



# **Strategic Housing Land Availability Assessment**

## **Second Interim Report**

This version updates and supersedes the November 2020 Interim SHLAA

**April 2021**

## Contents

1	Introduction .....	3
	Introduction to the SHLAA .....	3
	Scope of the Second Interim Report.....	3
	National guidance and primary purposes of SHLAA .....	3
	SHLAA methodology .....	4
2	Stage 1: Site/ Broad Location identification .....	6
	Assessment area and site size.....	6
	Desktop review of existing information.....	6
	Total sites considered .....	7
3	Stage 2: Site assessment .....	7
	Primary constraints.....	8
	Secondary constraints.....	8
	Site Specific Constraints.....	8
	Scope and limitations of assessment.....	8
	Estimating development capacity.....	9
4	Summary of interim observations .....	10
5	Next stages.....	10
	Further site investigation.....	10
	Additional site search.....	11
	Assessing availability.....	11
	Assessing achievability including viability.....	11
	Considering windfall allowance in line with national guidance.....	12
	Sites Schedule: See separate document .....	12

# 1 Introduction

## Introduction to the SHLAA

- 1.1 The Strategic Housing Land Availability Assessment (SHLAA) is used to support the plan making process by providing an understanding of the characteristics of residential land supply and opportunities available within North Somerset to meet the housing requirement. The approach ensures that all potential land supply options are assessed together to help inform which sites are potentially the most suitable and deliverable taking into account constraints and other factors that influence delivery. The SHLAA is being prepared alongside the emerging North Somerset Local Plan 2038, and will contribute to the information to enable the identification of sites and locations that are most suitable for the level of development required.
- 1.2 The SHLAA is an evidence source providing an overall assessment of housing potential including detailed appraisal of specific sites. It is not part of the development plan and does not in itself allocate sites. The identification of a particular site does not imply that there is a presumption in favour of any development proposal, or that planning permission will be granted or refused should an application be submitted. The status of a site may change over time. In all cases the Council will exercise its statutory duties in relation to the consideration and determination of planning applications. It is important to note that not all of the sites that go on to be identified as having suitable potential will necessarily be consistent with the eventual local plan spatial strategy.

## Scope of the Second Interim Report

- 1.3 The SHLAA is being prepared to support the preparation of the North Somerset Local Plan 2038. An Interim Report was published in November 2020 alongside the North Somerset Local Plan 2038 'Choices for the Future' Consultation<sup>1</sup>. This Second Interim Report updates and supersedes that initial SHLAA document by including further sites, and additional analysis of sites against constraints. Further site assessment will be carried out once a preferred spatial strategy and broad locations are identified. The full SHLAA documentation is anticipated to be published at Local Plan Regulation 18 Consultation Draft stage.
- 1.4 This SHLAA covers a large part of the Stage 2 of the methodology which relates to site/broad location assessment (see page 5 for methodology diagram), although further work will still be required in relation to the investigation of additional relevant aspects e.g. transport implications of specific sites, overcoming identified constraints and assessing site achievability, availability and deliverability, the scope of which is indicated in the Next Stages at the end of the report.

## National guidance and primary purposes of SHLAA

- 1.5 National planning advice encourages local planning authorities to prepare a SHLAA as a key part of their evidence base when preparing a local plan. Government advice as set out in the National Planning Policy Framework (2019) states that:

*'Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land*

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<sup>1</sup> Consultation ran from 2 November 2020 to 14 December 2020.

*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)

