



CHARNWOOD LOCAL PLAN 2021-2037

Examination Statement by Charnwood Borough Council

**Matter 5:
Employment Development & Town Centres**

May 2022

Issue 1 - Whether the assessment of the need for employment and the employment floorspace requirement are soundly based

Context – On 1 September 2020, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (UCO 2020) came into force. The Regulations created Class E – Commercial, Business and Service Uses. Use Classes B2 (general industrial) and B8 (storage and distribution) remain unchanged.

5.1 The Housing and Economic Development Needs Assessment (EB-EMP1) sets out a ‘planned growth scenario’ of 18,500 jobs for the Borough (2011 – 2036). How has the Employment Land Review (EB-EMP2) taken into account local factors in arriving at the need for employment land in the following sectors, and is the approach justified:

- ***Offices (formerly Class B1(a), now covered by Class E(c)***
- ***Industrial (Class B2 and B8)***

5.1.1 The Employment Land Review (EB-EMP2) took the Housing and Economic Development Needs Assessment (HEDNA) (EB-EMP1) employment land requirement figures as a starting point and assessed local evidence to determine the need for employment land in Charnwood. The local factors which were considered consist of an assessment of the local economy and future economic growth along with an analysis of the employment property market in Charnwood. This was carried out by examining qualitative demand, rents and yields and undertaking assessments of employment sites.

5.1.2 EB-EMP2 first used Experian data to examine the Borough’s current employment profile of job numbers by employment sector and future growth to 2036 by sectors and specific job categories. This was then worked through to land use category giving a detailed view of how the Charnwood economy would change over time and provide a fact check to the results of HEDNA. In terms of land supply for offices in the Plan, the analysis suggests a ‘business as usual’ approach to growth for this sector in Charnwood. Although the impact of the Enterprise Zone and potential to stimulate economic activity through multipliers and spin-off firms was not evident through the data (para 3.9). For industrial uses, the evidence shows that the ‘traditional’ manufacturing sector will decline, but at a much slower rate than previously, with a growth in ‘people serving’ sectors (para 3.15).

5.1.3 EB-EMP2 then reviewed the employment property and land market in Charnwood for offices and industry, looking at the balance of the market and potential land for future employment development, providing further detail to the HEDNA findings. This qualitative evidence sought to determine if existing floorspace will meet current and future requirements; whether there will be demand for more or different space; and if property and land are oversupplied overall or by sector. Existing employment sites have been assessed;

consultation has been carried out with agents and occupiers; and property databases and reports have been utilised. This has enabled four market sub-areas to be identified in the Borough and provide a finer grain to the analysis.

- 5.1.4 Market evidence does not support allocating new land for offices in Charnwood beyond existing allocations due to short term viability issues for developers, though longer-term investment could still prove viable (para.4.127). It identified the focus should be on refurbishment and continuation of development at Watermead Business Park.
- 5.1.5 The evidence on the industrial market highlights low vacancy rates with very low availability (para 4.90). In the short to medium term, it identifies a need for industrial space fuelled by strong demand and low vacancy, with greatest demand for small and medium scale freehold units.
- 5.1.6 Consequently, EB-EMP2 is a proportionate assessment of local factors upon which the need for employment land evidenced in HEDNA can be updated, notably for industrial land.

5.2 Is an extra 10 hectares on top of the identified need for employment land justified to support an improvement in vacancy rates to allow for churn and market choice, and how was that figure arrived at?

- 5.2.1 The evidence provided by the Employment Land Review (EB-EMP2) detailed above supports the addition of 10 hectares to the identified need as appropriate. The Housing and Economic Development Needs Assessment (HEDNA) (EB-EMP1) could not fully consider local factors and EB-EMP2 has provided this local detail identifying two factors which justify a higher requirement.
- 5.2.2 Firstly, very low vacancy rates and evidence from agents suggest the market is not in balance (para 6.38) which could be rectified by additional supply. Secondly, a lack of supply because of low vacancy rates are reported to have constrained past take-up which may mean past take-up estimates used in HEDNA are too low and don't reflect full market demand. Vacancy rates of 3.8% would require a further 3.7% vacancy to return rates to 7.5% to enable the market to function efficiently with occupiers able to move between properties and the market offering a choice of property (para 6.15). To achieve this would require an additional 10 ha (42,000 sqm of floorspace).

5.3 How has the need for employment been translated into a requirement for floorspace and land? Are the assumptions in relation to the following factors clear and are they realistic and justified by the evidence:

- **Site coverage/plot ratio – 0.35 for office uses, 0.42 for B2 uses, 0.4 for B8 uses**
- **Loss of employment land to other uses**
- **A 5 year margin for choice – 8.6 hectares 2011 - 2036**
- **Assumptions for job densities in the following sectors:**
 - **Former B1a and B1b (offices, research & development, light industry)**
 - **B2 (general industry)**
 - **B8 (storage and distribution)**

How has the need for employment been translated into a requirement for floorspace and land?

