

**STRATEGIC HOUSING LAND
AVAILABILITY ASSESSMENT (SHLAA)**

**For The
CITY OF BRADFORD METROPOLITAN DISTRICT**

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Draft Report: October 2011

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In relation to the information contained within this report (and any other report relating, or making reference, to the findings of Bradford's Strategic Housing Land Availability Assessment) the Council makes the following disclaimer without prejudice:

The identification of potential housing sites in this SHLAA does not imply that the Council will necessarily grant planning permission for residential development. Planning applications will continue to be treated on their merits against the appropriate development plan policies (currently to be found in the RSS and in the Replacement Bradford Unitary Development Plan) and other material planning considerations including national planning guidance. Sites which are, for example, currently in employment use or in the Green Belt still need to be assessed against the relevant planning policies that seek to protect employment land and the Green Belt.

The identification of potential housing sites in the SHLAA which is a purely technical document does not imply that they will necessarily become housing site allocations in the LDF. There are many factors involved in selecting the most appropriate sites in the LDF such as local environmental impact which are not part of the SHLAA process. Thus sites which are assessed favourably by the SHLAA process may not necessarily be considered acceptable for allocation in the LDF.

The inclusion of potential housing sites in the SHLAA does not preclude them being developed for other suitable purposes.

Information relating to individual sites in the SHLAA was based on the best information available at the time of the assessment. Circumstances may change or there may be some omissions and /or factual inaccuracies, which the Council does not take liability for. There may be additional constraints to consider that were not identified at the time of the assessment. Likewise some constraints may no longer be applicable.

The deliverability and developability categories are based on judgements made on the best information available at the time of the assessment. Circumstances or assumptions may change which may mean that sites come forward sooner or later than envisaged.

Capacities and densities identified on sites either relate to the number of dwellings for which planning permission has been granted or are based on indicative assessments by employing density multipliers adjusted to take account of known constraints. They are indicative and may change. The density assumptions do not represent planning policies which are supported by the Council and the density and yield conclusions on individual sites do not necessarily represent what may be considered an acceptable solution in planning terms should planning applications be submitted.

The exclusion of sites from the assessment does not preclude the possibility of residential development being granted on them. Some sites may never have been identified whilst others may have been discounted.

Site visits by the Council and other SHLAA Working Group Members took place over a period spanning late 2009 to late 2010 with further negotiation and exchange of information beyond this. The status of sites and information relating to them may have changed since the original assessment. For example, an identified site may subsequently have been granted planning permission whilst other planning permissions may have lapsed. The study is to be updated on a regular basis and any changes including new information will be input to the database at this point.

1. EXECUTIVE SUMMARY

- 1.1. Planning Policy Statement 3 (PPS3) Housing requires local authorities to undertake Strategic Housing Land Availability Assessments (SHLAA's) in order to provide a pool of sites from which to select sites for allocation when preparing their Local Development Frameworks (LDF's), to inform the Core Strategy in terms of the overall spatial strategy to be adopted and to ensure that they maintain a 5-year supply of housing land in order to meet the need for new homes. It forms an important component of the overall evidence base underpinning the LDF.
- 1.2. The SHLAA is a purely technical exercise and is not a policy document. Production of the SHLAA precedes the plan making stages of the LDF which will actually allocate development sites. The assessment of sites within the LDF will use the information gained from carrying out the SHLAA but will incorporate more detailed assessments and a range of additional issues will require consideration such as, for example, competing land uses, sustainability appraisal and the outcome of statutory consultation. Sites included in the SHLAA Assessment do not therefore necessarily have any planning status as explained in the Disclaimer at the beginning of this document.
- 1.3. The SHLAA has been undertaken in accordance with Practice Guidance published by the Department for Communities and Local Government (CLG) with the deliverability and developability of over 700 sites assessed. A site size threshold of 0.4 ha or 15 dwellings was used in the study.
- 1.4. The SHLAA has been carried out in partnership with a range of stakeholders in particular market and social housing developers. The SHLAA Working Group, membership of which is detailed in Appendix 3, has agreed the overall SHLAA methodology, resolved and agreed approaches to a number of detailed methodological issues such as assumed development densities and completion rates, and scrutinised and agreed the results of each site appraisal.
- 1.5. Section 2 of this report outlines the methodology for the assessment and the 10 stages of work. The most significant aspects of the approach taken to Bradford's SHLAA are detailed below:
 - Sites have been compiled from a wide variety of sources including a call for sites exercise and no parts of the district have been excluded from the study. Given the scale of the housing required in the district the net has therefore been cast as widely as possible as advised by the Government. This has meant that sites such as those within the green belt have not been automatically excluded from the study;
 - Agreement has been reached in compromise with volume house builders on site density assumptions but these assumptions do not in any way represent the planning policy of the Council and all planning applications will continue to be assessed against the policies of the statutory development plan – the Replacement Unitary Development Plan (RUDP) – together with any relevant national planning guidance;
 - On the advice of the volume house builder representatives on the SHLAA Working Group, and in reflection of market conditions in the district, the assumed annual completion rates for deliverable and developable sites are significantly lower in Bradford's SHLAA than in many other SHLAA's produced elsewhere. This has the direct result of stretching the development of sites over longer time spans. In some cases the development of sites is assumed to extend

beyond the nominal end point for the study. For this reason data on the residual capacity of sites is given in addition to expected delivery within the period to 2026.

- All sites have been subjected to the three tests of suitability, availability, and achievability. Again because of the scale of housing needed and the likely shortage of development sites it has not been possible to exclude sites from the SHLAA or classify them as ‘unsuitable’ purely on the basis of local planning policy designations. The study can therefore be considered to have taken a broadly ‘national policy on local policy off’ approach. However the way in which the sites have been categorised and the way in which the data results are presented allows for in depth analysis of the implications of the available land supply on a settlement by settlement basis.
- 1.6. The SHLAA Assessment has found that there is the potential in the district to deliver in the order of approximately 38,500 over dwellings over the 17 year study period with a residual of 5467 dwellings being completed beyond the study period if the pessimistic development rate assumptions of the volume house builders on the SHLAA Working Group prove to be correct. This means that the total SHLAA capacity amounts to 44,051 dwellings.
- 1.7. Although the total capacity of 44,051 dwellings is roughly approximate to the scale of the housing requirement emerging within the LDF Core Strategy a more detailed analysis of the results reveals a number of difficult and challenging issues:
- Over half of the capacity within the SHLAA falls within the category of being subject to ‘local policy constraints’. It should be assumed that some of these sites could, when subject to more detailed appraisals of their local environmental impacts as part of LDF production, be ruled out as LDF housing allocations.
 - More than half of the deliverable and developable land supply lies on green field sites.
 - The timing of the supply is heavily weighted towards the middle and later phases of the SHLAA study period. This reflects the number of sites which could only be brought forward following production of the new LDF and also the weak economic and housing market conditions which are expected in the first part of the SHLAA study period.
- 1.8. The results of the SHLAA on a site by site basis and aggregated up by settlement are presented in section 4 of this study. The tables break down deliverable and developable supply in a number of ways – for example according to suitability category and according to green field or PDL status. The accompanying tables also provided a year by year trajectory of potential delivery on each site.
- 1.9. Appendix 9 presents the 5 year land supply position for the period April 2009-2014 based on the agreed results within the SHLAA. The assessment reveals that there is no PPS3 compliant land 5 land supply – deliverable capacity is equivalent to approximately 39.5% of the total required.
- 1.10. Work on the second SHLAA which will update the analysis of the sites within this first study and reduce the site size threshold to 0.2 ha is now underway. The second SHLAA will be carried out to a base date of April 2011 and cover the period to 2028.

2. INTRODUCTION

What Is A SHLAA?

- 2.1. This report sets out the process, methodology and findings of the first Strategic Housing Land Availability Assessment for the district of Bradford. It provides evidence and information to support the production of Bradford's Local Development Framework (LDF).
- 2.2. A Strategic Housing Land Availability Assessment (SHLAA) is a process that identifies land with *potential* for future housing development. Ensuring an adequate supply of land for housing is a key function of the planning system and an evidence-based policy approach is a key principle of national Planning Policy Statement 3 (PPS3): *Housing*
- 2.3. A Strategic Housing Land Availability Assessment (SHLAA) can therefore best be described as a process of pooling, from a variety of sources, all known potential sites for housing development at a particular point in time and then – in partnership with stakeholders involved in housing delivery – carrying out a technical assessment of their suitability, availability and achievability. In addition to providing an aggregate picture of the total supply of land of different types (brown field, green field, within the urban area, within the green belt etc) the study produces a list of sites categorising them according to whether they are:
 - Deliverable within the short term – within 5 years;
 - Developable in the medium or longer term (usually the 6-10 and 11-15 year periods);
 - Or not currently developable.
- 2.4. The results of the study can then be used to inform both the strategic and site specific parts of the Local Development Framework.
- 2.5. Producing a SHLAA is not a one off exercise. Once completed the SHLAA's should ideally be updated and rolled forward on an annual basis.

