
Cabinet Member Meeting (Business, Enterprise and Employment)

11 September 2014

Name of Cabinet Member:

Cabinet Member (Business, Enterprise and Employment) – Councillor Maton

Director Approving Submission of the report:

Executive Director Place

Ward(s) affected:

All

Title:

Draft Strategic Housing Land Availability Assessment (SHLAA) – Technical Evidence Paper (2014)

Is this a key decision?

No

Executive Summary:

A Strategic Housing Land Availability Assessment (SHLAA) is a fundamental requirement of National Guidance and a part of the Council's Evidence base that supports the preparation and development of its new Local Plan. The purpose of the SHLAA is to consider the availability of land within Coventry that is suitable for housing development. It must consider all reasonable options for possible development, which includes land within the Green Belt. This is with a view to identifying sufficient land to meet the Council's objectively assessed need for housing, which is a minimum of 23,600 homes between 2011 and 2031 (as evidenced by the Joint Strategic Housing Market Assessment (Joint SHMA)).

It is important to clarify however that the identification of a site within the document does not determine whether or not a site will be allocated for housing through the Local Plan, nor does it guarantee that the site will receive planning permission.

The SHLAA examines all components of housing land supply, considering their suitability for housing, their availability for housing and their achievability/viability to deliver new homes within the plan period. Within this assessment are 480 sites that do not currently have planning permission. Of these 480 sites a total of 168 sites have been shortlisted as potential residential or mixed use opportunities. These sites are known as 'SHLAA sites', and some are currently situated within the Coventry Green Belt. The remaining 312 sites were discounted as being unsuitable for potential housing delivery for a variety of reasons. Examples included well

established employment land, high quality green spaces and essential social or community provisions.

The table below highlights the different components of the total housing land supply position at April 1st 2014. This table shows that the city’s identified supply is 271 homes short of the minimum housing need identified in the Joint SHMA of 23,600 dwellings.

Components of Land Supply (2011-2031)	Total Dwellings
Past Net Completions (2011-2014)	2,998
Sites with an Extant Planning Permission (at April 1 st 2014)	5,259
Sites Under Construction (at April 1 st 2014)	857
SHLAA Sites	6,260
Indicative Green Belt SHLAA Sites	6,864
Outstanding Allocations from the 2001 Development Plan	695
Windfall Allowance (for sites delivering less than 5 homes)	396
Total	23,329

As part of assessing these sites however it is necessary to make assumptions about site density. In relation to sites currently within the Green Belt the SHLAA has included a market sensitivity test that reflects a lower density assumption for these particular sites. If this alternative density is used then the total supply reduces to 22,117 homes, creating a shortfall of 1,483 dwellings over the plan period.

The SHLAA also presents an update on the Councils 5 year housing land supply position, which shows that the Council currently have a 6 year supply of deliverable housing land. When we consider longer term supply however there are greater issues to consider. Firstly, we are seeing annual completion rates increasing year on year, whilst we also see a significant proportion of longer term brownfield sites either focused on higher density options within or adjacent to centres or situated on operational employment sites. Although these sites remain suitable for consideration due to developer or land owner promotion, both issues present viability pressures and restrict site availability that may prevent their short term development. Of further importance is the recent trend in sites previously identified for housing coming forward for employment generating uses. The SHLAA suggests that sites previously expected to deliver upwards of 700 homes have now been utilised for the creation and/or retention of jobs throughout the city meaning they are no longer available to provide new homes.

This highlights the importance of maintaining a flexible and varied supply of housing land that is capable of responding to market demands and conditions and that can continue to meet the housing needs of the city. It also highlights the need to balance the city’s limited land supply between meeting the needs for housing and the needs for other uses such as employment, retail, community uses and high quality green spaces. It is for these reasons that sites that currently sit within the Coventry Green Belt now have to be considered for development.

Recommendations:

The Cabinet Member is requested to:

1. Approve the publication of the “Draft Strategic Housing Land Availability Assessment (SHLAA)(2014)” to support the period of public engagement associated with the Council’s new Local Plan document. This will be made available for public engagement between 12th September and 31st October 2014.

List of Appendices included:

- Appendix 1: Draft Strategic Housing Land Availability Assessment (SHLAA) (2014)

Other useful background papers:

- New Coventry Local Plan – Delivering Sustainable Growth (2011-2031) – Report to be considered by Coventry City Council Cabinet on the 2nd September 2014 and Council on the 9th September 2014. Document is available to view via the following link:
<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=124&MId=10268&Ver=4>

Has it been or will it be considered by Scrutiny?

The report itself will not be considered by Scrutiny; however the results of its publication as a supporting document to the Local Plan public engagement paper will be considered by Scrutiny Board 3 at its meeting on the 12th November 2014

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No

Will this report go to Council?

