

Strategic Housing & Economic Land Availability Assessment 2023 – Assessment of Housing Land

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Strategic Housing & Economic Land Availability Assessment (SHELAA) 2023

Assessment of Housing Land

1 Introduction

- 1.1 The South Staffordshire SHELAA – Assessment of Housing Land, is a study of potential housing and employment sites in the district. The SHELAA is not a statutory planning document, nor a Council policy document, nor does it allocate land. It is a technical background document which forms a key part of the evidence base for the Local Plan in identifying land which is suitable, available and achievable for housing development over the plan period.
- 1.2 **The SHELAA itself does not determine whether a site should be allocated for housing, but is an important source of evidence in deciding where housing might be located.** This is because not all sites considered in the SHELAA will be suitable for development, particularly due to the Green Belt and Open Countryside designations that limit the scope for suitable housing sites within the District. A large number of sites are included in the study, which identifies significantly more land than is needed to meet our housing need or to make a contribution to the unmet needs of other authorities. This means there is a genuine choice of locations for new development and thus the SHELAA identifies possible sites, and plan making, through the preparation of the Local Plan review, decides between them. **Ultimately, the Council’s Local Plan Review and the associated Site Selection Topic Paper will assess what are considered to be appropriate sites for allocation, based on the options identified through the SHELAA process and the wider Local Plan Review evidence base.**
- 1.3 The SHELAA – Assessment of Housing Land has considered a wide range of sites for the provision of future housing in South Staffordshire. However, the inclusion of a site in the SHELAA does not prejudice any decision the Council may make in the future on any of the sites contained in it, nor does it alter policy or land designation set out in the Local Plan. Sites for housing, or other development, will come forward through the statutory planning process and will be subject to further tests of the suitability over and above those used in this SHELAA.

National Policy and Guidance

- 1.4 The National Planning Policy Framework (NPPF) establishes the requirement for local planning authorities to prepare an assessment of housing land availability. This should make realistic assumptions about the availability, suitability and the likely economic viability of the land needed to meet the local housing need for the district and any needs that cannot be met within neighbouring areas.
- 1.5 Planning Practice Guidance (PPG) currently provides combined guidance for the assessment of housing and employment land to meet development needs, giving further detail on how a SHELAA should be produced. It contains a methodology which should be used to ensure a robust assessment of land availability. PPG states that the assessment should be ‘thorough but proportionate’ building where possible on existing information. The methodology is explained in more detail in Section 5 of this study.

- 1.6 One of the aims of the NPPF is to significantly boost the supply of homes and to this end it states at para 69 that local planning authorities should ensure their planning policies identify a supply of land for:
- Specific, deliverable sites for five years following the intended date of adoption, and;
 - Specific, deliverable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
- 1.7 The NPPF also states that local planning authorities may make an allowance for windfall sites in their land supply if there is compelling evidence that such sites will form a reliable source of supply.

2 Background

- 2.1 The first SHLAA was undertaken by consultants and published in 2008. This was superseded in 2011 by a comprehensive review of the SHLAA and its methodology and a SHLAA Panel was appointed to advise on the process and outcomes. The principles and approach agreed by the Panel in 2011 have informed the updates of the SHLAA since. To reflect updates in national policy and guidance and the need to review the Council's Local Plan, the SHLAA Housing Panel was reconvened in November 2017 to update the assessment methodology. The SHLAA Housing Panel provided expertise, information and advice on the housing market, including areas such as build rates and lead-in times. The Panel was made up from representatives of key stakeholders, adjacent local authorities, local house builders and external planning professionals. The methodology used in this assessment was agreed with the participants, as set out in the meeting minutes in Appendix 1. A further targeted update consultation was also undertaken to inform the 2022 update, ensuring that information on build rates and lead-in times reflect current market evidence.
- 2.2 Calls for sites have been carried out regularly since 2007, with the last formal exercise being undertaken in 2017. Ad hoc submissions of new sites are accepted and included in the subsequent updates of the SHLAA, with especially large numbers of suggestions being received through the 2018, 2019 and 2021 Local Plan Review consultations in particular. The Council has also undertaken a proactive review of urban capacity sites to inform the 2022 update.

3 South Staffordshire Local Plan

- 4.4 The Council's current Local Plan is made up of two main documents; the adopted Core Strategy 2012 and Site Allocations Document 2018 (SAD).

