011-2031 and Paragraph 73 of the NPPF (Dec 2023), as they are located adjacent to a sustainable settlement as identified in the Plan for Stafford Borough Part 2. Combined, these sites have the potential to accommodate 17,988 residential units.
- 4.10 There are 4 sites that are potentially developable subject to compliance with Paragraph 154, Section G, of the NPPF (Dec 2023) 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 115 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 115 units.
- 4.11 There are 2 sites that 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.

- 4.12 Furthermore, there were 2 sites submitted for use as a Renewable Energy generation site and these two sites total 158.54 hectares. These are potentially developable subject to compliance with Policy N3 of the Local Plan and Paragraph 163 of the NPPF (Dec 2023) relating to renewable and low carbon development.

Not currently developable sites

- 4.13 There are 170 sites that are not currently developable which are constrained for a variety of reasons such as not being within or adjacent to a sustainable settlement, being located within the Green Belt or being impacted by a physical constraint e.g. Flood Zone. In some cases, these constraints may not be able to be resolved, but if these constraints were overcome, the sites would be capable of delivering 52,894 residential units and 181.05 hectares of employment land.

5. Conclusion

- 5.1 The SHELAA is a 'living' document and will be updated and published on an annual basis to ensure it remains an effective and up-to-date evidence base. Submitted sites (and any site amendments) will be kept on file and added to the Council's database when processed by officers. New submissions will be included in subsequent publications of the SHELAA document.
- 5.2 The subsequent updates will not alter the methodology followed unless the national Planning Practice Guidance on SHELAA preparation is significantly amended.
- 5.3 The Council will continue to accept suggested sites for inclusion in future SHELAA reviews and to be considered through the Local Plan process. A Call for Sites submission form is available on the Council's website (www.staffordbc.gov.uk/call-sites-including-brownfield-land-consultation).