National Planning Policy

- 2.6. At the time of writing this study national government policy with regards to planning for housing and producing LDF's is contained within Planning Policy Statements 3 and 12 (PPS3 and PPS12).
- 2.7. National Policy on housing contained within Planning Policy Statement 3 Housing (PPS3). This sets out the Government's objective of ensuring that the planning system delivers a flexible, responsive supply of land for housing with sufficient suitable land available to achieve housing delivery objectives. The housing delivery objectives are set out in Core Strategies based on a robust appraisal of the need for new housing over the lifetime of the plan.
- 2.8. PPS3 requires local authorities to undertake Strategic Housing Land Availability Assessments (SHLAA's) in order to provide a pool of sites from which to select sites for allocation when preparing their Local Development Frameworks (LDF's) and also to ensure that they maintain a 5-year supply of housing land in order to meet the need for new homes. This is a purely technical exercise which precedes the plan making stages of the LDF but nonetheless forms an important component of the wider evidence base underpinning it.

- 2.9. Local Development Documents (the constituent parts of the LDF) are to set out policies and strategies for delivering the required level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption taking account of the level of housing required in the Regional Spatial Strategy (RSS). The SHLAA is one of the major means of identifying sites and broad locations.
- 2.10. Once identified in LDF's, PPS3 says that the supply of land should be managed to ensure that a continuous five year supply of *deliverable* sites is maintained. This means that the SHLAA will need to be updated on a regular basis and performance against the housing trajectory reported in each authority's LDF Annual Monitoring Report

Regional Planning Policy

- 2.11. Policy H2 of the Regional Spatial Strategy (RSS) for Yorkshire and the Humber, adopted in May 2008, requires local planning authorities to prepare SHLAA's in order to provide evidence for their Local Development Frameworks (LDFs). The RSS will remain a part of the statutory development plan for Bradford until the Localism Bill, which contains proposals for the revocation of Regional strategies, gains Royal Assent.

Local Planning Policy

- 2.12. The Replacement Unitary Development Plan for Bradford (RUDP) which was adopted in October 2005 and further saved by the Secretary of state in 2008 remains the principal element of the statutory development plan for Bradford District.
- 2.13. In line with the Planning and Compulsory Purchase Act 2004, the RUDP is to be replaced by the LDF over the next few years. The first LDF document to be prepared is the Core Strategy which is currently in preparation with the Preferred Options stage document being issued for consultation between November 2011 and January 2012.
- 2.14. A further suite of documents which identify specific development sites are being prepared in parallel with the Core Strategy. These include the Allocations Development Plan Document (DPD), the Shipley & Canal road Area Action Plan and the Bradford City Centre Area Action Plan.

Purpose of the SHLAA Assessment

- 2.15. The SHLAA provides vital evidence to support both the Council's plan making and its management and monitoring of housing land supply and housing delivery. More specifically the SHLAA will assist in the production of:

Bradford's LDF Core Strategy – the LDF Core Strategy for Bradford will determine the broad pattern and scale of development across the district over the next 15 years. It will identify where there will be growth, where critical environmental assets need conserving and how to ensure the development that takes place is sustainable. The Council has already undertaken consultation to investigate a number of possible spatial options for where growth should go. The eventual choices made in the Core Strategy will affect how much land and how many sites for housing need to be identified in each settlement in the district. By looking at the potential supply land across the district, the SHLAA will assist in showing how realistic different options for accommodating and distributing housing growth would be. It also highlights the implications of opting for different quantum of development in different areas – for example on the need for green field or green belt land.

A 5 Year Housing Land Supply Statement – Local Planning Authorities (LPA's) must ensure that there is an adequate and continuous supply of housing land to enable its house building targets (set out in Regional Spatial Strategies) to be met. The Government requires LPA's to assess, on an annual basis, how much land is currently deliverable and by this it means sites which are suitable, available now (or within the next 5 years) and are achievable now (or in the next 5 years) in terms of their attractiveness to developers and the market. The process of appraising the sites in the SHLAA will provide the data to make this assessment.

Bradford's Allocations DPD – as stated above the SHLAA will provide a pool of sites for the Allocations DPD to select from – and assuming that there are more than the required number of sites available, the DPD will select those which are most sustainable, which promote a continuing emphasis on the use of previously developed land and are most in line with the LDF Core Strategy.

The Practice Guidance document issued by the Government to provide advice on how SHLAA's should be carried out sets out the core outputs and processes of a SHLAA and these are listed in Table 1 below:

Table 1: Strategic Housing Land Availability Assessment - Core Outputs

CLG Core Outputs		Bradford's SHLAA
1.	A list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary).	Appendix 8 contains a tabular list of sites each with a unique reference number which can be cross referenced with the maps in the results section of the report. Further background on each site is held on a database which is linked to shape files detailing site boundaries within GIS.
2.	Assessment of the deliverability / developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed.	The sites listed in Appendix 8 have all been assessed against the tests of suitability, availability and achievability. The conclusions on each of these tests are captured and justified within the table.
3.	Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified).	The potential capacity of each site has been assessed against a defined set of density rules as agreed with the SHLAA working group.
4.	Constraints on the delivery of identified sites.	Constraints – which includes policy constraints, ownership constraints, and physical constraints have been assessed and recorded within Appendix 8 and the more detailed SHLAA database.
5.	Recommendations on how these constraints could be overcome and when.	Where possible, recommendations on how these constraints can be overcome have been recorded in the table or the SHLAA database.

CLG Process Checklist		Bradford's SHLAA
1.	The survey and assessment should involve key stakeholders including house builders, social landlords, local property agents and local communities.	The draft methodology for the SHLAA has been subject to consultation with stakeholders and the wider community. Inputs from these groups have also been sought via the Call For Sites exercise. The SHLAA itself has been carried out in partnership with a working group comprising market and social housing developers, agents, and via co-operative working between different departments within the Council. Comments on this report will be fed into both the next SHLAA and the wider LDF process.
2.	The methods, assumptions, judgements and findings should be discussed and agreed upon throughout the process in an open and transparent way, and explained in the Assessment Report. The report should include an explanation as to why particular sites or areas have been excluded from the Assessment.	The working group set up to oversee and input into the SHLAA has discussed and agreed the methodology used. The decisions on the approaches are fully explained and transparency has been enhanced by setting out the areas where differences in opinion had to be resolved. Further details on how sites were assessed by the different parties are recorded in the Council's systems and are available on request.

3. METHODOLOGY

- 3.1. In formulating the methodology for Bradford’s SHLAA the Council and the SHLAA Working Group has had regard to a number of sources of both guidance and examples of recent good practice. First and foremost the Government produced a Practice Guidance Document in July 2007. The Guidance suggests that there are ten key stages in producing a SHLAA and these are illustrated in Figure 2.
- 3.2. In addition to the Government’s Practice Guidance, further advice has been issued by the Planning Advisory Service and by the Yorkshire and Humber Regional Assembly in a report prepared by consultants ARUP. The latter is particularly useful in that it has looked at the issues facing local authorities in this region in delivering SHLAA’s within the required timescales and resources constraints. It emphasises the need to keep SHLAA’s as simple as possible and utilise existing data wherever possible.
- 3.3. The final methodology for carrying out the SHLAA has been based on the above guidance and has evolved in a number of stages as illustrated in Figure 1 below. Key stages included consultation on a broad methodology framework in autumn 2008. This elicited 92 comments from 12 organisations which were broadly supportive of the suggested approach. These comments and responses to them are included in a table at Appendix 2.