Core Strategy

- 3.2 The Council's Core Strategy 2006 – 2028 was adopted in December 2012. The spatial strategy in the Core Strategy is underpinned by the principles of rural/urban regeneration, which is also a national objective of Green Belt policy in the NPPF. The Council supports the principles of achieving rural regeneration for South Staffordshire and the role the district will play in supporting the urban regeneration of the Major Urban Areas, particularly the Black Country.

- 3.3 The Core Strategy's existing approach to the distribution of housing growth and development is for the geographic spread of development based on a clearly defined settlement hierarchy. The settlement hierarchy currently consists of Main, Local and Small service villages and a category of Other Villages and Hamlets. The Core Strategy identifies the Main Service Villages as the main focus for growth and development, with limited growth in the Local Service Villages. It also considers that no housing allocations should be made in the Small Service Villages where the emphasis will be on the provision of rural affordable housing to meet local needs over and above the housing allocations. Windfall sites within the development boundaries of the lower order villages will be determined on their merits.

Site Allocations Document (SAD)

- 3.4 The SAD was adopted in order to deliver the housing numbers set out in the Core Strategy. The SAD identifies specific sites for housing, employment and Gypsy and Traveller provision. Housing sites allocated through the SAD are included as suitable site options in the SHELAA.

Local Plan Review (emerging)

- 3.5 The existing Core Strategy and Site Allocations Document are currently being reviewed to reflect changing development pressures in and around the District. The scope of the Local Plan Review was first set out in Policy SAD1 of the 2018 Site Allocations Document, which included requirements to:
- Consider the District's ability to contribute to emerging regional unmet housing needs from the Greater Birmingham Housing Market Area (GBHMA) and to unmet employment needs through the Duty to Co-operate
 - Re-assess the District's own housing need and ability to meet this need
 - Undertake a joint Green Belt Review with the Black Country authorities
 - Review the appropriateness of the existing settlement hierarchy
- 3.6 The Council is currently preparing its Local Plan Review for submission to the planning inspectorate in 2025, with the site options identified through the SHELAA process forming a key piece of evidence in this review.

4 Purpose of SHELAA

- 4.4 The main purpose of the SHELAA is to identify a future supply of land which is suitable, available and achievable to meet the identified housing needs of the area.

The assessment should:

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

- 4.2 The aim of the SHELAA is to identify as many potential sites as possible for housing development in the study area. This is to provide a genuine choice of location for new development, and so that there are options available which will be further explored through the Local Plan review process. Sites are included in the SHELAA irrespective of policy

constraints, including Green Belt, lack of conformity to the existing spatial strategy or our local adopted Open Countryside policy.

- 4.3 The PPG (as of December 2023) states ‘...the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority’s (or, where relevant, elected Mayor or combined authority) requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements’.
- 4.4 The PPG also states that the SHELAA should provide standard core outputs and these are:
- a) a list of all sites or broad locations considered, cross-referenced to their locations on maps;
 - b) an assessment of each site or broad location, including:
 - (i) where these have been discounted, evidence justifying reasons given
 - (ii) where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
 - (iii) an indicative trajectory of anticipated development based on the evidence available.
- 4.5 NPPF indicates that sites which are classed as ‘deliverable’ are those which are suitable for housing and where there is a realistic prospect that housing will be delivered on the site within 5 years. ‘Developable’ sites are those which are in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