- 5.3.1 As noted above, it was the Housing and Economic Development Needs Assessment (HEDNA) (EB-EMP1) that provided the employment land requirements which informed the local evidence provided in (EB-EMP2). EB-EMP1 is therefore the source for the assumptions listed above.
- 5.3.2 EB-EMP1 has used and contrasted several different forecast methodologies to provide an appropriate means of translating employment need into a requirement for floorspace and land to meet this need. These have been based upon labour demand, labour supply and past take-up scenarios, as recommended in the Planning Practice Guidance (PPG) (para 11.3).
- 5.3.3 The labour demand scenario examines econometric forecasts and HEDNA has analysed the future economic performance in Charnwood to inform this approach. A forecast growth in jobs by Use Class was determined and employment densities were then utilised to forecast net changes in employment floorspace by Use Class; to calculate the land requirements to support these net changes, plot ratios were applied. The past completions trend scenario considers past completions by Use Class and projects these forward over time to provide a requirement for land. HEDNA used the longest available trend period data for Charnwood to evidence the land requirement by Use Class.
- 5.3.4 HEDNA has determined that the different forecasting methodologies are more relevant for different market segments. For office uses, the labour demand and completion trend scenarios should both be considered as appropriate, thus providing a range for future provision which was then scrutinised by the Employment Land Review (EB-EMP2), taking account of local factors to determine a final requirement. For industrial floorspace (B1c/B2) and small-scale B8 (<9,000sqm), there tends to be a poor correlation between past employment and floorspace, job numbers may fall but floorspace may not do so due to capital investment and productivity improvements (para 11.36 - key

points). The analysis of economic performance envisages that manufacturing GVA will grow strongly and on this basis, it is appropriate to plan for additional manufacturing floorspace. Therefore, HEDNA concludes that greater weight should be given to the completions trend for B1c/B2/small-scale B8 floorspace.

Are the assumptions in relation to the following factors clear and are they realistic and justified by the evidence:

Site coverage/plot ratio – 0.35 for office uses, 0.42 for B2 uses, 0.4 for B8 uses

- 5.3.5 The site coverage/plot ratios used for office and B2 uses are established in the Housing and Economic Development Needs Assessment (HEDNA) (EB-EMP1) and are based upon the consultant's judgement of typical plot ratios for these use classes as experts in this field. The plot ratio assumptions for B8 uses have historically been assumed at 40% of floorspace to land, as identified in the Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change study (EB-EMP3) (para 10.2 - eg PACEC 2008). These ratios have been agreed by all the local planning authorities who form the Leicester and Leicestershire Functional Economic Market Area for undertaking Strategic Housing and Economic Land Availability Assessment and are identified in the Joint Methodology paper attached as Appendix 1..

Loss of employment land to other uses

- 5.3.6 The Employment Land Review (EB-EMP2) provides an analysis of the loss of employment land to other uses. The study has used data from the Valuation Office Agency to establish a loss of 33 ha (140,000sqm) of industrial land (including B8) between 2010/11 to 2015/16.
- 5.3.7 EB-EPM2 then considers future loss and whether further employment land could be released (para 6.19). This analysis identifies that low vacancy rates and limited market choice; the employment land lost previously being underused or obsolete stock; the economic forecast for the loss of manufacturing jobs to be reduced; and the viability impacts on existing firms moving to new stock with higher rent would all indicate further release of sites is not appropriate. EB-EPM2 concludes that sites should be retained, subject to certain criteria and an overprovision of land is justified to provide a buffer for unforeseen losses from supply (para 7.26).

A 5-year margin for choice – 8.6 hectares 2011 – 2036

- 5.3.8 The Housing and Economic Development Needs Assessment (HEDNA) (EB-EMP1) recognises that in determining the amount of employment land that will be required for development a margin for flexibility should be included due to the requirement for some vacancy to allow the market to function; the potential for errors in forecasting need; to provide choice to the market; and to provide flexibility in delivery. A 5-year period based on past employment land delivery

is considered appropriate which equates to 8.6 ha for Charnwood with 5 years equating to 20% of supply over the period 2011 to 2036. There is no standard across employment land studies as to how large the margin should be, it is a matter of professional judgement; however, many studies include five years of supply and the longer the period assessed the greater the number of years of margin that would be appropriate. On that basis a 5-year margin is considered justified and appropriate.

Assumptions for job densities in the following sectors

- 5.3.9 The Housing and Economic Development Needs Assessment (HEDNA) (EB-EMP1) utilises job densities in its labour demand scenario modelling. The job density refers to the average floorspace (sqm) per Full-Time Equivalent (FTE) and have taken account of the HCA Employment Densities Guide: 3rd Edition (2015) as a robust source of information (para 11.8).

