



Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council

**Strategic Housing Land Availability Assessment
Methodology December 2019**

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Foreword

Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council are preparing a new Joint Local Plan. A key piece of evidence to support the production of the Joint Local Plan is the Strategic Housing Land Availability Assessment (SHLAA) which provides details of sites within the area and assesses whether they have development potential. This methodology has been developed by both councils and will be used to prepare separate consistent SHLAAs for each council. These will then form a key piece of evidence in the production of the Joint Local Plan.

If you would like any further information in relation to the SHLAA or wider Joint Local Plan programme, please find below the contact details for both authorities.

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1. Introduction & Background

Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council have started to prepare a Local Plan in partnership. The Joint Local Plan will identify how much new land is required to supply our communities development needs over the next 15 to 20 years, and in which locations, to help ensure sustainable economic growth is achieved.

The SHLAA aims to provide details of sites in each local authority area which may have the potential to meet the housing needs across the housing market area (HMA), which will be set out in the Joint Strategic Housing Market Assessment (SHMA). This is required by national planning policy.

The primary role of the assessment is firstly to identify sites and broad locations for development and then secondly, to assess whether they are suitable, available and achievable for housing development and the likelihood of potential development sites coming forward. This assessment will inform whether the councils have enough land to meet their future housing needs. Each SHLAA document and subsequent update will therefore provide an important evidence base of the plan area's potential capacity to accommodate new housing and will be used to inform the development of the Joint Local Plan strategy.

Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council are preparing separate SHLAAs, but have worked together to prepare a joint methodology so that there is a robust and consistent approach to this assessment of future land supply across the housing market area (HMA).

This report aims to set out the methodology which will be used to guide the technical assessment of sites to be considered in each council's respective SHLAA.

Policy Context

Planning policies, designations and allocations of land within Newcastle-under-Lyme and Stoke-on-Trent are currently set by the joint Core Spatial Strategy 2006-2026 and the remaining saved policies of the Newcastle-under-Lyme Local Plan 2011 and the Stoke-on-Trent City Plan 2001. All of these existing development plan documents were adopted prior to the publication of the NPPF.

In order to ensure that planning policies for both areas are up to date and are fully compliant with the requirements of the NPPF and the supporting Planning Practice Guidance (PPG), both authorities have resolved¹ to work jointly on a new Local Plan which will cover both Newcastle-under-Lyme and Stoke-on-Trent. As well as setting the broad development strategy for the two areas, this new plan will also contain detailed policies, designations and allocations of land for specific uses such as residential and employment development.

Details for the production of the new Joint Local Plan are available on either of the council websites: [Newcastle Planning Policy Website](#) and [Stoke Planning Policy Website](#).

The SHLAA will be a key evidence document which will inform the development strategy i.e. spatial options and land allocations for new housing development within the new plan.

Purpose of the Assessment

The SHLAA aims to provide details of sites and broad locations within each council area and assess whether they have development potential which will help the councils to proactively plan for those sites to go forward in the Joint Local Plan and help each council to meet its local housing need and therefore the combined housing need across the housing market area. Where appropriate, both councils' respective SHLAAs will also be used to inform a five year supply of housing land for each council.

The primary role of the assessment should therefore identify sites and broad locations of development, assess development potential and assess individual sites in terms of their suitability for development and the likelihood of development coming forward.

The PPG is clear that the SHLAA forms a key component of the evidence to underpin policies in the development plan for housing and economic regeneration, including supporting the delivery of land to meet identified need for these uses.

¹ Resolved at Newcastle-under-Lyme Borough Council Cabinet meeting on 16th October 2013 and Stoke-on-Trent City Council Cabinet meeting on 19th December 2013.

Whilst the SHLAA provides a robust mechanism to help identify a potential future supply of housing land which is suitable, available and achievable, the SHLAA will not itself allocate land for residential use, and sites identified in the SHLAA will not automatically come forward, or be guaranteed planning permission. Likewise, if sites are ruled out through the SHLAA process this does not prevent a planning application being submitted on the site. Any applications for planning permission to develop sites would be considered against the most up to date national and local planning policies, together with all material planning considerations. Any proposals to allocate sites will be subject to extensive consultation in line with the Joint Statement of Community Involvement (Adopted 2015)

Partnership Approach

Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council have developed a joint methodology to guide the preparation of each council's respective SHLAA. This reflects the PPG, which requires the SHLAA assessment to be undertaken on a regular basis working with other planning authorities in the relevant housing market area or functional economic area. Furthermore, there are clear guidelines that recommend that local planning authorities engage with stakeholders from the earliest stages of plan preparation which includes the evidence base in relation to land availability.

As part of fostering a positive and proactive relationship with the development industry, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council undertook targeted consultation with landowners, developers, agents and relevant organisations on a draft version of this methodology paper from 14th October to 4th November 2015. The comments received were considered in preparing the July 2017 methodology document, which set out the parameters used to complete each council's respective SHLAA. Using the Joint Methodology, both Council's published SHLAAs in 2017.

This revised version of the Joint SHLAA methodology looks to add clarity to the process, whilst updating in accordance with updates to National Policy and guidance.

Outputs

To ensure that the outputs of the study are consistent with the PPG each council's SHLAA will deliver the following outputs.

- A list of all sites or broad locations considered, cross-referenced to their locations on maps,
- An assessment of each site or broad location,
- Details of those sites which are considered to be realistic candidates for development (*Residential land supply in years 0-5 (deliverable), 6-10 (developable), 11-15 (developable) and sites currently considered to not to be developable – due to constraints (availability, viability/ suitability – these may be sites where further investigation is required in order to ascertain whether the constraints can be overcome and therefore for the site to become developable)*)
- The potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when,

- An indicative trajectory of anticipated development and consideration of associated risks.