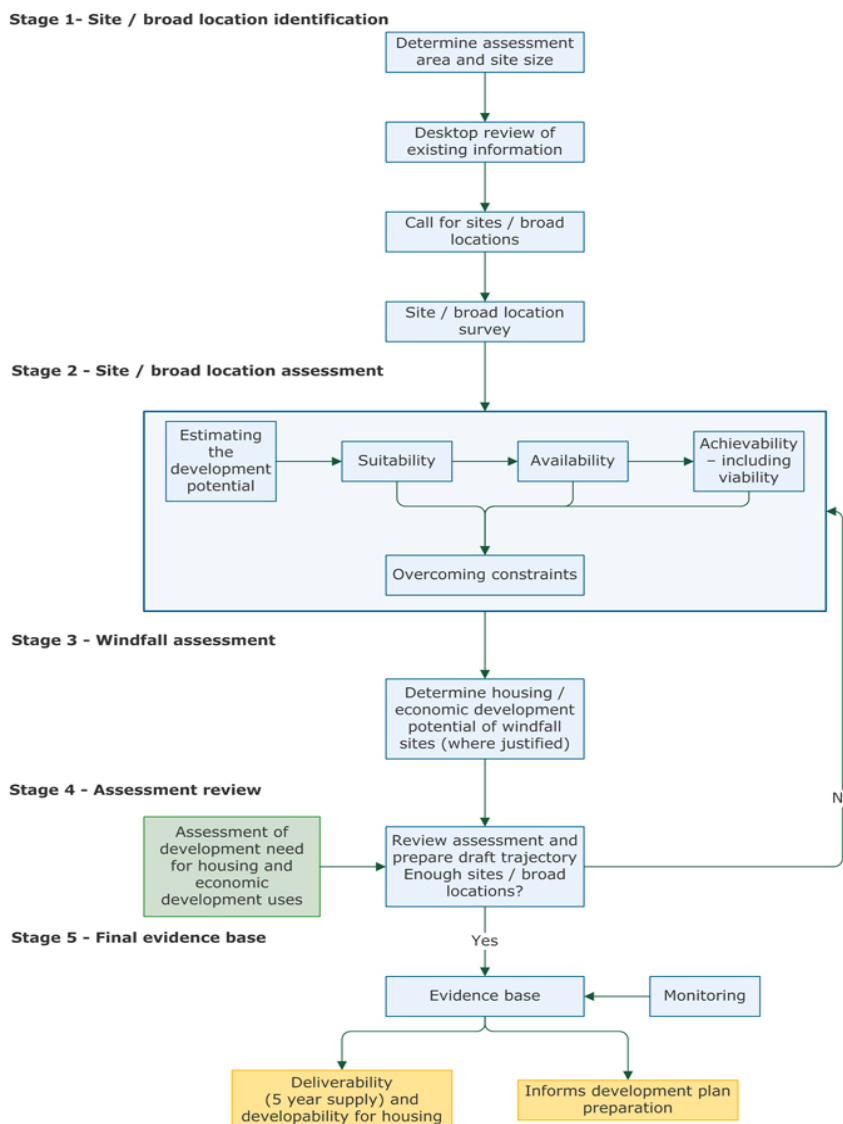
5 Methodology

- 5.1 Local authorities are encouraged to work together at the relevant appropriate geography (e.g. a housing market area) to address unmet development needs in line with the Duty to Cooperate. Involvement of developers, those with land interests, land promoters, local property agents, local communities, partner organisations, LEPs, businesses, and parish councils is important in plan preparation and should be engaged from the outset.
- 5.2 However, due to the scale of the Greater Birmingham & Black Country Housing Market Area within which South Staffordshire sits and the difference in timescales for the preparation of Local Plans, or reviews of Plans across the wider area, this SHELAA relates only to the local planning authority area of South Staffordshire and has not been prepared jointly with other authorities. Officers from adjoining authorities are members of the SHELAA Housing Panel and the Council remains committed to working with appropriate adjoining authorities in the production of evidence.
- 5.3 A SHELAA Housing Panel was reformed for the review of the SHLAA in late 2017. The Panel consisted of representatives from a range of development industry stakeholders, land owners, planning specialists, RPs and delivery agencies and also included officer representatives from adjoining local planning authorities. The Panel participated in this document’s preparation by first offering comments and agreeing changes to the methodology to be used prior to the assessment being undertaken (including consideration of likely lead-in times and build-out rates on sites). A draft of the final SHELAA report was

then sent to the Panel once completed, in order for them to provide comments and suggest any changes necessary to allow the document to be agreed. Minutes of the initial meeting and agreed outcomes of the SHELAA Housing Panel are contained in Appendix 1, which also includes Panel member comments on the final draft SHELAA Assessment of Housing Land report. Further details of the Panel members and the Panel terms of reference can be found in Appendices 1 & 2.

- 5.4 A targeted consultation on updated build rate and lead-in time assumptions has been carried out more recently to ensure that indicative assumptions for site delivery remain up-to-date. This was carried out with the input of housing market area local authorities alongside housebuilders, land promoters and agents operating in the South Staffordshire area. Responses to this consultation are summarised in Appendix 6, alongside the Council’s responses and any proposed changes to the SHELAA that result.
- 5.5 All sites which have been considered for inclusion in the SHELAA but have been discounted because they are considered ‘not suitable for housing’, for any of the reasons set out in paras 5.39-5.40 are included in the site assessment tables in Appendix 7 and are shown on the SHELAA site maps for the relevant broad location (i.e. village, area of urban fringe, locality).