Former B1a and B1b (offices, research & development, light industry)

- 5.3.10 The 2015 Employment Densities Guide provides a range of plot ratios for B1a uses by sub-sector ranging from 10-13 sqm (NIA) per FTE employee. An assumption that the gross external area of buildings is 20% higher than the net internal area has been used. For B1b uses the Guide divides the sector into two, innovation and science, and industrial focussed. A mid-point of 60 sqm per FTE employee has been used with the gross external area of buildings 20% higher than the net internal area. For light industry, an average of 49.4 sqm per employee has been used with a 5% increase to translate gross internal area to the gross external area of buildings.

B2 (general industry)

- 5.3.11 For B2 uses an average of 37.8 sqm per employee has been used and again this assumes that the gross external area of buildings is on average 5% higher than the gross internal area.

B8 (storage and distribution)

- 5.3.12 The HEDNA (EB-EMP1) employment land requirement for small scale B8 (<9,000sqm) uses the past completions trend scenario. Job densities for these uses can vary significantly and as such there is a weak relationship between job growth and floorspace requirements; therefore, a labour demand scenario was not undertaken, and no job densities established.
- 5.3.13 In conclusion, the job densities which have been used to assist in determining the requirement for employment land and floorspace are based on reliable evidence, are appropriate and justified.

5.4 Should the Loughborough Science and Enterprise Park accommodate more general office and industrial uses as suggested by the Employment Land Review (EB/EMP/2) paragraph 7.16?

- 5.4.1 The Employment Land Review (EB-EMP2), in its analysis of the Loughborough University Science and Enterprise Park, recognises the unique role it plays in serving uses in the knowledge-based sector rather than general employment uses. EB-EMP2 goes on to identify the requirement for grow-on units for businesses initially established on the Science Park. The provision of such units is supported by Policy LUC3: Loughborough Science and Enterprise Park, provided they maintain links with the knowledge-based sector (para 7.14).
- 5.4.2 EB-EMP2 then suggests that consideration should also be given to accommodating firms in the less specialist, general employment market. This has previously been explored during the allocation of the Science Park extension through the Charnwood Core Strategy and in subsequent work in developing the Loughborough Science and Enterprise Park Concept Masterplan Framework (EB-EMP4). To accommodate more general uses would dilute the distinctive nature of the Science Park with its close integration with the University for knowledge-based and high technology businesses on a campus-based science park with significant expansion space.
- 5.4.3 The NPPF (para 83) recognises the importance of making provision for clusters or networks of knowledge and data-driven, creative, or high technology industries, to accommodate general employment uses on the Science Park would weaken this objective and the rationale and justification for the Science and Enterprise Park allocation.

5.5 Is the allocation of 154.8 hectares of employment land in Policy DS4 justified compared with the assessed need of 44.5 hectares set out in the Employment Land Review? If so, why, and what is the amount of oversupply? Is the Plan making any contribution to strategic need?

- 5.5.1. The amount of land allocated in the Plan via Policy DS4 is justified. The 154.8 ha includes 73 ha at the Loughborough Science and Enterprise Park which does not meet the assessed need for employment land set out in the Employment Land Review (EB-EMP2). The specialist nature of the Science Park means that the allocation will serve a specific employment sector in a broader regional and national context which cannot be accommodated within the normal predictive models for employment land forecasting. The need set out in EB-EMP2, and the other employment allocations promoted by Policy DS4 do not compete with the Science Park and no adverse effect is anticipated in respect of those allocations. The remaining allocations, discounting the Science Park, total 81.8 ha.

- 5.5.2. EB-EMP2 identifies the need for 44.5 ha of land for industrial and small-scale warehouse uses with a further 14 ha needed to meet the need for office uses. Therefore, the 81.8 ha allocated should be viewed in the context of an employment land requirement in EB-EMP2 of 58.5 ha; this requirement was established to cover the period 2017 to 2036. Since 2017 an amount of employment development has occurred which should be deducted from the requirement, in line with the methodology of EB-EMP2. Furthermore, with an extended plan period to 2037 a further year's need should be added to the requirement. This gives a need for employment land of 55.47 ha 2021 to 2037, as detailed in the employment topic paper TP/3. The resulting oversupply of employment land would therefore be 26.33 ha.
- 5.5.3. An oversupply of employment land provides flexibility and market choice and will ensure that the economy is not unduly constrained by a lack of land for development.
- 5.5.4. In terms of a contribution to meeting strategic need since the preparation of the Regional Spatial Strategy in the early 2000s it has been recognised that the City of Leicester could not provide sufficient employment land to meet its needs. Several evidence base studies were undertaken across the Leicester and Leicestershire Functional Economic Market Area (FEMA) to inform the amount and appropriate distribution of unmet need from the City. On that basis the Charnwood Core Strategy was adopted with employment allocations which sought to not only meet the needs of Charnwood but also contribute towards meeting the needs of Leicester City and the wider FEMA. The employment allocations ES2, ES9 and ES10 in Policy DS4 are carried forward from the Charnwood Local Plan Core Strategy and are in locations which have a close functional relationship with city of Leicester.
- 5.5.5. Leicester City have declared an unmet need for employment land of 23 ha with work underway through a Housing and Employment Need Assessment to determine a possible distribution for this need, which will be agreed through a Statement of Common Ground involving the authorities which form the Leicester and Leicestershire FEMA. Whilst this has yet to be formally agreed, the oversupply of employment land which was originally allocated through the Core Strategy to address this issue will allow Charnwood to play a full role in addressing Leicester's unmet need.