Figure 1: Evolution of the Bradford’s SHLAA Methodology

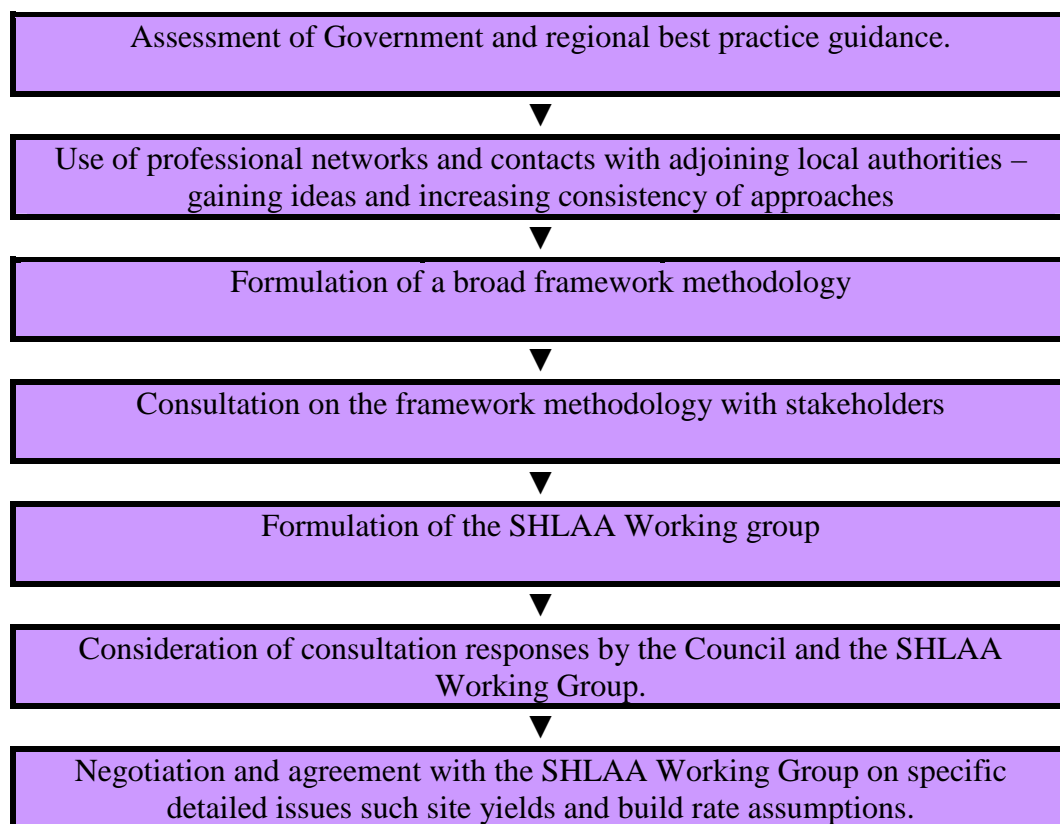
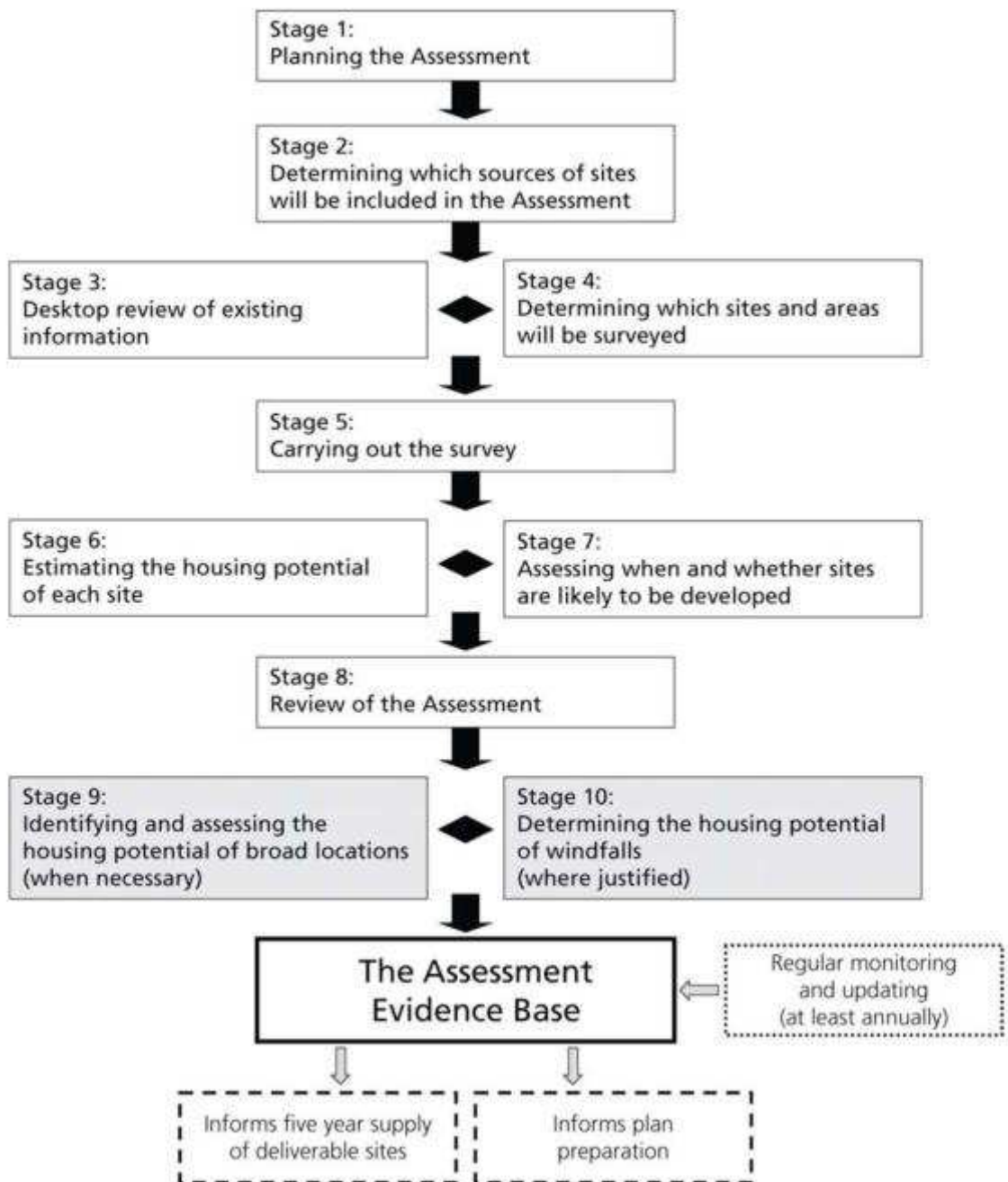


Figure 2: The SHLAA Process as Set Out in Government Practice Guidance



3.4. Each of the ten stages and the decisions and choices made are now described in turn in the sections below.

4. PLANNING THE ASSESSMENT

- 4.1. The CLG Practice Guidance requires that a number of management issues be addressed at the outset of planning the assessment. These were consequently given detailed consideration in planning the assessment as follows:

Sub Regional Working And Consistency

- 4.2. The first issue in planning the assessment alluded to in the Government's Practice Guidance is whether it would be practical and beneficial to carry out a joint SHLAA with other local authorities in the same housing market area. Informal officer level contacts were made with a number of adjoining authorities and the issue was included in the methodology consultation exercise.
- 4.3. It was concluded that such a joint SHLAA would be impracticable and unnecessary for a number of reasons.
- Although there is an overlap in markets between Bradford and its adjoining authorities there is no one market covering all of these administrative areas.
 - Working out a housing requirement – which is essential for the SHLAA process - for overlapping market areas would not be possible as the RSS only indicates housing targets on a Local Authority basis;
 - The Strategic Housing Market Assessment (SHMA) reports prepared by Ecotec for the Yorkshire and Humber Assembly provide analysis on a local authority basis; local authorities were thus considered a good approximation as to actual markets; the subsequently produced Strategic Housing Market Assessment produced for the Council by Arc4 has reaffirmed this by concluding that Bradford can be considered a functioning and self contained market area;
 - Local authorities adjoining Bradford are at different points in their LDF and their timetable for production of LDF documents and evidence is different;
 - The scale of sites involved in adjoining authorities differs widely as do the resources available to carry out the studies; while all studies need to be robust their methodologies and processes have to be cognisant of the resources available to carry them out.
- 4.4. Despite the above the Council's officers have liaised and shared best practice with neighbouring authorities to ensure that as far as possible methodologies are consistent. In particular Calderdale has taken up the offer of a place on Bradford's SHLAA Working Group in an observational capacity with a reciprocal arrangement operating for Calderdale's working group.

Stakeholder Involvement – The SHLAA Working Group

- 4.5. The Government best practice document has indicated that SHLAA's should be produced in partnership with key stakeholders such as market house builders, local agents and social housing providers. This has been achieved by forming a working group to both agree the approach and methodology for the SHLAA and to oversee and input into the site assessments.
- 4.6. Bearing in mind the focus of SHLAA's on assessing the viability and deliverability of sites it is important to ensure that the working group is representative of stakeholders connected with

housing delivery in the district and has the right range of knowledge and skills to add value to and ensure a robust appraisal of sites.

- 4.7. During the methodology consultation exercise an open invitation was made for organisations to volunteer their involvement in the SHLAA Working Group or suggest who should be involved. The final composition of the Group as set out in Appendix 3 reflects a limited number of expressions of interest from house builders in the market sector. Representation from social house builders was obtained via contact and discussion with the Bradford Housing Partnership and the Bradford Housing Association Liaison Group with each body nominating representatives for the SHLAA Working group. Perhaps inevitably given the technical complexity of the exercise, the knowledge required, and the onerous time and resource commitments which membership of the working group involves, and the fact that many local authorities have been preparing SHLAA's at the same time, it has proved difficult to secure member involvement and member input from as diverse a range of organisations as would ideally be the case.
- 4.8. The terms of reference for the SHLAA Working Group as agreed by all parties at the initial inception meeting are set out in Appendix 3.