Methodology Flowchart



Stage 1: Identification of sites and broad locations

Sites considered in the SHELAA process

- 5.6 The SHELAA considers all sites identified through the processes set out below. It does not set a minimum site size threshold for identifying housing or employment sites, as this matter is considered separately through the Local Plan site selection processes for housing and employment.
- 5.7 The PPG identifies various sources of sites that may have housing potential, both within and outside the planning process. This has been used as a basis for determining how housing sites are categorised in the SHELAA. Historically, opportunities for large scale redevelopment and redesign of existing residential or economic areas and potential urban extensions and new freestanding settlements had not been assessed in detail prior to the SHELAA 2018. However, the planned review of the Local Plan and subsequent changes of strategic approach has necessitated consideration of the potential for urban extensions and/or new freestanding settlements to meet housing need, and as such more recent call for sites have encouraged such land to be put forward.

Desktop Review of Existing Information

- 5.8 Information on the sources of potential sites for housing and employment, and of sites already known through the planning process has been sought from the following:
- Housing Land Availability (HLA) records
 - Historic planning application records
 - Previous draft Local Plans
 - Public Sector Land (in particular Staffordshire County Council)
 - Registered Providers (RPs)
 - Utility service providers
 - Pre-application enquiries
 - Derelict land survey/NLUD
 - Calls for Sites exercises
 - Ad hoc site suggestions
 - Parish Councils
 - Site surveys
 - Local Plan Consultation responses
- 5.9 Calls for sites have been carried out regularly since 2007. Site surveys for housing proposals have traditionally been carried out for all sites within or immediately adjacent to Main and Local Service villages, as these have historically been the focus for growth within the district under the existing spatial strategy. However, the need to review the Core Strategy's spatial distribution of development means that some sites which are disassociated from a settlement or adjacent to or within Small/Other villages and hamlets will now be subjected to more detailed investigation, to assess their capability to provide deliverable/developable housing and employment sites through the Local Plan review.

5.10 The table below contains all sources of information to identify potential sites to be considered through the SHELAA process, in line with PPG requirements. A fuller explanation of how each source of information has been used is given in Appendix 7.

Sources of Sites with Potential for Housing & Employment

Type of site
<ul style="list-style-type: none"> • Existing housing allocations and site development briefs not yet with planning permission • Planning permissions for housing that are unimplemented or under construction • Planning applications that have been refused or withdrawn • Land in the local authority’s ownership • Surplus and likely to become surplus public sector land (e.g. County Council, adjoining LPA, South Staffs Council owned land) • Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes e.g. offices to residential) • Additional opportunities in established uses (e.g. making productive use of under-utilised facilities such as garage blocks) • Business requirements and aspirations • Sites in rural locations • Large scale redevelopment and redesign of existing residential areas • Sites in and adjoining villages or rural settlements and rural exception sites • Potential urban extensions and new freestanding settlements • Sites from previous employment land studies which have been suggested for housing • Sites from previous SHLAAs which have been suggested for employment

Stage 2: Site/Broad Location Assessment

Geographical Coverage

5.11 Much of South Staffordshire lies within the West Midlands Green Belt – over 32,000 hectares – and the remainder to the north of the Green Belt boundary is defined as ‘Open Countryside’. This assessment covers the whole of South Staffordshire District Council’s geographical area, including land adjoining the boundaries of neighbouring local authorities, as many opportunities for urban extensions may come forward in these locations.

Settlement Hierarchy & Existing Strategic Employment Sites

5.12 The distribution of housing growth in the district has traditionally been in accordance with the principles of the settlement hierarchy defined in Core Policy 1 of the adopted 2012 Core Strategy, which are the broad locations for housing growth in existing policy. The current settlements which from the main focus for growth are the nine Main Service Villages of:

- Bilbrook
- Brewood
- Cheslyn Hay
- Codsall
- Great Wyrley
- Kinver
- Penkridge
- Perton
- Wombourne

Limited development to meet local needs has been supported by Core Strategy policies in the seven Local Service Villages of:

- Coven
- Essington
- Featherstone
- Huntington
- Pattingham
- Swindon
- Wheaton Aston

5.13 In addition, the Core Strategy focused new employment land allocations on the existing four strategic employment sites at i54 South Staffordshire, Hilton Cross, ROF Featherstone and Four Ashes, with all other employment growth being focused towards the Main and Local Service Villages, with limited opportunities for rural employment and diversification outside of these areas.