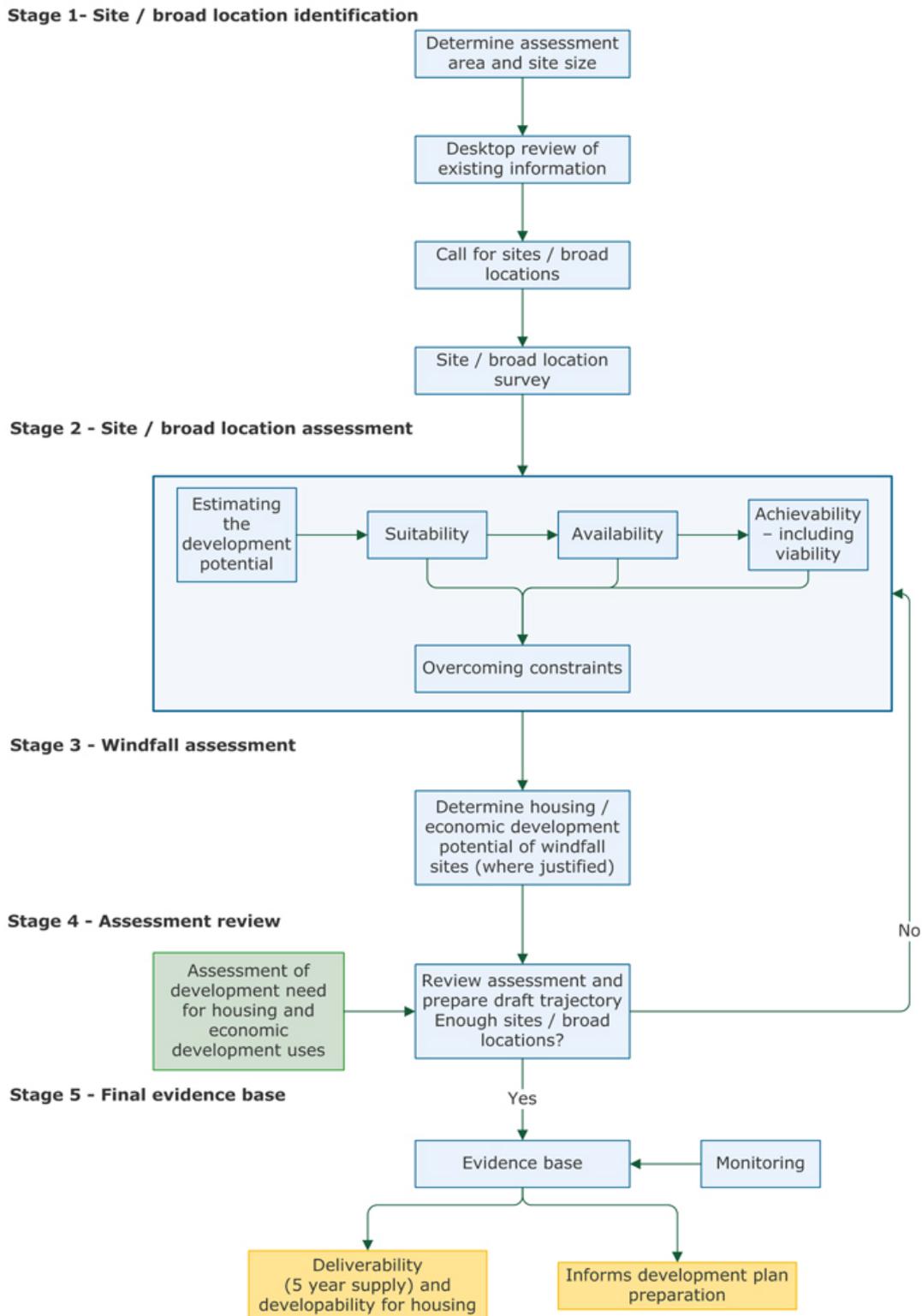
1.6 The primary purposes of the SHLAA are to:

- Identify sites with potential for housing.
- Assess their suitability for housing and development potential.
- Assess the likelihood of development coming forward including site availability, achievability and deliverability.

1.7 National guidance is clear to state that ‘the Assessment is an important evidence source to inform plan-making but does not in itself determine whether a site should be allocated for development’ (National Planning Policy Guidance). This will be the role of the new local plan 2038 plan preparation.

#### [SHLAA methodology](#)

1.8 The methodology of the SHLAA will follow the steps set out in the National Planning Practice Guidance. The following diagram taken from the NPPG summarises the stages required:



**Figure 1: SHLAA methodology - NPPG**

1.9 This Second Interim Report addresses elements of Stage 2, particularly the assessment of suitability, initial availability review, and initial, indicative estimates of potential development capacity. Further stages of the SHLAA will be addressed in line with the preparation of the local plan 2038.

## 2 Stage 1: Site/ Broad Location identification

- 2.1 The November 2020 initial review of land availability provided a source of information which informed the identification of the alternative spatial distribution approaches presented within the Choices consultation document. This included an understanding of an up-to-date range of sites that are being promoted for development and provided a comprehensive range of sites for consideration. This was useful in providing an indication of the potential places and broad capacity where development could be considered. Since that publication, further sites have been submitted to the local plan process particularly in relation to the Choices for the future consultation<sup>2</sup>, and these have now been included in this Second Interim Report.