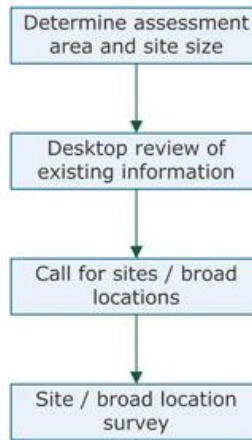
Review

It is anticipated that both councils will update their respective SHLAAs throughout the Local Plan process, to provide the evidence on housing land supply to inform the development of the Joint Local Plan. The SHLAA is subject to periodic review and assessments will be updated accordingly.

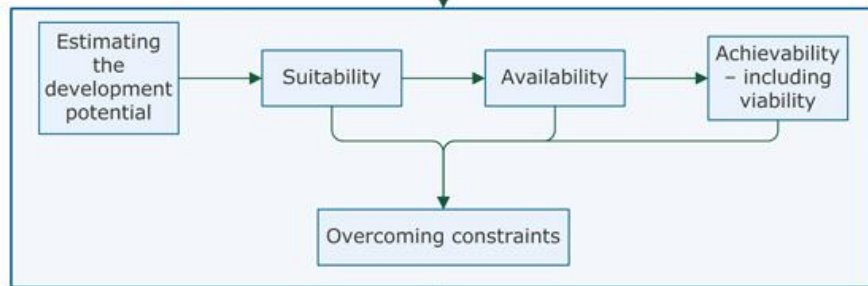
2. Methodology

The methodology has been prepared in accordance with the PPG. This is illustrated in the diagram below.

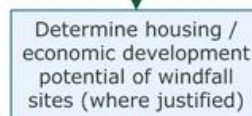
Stage 1 - Site / broad location identification



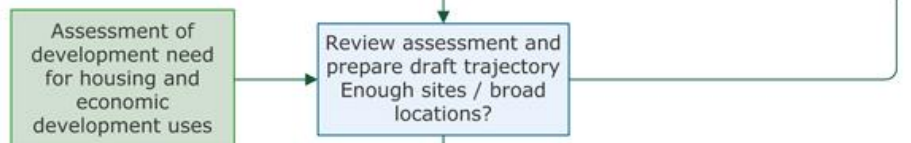
Stage 2 - Site / broad location assessment



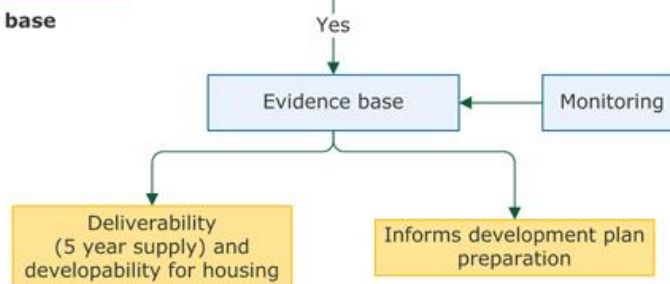
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



Assessment Methodology

Stage 1 – Identification of Sites/ Broad Locations

Determining the Assessment Area & Site Size

The PPG is clear that the geographical area that should be considered as part of the SHLAA assessment should relate to the Housing Market Area (HMA) and Functional Economic Market Area (FEMA). The Newcastle-under-Lyme and Stoke-on-Trent Strategic Housing Market Assessment (SHMA) identifies that the two authorities form a single HMA for the purposes of identifying and meeting housing need and therefore this geographical area forms a robust basis in which to base the respective SHLAA assessments. The two authorities have therefore created a consistent methodology to be used in identifying and assessing the capacity of deliverable and developable housing sites and this will allow a consistent assessment of housing land availability over the housing market area, as required by PPG.

All sites considered in previous SHLAAs have been carried forward in to this assessment. Both councils have also run Call for Sites exercises throughout the Joint Local Plan process to seek submissions of sites to be included in this assessment. Expired planning approvals for residential development have also been considered, as have sites included in other studies such as the Employment Land Review.

Small Sites

Each authority's SHLAA will assess all sites capable of delivering five or more dwellings, in line with the requirements of the PPG. Historically, sites of four dwellings or less have also made a significant contribution to each authority's housing supply, with a significant number of planning permissions for smaller scale schemes coming forward. These are considered in a separate process, as Windfall Sites. Further information on the latest positions is included in the 5 Year Housing Land Supply Statement.

Desktop Review of Existing Data

The PPG requires that plan makers should be proactive in identifying as wide a range as possible of sites and broad locations for development. It further reinforces this by stating that 'plan makers should not simply rely on sites that they have been informed about but actively identify sites through the desktop review process'. The PPG notes that these sites may not always be in suitable locations stating 'sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly'.

Therefore, in considering sites which could form part of each council's housing land supply, a variety of sources will be used to identify sites for assessment. In accordance with the types of sites listed within the PPG, these will primarily include:

- Previously submitted SHLAA sites without planning permission
- Extant planning permissions yet to be completed or implemented
- Expired planning permissions
- Planning applications that have been refused or withdrawn.
- Land in public sector ownership (including Staffordshire County Council land)
- Opportunities in established uses (such as sites identified as surplus to local needs through evidence-base studies including the joint Employment Land Review, Playing Pitch Strategies and Green Space/Open Space Strategies)
- Desktop Review and Officer identified sites (see below).

An Urban Capacity Assessment has been undertaken as a desktop review of sites in accordance with a common methodology using Ordnance Survey mapping, as set out in the PPG. The additional sites study looked at classifications of land in the Ordnance Survey Mastermap that were likely to contain under-utilised land. Officers then went through each parcel to assess if it should be included, discounting where it was already assessed or had no development potential. This ensures that all reasonable alternatives within the urban area have been considered.