5.14 However, the Council recognises that there will be a need to revisit this spatial strategy in the Local Plan Review, to test its ability to accommodate not just the Council's objectively assessed needs for housing and employment but potentially also other unmet needs from other local authorities. In particular, the 2019 Local Plan Review – Spatial Housing Strategy and Infrastructure Delivery consultation proposed a variety of revised spatial strategy options for housing across the District, which tested a number of approaches that would allocate significant growth in locations not currently supported by the existing spatial strategy for the District. Therefore, unlike in previous SHLAAs, the 2018 SHELAA and subsequent SHELAA's did not automatically treat sites as 'not suitable' for housing or employment where they did not accord with the existing Spatial Strategy set out in the adopted Core Strategy. This approach is carried forward in the methodology for identifying sites set out in further detail later in this paper.

Site assessment of employment sites

5.15 Sites identified at Stage 1 as potential employment sites required further detailed assessment. To ensure this is considered robustly, the Council's Economic Development Needs Assessment Part 2 assessed the potential suitability of any relevant site suggestions for employment use, having regard to appropriateness and likely market attractiveness of a site for employment. This has not selected employment sites but provides a robust evidence

base to inform the Council’s employment site allocations, as selected through the Employment Site Selection Topic Paper.

Site assessment for housing sites

5.16 In order to assess the deliverability and developability of a site, information will be collected from landowners, agents and developers with regard to the site’s availability and achievability. Each site will be subject to a site survey and basic information collated, including the constraints which affect the site. Information regarding the following constraints will be recorded:

- Green Belt
- Conservation Areas
- Listed Building/Locally Listed Buildings
- Open Space
- Nature conservation value
- Flood Risk
- Ground conditions/topography
- Vehicular access
- Rights of Way
- Pylons/telephone lines
- Trees/TPOs
- Surrounding land use
- Other constraints (eg legal, buildings worthy of retention)

Estimating Housing Potential

5.17 In determining the housing potential of sites a number of factors need to be taken into account. The NPPF indicates that a local authority should set out its own approach to housing density to reflect local circumstances. In South Staffordshire this will have regard to the adopted South Staffordshire Design Guide SPD, the scale of the development and its relationship to nearby settlements, as reflected in previous appropriate housing layouts. Factors which impact on density may include presence of trees, topography, or the need for buffer zones and the existing built development. Dependent on the size of the site an allowance needs to be made for open space, access roads, infrastructure and other uses to serve the community.

5.18 If a detailed development brief has been drawn up or planning application has been approved the net developable area of a site may already have been established. Where such site-specific information has not been made available, the Council has used the following conservative assumptions for calculating a baseline minimum net deliverable area for estimating site capacity:

Developable Land Thresholds

Table 3: Net / Gross assumptions	
Site Size (ha) Development	Ratio (Net Developable Area)

< 0.4 ha	100%
0.4 – 2 ha	70%
>2 ha	60%

5.19 Where there are site specific characteristics that may affect the net developable area, such as flood zones and tree preservation orders, these have been considered alongside the above assumptions where it is judged that they will help to inform a more robust assessment of the site’s capacity.

Density

5.20 For the purposes of the SHELAA, assumptions have been made about the capacity of sites using the above Developable Land Thresholds in Table 3. Where no better information is available, these have been used alongside the density assumptions below to establish the potential site yield. In the 2018 SHELAA, the following starting point assumptions were identified, using an analysis of average density across historic planning permissions from 2007-2017 for similar schemes within the district.

Density assumptions (dwellings per net developable hectare)	
Village edge/isolated greenfield sites	32 dph
Sites within existing village envelope/brownfield sites	38 dph
Sites on the edge of an adjacent urban area (e.g. the Black Country)	35 dph

5.21 It is recognised that the above assumptions can only be considered starting points for estimating site capacity. In reality a number of site specific factors may affect yield (e.g. Conservation Areas). Where the Council judges that better site specific information is available, such as a planning permission or an appropriate site brief, this may be used to estimate likely capacity in terms of deliverability, developability etc. Using this approach gives a broad indication of likely yield which is appropriate for inclusion in the SHELAA.