### Assessment area and site size.

- 2.2 The SHLAA relates to the administrative area of North Somerset.
- 2.3 North Somerset Council is working with the other West of England authorities and West of England Combined Authority (WECA) to seek to secure consistency across SHLAA preparation. This will allow consistency of assumptions, processes and outcomes that can be aggregated if required to support effective plan making.
- 2.4 No site size threshold is included within the SHLAA. It will assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions.

### Desktop review of existing information

- 2.5 The desktop review process has considered sites from various sources for inclusion in the SHLAA. These included:
- Sites previously submitted to the 2017 call for sites,
  - Sites submitted to the Joint Spatial Plan (within North Somerset),
  - Sites submitted to the 2018 Issues and Options, and,
  - Sites submitted to date to the various stages of the Local Plan 2038. At this stage this includes the Pre-commencement stage, and the Challenges and Choices consultations,
  - Sites submitted to the 2020 call for sites, and,
  - Other sites submitted to the new Local Plan 2038 process
- 2.6 In addition, the extant housing allocations in the North Somerset Site Allocations Plan (2018)<sup>3</sup> are also included for review.
- 2.7 At this stage the sites only comprise sites put forward for assessment by landowners, developers, or others with an interest in the local plan. NPPG guidance emphasises the importance of not simply relying on sites that have been put forward by landowners or developers, but to actively identify sites that may assist in meeting the development needs of an area. The process of active identification of sites will

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<sup>2</sup> 15 new sites were added to the SHLAA following submission to the Choices consultation. A further c.29 sites were also submitted to the consultation although were already within the SHLAA being submitted to earlier stages or plan processes.

<sup>3</sup> [North Somerset Site Allocations Plan \(2018\)](#)

commence once a preferred spatial strategy has been agreed and broad locations identified, along with an assessment of other potential sources of supply.

#### Total sites considered

- 2.8 In total, at this stage 370 sites comprising around 4050ha have been identified in this Second Interim SHLAA. As the SHLAA progresses, many of these may be discounted due to suitability factors, including compatibility with the emerging local plan policy, but the remaining sites will provide a pool of opportunities to explore through plan the making process, including informing the identification of alternative site opportunities.
- 2.9 The full schedule of sites considered is set out in the accompanying Sites Schedule. The Site Reference provided in the Schedule corresponds to the site references provided on the [SHLAA Site Mapping](#).
- 2.10 Additional sites identified or submitted through the course of the new Local Plan production will be included in ongoing work on the SHLAA.

### 3 Stage 2: Site assessment

- 3.1 The assessment of suitability has at this stage considered the sites against a series of constraints identified in Table 1 below.

<i>Primary Constraint</i>	<i>Secondary constraint</i>	<i>Site Specific constraints</i>
Site already developed with active use	Green Belt	Heritage features (listed buildings and Conservation Areas)
Flood Zone 3b (SFRA, 2020)	Area of Outstanding Natural Beauty (AONB)	Parks and open spaces
Site of Special Scientific Interest	Designated Local Green Space	Horseshoe Bat Zone A
European Sites (RAMSAR, SAC, SPA)	Flood zone 3a (SFRA, 2020)	Groundwater Source Protection Zone
Ancient Woodland	Areas of Critical Drainage (SFRA, 2020)	Woodland features on site
National Nature Reserve	Horseshoe Bat Juvenile Sustenance Zone	
Local Nature Reserve	Local Wildlife Site	
Scheduled Monument	Priority Habitats	
Registered Park and Gardens	High Grade Agricultural land (Grade 1)	
Regionally Important Geological Sites	Priority habitats	
Working mineral sites		

<i>Primary Constraint</i>	<i>Secondary constraint</i>	<i>Site Specific constraints</i>
Table 1: Constraints/ features considered through the study		

- 3.2 This is to record which constraints affect particular sites and importantly to identify those sites which at this stage should not be considered any further through the plan making process due to the significance of the constraint.

#### Primary constraints

- 3.3 The listed Primary Constraints are considered to rule out any development potential. Sites discounted due to them falling entirely within a Primary Constraint are recorded in the Sites Schedule, and these sites will not be considered any further through ongoing work on the SHLAA.

- 3.4 10 sites are affected by Primary Constraints in their entirety. A further 94 sites are partially affected by these constraints; these sites will be taken forward for further consideration although that part affected will not be considered for development potential.