5.6 Does the Plan identify a 10 hectare site for larger units (over 9,0000 sqm), as recommended in the Employment Land Review? If so, where is it and how will it meet the requirements of that sector?

- 5.6.1. The Local Plan does not allocate a 10 ha site for larger units over 9,000sqm. The Employment Land Review (EB-EMP2) recommends that consideration be given to allocating further land for larger units over 9,000sqm, the requirements for which have not been identified through the Housing and Economic Development Needs Assessment (HEDNA) (EB-EMP1). The

market for such units operates at a scale larger than local authority level with the sector covering a sub-regional, regional, and even national level.

- 5.6.2. On that basis the Leicester and Leicestershire authorities have undertaken the Warehousing and Logistics in Leicester and Leicestershire 2022 study (EB-EMP3) to specifically identify the need for units over 9,000sqm, including local need, and work is on-going with partners to identify suitable locations for the allocation of any unmet need, this is further discussed in Issue 3. Whilst this work is seeking to specifically address the need for units over 9,000sqm it should be noted that the need for such an individual unit could be met on several allocations in the Plan should a proposal come forward.
- 5.6.3. EB-EMP2 also notes regarding the allocation of 10ha for units over 9,000sqm, that this site could also provide an element of new, small industrial units to meet a quantitative need in the local area. The Local Plan has allocated 5 ha of employment land off Fairway Road, Shepshed (ES8) which could meet this need.

Issue 2 - Employment Allocations and Other Employment Policies

5.7 Do the allocations in Policy DS4 accord with the evidence and findings in the Employment Land Review in terms of the assessments in Appendix A of that document? Is the employment allocation at Dishley Grange justified by the evidence?

- 5.7.1. The employment land allocated through Policy DS4 are supported by the findings of the Employment Land Review (EB-EMP2). The allocation of the Loughborough Science and Enterprise Park has been discussed previously and was not assessed by EB-EMP2. Policy DS4 allocates a further 10 sites for general employment uses and EB-EMP2 recommends the re-allocation of 7 of these sites, supported by the site assessments in Appendix A. A further site, Land off Fairway Road, Shepshed, was assessed by EB-EMP2 and was identified as suitable for employment uses and attractive to occupiers. The site has been allocated to support the housing growth in Shepshed and meet a need for small industrial units in the area identified by EB-EMP2, providing flexibility, and supporting the spatial strategy. The employment land off Sileby Road, Barrow upon Soar, opposite an existing industrial estate represents a site allocated in the Barrow upon Soar Neighbourhood Plan to improve sustainability and replace lost jobs locally and is allocated to take this into account.
- 5.7.2. EB-EMP2 suggested that the final site, land at Dishley Grange, should be considered for de-allocation and the commitment to develop the site be explored with the owners. The site was being considered for de-allocation; however, during the Plan preparation process an application was submitted and subsequently approved for Phase 1 of the site. Subsequently the promoter of the site has been contacted and their commitment to delivering the allocation has been confirmed.

5.8 Are the employment allocations in Policy DS4 based on a robust site selection methodology, positively prepared and will they be deliverable in accordance with the trajectory in Appendix 2? Why is the Loughborough Science and Enterprise Park not included in the trajectory? Are the employment and housing land trajectories in Appendix 2 aligned?

- 5.8.1. The employment allocations in Policy DS4 have been selected on a robust basis informed by the evidence, notably SD-5, EB-EMP1 and EB-EMP2, and is described in TP-2. The Sustainability Appraisal (SD-5) considered the evidence and explored potential alternatives relating to developing Charnwood's strategy for employment (Chapter 5) appraising four reasonable alternatives. The preferred option reflected in the Local Plan has been to continue existing commitments and allocations with an additional 5 ha of employment land located in Shepshed to support the employment needs of residents and boost the supply of smaller units. The allocated sites will meet the objectively assessed need for employment land in Charnwood with additional supply providing flexibility and giving the potential to support unmet need across Leicester and Leicestershire.
- 5.8.2. The Employment Land Trajectory set out in Appendix 2 has been informed by discussions with promoters and landowners and, for many of the sites, by information contained in the relevant planning approvals. This has provided a robust basis for the trajectory. The Loughborough Science and Enterprise Park has not been included in the trajectory as it does not seek to meet the general need for employment land in Charnwood but instead serves a specialist employment type in a broader regional and national context with its delivery stretching beyond the end of the plan period. The employment land to be provided at the three Sustainable Urban Extensions (SUEs) which represents 56 ha of the employment land supply is linked to triggers in housing delivery and as such the trajectories are aligned. Delivery of the other sites is relatively well spread with early delivery possible due to extant planning permissions or the smaller nature of the sites.