5.22 The Council has an adopted South Staffordshire Design Guide SPD which promotes high quality design and is a practical toolkit to be used when considering development design. On a site-by-site basis it may be appropriate to develop at differing densities than those given above, as appropriate densities may vary considerably from village to village given the diverse settlement pattern and village character within the district. The Council will also consider a minimum density policy that alters some site densities in the Local Plan Review process, which will ultimately be reflected in final allocated site capacities. The densities given in the SHELAA are simply designed to offer a realistic estimate of minimum site capacity on a District-wide basis, prior to sites’ allocation in the Local Plan Review.

- 5.23 Nevertheless, the density assumptions for sites that are proposed to be taken forward as allocations in the emerging Local Plan also reflect site specific circumstances that have been explored in further detail in the preparation of the local plan evidence base.
- 5.24 NPPF requires all Local Planning Authorities to identify sufficient, specific ‘deliverable’ sites to meet the housing requirement for the first 5 years post intended date of adoption of the plan (plus buffer), and sufficient ‘developable’ sites for the subsequent 6-10 years, and where possible for years 11-15 of the plan period. If a site has constraints which mean it is not known how or when it might become available, then such sites need to be identified as ‘not currently developable’. The availability of sites will need to take into account legal or ownership constraints; the existence of a willing landowner or developer; the delivery record of the landowner/developer; and the viability of the site.

Assessing Deliverable and Developable housing sites

- 5.25 To be considered deliverable, a site should be available now, be in a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- 5.26 A deliverable site is not limited to sites with permission. A site can be deliverable even if it does not have a current planning consent, where there is clear evidence that housing completions will be achieved on site within five years.
- 5.27 Making an assessment of whether a site is suitable, available and achievable will provide a basis for plan makers to consider whether the site falls within the categories of deliverable, developable or not currently developable.

Assessing Suitability

The PPG (as of December 2023) offers the following guidance on assessing suitability:

“When considering constraints, plan-makers may wish to consider the information collected as part of the initial site survey, as well as other relevant information, such as:

- national 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.*

... When assessing sites against the adopted development plan, plan-makers will need to take account of how up to date the plan policies are and consider the relevance of identified constraints on sites / broad locations and whether such constraints may be overcome...”

- 5.28 In light of the above, the suitability of sites has been determined through assessment against national and local planning policy including the NPPF and adopted Core Strategy. Although

the Core Strategy is currently under review, it is still the development plan for the area, and many local policies are still offered support by important policies within the NPPF (Green Belt being a key example). It would therefore be inappropriate not to record how they affect the suitability of a site in advance of the Local Plan review, although it is important to ensure that the assessment's scope does not rule out sites for further consideration on purely based on existing development plan policies. Approaching the assessment of suitability in this manner will help to determine where Core Strategy policies may require alteration to meet housing needs.

- 5.29 Please note that the criteria listed below are not exhaustive. The suitability of a site has necessarily involved a degree of officer judgement on a site by site basis.

Sites which will be considered 'suitable'

- 5.30 Sites with planning permission will automatically be considered suitable until permission expires, at which point their suitability will be reassessed.
- 5.31 Sites without permission that benefit from allocation in the Council's 2018 Site Allocations Document have also been considered suitable for development.
- 5.32 Sites within the development boundary of a Main or Local Service Village not currently covered by another policy constraint (e.g. current employment sites and open space designations) will be considered suitable.

Sites which will be considered 'potentially suitable, but subject to policy constraints'

- 5.33 Subject to no other overriding physical or policy constraints¹ being identified, sites falling into any of the following categories will be considered as being potentially suitable for development:
- Sites safeguarded for future development in the adopted Site Allocations Document
 - Sites in the Green Belt/Open Countryside adjacent to an existing village development boundary (including Small Service Villages and Other Villages and Hamlets)
 - Sites in the Green Belt/Open Countryside adjacent to a neighbouring urban area
 - Employment sites, which are identified as being required to meet employment needs both within and beyond the District in the Council's Economic Development Needs Assessment (EDNA) 2018²
 - Sites in the Green Belt/Open Countryside potentially capable of delivering a freestanding new settlement of at least 1,500 dwellings
- 5.34 Sites identified as above will be assessed in the same level of detail as sites which conform with existing Core Strategy policies, in order to inform the Council's understanding of how much supply could potentially be delivered if specific policies were altered through the Local Plan review. This will include further assessment of sites' potential suitability for development through evidence base documents which will inform the Local Plan review (e.g. the Council's Site Selection Topic Paper).