A further review was taken around the edge of the settlements using Ordnance Survey in accordance with the PPG.

Call for Sites - Suggesting a Potential Housing Site to the Councils

In order to supplement sites from the above sources, both councils ran a Call for Sites exercise alongside consultation on the various stages of the Joint Local Plan.

This exercise invited all members of the public to submit potential site options to the councils for assessment through the SHLAA process. All contacts on each council's consultation database were contacted as part of this exercise. The sites nominated have subsequently been added to the database and will be considered as part of the assessment. The "Call for Sites" process will remain open and therefore there will continue to be an opportunity to put sites forward at any point. Although the Councils will endeavour to make people aware of when the SHLAA will be finalised. Any sites put forward will be recorded and held in the database until the next SHLAA assessment.

If you would like to suggest a new site for consideration or provide new information on a site already known to either council, please complete a Call for Sites submission form for the site and include a location plan. Further details and a Call for Sites form can be found on each of the respective council websites or in Appendix D of this document. The links to both Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council websites can be found below:

[Newcastle Planning Policy Website](#)

[Stoke-on-Trent Planning Policy](#)

Both Councils undertook further work on the availability of sites in Summer 2019. This included targeting existing sites that required further availability information, through letters requesting updated information from landowners on the availability of their sites for development.

Carrying out the Survey/ Site Assessment

In order to fully assess a site in terms of deliverability and developability, decisions will be based on the most up to date information available at the time of the assessment.

3. Detailed Methodology

Stage 2 – Site/ Broad Location Assessment

Estimating the Development Potential

Below are the proposed assumptions to be used in assessing the development potential of proposed SHLAA sites based on a desktop analysis by officers. These assumptions are intended only as a starting point for estimating capacity and site delivery timescales, and will be superseded by more appropriate site specific information where this is available.

Developable area assumptions

Below are the assumptions to be used where no site specific information is available to guide assessment of the proportion of a site required for associated infrastructure. These assumptions reflect the fact that larger sites may need to provide a portion of land for necessary infrastructure, such as open space and community facilities, which may not be reflected in average density assumptions. Therefore, in the absence of more detailed information, the councils will use the following presumptions as a starting point to determine how much of a site's area could accommodate housing development.

Officers will also consider the sites on an individual basis to determine an appropriate developable area in arriving at a judgement as to the appropriate developable area.

Stoke City Council Developable area			
Site Size (Hectares)	Proportion of site for associated infrastructure	Area of site for housing	
Up to 0.5	5%	95%	
0.5-2	20%	80%	
2+	30%	70%	
Newcastle Council Developable area			
Site Size (Hectares)	Proportion of site for associated infrastructure	Area of site for housing	
Up to 0.5	5%	95%	
0.5-2	15%	85%	
2+	20%	80%	

The tables above contain different developable areas for each authority following an assessment of planning permissions which indicated a different developable area should apply to each area.

Density Assumptions

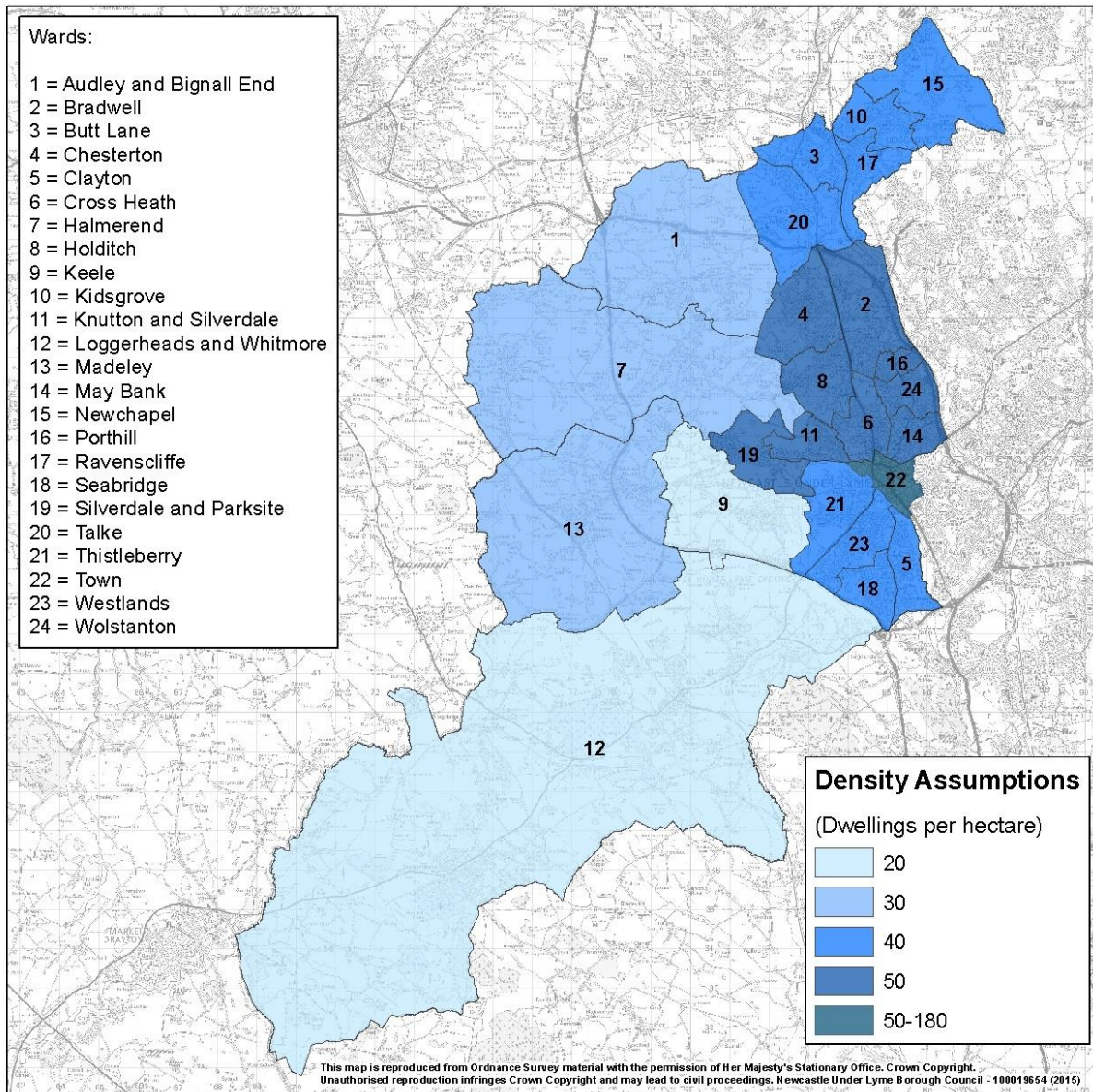
The assumptions to be used to guide assessment of potential capacity per hectare are set out below for each authority. These density assumptions will be used alongside officer judgement on site specific constraints and developable area assumptions to determine site capacity.