Period Covered By The Study

- 4.9. Following consultation on the SHLAA methodology in Autumn 2008, the SHLAA Working Group had its inception meeting in April 2009. At the time of commencement of the study the most up to date source of planning data was contained within the Housing Land Register base dated April 2009 and the expected period covered by the LDF was thought to be up to 2026. For the purposes of data analysis and to assist with the formulation of a housing trajectory for the Core Strategy, the resulting 17 year span was divided into 3 phases as follows:
- Years 1-6 (April 2009 – April 2016)
 - Years 7-12 (April 2016 – April 2021)
 - Years 13-17 (April 2021 – April 2026)

Resources, Skills, Management and Quality Assurance

- 4.10. Within the Local Planning Authority the primary resource has been the LDF team with support from the Council's Housing and Asset Management services. This team has had the responsibility not only for site assessment but for setting up new database and GIS systems from scratch. The knowledge and skills available to the SHLAA has been significantly enhanced by the involvement of both developers and agents with an in depth understanding of the development sector and housing market within the district.
- 4.11. It is important that the SHLAA is as comprehensive, as thorough in its assessment, as transparent in its inbuilt assumptions and thus as robust as it can be given the constraints under which it is operating. Inevitably in a study which has spanned more than 2 years there will be individual sites where circumstances will have changed over that period. Hence the need for regular updates of the study and the Council's commitment to producing a second updated SHLAA to a April 2011 base date by the summer of 2012. However quality, transparency and scrutiny has been maximised via the following mechanisms:
- By offering an early opportunity to shape the SHLAA process and methodology;
 - By constituting a balanced SHLAA Working Group with the local knowledge and skills to provide robust site analyses;
 - By agreeing with the stakeholder working group their roles, responsibilities and decision making protocols and making them available in the SHLAA report;

- By recording in its final SHLAA report, the appraisals of sites, and where methodology disagreements occurred and how they were resolved;
- By providing site surveyors adequate briefing to ensure consistency of approach in appraising sites;
- By quality checking a sample of survey returns;
- By publishing the SHLAA in full at the conclusion of the study.

SOURCES OF SITES INCLUCDED IN THE ASSESSMENT

5. SOURCES OF SITES INCLUDED IN THE ASSESSMENT

Robustness and Casting the Net Widely

- 5.1. The Government's Practice Guidance for SHLAA's explains that a key decision which must be made at the start of the process is the types and sources of sites which will be included in the assessment. The Practice Guidance suggests that the SHLAA should aim to identify as many sites as possible with housing potential in and around as many settlements as possible in the study area.
- 5.2. The Practice Guidance presents one way of categorising such sites, making a distinction between:
 - **Sites already in the planning process** – sites with either development plan allocation for housing or with permission for housing. This includes sites which although under construction, have yet to be completed.
 - **Sites not currently in the planning process** – including vacant land and buildings, surplus public sector land, land in non residential use such as car parks and commercial property, garage blocks and proposals for the re-modelling of existing housing areas. This category also potentially includes sites within the green belt and other areas currently protected from development in the statutory development plan.
- 5.3. All of the above sources have been included in the SHLAA. With regards to the re-modelling of existing residential areas, the Council is currently working with its partners to bring forward proposals within a number of areas including Holme Wood and Thorpe Edge. These master planning activities are not yet complete therefore the full potential range of development sites which may arise from the re-modelling of existing areas will not be available until the current SHLAA is updated.
- 5.4. The Practice Guidance suggests that while some types of land or geographical areas may be excluded from SHLAA's, this should only be done where clearly justified and in agreement with stakeholders. Given the scale of the population and household growth projected by the Government and its agencies (ONS and CLG) for Bradford over the next 20 years, it has been concluded that the SHLAA needs to include as wide a selection of sites and locations as possible.
- 5.5. For this reason all known sites at the base date of the study - whether green field or brown field, and in all settlements regardless of their size or position in the current UDP settlement hierarchy have been included in the SHLAA.
- 5.6. As far as urban extensions are concerned the Council are currently consulting upon a potential urban extension as part of the Holme Wood Neighbourhood Plan. This Plan includes a number of options with varying degrees of green belt release the largest of which constitutes an urban extension. This current SHLAA does not include the full range of green belt land set out as development options in the neighbourhood Plan consultation but the SHLAA update could do so depending on the outcome of consultation.

- 5.7. The one potential source of sites mentioned by the Government in its Practice Guidance which is not included in the SHLAA is new free standing settlements. No such indication of a need for such a new settlement is included in the current RSS and the prime focus within Bradford at present remains the regeneration and remodelling of existing urban areas.
- 5.8. Given the above analysis, Table 2 below, indicates the sources and datasets used to compile the list of sites included in the SHLAA.

Table 2: Sites Sources for the SHLAA

Sites With Planning Status
• Sites Under Construction
• Sites with Planning Permission – Un-started / not yet implemented
• RUDP Housing Allocations – Un-started / not yet implemented
Sites Without Planning Status
• RUDP Allocated Safeguarded Land
• Surplus / Poorly Performing Employment Sites Identified via the Employment Land Study
• Vacant, under used or derelict sites ascertained by survey work including Urban Capacity Study Sites.
• Masterplan Sites
• Surplus Council Owned Land as forwarded by the Council’s Asset Management service
• Call for Sites Submissions from land owners / agents / developers

Table Notes
<ul style="list-style-type: none"> • <i>RUDP Safeguarded Land – in the RUDP a number of areas of land lying between the edge of the built up area and the green belt were safeguarded as a land bank reserved for future allocation should the supply of sites within settlements be insufficient.</i> • <i>Employment Sites – In 2007 the Council commissioned consultants AUPS to produce an Employment Land study to assess the future need for employment land and the adequacy of existing sites allocated or with permission for such development. All existing sites were assessed and scored against a range of criteria – those sites performing poorly and recommended for allocation or potential de-allocation have been included in the SHLAA;</i> • <i>A significant amount of work was carried out in identifying surplus land and buildings as apart of the Council’s Urban Capacity Study. The Urban Capacity was never finished due to the replacement of such studies by the Government with SHLAA’s - this work and the sites identified have however been rolled forward where appropriate into the SHLAA;</i> • <i>Masterplan Sites – a number of master planning documents have been produced in recent years covering Bradford City Centre, Airedale and Manningham. Where appropriate potential sites identified in these documents have been included in the SHLAA along with sites related to other emerging plans such as those being formulated by InCommunities (formerly BCHT);</i> • <i>Over the last 2 years the Council has received a number of site submissions from developers and land owners wishing to see their proposals included in the SHLAA / LDF process – this includes sites submitted during the ‘Call For Sites’ exercise. These sites have been included in the SHLAA.</i>

Site Size Thresholds

- 5.9. Inevitably it is impracticable to all include all sites down to individual plots within the SHLAA. The decision on the most appropriate site size threshold to adopt has been taken having regard to the nature of land supply in the area, the scale of the task in terms of numbers of sites and resources available to the study and the need to be realistic about the time external members of the SHLAA Working Group are able to offer. Another factor taken into account has been the site size threshold adopted in the RUDP which only allocated or designates sites which are at least 0.4 ha.
- 5.10. For these reasons a site size threshold of 0.4 ha was generally applied. The only exception to this was for smaller sites where higher density was likely to be achieved and in this case a dwelling threshold of 15 units rather than a site size threshold was used.

6. DESKTOP REVIEW OF EXISTING INFORMATION

- 6.1. An exercise was taken to collate information from 'desktop sources' on potential sites. The data sources used are listed in Table 3 below. Data was input into the SHLAA database. In some cases where sites appeared in more than one dataset the site list and information was rationalised or combined.

Table 3: Data Sources Used In Desktop Review

Information Source	Data Provided / Use
Housing Land Register (updated annually)	Identifies sites. Provides information on site yield, whether site has commenced construction, dwellings started / completed so far, & type of site (PDL / Green field)
Planning Application Files – paper & electronic	Detailed site proposals, site development issues and constraints, site ownership.
Bradford Replacement UDP	Identifies sites and provides site related information including constraints such as required infrastructure improvements.
Site Specific Development Briefs	Provides contextual information on potential sites including constraints;
The National Land Use Database	Provides details of sites and buildings and constraints on delivery;
Bradford Urban Capacity Study – survey work & database	Identifies sites and provides a range of survey data.
Employment Land Review (ELR)	Provides an appraisal of the suitability and developability for employment use of a range of sites currently allocated / with permission for such use. Thus identifies potential housing sites where employment uses not viable and provides contextual information including site constraints.
Call For Sites Exercise	Identifies sites. Submissions were made on a standard proforma (see Appendix 4) which provided extensive information to enable assessment.
Local Authority Asset Management Records	Identifies sites and provides background information.
Council’s GIS System	The Council’s GIS system captures a vast array information from a variety of internal and external sources ranging from planning designations, contaminated land records, TPO’s, hazardous installations and HSE consultation zones, listed buildings and conservation areas, & flood risk zones.
Ordnance Survey Maps	Helps identify characteristics of site and surrounding areas, helps resolve site boundary issues and allows site size measurement.
Aerial Photos	Assists in identifying current land use, topography, neighbouring uses and resolving site boundaries.
Planning Permissions Survey	See SHLAA stage 7 - obtains information on the intentions of those who have obtained consents;
Land Ownership Survey	See SHLAA Stage 7 – provides information of land owner intentions – when and whether the site may be available for development.
Bradford Annual Monitoring Report	Provides data on housing completions, the capacity of remaining unimplemented sites, and the amount of development on windfall sites.