¹ E.g. those listed at paras 5.39-5.40

² Section 8 of the 2018 EDNA

- 5.35 Site suggestions for development in the Open Countryside/Green Belt which are not directly adjoining an existing village development boundary or the urban area have only been considered ‘potentially suitable’ where it can be demonstrated that sites will provide a sufficient area of land to deliver a minimum of 1,500 homes. Sites disassociated from existing village development boundaries/urban areas which cannot demonstrate that they will deliver a minimum capacity of 1,500 dwellings have been considered as ‘unsuitable’ isolated rural housing, in line with paragraphs 83 and 84 of the NPPF 2023, and will not be considered further. Where a site promoter can evidence that key services and facilities (i.e. local shops, primary schools and public transport links) can be provided within a freestanding site of less than 1,500 dwellings, the Council may consider inclusion of sites below this threshold in further assessments.
- 5.36 In line with the 2018 SHELAA, this 1,500 dwelling threshold has been selected to reflect the 2016 MHCLG minimum site size for considering proposals for new free-standing garden villages³. However, the Council does not consider that an otherwise isolated site of this capacity, will necessarily achieve a reasonable degree of self-containment and further MHCLG garden community prospectuses have indicated support for a higher threshold of 10,000 dwellings. The 2018 Garden Communities prospectus⁴ indicated that sites of 1,500 to 10,000 dwellings only being supported where these are “*particularly strong in other aspects*”, such as delivering brownfield land, demonstrating exceptional quality or innovations or being in areas of particularly high housing demand.
- 5.37 In reality, this means that sites may need to be larger than the 1,500 dwelling threshold to accommodate sufficient services and facilities or may need to demonstrate significant on-site infrastructure delivery to be of a size and location to truly support a sustainable community. At this stage, the role of identifying potential new settlements options is simply to provide a wider range of land options for further consideration in the Local Plan review. The use of the 1,500 dwelling threshold in the SHELAA is only a starting point for identifying such proposals and the merits of such sites will be examined further through the Local Plan review.
- 5.38 It is also important to note that a very wide range of sites are identified as ‘potentially suitable’ in the SHELAA based on these criteria and there may be other constraints which emerge through consideration of the Council’s evidence base. Potentially suitable sites will be further assessed through the site selection process that informs the Council’s Local Plan Review. This will include consideration of the Council’s more detailed evidence base on policy constraints (e.g. Green Belt Study, Landscape Sensitivity Assessment, Rural Services and Facilities Audit), wider strategic evidence base documents (e.g. the GBHMA Strategic Growth Study) and further evidence of site specific constraints gathered through the site assessment process (e.g. Highways Authority views, Historic Environment Assessments, Sustainability Appraisals).

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf

⁴

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805688/Garden_Communities_Prospectus.pdf

Sites which will be considered ‘potentially suitable, but subject to physical constraints’

5.39 Subject to no other overriding physical or policy constraints⁵ being identified, the following sites have been considered as being potentially suitable for development;

- Sites containing a physical constraint which may prevent development on the site in its current form, such as lack of highways access, steep topography, telephone lines, ground conditions etc.

Sites which will be considered ‘unsuitable’

5.40 The following sites have been considered unsuitable for development:

- Sites within the Green Belt or Open Countryside which are disassociated⁶ from an existing development boundary or the built extent of a neighbouring urban area, which do not have capacity to deliver a minimum of 1,500 dwellings.
- Sites providing essential community facilities and services, unless it can be demonstrated that these are surplus to local needs
- Sites providing open space, sport or recreation functions, unless clearly shown to be surplus requirements, or unless the loss resulting would be replaced by equivalent or better provision (NPPF paragraph 103)

5.41 In addition to the above, sites within the following designations have also been deemed unsuitable for development where these designations cover the majority of the site:

- Ancient Woodland
- Scheduled Ancient Monuments
- Sites of Special Scientific Interest (SSSI)
- Registered Parks and Gardens
- Local Nature Reserves (LNR)
- National Nature Reserves (NNR)
- Sites of Biological Interest (SBI)
- Special Areas of Conservation (SAC)
- Regionally Important Geological Sites (RIGS)
- Flood Zone 3

5.42 Where the minority of a site is covered by a designation, these may be assessed in further detail, albeit with a reduced developable area to reflect the extent of the designation. Sites

⁵ E.g. those listed at paras 5.39 - 5.41

⁶ A site is considered disassociated from a village development boundary when it is not directly adjacent to it. On a case by case basis, it may be appropriate to consider a site not directly adjoining a development boundary as a ‘potentially suitable’ extension to a village/urban area where the site is a short distance from the host settlement and a legible and safe pedestrian route and means of access to the host settlement can be demonstrated by the site promoter.

which are flagged as ‘unsuitable’ will not be considered further through the Local Plan review evidence base, in line with the PPG guidance⁷.