No

Report title: *Draft Strategic Housing Land Availability Assessment (SHLAA) – Technical Evidence Paper (2014)*

1. Context (or background)

- 1.1 A Strategic Housing Land Availability Assessment (SHLAA) is a fundamental part of the Council's Evidence base that supports the preparation and development of its new Local Plan. It is also a principal requirement of the National Planning Policy Framework (NPPF) and is therefore necessary to deliver a sound Local Plan.
- 1.2 The purpose of the SHLAA is to consider the availability of land within Coventry that is suitable for housing development. It must consider all reasonable options for possible development, which includes land within the Green Belt. This is with a view to identifying sufficient land to meet the Council's objectively assessed need for housing, which is based on the Coventry and Warwickshire Joint Strategic Housing Market Assessment (Joint SHMA). This identifies a housing need in Coventry of between 23,600 and 36,220 homes between 2011 and 2031. A key variation in these numbers however is the distribution of housing need throughout Coventry and Warwickshire (The Housing Market Area), which has been brought about by new population projections released by Government. As such Coventry's minimum housing need is considered to be 23,600 homes, which is supported by at least some of the difference between the two numbers already being planned for across Warwickshire.
- 1.3 Once land is identified through the SHLAA, this information will also help inform the Council's 5 year housing land supply. It is important to clarify however that the identification of a site within the document does not determine whether or not a site will be allocated for housing through the Local Plan, nor does it guarantee that the site will receive planning permission. It is a review of potential housing land at a point in time. Sites must then come forward through the planning process having regard to the policy position at the time of the application.
- 1.4 The Council does have an existing SHLAA document, which was published in July 2012 to support the previous Core Strategy Submission Draft. As a result, the supply of land identified within that document is restricted to meeting a housing requirement that has been deemed undeliverable as part of the Duty to Cooperate, and has subsequently been updated through new evidence. As such, the land supply identified in the 2012 SHLAA is insufficient to meet the city's housing need in the Joint SHMA.
- 1.5 The SHLAA examines all components of housing land supply, considering their suitability for housing, their availability for housing and their achievability/viability to deliver new homes within the plan period (2011-2031). Within this assessment are 480 sites that do not currently have planning permission. Of these 480 sites a total of 168 sites have been shortlisted as potential residential or mixed use opportunities. These sites cover approximately 488ha of gross developable land area and contribute up to 13,120 dwellings to the total land supply. Included within these sites is a selection of sites currently situated within the Coventry Green Belt. These sites total around 300Ha of land. The remaining 312 sites were discounted as being unsuitable for housing development. Of the sites discounted 207 were Greenfield Sites, with 45 of these constrained by their Green Belt designation. Reasons for discounting Greenfield sites included: an unacceptable loss of well used and maintained allotments or playing fields, inappropriate loss of incidental public open space that form integral parts of street scenes and urban setting and other additional issues such as flood risk, historic landscape character and access. With regards Green Belt sites, similar issues were apparent as were issues of openness and impact on the Meriden Gap. The remaining 105 sites that were discounted included 16 on established employment sites, 12 on active social and/or community land, 67 would have resulted in an

unacceptable or inappropriate loss of off street parking / garage facilities, and a further 10 were made up of sites that despite being largely vacant suffered from access or other site specific issue.

- 1.6 The SHLAA also includes a small allowance of 396 dwellings within the land supply for the delivery of sites of less than 5 dwellings. This reflects the threshold of sites promoted by the Practice Guidance and the difficulty of trying to identify sites that deliver this small number of homes. The number of homes identified in the supply is reflective of long term trends in Coventry and includes an allowance for the conversion of houses to flats or small infill developments of 1 or 2 homes.
- 1.7 The table below highlights the different components of the total housing land supply position at April 1st 2014. This table shows that the city's identified supply is 189 homes short of the minimum housing need identified in the Joint SHMA.

Components of Land Supply (2011-2031)	Total Dwellings
Past Net Completions (2011-2014)	2,998
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Outstanding Allocations from the 2001 Development Plan	695
Windfall Allowance (for sites delivering less than 5 homes)	396
Total	23,329

- 1.8 As part of assessing these sites however it is necessary to make assumptions about site density. In relation to sites currently within the Green Belt the SHLAA has included a market sensitivity test that reflects a lower density assumption for these particular sites. If this alternative density is used then the total supply reduces to 22,117 homes, creating a shortfall of 1,483 dwellings over the plan period. A key aspect of publishing this SHLAA as part of the Local Plan public engagement process will be to test the robustness of these density assumptions.
- 1.9 The SHLAA also presents an update on the Councils 5 year housing land supply position. The SHLAA identifies a supply of 7,764 homes available within the next 5 years compared to a requirement (based on the Joint SHMA of around 6,450. This shows that the Council currently have a 6 year supply of deliverable housing land.
- 1.10 When we consider longer term supply however there are greater issues to consider. Firstly we are seeing annual completion rates increasing year on year, which is eroding the Councils housing land supply quicker than before. A significant proportion of longer term brownfield sites are also either focused on higher density options within or adjacent to centres or situated on operational employment sites. Although these sites remain suitable for consideration due to developer or land owner promotion, both issues present viability pressures and restrict site availability that may prevent their short term development. Of further importance is the recent trend in sites previously identified for housing coming forward for employment generating uses. The SHLAA suggests that sites previously expected to deliver upwards of 700 homes have now been utilised for the creation and/or retention of jobs throughout the city meaning they are no longer available to provide new homes.
- 1.11 This highlights the importance of maintaining a flexible and varied supply of housing land that is capable of responding to market demands and conditions and that can continue to

meet the housing needs of the city. It also highlights the need to balance the city's limited land supply between meeting the needs for housing and the needs for other uses such as employment, retail, community uses and high quality green spaces. It is for these reasons that sites that currently sit within the Coventry Green Belt now have to be considered for development.