The PPG requires that, in the absence of an up-to-date plan policy on density, relevant existing development schemes can be used as a basis for assessment. The councils have therefore determined housing densities using historic data on completed schemes and extant planning permissions of 5 or more dwellings from various sub-areas. This is to ensure that these assumptions are based upon site densities which were deliverable and considered to be suitable in the context of the area. These sub-areas are derived from the joint Strategic Housing Market Assessment.

Officers may also consider factors such as density and character of the immediate area surrounding a site and any other site specific characteristics in arriving at a judgement as to the appropriate site density.

In Newcastle-under-Lyme, Town Ward has been split apart from the rest of the Central area, to ensure the higher density nature of this ward is appropriately considered. This largely reflects completions of apartments within or surrounding the town centre. However, there are also locations within the Town ward where high density apartment developments would not appropriately reflect the character of the surrounding area. In these cases a lower density of 50.d.p.h. will be applied as a starting point to reflect the character of the wider Central sub-market area.

Newcastle-under-Lyme



Areas	Wards	Density Assumptions for the SHLAA (Dwellings per hectare)
Audley and Rural North	Audley and Bignall End and Halmerend wards	30
Central	May Bank, Cross Heath, Wolstanton, Porthill, Bradwell, Chesterton, Holditch, Knutton and Silverdale, Silverdale and Parksite	50

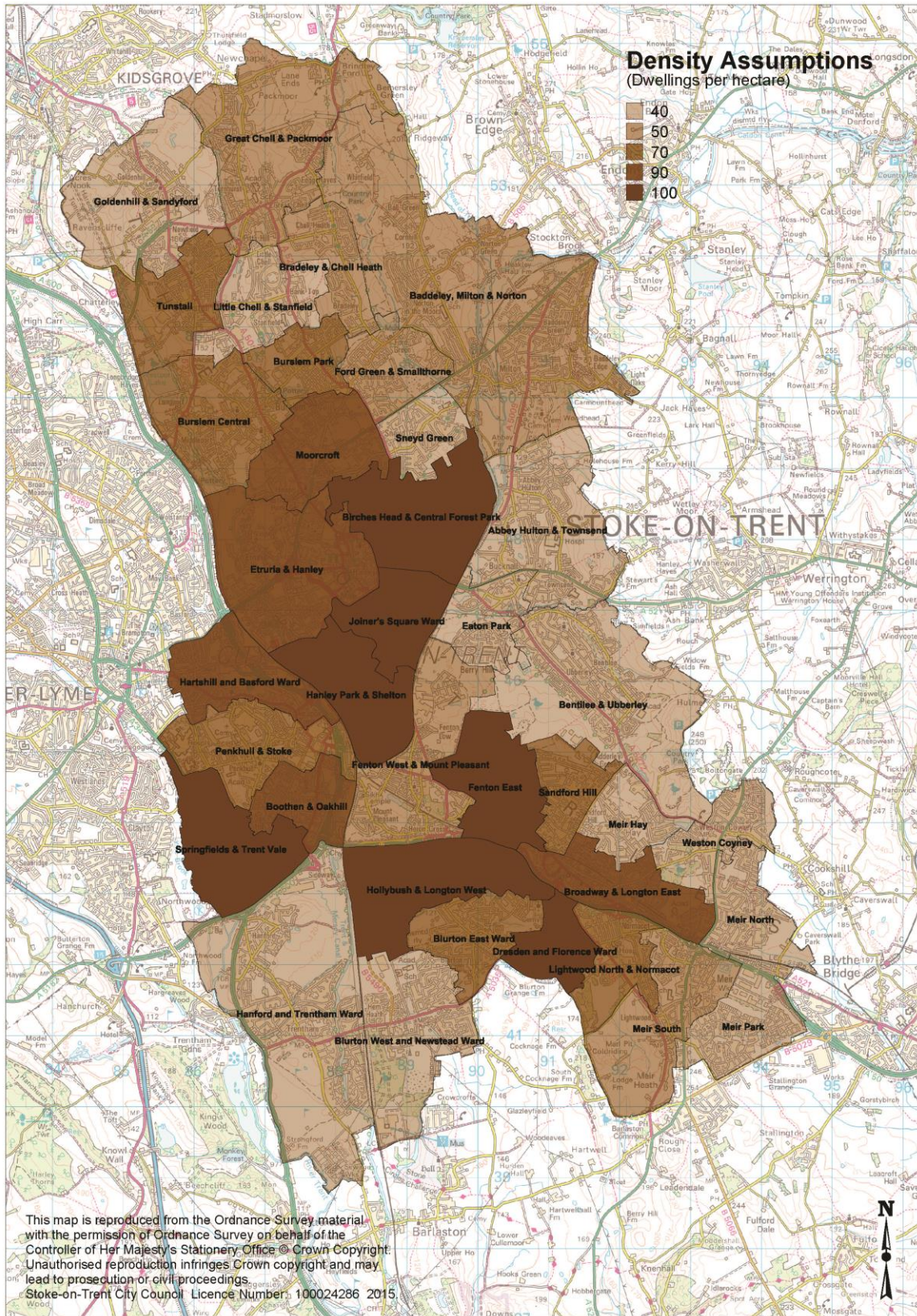
Central	Town Ward	180 dwellings per hectare or 50 dwellings per hectare
Clayton	Clayton, Seabridge, Westlands and Thistleberry Wards	40
Keele	- (Keele Ward):	20
Kidsgrove and Talke	(Talke, Butt Lane, Ravenscliffe, Kidsgrove and Newchapel Wards):	40
Madeley	Madeley Ward	30
Rural South	Loggerheads and Whitmore Ward	20