#### Secondary constraints

- 3.5 For sites not subject to Primary Constraints, or only partially affected, the next step of the assessment is to flag up where sites are wholly or partially affected by one or more of the Secondary Constraints listed in Table 1.

- 3.6 Sites falling within any of these constraints have not been discounted at this stage. It simply highlights which constraints are present on each site and where justification would be required if considering these sites through the preparation of the local plan. The SHLAA does not seek to provide any policy preference to these sites or constraints.

- 3.7 305 (82%) of the sites are identified as being affected by one or more of the Secondary Constraints. The specific constraint applying to individual sites is shown in the Sites Schedule.

- 120 sites affected by Green Belt in whole or part affecting around 1600ha.
- 106 sites affected by flood zone 3a in whole or part affecting around 2120ha.
- 12 sites affected by AONB in whole or part affecting around 24ha.

#### Site Specific Constraints

- 3.8 In addition to the above constraints, this phase of the SHLAA has assessed the sites against a series of other constraints to build up a picture of those factors that may influence a sites potential, and the issues that may need to be overcome in considering any development potential.

- 3.9 This is not an exhaustive list and a range of other constraints will need to be taken into account in due course as specific sites are considered.

#### Scope and limitations of assessment

- 3.10 The Second Interim SHLAA has identified site attributes, features and constraints that would influence development potential. It is not a detailed assessment of all constraints that may affect a site and indeed upon further assessment, there may be constraints that lead to site being discounted.

- 3.11 The SHLAA does not address the wider sustainability of sites either individually or collectively as this is a role for plan making and sustainability appraisal.
- 3.12 The SHLAA will consider each site on its merits and makes no assumption as to the combination of potential sites that may come forward. Further evaluation of the cumulative impact/constraints across a combination of sites should be considered once a preferred spatial strategy and broad locations are identified through the plan making process.

[Estimating development capacity](#)

- 3.13 At this stage of the process it is useful to understand the potential dwelling capacity of sites including to inform the estimation of broad capacities/location opportunities to inform the spatial strategy consideration.
- 3.14 Density multipliers have been used to provide a consistent Benchmark Dwelling Capacity (BDC) across all sites. Table 2 sets out the assumptions used to generate the BDC. This provides an indicative capacity only as the methodology cannot entirely factor in the nuances of a given site which would need to be undertaken if the site was to be considered for allocation. The approach differentiates between dwelling yield on smaller sites where the net residential area to gross site area ratio will generally be higher, and larger sites where the addition of other non-residential uses will reduce the ratio. For the largest sites, a working assumption is to assume 40 dph average across 50% of the gross site area, however dwelling capacities will be refined as the local plan progresses, and sites are examined in greater detail.

Site size (ha)	Net Residential Area assumed as a percentage of gross site area	Density
0-0.39	100%	40
0.4 to 1.99	90%	
2 to 9.99	75%	
10+	50%	
<b>BDC = (Site area x NRA) x average density</b>		
Table 2: Dwelling yield assumptions		

- 3.15 Where available, for sites submitted to the recent call for sites in 2020, the dwelling capacity provided has been referenced within the Sites Schedule to provide a comparison.
- 3.16 The dwelling capacity estimated for each site also assumes the provision of dwellings on the site is being maximised. It may be that alternative solutions to the site's development are preferred such as the provision of employment on the site. Some allowance for this is made on the larger sites, but on smaller sites, this is assumed to be undertaken at plan-making stage and the dwelling capacities may be altered

accordingly. Development briefs and/or masterplanning processes could be utilised to explore and test alternative site approaches.