DETERMINING WHICH AREAS AND SITES WERE SURVEYED

7. DETERMINING WHICH SITES AND AREAS WERE SURVEYED

- 7.1. This stage involves making decisions on which areas are surveyed to identify new sites and which sites from the varying sources are surveyed to gain information to allow an appraisal of their developability.
- 7.2. The SHLAA has incorporated the results of 3 blocks of survey work. The first block included in the SHLAA is the survey results from the uncompleted urban capacity study carried out in 2007. This included surveys of:
 - Bradford city centre
 - All town, district and local centres as identified in the RUDP
 - An 800M pedshed (walking zone) around Bradford City Centre
 - 400M pedsheds (walking zones) around Shipley, Keighley, Ilkley, and Bingley town centres;
 - All RUDP designated mixed use areas;
 - All RUDP employment sites;
 - Sample surveys of residential areas based on the typical urban area typology
- 7.3. Not all sites which were identified as part of urban capacity work were included in the SHLAA – for example some were ruled out because they were too small while others were excluded due to newer information which indicated that they were not likely to be available for residential development.
- 7.4. All sites sourced from the urban capacity were re-surveyed in the second survey block and utilised a proforma specifically designed to capture the data needs to assess developability. The field survey proforma used for the SHLAA is included in Appendix 5. Further new sites were sought and identified as part of this survey block. This second survey block included surveys of all sites in the SHLAA not sourced from the Housing Land Register.
- 7.5. A third survey block involved collecting survey information, using the same SHLAA field survey proforma, for sites in the Housing Land Register (HLR). These sites are in any case visited as part of the annual housing land survey carried out by Council officers as part of work which informs the Annual Monitoring report. This enabled SHLAA data to be collected at the same time as the annual housing land survey.
- 7.6. As a result of the above work all sites within the SHLAA database have been subject to field surveys.
- 7.7. In some local authority areas the choice has been made to only survey specific settlements or geographical areas. This is not the case in Bradford. Given the scale of projected housing need all settlements large enough to have housing site allocations within the RUDP have been surveyed and included in the SHLAA.
- 7.8. For clarity the settlements which have been included in the SHLAA are listed below:

Table 4: Settlements Included in the SHLAA

Bradford Thornton Queensbury Shipley Keighley Ilkley Bingley	Baildon Cottingley Harden Wilsden Cullingworth Menston Denholme	Oakworth Riddlesden East Morton Oxenhope	Burley in Wharfedale Addingham Silsden Steeton with Eastburn Haworth
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7.9. Table 5 below provides an outline of how many sites have been included from each source type.

Table 5: Site Numbers and Sources

Site Source	No. of Sites
Call for Sites	240
Housing Land Register	176
Safeguarded Land	42
Urban Capacity	191
Other	52
TOTAL NUMBER OF SITES	701

8. CARRYING OUT THE SURVEY

- 8.1. As stated above all SHLAA sites were visited in a comprehensive field survey. Information from the survey was used to supplement desktop information already available from existing Council systems and external sources. Consistency in the information collected and approach taken was ensured firstly by briefing all surveyors before work began and secondly by collecting information on a standard proforma (see Appendix 5).
- 8.2. The field survey was aimed at recording the character of the site and its surroundings and geared towards collecting information which would assist in assessing the suitability, availability, and achievability of the site. As a minimum the following information was collected:
- physical constraints, e.g. access, steep slopes, potential for flooding, natural features of significance and location of pylons etc
 - site size;
 - current use(s) of site;
 - character of surrounding area;
 - Any indication of availability
 - site boundaries;
 - surrounding land use(s);
 - PDL / Green Field?
 - Potential type of dwellings suited to site

ESTIMATING THE HOUSING POTENTIAL (YIELD) OF EACH SITE

9. ESTIMATING THE HOUSING POTENTIAL OF EACH SITE

- 9.1. The Government's Practice Guidance sets out a range of different approaches to estimating the potential yield of sites ranging from using rules of thumb to undertaking detailed scheme designs on each and every site. The key is to choose a method which is going to give a reasonable estimate of potential site yields whilst reflecting the amount of available resources and different skill sets required. Inevitably attempting to second guess the type of development and density of development which might occur on a site now in current conditions of market demand when that site may not be developed for many years if at all is difficult task.
- 9.2. The SHLAA Working Group therefore made a number of decisions on the best approach given the particular circumstances pertinent to Bradford's SHLAA:
- That for sites which already have a planning permission for residential development the yield contained within that permission would be used. However all Working Group members were given the chance to review these yields and if there was robust evidence or reasons to depart from the planning permission yield adjustments were made. Where any such adjustments were made these were recorded in the SHLAA database.
 - For sites without any planning permission a two stage process was used which involved calculating the net developable area of the site based on site size using rules of thumb and secondly using density multipliers. Using Density multipliers involves setting standard densities for sites so that site yields are generated automatically. Different densities can be assigned according to the type of housing development envisaged and the site's geographical location.
- 9.3. Estimating net developable areas for each site has allowed for a more realistic assessment of site yields to be obtained. It recognises that not all of a site will be given over to housing. PPS3 states that net dwelling density is calculated by including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, incidental open space etc. Thus any areas given over to facilities such as sports pitches which will be used by a wider catchment, or to shops, community facilities, or areas left undeveloped would be excluded. Set out below are the rules of thumb used in the SHLAA as advocated in the Government's guide to carrying urban capacity studies, 'Tapping the Potential'. This document is based on recognised research into densities in relation to site size and thus carries considerable weight.

Table 6: Net Developable Areas – Rules of Thumb

Site Size	Assumed Net ratio
< 0.4 hectares	100% of gross site area
0.4 – 2 hectares	90% of gross site area
Over 2 hectares	75% of gross site area

- 9.4. In the case of sites which comprise buildings for conversion the SHLAA uses the yardstick advocated in both the national and regional guidance on preparing urban potential studies. Here the known potential is converted into a housing yield by using a gross to net ratio to determine

the usable floor area (80% is normally used except for difficult or deep plan buildings where the figure used is 60%). This is then divided by a unit floorspace - URBED has suggested that 70m² is a useful rule of thumb. This floorspace assumes a mix of one and two bedroom flats.

- 9.5. The issue of which density multipliers to use generated considerable debate and disagreement among working group members with planning officers generally advocating relatively high densities and the market house builders advocating much lower densities. This difference is perhaps understandable as the volume house builders were rightly seeking to take account of market trends which are generally moving away from developing flats and apartments at high overall densities and instead focusing on family housing at relatively low densities. At the same time planning officers were quite rightly seeking to ensure that the densities used on all types of sites (not just flats and apartments) reflected the need to use land as a scarce resource efficiently as possible. A period of negotiation ensued which involved the exchange of information on actually implemented schemes in the recent past.
- 9.6. The end result is captured in Table 7. While not necessarily reflecting either party's ideal approach the result was a workable compromise which allowed site assessments to progress. It should be stated however that the site yields do not in any way necessarily reflect from a policy point of view what officers consider would be the appropriate site yield should planning applications be submitted in the future.
- 9.7. Applying the density rules involved Council officers making an initial judgement as to which of four categories a site should be placed in, each category reflecting a different type of end housing product and thus with different density assumptions. The Working Group agreed that given that these were only estimates it would be better to express densities within a range rather than giving a specific figure. Thus where there is no planning permission granted sites in the SHLAA database have yields expressed as a range.

Table 7: SHLAA Density Categories and Multipliers

<p><u>Low Density - 30-40 units per hectare</u> Sites most appropriate for family homes, within and on the edge of the urban area and rural locations.</p>
<p><u>Medium Density - 41-50 units per hectare</u> Sites within the urban area with good access to local facilities and transport, most suitable for mixed schemes which may include smaller family homes, elderly accommodation and some low rise apartments.</p>
<p><u>Medium/high Density - 51-99 units per hectare</u> Areas subject to master planning proposals or in particularly accessible locations within the urban areas, where a mix of densities would be most likely to include both apartments and other family housing as part of the mixed character of the area.</p>
<p><u>High Density - 100-250 units per hectare</u> Apartment style development predominantly in the city and town centres, but also on specific types of sites where this form of development has been promoted in masterplans or, in early discussions with the Council as the form of development appropriate for the site. Includes student accommodation.</p>

ASSESSING WHETHER AND WHEN SITES COULD BE DEVELOPED

10. ASSESSING WHETHER AND WHEN SITES COULD BE DEVELOPED

- 10.1. In order to determine whether sites are deliverable or developable as required by PPS3, the three tests in the Government Practice Guidance of Suitability, Availability and Achievability were applied to each site.
- 10.2. Broadly speaking **deliverable sites** are those which can contribute houses in the short term with no policy, physical, ownership or viability constraints which would prevent development taking place within the first five years of the study period. **Developable sites** are those likely to be or capable of being implemented later in the study period – in most cases because either they are not yet fully compliant with planning policy and would therefore need to be assessed consulted upon and included within the new LDF, or where there are delivery issues which prevent immediate development. Cases here include sites where development is dependent on the provision of infrastructure which is programmed for a later point or where sites are located in weaker market areas where development is unlikely to take place until market conditions improve or regeneration activities or master plans are implemented.
- 10.3. The 3 tests carried out in sequence on each site were therefore:
1. **Suitability** – which establishes whether the site is in a broadly suitable location for development and screens out those highly unlikely to be acceptable based on national policy designations;
 2. **Availability** – which assesses whether the land genuinely available for housing development – it distinguishes between land available now, available in the future and where availability is unknown or uncertain;
 3. **Achievability** – looks at whether it will be viable to deliver houses on site with respect to costs, development constraints and the market;

The Suitability Test

- 10.4. A key issue for the study has been to determine which criteria will be used to assess the suitability of sites within the SHLAA and which criteria will be left out. It is important to make a distinction between a SHLAA which is a strategic technical document focused on identifying sites which are developable and the LDF which has the role of assessing and allocating the best range of sites having regard to a much wider range of strategic and local environmental factors. Government Practice Guidance states that the SHLAA assessment should not be narrowed down by existing policies designed to constrain development, whilst the Regional Practice Guidance advises that the 'suitable' test should not seek to create local policy in its own right, but defer to national and up-to-date regional policy tests.
- 10.5. In Bradford's case it has been clear at the outset that given the scale of housing need in the district and given the limited supply of land already identified and with a planning allocation or permission that it would not be feasible to use local planning and environmental policy designations to screen sites out or classify them as unsuitable. If this has been done the whole SHLAA exercise would only have to have been repeated with the policy assumptions changed thus causing wasted time and resources.
- 10.6. The end result of the suitability test is to classify each site as either:
- Suitable now;

- Potentially suitable (local policy constraints),
- Potentially suitable (physical constraints), or
- Unsuitable (not currently suitable).