Stoke-on-Trent

In Stoke-on-Trent density completions and commitments data has been considered for sites of 5 or more dwellings and translated into an average density for each ward. Eaton Park, Meir Hay, Meir Park and Sneyd Green have limited data available to inform density assumptions and therefore the assumptions set out in the Core Spatial Strategy have been applied.

Ward	Density Assumption for SHLAA (Dwellings per hectare)
Abbey Hulton & Townsend	40
Bentilee & Ubberley	
Blurton West & Newstead	
Goldenhill & Sandford	
Hanford & Trentham	
Little Chell & Stanfield	
Meir North	
Weston Coyney	
Eaton Park	
Meir Hay	
Meir Park	
Sneyd Green	
Baddeley, Milton & Norton	50
Bradeley & Chell Heath	
Fenton West & Mount Pleasant	
Ford Green & Smallthorne	

Great Chell & Packmoor	
Meir South	
Blurton East	
Burslem Central	
Burslem Park	70
Lightwood North & Normacot	
Penkhull & Stoke	
Sandford Hill	
Tunstall	
Boothen & Oakhill	90
Etruria & Hanley	
Hartshill & Basford	
Moorcroft	
Broadway & Longton East	
Birches Head & Central Park	100
Dresden & Florence	
Fenton East	
Hanley Park & Shelton	
Hollybush & Longton West	
Joiner's Square	
Springfields & Trent Vale	



Lead-in Times and Build-Out Rates

The assumptions set out in the tables below will be applied from the anticipated date of site commencement to determine site delivery timescales where no site specific information is available to guide judgements on when sites will be delivered. These are intended only as a starting point for estimating delivery timescales and where more appropriate site-specific information is available, this will be used instead.

In determining the indicative lead-in times and build-out rates set out below, historic monitoring data was considered for all completed sites which delivered 5 or more dwellings. This has been updated to take into account larger sites across the area which weren't previously delivering.

Information was also split by completed site capacity to recognise that the scale of a proposed scheme may affect build out-rates on a site. The site size thresholds used have been chosen to ensure that rates are based on average build-out rates across a large sample of sites, to avoid single sites skewing these figures.

For lead in-times, the historic data was used to establish average timescales from a site gaining planning approval to commencement on site. Where sites are yet to receive full planning permission, an additional 12 month lead-in time has also been assumed to reflect the time taken to prepare for and to obtain planning permission.

Newcastle-under-Lyme & Stoke-on-Trent – Site build-out rates	
Sites of 50 dwellings or more	30 dwellings per annum with Newcastle-under-Lyme. For Stoke-on-Trent, 20 dwellings for the first year, rising to 40 per annum for the subsequent years.
Sites of 16-49 dwellings	20 dwellings per annum
Sites of 5-15 dwellings	5 dwellings per annum
Newcastle-under-Lyme & Stoke-on-Trent	Site lead in time

With full planning permission	12 months
With outline planning permission	24 months

Assessing the Suitability of Sites for Housing

In order to assess the suitability of a site for development a number of considerations should be taken into account including:

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

Taking the above into account, all available information will be considered to establish the potential for suitability constraints on a site. This will then inform a judgement as to whether the site falls into one of three categories:

- **Suitable**- Sites which are free from suitability constraints, or where there is clear evidence that constraints can be overcome.
- **Potentially suitable (constrained)** - Sites which may be constrained by suitability considerations, but where mitigation measures may be possible, enabling constraints to be overcome. These sites will not be considered suitable for inclusion in the 0-5 year supply until it can be demonstrated that these constraints can be mitigated or removed.
- **Unsuitable**- Sites with significant suitability constraints, which are unlikely to be overcome through mitigation without a review of assessment criteria (e.g. sites within Flood Zone 3 or a Green Belt designation).

It should be noted that a judgement on a site's suitability may be subject to change as new evidence emerges.

Suitability Assumptions

When assessing sites suitability a number of assumptions are applied in order to determine individual site suitability. These are set out below. Equally, there may be as yet unidentified constraints relating to housing sites which will have to be considered in assessing their suitability for development once clear evidence of a constraint becomes apparent. Sites which have an extant planning permission for a residential use will be considered suitable, in accordance with the PPG.

Development Plan policies (including Green Belt) – The councils are currently reviewing their existing Development Plan policies through the preparation of the Joint Local Plan. Therefore, sites will be assessed against existing Development Plan policies from the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy (2009) and Saved Policies of the Newcastle-under-Lyme Local Plan (adopted 2003) and the City Plan (2001). Sites within the Green Belt will be considered ‘unsuitable’, and will only be reconsidered if exceptional circumstances are demonstrated through the preparation of the Joint Local Plan, in line with the requirements of paragraph 137 of the NPPF.