5.9 Will Policy LUC3 be effective in bringing the Loughborough Science and Enterprise Park forward for business development? Are the development requirements comprehensive, including the effect on landscape character, open space and biodiversity?

- 5.9.1. Policy LUC3 provides an effective framework for delivery of the Loughborough Science and Enterprise Park (LSEP). The policy provides a positive planning framework for the extension of the Science and Enterprise Park is justified by the evidence, most recently EB-EMP4 and is supported by strategic and corporate commitments of both the Council and its partners at Loughborough University, Leicestershire County Council and the Leicester and Leicestershire Enterprise Partnership (LLEP). This is supported by its inclusion as part of the Loughborough and Leicester Science and Innovation Enterprise Zone. The policy has been developed in consultation with the landowner, Loughborough University, who have signed a Statement of

Common Ground which states that the allocation of the site for an extension to the Science and Enterprise Park is appropriate and justified, and Policy LUC3 is considered sound. A similar policy framework was applied to proposal for this site, which was the subject of an application (Ref: P/19/0524/2) considered by the Borough Council's Plans Committee on 19 December 2019. The Borough Council's Committee resolved to grant permission subject to the signing of a S106 agreement. The application was subsequently withdrawn.

- 5.9.2. Policy LUC3 makes several requirements of the development to avoid, manage or mitigate potential adverse effects. These requirements seek to ensure the integration of the development into the sensitive landscape in a manner that respects its character and biodiversity, including a commitment to working in partnership on a green infrastructure strategy. The two ancient woodlands adjoining the allocation will be preserved and 40% of the remaining land is to be retained as parkland.
- 5.9.3. Securing high-quality design will ensure that buildings respect the local topography, provide landmark features on prominent frontages and gateways and employ innovative construction solutions to minimize their carbon footprint and ensure adaptability to climate change. This process includes a commitment to work in partnership to prepare a flexible parameter masterplan. The provision of sustainable urban drainage systems and flood alleviation measures will maintain a green field run off rate together with measures to reduce the risk of downstream flooding of the Burleigh Brook. Sustainable transport solutions for journeys to work will be encouraged through the preparation of Transport Assessments and Travel Plans and the maintenance of a network of connections to local paths, cycleways, and public transport routes. An economic development strategy will be prepared to capture the wider benefits of the development, typically through aligned training and development regimes designed to meet the needs of businesses, through partnership working.

5.10 Should Policy DS4 specify any site requirements for the employment allocations?

- 5.10.1. It is considered that other policies within the Local Plan provide a sufficient framework to ensure that potential adverse effects are avoided, managed, or mitigated. SD/2 paragraph 1.26 is that the Local Plan should be read as a whole. The three SUEs are all subject to bespoke policies which will guide the employment allocations; the other allocations will be subject to the relevant place-based policy and the topic-based policies through the development management process.

Policy E2 – Protecting Existing Employment Sites

5.11 How have ‘good quality’ employment sites referred to in Policy E2 and shown on the Policies Map been identified? Is it clear what is meant by ‘good quality’ in both the policy and its supporting text?

- 5.11.1. The Employment Land Review (EB-EMP2) undertook an assessment of the property market, demand for employment land and existing employment sites in Charnwood. This showed low vacancy rates with existing sites well occupied and in market demand. Furthermore, the employment land allocations in the Plan are yet to be developed and cannot act as a substitute for existing built stock. On that basis EB-EMP2 recommends that the loss of most existing built stock should be controlled.
- 5.11.2. EB-EMP2 undertook an assessment of employment sites in Charnwood (Appendix A) and concluded that most sites remain fit for purpose, in demand and should be safeguarded. These sites are shown on the Policies Map as locations where Policy E2 will be applicable. EB-EMP2 identified five sites which performed poorly and considered that should the owners wish to redevelop their site for other uses then they should be released from the stock. Policy E2 is not identified as applicable to these sites on the Policies Map (para 7.31).
- 5.11.3. The use of the term ‘good quality’ in Policy E2, the supporting text and the Policies Map is erroneous and main modifications are suggested to ensure that the Plan is justified, effective and can be found sound. (Reference Main5.a to Main 5.d)

5.12 Will the marketing requirements for ‘good quality’ and sites not falling within that definition be effective in safeguarding employment uses and minimising losses of employment floorspace? Does the supporting text in paragraph 5.27 set out more stringent marketing requirements than Policy E2?