10.7. If a site is found to have both local policy constraints and physical constraints then it has been classified under the local policy constraints category. In such cases the nature of the physical constraints has still been recorded in the comments field of the database, included in the summary tables and taken into account in determining the overall developability of the site.

10.8. Tables 8 and 9 below indicate broadly how the tests have been applied to determine the site's suitability category and the criteria used.

Table 8: Broad Suitability Rules

Suitability Category	Guidelines
Suitable Now	<ul style="list-style-type: none"> • All sites allocated for housing development within the RUDP; • Sites which are not affected by any of the defined strategic / national policy constraints and do not have significant physical constraints;
Potentially Suitable (Policy Constraints)	<ul style="list-style-type: none"> • Sites affected by the 'local' policy constraints included in table 9;
Potentially Suitable (Physical Constraints)	<ul style="list-style-type: none"> • Sites which are affected by physical constraints on their development such as the need to provide access improvement and other infrastructure, or overcome difficult ground conditions, contamination etc
Unsuitable	<ul style="list-style-type: none"> • Sites where national or international policy designations and or the application of the criteria in table 9 would normally rule out any prospect of development.

10.9. Therefore although the first SHLAA test is called a 'suitability test' a favourable suitability assessment in the SHLAA does not imply a site will be considered suitable for allocation in the LDF. This is in effect a tool to narrow down the range of sites which subsequent stages of the SHLAA and then in due course the LDF have to select from.

10.10. By adopting the range of suitability categories identified above this SHLAA report and the data tables within it are able to make clear how much of the identified potential land supply could be affected by such current or potential local policy constraints. This enables figures to be aggregated or disaggregated in whatever way is considered appropriate and will allow officers, local members, local communities and LDF Inspectors to consider both 'policy on' and 'policy off' scenarios when reaching conclusions on whether there is an adequate supply of housing land. This approach is similar to the ones adopted in a number of other local authority SHLAA's including Calderdale and Sheffield / Rotherham.

Table 9: Criteria Used in the Suitability Test

1. Criteria Which Would Result In A Site Being categorised as ‘Unsuitable’	
Green Belt	But <u>only</u> classified as unsuitable where : <ul style="list-style-type: none"> • The site is not adjacent and contiguous to the built up area; and or • Could not reasonably form an acceptable urban extension.
Areas of international or national wildlife importance – SSSI’s / SPA’s / SAC’s. Class 1 Archaeological Area	Classified unsuitable <u>except</u> where only a small part of the site falls within the designated area and there is reasonable prospect that mitigation measures could make development acceptable.
Sites within the Environment Agency defined Flood Zone 3b – the functional flood plain.	Classified unsuitable <u>except</u> where only a small part of the site falls within the designated area and there is reasonable prospect that mitigation measures could make development acceptable
Sites in proximity to HSE designated major hazard sites or hazardous installations.	Not all sites are considered unsuitable for residential development – it depends on the installation concerned, the level of risk from that installation and the size of the potential development. Application of HSE zones and the carrying out of the HSE PADHI test determines the outcome.
2. Criteria Which Would Result In A Site Being categorised as ‘Suitable Now’	
Sites with an extant planning consent for residential development	
Sites allocated for residential development in the RUDP;	
Sites not affected by national policy designations listed in 1 above or local policy designations as listed in 3 below and not affected by physical constraints as listed in 4 below.	
3. Criteria Which Would Result In A Site Being categorised as ‘Potentially Suitable (Policy Constraints)’	
Green Belt	Where: The site is adjacent / contiguous to the built up area; and / or could reasonably form an acceptable urban extension.
Sites which lie within areas with the following RUDP / other protective designations	Flood zone 3a, Historic Battlefields, Historic Parks and Gardens, Areas of Archaeological Interest, Conservation Areas, Urban Greenspace, Village Greenspace, Playing Fields, Recreation Open Space, TPO’s, SEGI & RIGGS, Bradford Wildlife Areas
Sites designated as safeguarded land	These are sites held in reserve for future plan reviews should the need for land in built up areas exceed supply.
Sites allocated in the RUDP for other i.e. non residential uses	Including employment sites and employment zones, retail sites etc.
4. Criteria Which Would Result In A Site Being categorised as ‘Potentially Suitable (Physical Constraints)’	
Sites with major known physical constraints such as significant road or bridge infrastructure, significant contamination or ground condition problems etc.	
Sites where current environmental conditions for prospective residents would be unacceptable but where there is a reasonable chance that such conditions will change during the study period – for example areas of industry but where major planned change is expected.	

The Availability & Achievability Tests

- 10.11. For this first SHLAA the second part of the assessment was to understand whether a site would be **available** for residential development in the short, medium or longer term and whether development of the site would be **achievable** and if so when development might be able to commence.
- 10.12. The Government's Practice Guidance states that a site is considered **available** for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. Land availability is a complex factor where circumstances can change over short periods and information will never be perfect. As outlined below the study has attempted to gain as much ownership information as possible from a variety of sources including questionnaire surveys and the results and assumptions made have been tested with and agreed with and among the SHLAA Working Group members.
- 10.13. The Government's Practice Guidance states that a site is considered **achievable** for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is said to be a judgment about the economic viability of a site, and the capacity of the developer to complete and sell the housing over a certain period. In line with the Government Practice Guidance the SHLAA Working Group have assessed site achievability based on a range of market, costs and delivery factors. For the Bradford SHLAA the Working Group have agreed that carrying out residual financial appraisals for every site would be impractical because of the large numbers involved and of questionable value because of the value judgments needed to set appraisal assumptions & inputs.
- 10.14. A more specific outline of the broad assumptions made by the Working group in assessing and categorising the availability and achievability of SHLAA sites is now outlined below.
- 10.15. The SHLAA's analysis of sites was based on a number of factors likely to affect the deliverability of future development, not least owner intentions, planning history, physical development constraints and the locality of sites across the District and prevailing market conditions.
- 10.16. Given the element of subjectivity of this part of the assessment, assumptions regarding when a site would be able to deliver new dwellings and thus where a site should be placed in the 17 year trajectory, were based on the twin principles of obtaining as much information as possible to inform this decision and of consultation, agreement and sharing of views among Working group members.
- 10.17. The 2 tests of availability and achievability were treated as being closely linked and as a consequence, there was no automatic assumption made to rank *achievability* on the basis of *availability* alone without factoring in other known information about the site and the local market. This included data submitted by land owners and their agents as part of the call for sites process, known information about the site/building from its planning history and the surveyors' notes following the site survey. To help further inform site availability a pilot batch of sites were sent to the land registry, who provided details of ownerships on sites considered to be *suitable now* and these persons were contacted to ascertain any future proposals for the land/buildings in question. The process was not repeated for the remaining sites as a direct result of a number of factors including the length of time involved in receiving and processing sometimes quite complex information, the unreliability of the results and the poor response rate from owners contacted.
- 10.18. The availability test results in sites being placed into one of the following five categorisations

- Available Years 1-6 (Short term)
- Available Years 7-12 (Medium Term)
- Available Years 13-17 (Long term)
- Uncertain
- Unavailable