2. Options considered and recommended proposal

- 2.1 In relation to the SHLAA there are 3 realistic options available. The first of these is to retain the Councils existing SHLAA from July 2012. This option has been discounted as it referred to a level of housing need that was found to be undeliverable in association with the Duty to Cooperate and as such does not meet the most up to date housing need for Coventry. To continue with this version of the SHLAA would not support a sound Local Plan.
- 2.2 The second option is to withdraw the 2012 SHLAA and continue preparing the Local Plan without a SHLAA. This option is discounted as it is a fundamental requirement of a sound Local Plan to be supported by a robust and up to date SHLAA.
- 2.3 The third option is presented in this report and is set out in Appendix 1. This involves publishing a new, up to date SHLAA, that has full regard to the most up to date housing needs of Coventry and which can therefore support the development of a sound Local Plan and the Duty to Cooperate process.

3. Results of consultation undertaken

- 3.1 There has been no consultation undertaken to date in relation to this version of the SHLAA.

4. Timetable for implementing this decision

- 4.1 Subject to the approval by the appropriate Cabinet Member, the draft SHLAA will be published alongside the Local Plan Public Engagement paper on the 12th September for a period of 7 weeks public engagement (ending on the 31st October 2014).
- 4.2 Following this, the outcomes of the public engagement will be reported to Scrutiny Board 3 at its November meeting.
- 4.3 The SHLAA will then be updated to reflect any necessary changes and new evidence before being finalised in the summer of 2015 to support the next stage of the Local Plan.

5. Comments from Executive Director, Resources

- 5.1 Financial implications
There are no direct financial implications of the recommendations in this report. It should be noted however that there are a small number of sites proposed to be shortlisted in the SHLAA that are currently in the ownership of Coventry City Council. This may support the delivery of capital receipts in the future.
- 5.2 Legal implications
There are no direct legal implications of the recommendations in this report. The document has been prepared in accordance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) - Housing and economic land availability assessment.

In developing the SHLAA, all reasonable sites have been considered within Coventry including Green Belt options. This demonstrates the City Council's continued commitment to fulfilling its responsibilities associated with the Duty to Cooperate.

6. Other implications

6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?

- A prosperous Coventry: An up to date SHLAA will promote and support the right approach to delivering the city's housing needs and help to ensure that sufficient new homes are provided to meet the needs of local people, and that businesses are not deprived of staff through a lack of housing;
- Providing a good choice of housing: An up to date SHLAA will help deliver the right homes in the right locations to meet the city's housing needs.

6.2 How is risk being managed?

The report being considered is a technical document intended to contribute towards the evidence base for the new Local Plan. Any risks that may materialise from the document will be minimal, if at all, and will be managed directly through the Local Plan process.

6.3 What is the impact on the organisation?

No direct impact.

6.4 Equalities / EIA

The Council will be undertaking a full Equality and Consultation Analysis (ECA) on the New Local Plan and its supporting documents (including the SHLAA) as they are developed over the coming months. The period of community and stakeholder engagement, due to start in September, will inform the ECA and enable the impact of these documents on key protected groups in the city to be fully understood and considered prior to finalisation of the Plan.

Notwithstanding, there are likely to be significant economic and social benefits to the city through the development of new homes in Coventry. This will be promoted by urban regeneration and the redevelopment of land currently sitting vacant and derelict as well as increased opportunities for job creation and the delivery of new infrastructure. The SHLAA identifies sites to support the delivery of these new homes.

6.5 Implications for (or impact on) the environment

There are expected to be some environmental impacts brought about by the level of housing that has been identified for Coventry and subsequently due to the sorts of sites that have had to be identified through the SHLAA.

The SHLAA is however a technical evidence document and does not allocate land for development or guarantee a planning consent will be granted. It will however help to inform the Local Plan, which already contains a commitment to protecting the city's highest value and most sensitive green spaces. Detailed assessment of these issues, as they have been considered through the Local Plan can be found in the Sustainability Appraisal Report (SA/SEA) that will be made available as part of the Public Engagement process.

6.6 Implications for partner organisations?

There are no direct implications for partner organisations as a result of this SHLAA that cannot be mitigated or managed through the supporting work that has already been undertaken and will be prepared by the Council as it moves towards the final version of the SHLAA and its new Local Plan.

There will however be potential implications for the Council's neighbouring authorities as part of the Duty to Cooperate as the SHLAA does identify a potential shortfall in housing land supply relative to the Councils objectively assessed need. These impacts are however expected to be minimised through the on-going development of a shared and consistent evidence base and will be considered through an active, constructive and on-going process as part of the Duty to Cooperate.

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Members: Cllr Kevin Maton	Cabinet Member for Business, Enterprise and Employment	Place	01/09/14	02/09/14

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Appendices