Sites required for other uses – Sites that are assessed as part of other evidence base documents, such as the Employment Land Review, Green / Open Space Strategy or Playing Pitch Strategy will be considered ‘unsuitable’ where there is a clear up-to-date requirement to keep the site for another use. Where this evidence requires updating or is subject to review, sites will be considered ‘potentially suitable’.

Contaminated Land– Contaminated land is a challenge in many parts of the two local authority areas. Potential constraints with regards land contamination will be established in consultation with the environmental health teams of the respective councils and any other relevant stakeholders, such as the Environment Agency. In most cases the key issue is not whether a site can be adequately remediated but instead whether it can be done so viably. The decision therefore to deem a site ‘unsuitable’ or ‘potentially suitable’ due to contamination should not be made unless there is site-specific information which indicates that remediation is unlikely to be able to make a site suitable.

Land Stability - Potential constraints with regards to ground stability will be established primarily through use of the Coal Authority’s Development High Risk areas. However, it is recognised that such constraints can usually be overcome and therefore sites in Development High Risk areas may be considered ‘suitable’ at this stage, subject to further detailed consideration at the site allocation or planning application stage.

Amenity Impacts- Where site specific information indicates that development on site would be affected by significant amenity constraints, the site will be deemed ‘potentially suitable’. Examples of such constraints may include being adjacent to an active landfill site or being within a Health and Safety Executive consultation zone. Please note that the loss of

property value or loss of a view are not material planning considerations and as such cannot be taken into account.

Flood Risk – Inappropriate development in areas of high flood risk should be avoided by directing development away from areas of highest risk, but where development is necessary then it will need to be made safe from flood risk and also without increasing flood risk elsewhere. Taking the above considerations into account, the SHLAA will apply the assumptions below. Until up-to-date Strategic Flood Risk Assessments are prepared to establish the extent of Flood Zone 3b, judgements will be made based upon Environment Agency Flood Zone mapping, which does not differentiate between Flood Zones 3a or 3b. Therefore, a precautionary principle that sites in Flood Zone 3 should be treated as ‘unsuitable’ will be used, unless evidence or modelling suggests otherwise (for example that remediation measures would alleviate adverse consequences). Where sites are only partially within Flood Zones 2 & 3, the area of the site will be reduced to locate development outside of these areas.

- Environment Agency Flood Zone 1 – ‘Suitable’
- Environment Agency Flood Zone 2 – ‘Potentially suitable’ i.e. constrained until an acceptable Flood Risk Assessment is produced
- Environment Agency Flood Zone 3 – ‘Unsuitable’

Historic Environment – A positive strategy should be promoted to conserve and enhance the historic environment. Where a potential development site would lead to substantial harm or total loss of a designated heritage asset the site should be deemed unsuitable. The assessment however will consider whether a listed building could be considered for alternative uses i.e. the conversion to residential. Taking into account the above considerations, development on the following sites would be deemed as ‘unsuitable’:

- Scheduled Ancient Monuments,
- Registered Battlefields
- Registered Parks and Gardens
- Grade I Grade II*, and Grade II listed buildings (loss would be unsuitable but the impact of development maybe mitigated through layout/design which is sensitive to the significance of the designated heritage asset)

The assessment will also consider the proximity of sites to nearby heritage assets other designated and non-designated areas and structures, such as conservation areas and buildings on the local list. Based on these considerations, officers will judge the degree of harm caused by the development of a site.

Natural Environment – Development on the following sites are suggested as being classified as ‘unsuitable’:

- European designated and Ramsar - including potential Special Protection Areas and Special Protection Areas, and proposed Ramsar sites
- Ancient woodland, Local Nature Reserves & Sites of Special Scientific Interest
- Blanket Tree Preservation Order sites
- Local Nature Reserves
- Heavily wooded sites.
- Regionally Important Geological Sites
- Sites of Biological Interest and Biodiversity Alert Sites

It is recognised that sites may also potentially impact upon the natural environment due to their proximity to environmental designations. Expert advice and data (such as SSSI impact zones) will be used to indicate such potential impacts. Any constraints by proximity to natural sites will be recorded but will not lead to a site being considered 'unsuitable' or 'potentially suitable' at this stage unless site specific information indicates that any potential impact is unlikely to be adequately addressed at a planning application/site allocation stage.

Access to Facilities – The councils will apply a number of measures to determine the accessibility of a site to essential facilities. Access to the following facilities will be considered:

- Primary, Secondary Schools and Further Education Colleges
- Employment
- Retail supermarkets
- Local retail opportunities
- GPs/ Health Care
- Post Office/ Health Centre
- Bus stop with a regular service
- Town Centre
- Major public transport node
- Publically accessible green space

An overall assessment of general accessibility will be considered by officers to determine whether the assessed site is considered 'potentially suitable'. As a starting point, this will include use of an indicative threshold of 800 metres² to measure access to facilities in the Stoke-on-Trent, Newcastle-under-Lyme and Kidsgrove urban areas. This measurement will be taken from the middle of each site to ensure a consistent approach. However, this threshold is only a starting point for considering accessibility, as whether a facility is within an acceptable

² This is the acceptable distance for general facilities indicated in the Institution for Highways and Transportation's 'Guidelines for Providing for Journeys on Foot' and is also consistent with the Government's 'Manual for Streets' guidance, which indicates a 'walkable' neighbourhood has a range of facilities within 800m

walking distance will depend upon the type and size of facility provided and the quality of pedestrian links. Ultimately, whether or not a site is in an unsustainable location due to poor access to facilities will be determined by use of officer judgement on a case-by-case basis, rather than a set number of facilities being required within a certain distance.