- 10.19. As a basic principle, sites identified as *Suitable Now* could come forward in the shortest period of the trajectory. In many cases this result will also suggest that a site is shown as being deliverable in the achievability result. This includes; sites where planning permission has been granted* and where there is a strong likelihood that development will proceed, sites where there was information was available to suggest that a landowner was in the process of marketing the property and sites already in the planning system, including housing sites in the RUDP which could come forward at any time. This does not always rule out sites identified through other means appearing in the shortest period of the trajectory such as previously developed sites, where there was a view that the site could be brought forward for development in the shortest time period. In all cases the results have been based on a balanced view of the information known about each site, which all have very individual circumstances.
- 10.20. **In the City Centre, the view was taken that most permissions granted during the past few years for apartment style residential units would not be delivered given the weak market during the life of the permission. As a consequence it was agreed that these sites would remain in the SHLAA but be afforded a forecasted yield and appear in the middle period of the trajectory until there was further evidence that the local market had improved.*
- 10.21. Sites identified in the suitability test as being Potentially Suitable with local policy constraints (or physical constraints) cannot generally be defined as being available and deliverable before the middle period of the trajectory without a policy change being made through the LDF process. Sites also ranked as being available from the middle period include sites where information is more limited such as having a current alternative use or other constraint of information about a site might be more limited including owners intentions. Additional constraints such as physical, local or market constraints and an opinion on the need to introduce significant infrastructure to allow a site to be developed have also influenced the positioning of a site in the trajectory in either the middle or latter parts of the trajectory. Where limited information is available on a site at present or where a landowner has indicated that the site will not be available for residential development because of other use, no units have been applied into the trajectory at present. As further information becomes available these sites may come back in as developable sites in future SHLAA updates and consequently have not been ruled out as having longer term potential.
- 10.22. As set out earlier the availability and achievability tests are intrinsically linked to Suitability in the positioning of a site in the trajectory. *Deliverable* generally applies to sites with reasonable certainty of delivery in the short term with no issues such as land ownership or conflicts with development plan policies which need resolving constraints allowing the site to prevent the site being developed in the short term. *Developable* acknowledges sites with some constraints such as market, topography or access issues but with the expectation that these can be overcome straight away. *Not currently developable* applies to those sites which have specific longer term constraints which may affect the viability of the site or sites which require major off site infrastructure or physical regeneration. In this case units will not be placed in the trajectory until these issues are resolved. Unachievable are those sites not considered to be resolvable are not meeting the requirements of the first SHLAA.
- 10.23. In placing figures into the trajectory, a consensus was agreed with the Working Group regarding the speed of delivery expected in bringing residential units forward to the market. For sites

yielding less than 150 units an average build rate of 20 units per year, rising to 30 units per year for larger sites has been applied for sites considered deliverable and thus in the early part of the trajectory, given the present weak market. After year 7 this would rise to either 30 units a year or 40 depending on site size as above.

- 10.24. Assumptions on when units would be built - lead times are set out below. These are based on planning consents and site size and account for the scale of work involved in site preparation before units can be delivered to the market;

Table 10: Lead Times For Trajectory Placement

		1st Trajectory Year
Full planning consent	Sites of less than 50 units	Year 3
Full planning consent	Sites of more than 50 units	Year 4
Outline planning consent	Sites of less than 50 units	Year 3 at 50% normal build rate
Outline planning consent	Sites of more than 50 units	Year 4 at 50% normal build rate
No current consent	Sites of less than 50 units	Year 4
No current consent	Sites of more than 50 units	Year 5

- 10.25. These delivery rates and build rates for new homes are much lower than those used by other Local Authorities in their SHLAA's and result in much lower figures in the early to middle period of the trajectory than would be generally anticipated. The reason for the applied low rates is to afford some realism to SHLAA on the basis of an ongoing weak market and consistently low delivery of new homes in the District for a number of years. The degree to whether low rates of delivery are still continuing will be reviewed by the Annual Monitoring Report and the assumptions either retained or revised on the basis of new information for the SHLAA update.

Overcoming Constraints

- 10.26. Where constraints were identified these were recorded in the database along with a description of the constraints, and their likely impact on developability. Assessments attempted to use the best information available, given the generic and strategic nature of the study to assess what action was required to overcome them, the type of action required and whether this could be achieved in the time period covered by the Core Strategy. The views of the Working Group were important in assembling this information.
- 10.27. As the work on the LDF progresses and the SHLAA is updated it is intended that where necessary further and more detailed information will be sought regarding constraints in relation to a number of the identified sites.

11. Reviewing the SHLAA Results

- 11.1. Stage 8 of the SHLAA involves reviewing the results of the site appraisals so that the housing potential of all sites is combined to give a district wide picture of potential supply. The two aspects which need analysing are the overall scale of supply in relation to the likely scale of housing need in the LDF and the nature of the supply, in particular timing issues - how much housing can be delivered and when. The results of this review will determine what further work the SHLAA needs to undertake as part of stages 9 and 10 or alternatively provide indications of actions for future SHLAA updates.
- 11.2. The LDF Core Strategy Further Engagement Draft is currently being compiled and subject to member approval will be published for consultation and engagement in the period up to the end of January 2012. One of the tasks of that Core Strategy is to set a target for housing delivery and therefore indicate the scale of land supply which needs to be identified in the LDF. It also needs to set out spatial and strategic objectives and policies which will deliver a sustainable pattern of growth within the district. At the time of writing it is expected that the proposed housing target is likely to be in the order of 45-48,000 new homes (the two figures varying according to whether an allowance is made for windfall development in the final 5 years of the plan period). This figure will be reviewed based on the consultation feedback and any further evidence obtained over the next year.
- 11.3. Ideally the SHLAA will have identified sufficient developable sites to meet at least the first 10 years of the LDF plan period and preferably the full 15 years. Given that some of the sites which are considered developable within the limited confines of the SHLAA may actually be affected by local planning policy constraints and local environmental designations, Bradford's SHLAA should ideally be aiming to identify an even greater supply of sites i.e. beyond the 10 / 15 years targets since this will allow for a genuine choice of sites which represents the best strategic and 'sustainable' fit and which avoids development within locally sensitive or valued locations and minimises any release of green belt.
- 11.4. Table 11 below gives a broad overview of extent, type and timing of land supply within the SHLAA. More detailed district wide data is included in the tables at the end of this section. These tables and data indicate a number of significant issues.
- 11.5. Firstly over half of the capacity in the SHLAA falls within the category of 'local policy constraints'. This does not by any means mean that all of these sites cannot be allocated for development in the LDF. For example some of the local policy considerations such designations would impact on the form and design of any development but would not rule out development in principle. Also in some occasions the impacts on these areas may be capable of being mitigated, for example development on areas of open space could fund improvements to other areas of open space or help provide new play facilities.
- 11.6. Secondly more than half of the deliverable and developable land supply is green field in nature. Further work is being already being undertaken as part of the SHLAA update and of work on the LDF to identify more brown field opportunities so that the final Core strategy can set as challenging a target for development on previously developed land as possible without adversely affecting the delivery of the new homes required.
- 11.7. Thirdly, perhaps unsurprisingly, the land supply in terms of its developability is heavily skewed towards the middle and latter parts of the trajectory period. This is not surprising firstly because

of the current weak market conditions which will not support higher rates of site implementation until conditions improve, and secondly because the amount of new land not currently with planning approval which needs to be identified in order to meet need over the LDF period. This in effect created an artificial ‘surge’ in the SHLAA trajectory at the start of the middle phase. Thus it should be noted that the precise pattern of delivery set out in the SHLAA trajectory will not necessarily be fully reflective of final delivery or of the LDF Core Strategy trajectory for the simple reason that there are so many sites within the SHLAA for which the timing of their release, should they be allocated, is dependent on LDF allocation policies and the approach to the phased release of sites. The phased release of sites will be necessary in order to ensure both that PDL targets are met and that development land is released in sync with the delivery of required community facilities and infrastructure.

Table 11: SHLAA Land Supply Overview (Based on Mid Point Yields)

	Yield	
Suitable Now	16640	38%
Potentially Suitable Policy Constraints)	25514	58%
Potentially Suitable (Physical Constraints)	1897	4%
Total	44051	100%

	Yield	
Short Term	7267	16%
Medium term	21194.5	48%
Long Term	15590	35%
	44051	100%

	Yield	
PDL	11678	27%
Green Field	25579	58%
Mixed	6794	15%
	44051	100%

- 11.8. Table 11 below indicates the extent to which the SHLAA supply meets the district’s housing requirements based on different assumptions relating both on the required housing target and whether actual yields will end up being towards the bottom, middle or upper end of the SHLAA projections. The table includes a range of possible housing targets both below and above the current suggested target within the Core Strategy Further Engagement Draft. Four of the possible included targets are based targets within the current RSS having taken into account the additional homes which need to be delivered as a result of under delivery against the targets in place for the years 2004-11. Some of the targets include an additional element to give flexibility and choice in site selection. The inclusion of these RSS based targets and flexibilities in no way represents Council policy or is indicative of what officers consider the LDF Core strategy should contain. It is added merely to illustrate the affects of varying the initial assumptions.
- 11.9. Table 12 shows how sensitive the outcomes are depending on what assumptions are made about the required housing target. It is therefore clear that there is a need for further sustainable sources of land supply, particularly previously developed land and land in sustainable locations which is not currently protected in the development plan for environmental reasons.

Table 12: Sensitivity of Land Supply Adequacy of Differing Assumptions

Requirement Target		Total District Wide SHLAA Yield*		
		Low	Mid	Upper
Core Strategy Proposed Target to 2028	45,500	37202	44051	50901
10 Year RSS Based Supply (to 2023)	37,141	37202	44051	50901
10 Year RSS Based Supply + 20% Flexibility	44,569	37202	44051	50901
15 Year RSS Based Supply	50,641	37202	44051	50901
15 Year RSS Based Supply + 20% Flexibility	60,769	37202	44051	50901

Key

	Indicates SHLAA land supply comfortable in excess of the relevant housing target.
	Indicates SHLAA land supply approximate to the relevant housing target.
	Indicates SHLAA land supply significantly lower that the relevant housing target.