- 5.12.1. The application of marketing requirements through the development process, is considered a suitable means of ensuring that viable employment floorspace is protected. This approach reflects the evidence provided by the Employment Land Review (EB-EMP2) and is effective. The details on marketing requirements set out under paragraph 5.27 of the supporting text is provided to give guidance and ensure that the evidence is sufficient to inform decision-taking.

Policy E3 – Rural Economic Development

5.13 Is Policy E3 consistent with the NPPF’s approach to the rural economy, in particular that sites for local business and community needs may have to be found adjacent to or beyond existing settlements? Do any other sectors need to be identified in the policy?

- 5.13.1. The NPPF (paras 84 & 85) supports a prosperous rural economy and Policy E3 seeks to support this objective. It does not seek to restrict the development of sites to meet local business and community needs in rural areas to existing settlements. However, it is recognised that a main modification to the Policy and supporting text could clarify this and assist in its interpretation, ensuring it is consistent with national policy. Similarly, a main modification to the Policy and supporting text could ensure that it is clear that all types of business are supported, including other land based rural businesses. (Main 5e refers)

Issue 3 – Warehousing and Logistics Floorspace

Context - The Warehousing and Logistics in Leicester and Leicestershire Study (EB/EMP/3) identifies a shortfall for large warehousing¹ of 718,875 square metres for rail served sites and 334,986 square metres for non-rail sites in the period to 2041. Two of the six broad Areas of Opportunity which the study identifies extend into Charnwood Borough:

1. Area 2 – between Syston and Ratcliffe-on-Soar, broadly following the A6, M1 and Midland Main Line transport corridors, and incorporating Loughborough (Road & Rail)
2. Area 4 – to the north west of Leicester, broadly following the M1 and A511 transport corridors, incorporating Coalville and Shepshed (road only)

5.14 How will the Areas of Opportunity identified in the Study be taken forward? Does this represent an unmet need across the Leicester and Leicestershire authorities or is it a cross boundary issue to apportion the distribution of logistics space?

- 5.14.1. The Areas of Opportunity (AoO), identified through the Warehousing and Logistics in Leicester and Leicestershire Study (EB/EMP/3), are broad areas that have the attributes which the strategic warehousing market requires and will be used to inform the supply of sites for the strategic distribution and logistics industry and meet the need identified in EB/EMP/3. EB-EMP/3 recommends that the future supply of sites is geographically spread and with sufficient sites to meet the varying needs of operators (e.g. proximity to labour, cargo origins, location of end users). To achieve this, it recommends a supply in at least two of the AoOs simultaneously, and that new land should initially be provided in those AoOs where there is an under-supply of strategic sites, ahead of those AoOs which are well provided for (para 11.11).
- 5.14.2. To take this approach forward a Statement of Common Ground has been produced by the Leicester and Leicestershire authorities (SCG-10) which identifies the further work required (para 3.12). This includes the creation of a system to monitor site allocation, consents and delivery and identifying the geographical distribution and phasing of the current supply. This will inform an

¹ Defined as larger than 9000 square metres

appropriate supply across the AoOs, in terms of geography and trajectory, as recommended by EB/EMP/2.

- 5.14.3. Since the agreement of SCG-10 work has progressed with a system to collectively monitor the supply and delivery of land for strategic warehousing across Leicester and Leicestershire. This seeks to identify gaps in supply and inform future decisions. This work has shown a further reduction in unmet need for road-only floorspace and, in terms of phasing, a supply of sites up to 2031 with rail-served sites in at least 2 AoOs at any one time to 2024/25 and road-only sites in at least 2 AoOs to 2028/29. Geographically there is also a good spread of committed supply with availability of road-only sites in each AoO, with rail-served sites being more focussed.
- 5.14.4. Discussions are underway on developing a sound method to distribute the remaining unmet floorspace requirement which will reflect the AoOs and recommendations of EB/EMP/2 through an understanding of suitable, deliverable and developable sites for large warehousing. This will seek to utilise the AoOs in identifying the best location/s for allocating the unmet need across Leicester and Leicestershire rather than seeking to apportion a distribution of sites by local authority area. It is not an unmet need across the Leicester and Leicestershire authorities, it is a cross boundary issue to apportion the distribution of logistics space.

5.15 Should the Plan be more explicit about addressing the need for logistics and warehousing floorspace to 2041 identified in the Study? Is there a need for a specific reference to logistics and warehousing within Policy E1 (Meeting Employment Needs) or within other policies as well, for example Policy DS1?