Recognising that sustainable transport solutions differ between urban and rural areas, as set out in paragraph 103 of the National Planning Policy Framework, the latest evidence will be considered regarding access to facilities in Newcastle-under-Lyme's rural area.

Highways Issues – Officer judgement will be used to make decisions on whether access constraints exist on sites. Where it is felt to be necessary, the councils will consult with each council's relevant highways teams and Highways England where appropriate to establish any potential highways constraints associated with sites. More detailed discussions will be held prior to the allocation of any sites through the Joint Local Plan and ultimately if a planning application is submitted on a site, it will be subject to a detailed transport assessment if there is a highways constraint.

Best and Most Versatile Agricultural Land – The best and most versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification. The NPPF requires local planning authorities to take into account the economic and other benefits of such land and should seek to use areas of poorer quality land in preference to that of higher quality. It is therefore proposed that land in grades 1 and 2 of the Agricultural Land Classification should be constrained by this factor and deemed as 'potentially suitable'.

Assessing a Sites Availability

Available information will be considered to establish whether a site is available for development. This will then inform a judgement as to whether the site falls into one of three categories:

- **'Available now'**- There are no known legal or physical barriers which would prevent immediate development on a site. Such sites may be considered 'deliverable', subject to an assessment of their suitability and achievability.
- **'Likely to become available'**- There is a legal or physical barrier preventing immediate development on a site which is likely to be overcome.
- **'Unavailable'**- The site has a clear legal or physical barrier preventing development on the site which is not likely to be overcome (e.g. an unwilling landowner)

For a site to be considered available for development, the PPG identifies that information should be obtained that confirms that there is confidence

that there are no legal or ownership issues, ransom strips or operational requirements of landowners. This will often mean that a developer or landowner has expressed an intention to develop, or the landowner has expressed an intention to sell.

The decision therefore on whether a site is considered available will be reached considering the following:

- Whether the site is in active use
- Whether the site could be developed now
- Whether the site is free from ownership and tenancy issues
- Whether there is an extant planning consent and if so whether it is in the process of being implemented.

If a site has extant planning permission and is in the process of being implemented, it will be considered to be available. Those sites that have an extant permission for an alternative use other than residential and are in the process of being implemented will be considered unavailable.

If a site has been directly nominated by the land owner or developer in control of the site then it will be assumed that the site is available. If this is the case but the site is still in active use, the site will still be considered available unless there are known tenancy issues. If a site is in active use and hasn't been put forward by a landowner or controlling developer, it is to be assumed that the site cannot be considered available at this time. It will be the landowners responsibility to keep the local authority updated of any changes affecting a sites availability.

'Suitable' and 'potentially suitable' sites where availability is unclear will be subject to further investigation and, if appropriate, officers will complete a land registry search to enable individual landowners to be contacted to determine availability.

The existence of a planning permission does not necessarily mean that the site is available. To take account of this, where an extant planning permission has been submitted on behalf of the sole landowner/all landowners on a site, it will be assumed that it is available for development. Where a planning application has not been submitted by all relevant landowners or has been put forward by a third party, further information will be sought to establish the site's availability. The assessment will therefore need to draw on the expertise of the Development Management team, based on first-hand knowledge to

understand whether there are any potential problems that would deem a site unavailable.

Assessing a Sites Achievability

Planning Practice Guidance suggests that in order for a site to be considered achievable for development there must be a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is based on a judgement of economic viability and the capacity of the developer to complete, let or sell the development over a certain period.

The issue of achievability is essentially related to the viability of the development of a site for housing. This is known to be a major issue in Stoke-on-Trent in particular, and both Newcastle-under-Lyme and Stoke-on-Trent have housing markets which are significantly lower value than both the regional and national averages. The housing market has been weak for a number of years and the problems in the drop in house prices in the rest of the country have also hit Stoke-on-Trent. This coupled with many major development sites being on brownfield land with often significant contamination and remediation requirements, has often led to the granting of planning permission but without the housing ever actually being delivered. Both councils are therefore putting great emphasis on site viability in the SHLAA process.

In order to assess viability and deliverability, the councils commissioned consultants to undertake a viability assessment so that this important issue can be considered in detail. The Viability Assessment looked at site specific costs and values to be able to produce a model to help guide the viability of sites. The assessment produced a model which can be used to make an assessment of the viability of the sites. The inputs into the model will be updated as further information is available.

In addition the following factors may also be considered to help achieve a decision on achievability:

- Whether there is active developer interest in the site?
- Whether similar sites have been successfully developed in the preceding years?
- Whether there are any abnormal development costs (identified through the viability study)

Overcoming Constraints

Where constraints are identified on a site which impact upon the suitability, availability or achievability of a site, the councils will consider what action would be needed to remove them as part of the local plans

process. This may include the provision of new infrastructure, dealing with fragmented landownership, environmental improvement or a need to review development plan policy. This will also include a consideration of when and how such actions could be delivered.

Stage 3 – Windfall Assessment

Windfall sites are sites which have not been specifically identified as available in the Local Plan process. The PPG allows local authorities to identify a windfall site allowance in their 0-5 or 6-15 year supply where they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. As the councils are seeking to fully identify as many site options as possible to inform their respective SHLAAs, a windfall allowance is not being proposed as part of this SHLAA methodology at this point in time. This will be kept under review and reconsidered in future land supply updates.