Table Notes

RSS Target for 2004-8 (1560x4) = 6240
 RSS target for 2004-11 = 6240 + 8100 = 14340
 Cumulative net completions 2004-2011 = 9,599
 Residual Unmet Delivery up to 2011 = 14340-9599 = 4741

RSS Target for 2008-11 (2700 x 3) = 8100

- 11.10. The Government Practice Guidance document indicates that if it is concluded that insufficient sites have been identified then there are a number of options open to the SHLAA working group. These include assessing the housing potential of broad locations and determining the housing potential of windfall. These two sources are thus assessed in turn in the next sections of the report. The likelihood of needing to include such sites, or windfalls and broad locations may be greater in Bradford's case due to the size of the housing and the massive increase in land supply required compared to the previous plan periods.
- 11.11. However an alternative to assessing these two sources is to consider as part of the SHLAA update whether there are any further sites which could be identified and appraised. These may have emerged during the course of the previous stages via new planning permissions granted, further pressure sites submitted to the Council, from master planning work which has advanced since the start of the study or from newly emerging local authority surplus land. New brown field sites may also have been identified during this intervening period. This is the preferred approach of the SHLAA Working Group at this stage.

Table 14: District Wide SHLAA Results – Phasing and Green Field / PDL Split

	‘Deliverable Sites’			‘Developable Sites’								
	SHORT TERM Years 1-6			MEDIUM TERM Years 7-12			LONG TERM Years 13-17			TOTAL		
	Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point
District Wide Trajectory Total	6922	7612	7267	18007.5	24381.5	21194.5	8498.5	11746.5	10122.5	33428	43740	38584
Green Field	2215	2482	2349	7224.5	10524.5	8874.5	410.5	1410.5	910.5	19841	25219	22530
Mixed	783	875	829	1926	2466	2196	1419	1557	1488	4128	4898	4513
PDL	3924	4255	4090	4782	7466	6124	753	1902	1328	9459	13623	11541
PDL Consolidated*	4316	4693	4505	5745	8699	7222	1463	2681	2072	11523	16071	13800.5
PDL %	62.3	61.6	62	31.9	35.7	34.1	17.2	22.8	20.4	34.5	36.7	35.8
District Wide Residual Supply*										3774	7161	5467.5
Residual – GF										2180	3918	3049
Residual – Mixed										1527	3035	2281
Residual PDL										67	208	137
District Wide Capacity Total										37202	50901	44051.5

Table 15: District Wide SHLAA Results – Phasing and Suitability Category

		‘Deliverable Sites’			‘Developable Sites’								
		SHORT TERM Years 1-6			MEDIUM TERM Years 7-12			LONG TERM Years 13-17			TOTAL		
		Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point	Lower Forecast	Upper Forecast	Mid Point
District Wide Trajectory Total		6922	7612	7267	18007.5	24381.5	21194.5	8498.5	11746.5	10122.5	33428	43740	38584
	Suitable Now	5983	6583	6283	7224.5	10524.5	8874.5	410.5	1410.5	910.5	13618	18518	16068
	Potentially Suitable (Policy Constraints)	902	984	943	10444	13419	11932	7318	9371	8344.5	18664	23774	21219
	Green Belt	202	219	211	5050	6413	5732	4508	5552	5030	9760	12184	10972
	Other	700	765	732	5394	7006	6200	2810	3819	3314	9903	11590	10247
	Potentially Suitable (Physical Constraints)	37	45	41	339	438	389	770	965	867.5	1146	1448	1297
Residual Supply*													
District Wide Residual Supply Total											3774	7161	5467.5
	Potentially Suitable (Policy Constraints)										2918	5673	4295
	Green Belt										1217	2445	1831
	Other										1701	3228	2464
	Potentially Suitable (Physical Constraints)										455	744	600
District Wide Capacity Total											37202	50901	44051.5

Table Notes

<i>District Wide Trajectory Total</i>	- the total capacity from deliverable and developable which is expected to come forward within the 17 year period
<i>*District Wide Mixed</i>	- these are sites which are part PDL and part green field.
<i>PDL Consolidated</i>	- a revised PDF total capacity and revised PDL % on assumption that all mixed sites are assigned a 50-50 greenfield / PDL split
<i>PDL Percentage</i>	- this is based on the consolidated PDL figure
<i>*Residual supply</i>	- sites expected to start within the period but be completed afterwards. The residual supply is the remaining capacity of a site not accounted for within the trajectory period.
<i>District Wide Capacity Total</i>	- the sum of the trajectory total and the residual unassigned supply. It gives a truer picture of the total capacity of deliverable and developable sites.

12. IDENTIFYING AND ASSESSING THE HOUSING POTENTIAL OF BROAD LOCATIONS

- 12.1. The Government's Practice Guidance states that broad locations are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. Examples of broad locations include:
- Within and adjoining settlements – for example, areas where housing development is or could be encouraged, and small extensions to settlements; and
 - Outside settlements – for example, major urban extensions, growth points, growth areas, new free-standing settlements and eco-towns. The need to explore these will usually be signalled by the Regional Spatial Strategy.
- 12.2. As has been explained earlier in this report, there is currently no proposal within the RSS for such new settlements and the Council are in the process of producing with local communities and stakeholders, a number of master plans and neighbourhood plans which are identifying specific development site opportunities. Such new potential sites will be capable of being included in future updates of the SHLAA. It is not therefore considered appropriate to include any assumptions in this first SHLAA.

ASSESSING THE HOUSING POTENTIAL OF WINDFALLS

13. Assessing the Housing Potential of Windfalls

- 13.1. PPS3 Housing states that allowances for windfalls (sites not specifically identified as available) should not be included in the first 10 years of land supply unless there is evidence of genuine local circumstances that prevent specific sites being identified. The assessment at stage 8 of the SHLAA has indicated that there cannot be complete certainty that the SHLAA has as yet identified a sufficient supply of land for housing development, particularly if the assumption that not all the sites may end up as being suitable as LDF allocations is accepted.
- 13.2. While it is not considered appropriate within this SHLAA and this point in time to make a final judgement as to the inclusion or exclusion of windfall in the land supply it is important to present the data - for information purposes only – of recent patterns of delivery on windfall sites. This is included in table 15 below.

Table 15: Dwellings from Windfall Sites 2004-11

Monitoring Year	No of Dwellings On Windfall Sites	Total No of Dwellings Completed (gross)	% of Total Completions on Windfall Sites	% of Windfall Completions on PDL
2004/5	991	1390	71%	90%
2005/6	969	1382	70%	95%
2006/7	963	1598	60%	98%
2007/8	1677	2230	75%	96%
2008/9	1346	1580	85%	96%
2009/10	1174	1360	86%	97%
2010/11	698	819	85%	96%

Source : Bradford Council AMR's 2005-2011

- 13.3. Table 13 shows that historically windfalls have made a significant contribution to housing provision in Bradford. Whilst it is acknowledged that the identification of sites in the SHLAA process will preclude these sites from being classed as windfalls in the future, the contribution of windfalls to the delivery of housing is expected to continue. For example, sites below the study threshold will come forward and this is confirmed by a number of such sites being put forward by land owners in response to the 'Call for Sites' exercise and urban capacity and SHLAA survey sites also below the site size threshold. Some sites currently in employment use are also likely to continue to come forward for development as their current use ends. Following the publication of this first SHLAA, windfall will continue to be monitored as part of the AMR process and it will be possible to see whether windfall contributions are being maintained or are reducing as a result of the identification of more of these sites through the LDF and SHLAA processes.

14. Conclusions

- 14.1. This SHLAA Assessment has been undertaken in accordance with the CLG Government Practice Guidance and has indicated a pool of sites to draw on when making development plan allocations in the relevant LDF documents.
- 14.2. The capacity of the sites within the SHLAA is roughly equivalent to the likely level of the housing requirement for the district as set out in the Core Strategy Further Engagement Draft. However this only gives part of the picture. Due to the scale of housing need the SHLAA has had to take an approach which can be characterised as 'national planning policy on and local planning policy off'. This means that there is a degree of uncertainty about whether some of the sites within the study will be found to be appropriate for allocation within the LDF once a full planning assessment of the sites is carried out as part of the production of the Allocations, Shipley & Canal Road and Bradford City Centre DPD's.
- 14.3. The Assessment has also demonstrated that the Council does not have a 5-year supply of deliverable housing land.
- 14.4. Work on the update of the SHLAA to an April 2011 base date is already underway. There are a substantial batch of new sites to be appraised on top of an update and rolling forward of the data on existing sites.
- 14.5. As explained in the Disclaimer at the start of this report the SHLAA remains a technical exercise exploring the potential scale of housing land supply in the district and as such is just one part of the evidence base being prepared to underpin the LDF. Sites identified in the Assessment do not necessarily have any planning status and applications for planning permission will be considered against the Replacement Unitary Development Plan and any other material considerations.

APPENDICES