- 5.15.1. As noted above the apportionment of strategic distribution space is a cross boundary issue across Leicestershire and is an ongoing process. Until a Statement of Common Ground is agreed, the extent of the role to which Charnwood will play in meeting the need for strategic warehousing and logistics within Leicestershire is unclear. It is therefore not justified for the Plan to be more explicit about addressing the need for logistics.
- 5.15.2. Modifications are proposed for Policy DS2 (Leicester and Leicestershire Unmet Needs) to enable a review of the Local Plan pending the outcome of the Statement of Common Ground on strategic warehousing and distribution. (Main5.i)

5.16 Overall, does the Plan allocate a sufficient amount, mix and choice of employment sites to meet future needs and has the Plan's economic strategy been positively prepared? Are the Plan's economic and housing strategies aligned?

- 5.16.1. Considering the robust evidence base referred to previously, notably EB/EMP/1 and EB/EMP/2, the Plan provides an appropriate amount, mix and choice of employment sites to meet future identified needs with sufficient

flexibility and choice in the location and phasing of employment land. The Plan's Vision, Objectives and Development Strategy have ensured that its economic and housing strategies are aligned, and that sustainable development is achieved.

Issue 4 – Whether the Plan will contribute to the vitality and viability of town centres

5.17 Are the boundaries of Loughborough Town Centre, the District Centres and the Local Centres on the Policies Map justified by the evidence in the Retail Study (EB/TC S&F/1)? Is the boundary of the Loughborough Primary Shopping Area justified?

- 5.17.1. The defined Centre boundaries shown on the Policies Map are evidenced by site visits, health check assessments and accompanying boundary recommendations that are included under Appendix 2, 3, 4 and 5 of (EB/TC/S&F/1b to 1e). The Centres have been appraised against the existing defined boundaries set out in the Charnwood Local Plan 2004, and any recommended changes have been incorporated on to the policies map.
- 5.17.2. EB/TC/S&F/1b to 1e was informed by site visits, and an assessment of the diversity of uses within Loughborough Town Centre. These have been used to identify areas where retail development is concentrated to provide clear justification for the Loughborough Primary Shopping Area.

5.18 What evidence justifies the thresholds for impact assessments in Policy T1? Does the 500 square metre threshold apply to Loughborough Town Centre or throughout the Borough and is this part of the policy clear?

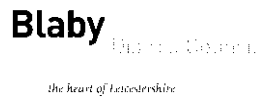
- 5.18.1. EB/TC/S&F/1 section 10.7 sets out the evidenced justification for the impact assessment thresholds set out in Policy T1. The evidence notes that using a supermarket proposal of 280sqm as an example, could have a significantly greater impact on a small centre than it would on a large town centre and notes a blanket threshold as set out in National Planning Policy Framework would be inappropriate. The recommendations for the different thresholds for district and local centres are based upon an analysis of the different sizes of units found in these types of centres. This is set out under Paragraphs 10.7.16 to 10.7.23.
- 5.18.2. The impact assessments part of Policy T1 is sufficiently clear. It provides a locally set threshold for the purpose of NPPF Paragraph 90. The 500msq threshold applies in all cases unless the proposal is within 800m of a district centre where the threshold 300sqm, or unless the proposal is within 800 metres of local centres where the threshold is 200sqm. The Policy is clear.

5.19 What evidence justifies the approach to hot food takeaways in Policy T1? how would 'clusters' of hot food takeaway uses be defined and how would the concentration and proximity of existing businesses be measured?

- 5.19.1. The evidence supporting Policy T1 is set out in topic paper EB/TC/S&F/2.
- 5.19.2. EB/TC/S&F/1 indicates that hot food takeaways detract from the vitality of Birstall and Shelthorpe District Centres. The Study recommends restricting the proportion of takeaway uses to enable a greater diversity of uses in some instance.
- 5.19.3. Evidence supplied by the Borough Council's Environmental Health Officers shows that there have been several complaints regarding amenity issues about takeaways. This suggests that there are issues associated with hot food takeaways in terms of noise, odour, or public nuisance.
- 5.19.4. Given this evidence it is justified for the Policy to seek to restrict over concentration of hot food takeaways to protect the vitality and viability of local centres in accordance with the NPPF.
- 5.19.5. The wording 'clusters' is included to allow for sufficient flexibility for the decision-taker to take account of local circumstances, including centre layout and neighbouring uses, whilst achieving the justified objective of preventing over-concentration of hot food takeaways.

5.20 Overall, does the Plan set out a positively prepared, justified and effective strategy for the economy and for the vitality and viability of the Town, District and Local centres? Are any main modifications necessary for soundness?

- 5.20.1. The Plan provides a sound basis to implement the spatial elements of the Council's vision and objectives for the Borough's economy. It meets the objectively assessed need for employment land in Charnwood and can contribute to meeting unmet need from Leicester. The strategy for the economy reflects the evidence which has been gathered and is in accordance with national policy on employment and the economy. In terms of defined centres, Policy T1 is sound and provides an effective strategy to support the vitality and viability of the Borough's town, district, and local centres. No modifications are considered necessary in relation to the town, district and local centres.