Stage 4 – Assessment Review

When the assessment of sites has been completed, the borough and city councils will produce separate SHLAA reports showing a housing trajectory and identifying what level of housing provision is likely to come forward to meet the local housing needs of each authority. A decision will be made as to whether sufficient sites have been identified to meet these needs. If it is then determined that insufficient deliverable and developable sites have been identified, a review of assumptions made regarding the physical and policy constraints affecting sites may have to be undertaken. As part of this review, the councils will also consider whether there is a need to apply a non-implementation rate at this stage.

Stage 5 – Final Evidence Base

Each SHLAA will inform the plan-making process through providing an understanding of what type of land is available, where it is located, and when it may be developed. Please note that inclusion of a site within the SHLAA does not mean that it will be allocated for development or granted planning permission. The SHLAA is evidence base information for plan-making and Development Management. Allocation of land for development will be considered through work to produce a Joint Local Plan for Newcastle-under-Lyme and Stoke-on-Trent and will be subject to Sustainability Appraisal and further public consultation. Please see the respective councils' websites for further information on work to produce a Joint Local Plan and timetable for doing this:

[Newcastle Planning Policy Website](#)
[Stoke Planning Policy Website](#)

The final SHLAA will include:

- Overall supply by type, location, years (0-5, 6-10, 11-15 and land not considered developable currently).
- Assessment information for each site.

Glossary

Ancient Woodland: An area that has been wooded continuously since at least 1600 AD.

Best and Most Versatile Agricultural Land: The most flexible, productive and efficient areas of agricultural land, which can best deliver future crops for food and non-food uses. The National Planning Policy Framework defines this as land falling into Grades 1,2 and 3a of the Agricultural Land Classification.

Biodiversity Alert Sites: Locally designated nature conservation sites (also known as Local Wildlife Sites)

Call for Sites: A consultation exercise in which landowners, developers and the public are invited to submit land to a council, so that land can be considered for its potential suitability for development.

Deliverable Sites: Sites which are available now, offer a suitable location for development now and are achievable with a realistic prospect that housing will be delivered on the site within five years. In particular this means that the development site should be financially viable.

Developable Sites: Sites which are in a suitable location for housing, where there is a reasonable prospect that the site is available for development and could be viably developed at the point in time envisaged.

Local Plan: A Local Plan sets out planning policies and land use proposals which will be used in determining applications for planning permission and to direct strategic investment.

Employment Land Review (ELR): These assessments examine the likely demand for, and supply of, land for employment uses. They assess sites in a current employment use and potential future employment sites.

Evidence Base: The studies, reports and assessments that support the development of planning policy documents, such as the Local Plan. The evidence base should provide should be adequate, relevant and up-to-date evidence on economic, social and environmental characteristics of the area in question.

Flood Risk Zones (1, 2 & 3): Flood Risk Zones identify areas where there is a low (Zone 1), medium (Zone 2) or high (Zone 3) probability of river or sea flooding, ignoring the presence of flood defences. National planning policy requires that development should be allocated in areas at lower risk of flooding.

Functional Economic Market Area (FEMA): An area reflecting the local commercial property market, based on an understanding of the requirements of the market regarding the location of premises and the spatial factors used in analysing demand and supply. Defining such areas may involve a consideration of factors such as travel to work areas and housing market areas.

Green / Open Space Strategy: A strategy which seeks to ensure that green spaces fulfil their potential to deliver environmental, economic and social benefits through a strategic approach to planning and management. This is based on an audit of all existing green spaces within an area.

Heritage Asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and asset identified by the local planning authority (including local listing).

Housing Market Area (HMA): An area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. In practice, such areas are defined by examining factors including household prices, migration patterns and commuting flows.

Local Nature Reserves: Local areas which are of special interest due to their wildlife or geological features. Designated by Local authorities under the National Parks and Access to the Countryside Act 1949.

National Planning Policy Framework: The National Planning Policy Framework is a material consideration in determining planning applications and a local authority must have regard to it in preparing a Local Plan.

Objectively Assessed Needs (OAN): This is a recommended housing figure set out in the Strategic Housing Market Assessment (SHMA) Review (2017).

Local Housing Need (LHN): the number of homes identified as being needed through the application of the standard method set out in national planning guidance, or a justified alternative approach.

Planning Practice Guidance: An online resource provided by the Department for Communities and Local Government which seeks to provide plain English guidance on national planning policies and legislation.

Play Pitch Strategy: A strategy for the maintenance and improvement of sports pitches within an area. This includes an audit of existing sports pitches and sporting need to inform future land use decisions on these sites.

Ramsar Sites: Wetlands of international importance, designated under the intergovernmental treaty of the Ramsar Convention, which aims to stop the loss of wetlands.

Regionally Important Geological Sites: Non-statutory areas of local importance for nature conservation that complement nationally and internationally designated geological and wildlife sites. Also known as Local Geological Sites.

Sites of Biological Interest: Locally designated nature conservation sites (also known as Local Wildlife Sites)

Sites of Special Scientific Interest (SSSI): Sites which are protected by national law to conserve their wildlife or geology under the Wildlife and Countryside Act 1981 (as amended).

Special Protection Areas (SPAs) and Special Areas of Conservation (SACs): Sites protected by the EU Habitats Directive and English and Welsh law, due to containing habitats or species of birds that are threatened or valuable

Strategic Housing Market Assessment (SHMA): A technical study which identifies the housing needs within a Housing Market Area (HMA). This includes factors such as the number of homes which need to be planned for, the need for affordable

housing within an area and the needs of specific groups such as older people, minority groups, people with disabilities and students.

Tree Preservation Order (TPO): A Tree Preservation Order is an order made by a local planning authority in England to protect specific trees, groups of trees or woodlands in the interests of amenity.

Windfall Sites: Sites which come forward for housing despite not having been identified through the Local Plan process. Examples of windfall sites include previously-developed sites which have unexpectedly become available for development.