## 4 Summary of interim observations

4.1 The following interim conclusions can be drawn from the SHLAA work undertaken to date:

- A large number of sites have been considered covering a wide range of site types including large strategic sites, urban locations and smaller green field opportunities.
- 10 sites have been discounted because they were wholly in conflict with the Primary Constraints accounting for around 42ha. Where this is the case, the constraint in question is identified on the Sites Schedule.
- 94 sites are partially affected by Primary Constraints and these were taken forward for further consideration. However the part affected by the Primary Constraint will be discounted from the dwelling potential in order that the dwelling estimation only relates to the part not affected.
- 48 sites are entirely unaffected by primary or secondary constraints accounting for around 75ha of land. From this, using the indicative dwelling capacities as a basis, around 2,350 dwellings are indicated on this land, although not all of these sites would necessarily be in conformity with the identified spatial strategy. Conversely, many of the sites falling within the category of sites subject to Secondary Constraint may only have a small part affected that could readily be addressed.
- Once sites discounted due to Primary Constraints are removed, 306 sites covering around 3,900 ha were highlighted as being affected in whole or in part by secondary constraints. Further work will be needed to understand to what extent these constraints can be mitigated, and what scope there is on the unaffected part to explore potential opportunities as the plan-making process progresses.
- Overall, once the sites affected by the Primary Constraints are removed, the SHLAA indicates a wide range of potential opportunities that have informed the consideration of spatial strategy approaches, and that can be drawn upon when considering specific broad locations and sites for consideration in the local plan. However, whilst the SHLAA indicates a large potential dwelling capacity, it is not appropriate to simply sum all potential supply as not all sites would be appropriate for inclusion in the plan, depending upon further investigation, and compatibility with the plan's preferred spatial strategy, once identified.

## 5 Next stages

### Further site investigation

5.1 The SHLAA is being prepared alongside the North Somerset Local Plan. The initial assessment work undertaken to date is intended to provide a clear starting point for the next stages of plan preparation where the focus will shift to the assessment of the identified broad locations and detailed sites.

5.2 The clarification of the spatial strategy and broad locations will provide the framework for focussing the next stage of the SHLAA and more detailed site assessment. This

will identify a range of potential opportunities at each place for further investigation. It will also by implication identify a range of sites which are inconsistent with the spatial strategy and will be discounted on that basis unless they form reasonable alternatives in conformity with the spatial strategy.

5.3 Whilst the scope of this more detailed site investigation stage will remain under review, this phase is anticipated to consider:

- Further assessment of other site constraints including transport,
- Implications of the constraints identified and potential mitigations where appropriate to overcome them.
- Investigation of delivery prospects including phasing and indicative trajectories, particularly at larger scale strategic locations.
- Review of the Benchmark Dwelling Capacity and any dwelling capacities proposed in the light of further information and indicative site delivery performance.
- Further in-depth assessment of achievability and availability.

#### Additional site search

5.4 In addition to the more detailed appraisal of potential sites identified as being consistent with the spatial strategy, a review of other land opportunities will be undertaken to identify whether there are any gaps such as other opportunities to consider which may then be identified and assessed for inclusion in the full SHLAA.

5.5 The active search will therefore be focussed around the identification of broad locations. In line with national guidance this will include the identification of any land in the local authorities ownership that may be considered through the local plan.

#### Assessing availability

5.6 The general assumption is that a site is considered available for development when, on the best information available, there is confidence that there are no overriding factors such as legal or ownership problems, multiple ownerships, ransom strips, tenancies or operational requirements of landowners which would remove the realistic prospect of the site coming forward.

5.7 A general assumption applied at this stage is that if a site has been submitted for consideration through a call for sites exercise or through a representation to the current local plan process, the site is available within the plan period to 2038. Once alternative sites are identified to deliver the preferred spatial strategy, additional availability assessment will be carried out to ensure the information is up-to-date information.

#### Assessing achievability including viability

5.8 Planning Practice Guidance requires that all policy requirements are set out at the plan making stage and viability tested in order that this can inform the price paid for land. It also confirms that the role for viability assessment is primarily at the plan making stage, and that viability testing is not required to consider each individual site.

5.9 Central to this is the assumption that to be viable, the development of the site should deliver an appropriate return to the landowner whilst achieving policy requirements and aspirations for the development. The balance between development costs and value are critical to this and as such the prospects for viability are likely to be influenced by the location of the site, the demand for property in the area, as well as

any specific costs that could arise through the development e.g. related to site remediation or other 'abnormal' costs.

- 5.10 Viability is going to be related to the identified mitigations/infrastructure to support the plan to which contributions may be sought, particularly from the larger sites and other policy requirements.
- 5.11 Achievability is also about demonstrating a reasonable prospect that sites can be brought forward at a particular point in time. Therefore the additional work indicated above in paragraph 5.3 will assist in demonstrating achievability of specific broad locations and sites.

[Considering windfall allowance in line with national guidance](#)

- 5.12 A review of windfall and particularly urban capacity is being undertaken, and this will inform the final SHLAA document.

[Sites Schedule: See separate document](#)