Leicester & Leicestershire Housing Market Area

Strategic Housing and Economic Land Availability Assessment

Joint Methodology Paper February 2019



Introduction

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

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

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

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

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

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

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

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

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

What are the core outputs of the Assessments?

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

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

How will the SHELAA inform future plans?

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

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

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

Methodology

How will the SHELAA be carried out?

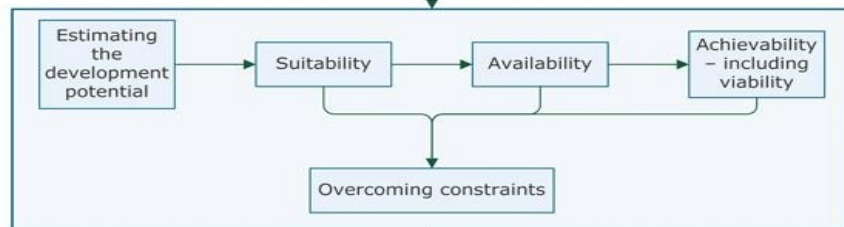
The flowchart below sets out the stages of the assessment as set out in the PPG. The guidance “indicates what inputs and processes should lead to a robust assessment of land availability. Plan makers should have regard to the guidance in preparing their assessments” but also provides the ability to depart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

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

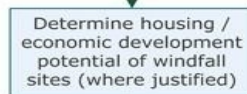
Stage 1- Site / broad location identification



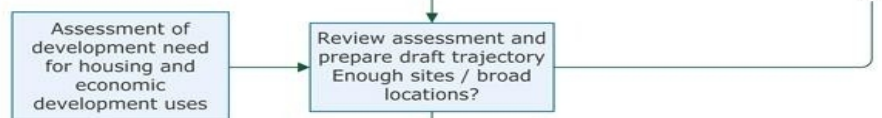
Stage 2 - Site / broad location assessment



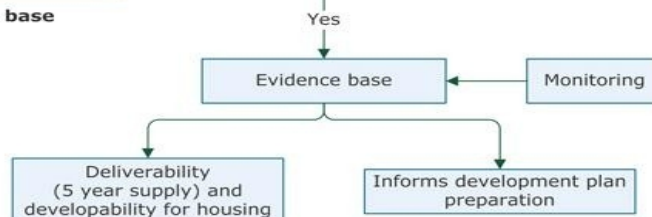
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



(Planning Practice Guidance para 6)

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

Methodology for the Leicester and Leicestershire Authorities

Stage 1: Site/Broad Location Identification.

Who should plan makers work with?

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

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

(Planning Practice Guidance, para 8)

The size of sites to be assessed

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

The assessment should consider all sites and broad locations capable of delivering:

- five or more dwellings, or
- economic development on sites of 0.25ha (or 500m² of floor space) and above.

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

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

Types of sites and sources of data

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

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

Call for sites

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

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

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

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

(Planning Practice Guidance, para 14)

The assessment area

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

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

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

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

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

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

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

Stage 2: Site/Broad Location Assessment

Estimating the development potential of each site

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

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

The development potential is a significant factor that affects economic viability of a site/broad location and its suitability for a particular use. Therefore, assessing achievability (including viability) and suitability can usefully be carried out in parallel with estimating the development potential.”

Housing Sites

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

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

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

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

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

Economic Development

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

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

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

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

Employment Sites (Use Class B1, B2 and B8)

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

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

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

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

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

Assessing when and whether sites are likely to be developed

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

Assessing suitability

According to the Planning Practice Guidance (para 19):

“Plan makers should assess the suitability of the identified use or mix of uses of a particular site or broad location including consideration of the types that may meet the needs of the community. These may include, but are not limited to: market housing, private rented, affordable housing, people wishing to build their own homes, housing for older people, or for economic development uses.”

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

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

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

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

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

Assessing availability

The Planning Practice Guidance (para 20) considers a site to be available for development; “when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems”.

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

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

Assessing achievability

According to Planning Practice Guidance (para 21):

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the site over a certain period.”

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

Stage 3: SHELAA Windfall Assessment

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

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

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

Stage 4: Assessment Review

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

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

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

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

Identifying developable and deliverable sites

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

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

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

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

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

Timeframe for Development

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

Within 0 - 5 years

Within 6 - 10 years

Within 11 - 15 years

Within 0-5 years

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

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

OR

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

Within 6-10 years

Sites will be put in this time frame if:

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

OR

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

Within 11 - 15 years

Sites will be put in this time frame if:

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

Strategic Housing and Economic Land Availability Assessment Review

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

Appendix A: Red constraints

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

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

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

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