Assessing availability

- 5.43 This assessment considers whether, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. These issues have been raised in the Council’s ‘Call for Sites’ form.
- 5.44 Unless information to the contrary has been submitted to the Council, it will be assumed that land submitted in the SHELAA is available for development. In some cases, larger land parcels potentially suitable for new settlements or sustainable urban extensions may involve multiple land owners. In such cases, site promoters will need to demonstrate that there is an in-principle agreement to deliver the relevant scale of site from all relevant land owners in order for the area to be assessed as a single site option.

Assessing achievability

- 5.45 Sites should be judged as achievable where it is considered that there is a reasonable prospect that a particular type of development will be developed on the site at a particular point in time. The Council’s previous evidence base included the Site Allocations and CIL Viability Study, which assesses the viability of broad typologies of residential development within the district. However, a number of other factors may contribute to determining the achievability of a site, including track record of delivery and consultation with individual site promoters.
- 5.46 The Site Allocations and CIL Viability Study concluded that most residential typologies within the district were likely to be viable and highlighted the strong local record of larger residential site deliverability. However, it did also identify that some of the larger greenfield site typologies assessed risk generating insufficient profits to meet landowner expectations, indicating that some planning policy requirements may not be deliverable on all sites. However, the larger sites allocated in the Site Allocations Document 2018 (i.e. those allocated for 50+ dwellings) now all benefit from outline or full planning permission and have all been signatories to policy-compliant levels of affordable housing. The Council is therefore confident that, subject to appropriate flexibility at the planning application stage and updated viability evidence to reconsider the viability of policies in the Local Plan review, housing sites submitted to the SHELAA will be achievable.
- 5.47 Sites which have been granted planning permission have been assumed to be achievable. Through the five year supply process, the Council proactively monitors larger planning permissions to ensure that permissions included within the SHELAA will be delivered. Therefore, it is considered appropriate to assume that all sites with planning permission are achievable unless otherwise indicated by individual site promoters or site-specific circumstances. This position also reflects the NPPF’s steer that sites with full planning

⁷ Planning Practice Guidance ‘Housing and economic land availability assessment’ Paragraph 3-014-20190722

permission and small sites should be considered deliverable in the absence of clear evidence to the contrary.

- 5.48 Sites proposed for allocation in the Council’s adopted Site Allocations Document are also considered to be achievable. Correspondence with each allocation site’s respective promoters indicates that all proposed SAD sites are achievable. This fact, coupled with the Council’s historic track record of delivery on schemes of 10 or more dwellings, is considered to represent a reasonable prospect that the SAD sites will come forward as envisaged.

Categorising housing sites

- 5.49 Based on an assessment of the above factors and any further site specific information provided, the SHELAA has split housing sites into 6 different categories which are set out below. The final trajectory of deliverable and developable supply will only include sites in categories S1-S3, although this position may be updated as sites in NCD1&2 are assessed through the Local Plan review evidence base:

- S1 Sites currently suitable for housing and deliverable within 5 years
- S2 Sites currently suitable for housing and developable between 5 and 10 years
- S3 Sites currently suitable for housing and developable 10+ years
- NCD1 Sites potentially suitable for housing but not currently developable because of a policy designation (e.g. Green Belt/Open Countryside/Employment Land/outside current Spatial Strategy/covered by Safeguarded Land Policy)
- NCD2 Sites potentially suitable for housing but not currently developable because of other constraints
- NS Sites which are unsuitable because of constraints which cannot be overcome.

Build Out Rates and Lead-In Timescales

- 5.50 To determine indicative lead-in times and buildout rates for housing sites in the SHELAA the Council has considered historic schemes permitted within a ten year period (2010-2020), alongside advice offered by members of the Council’s SHELAA Housing Panel and national research conducted by development industry bodies. These assumptions have also been reviewed more recently in 2022 through a targeted consultation with neighbouring and HMA local authorities, alongside local developers, land promoters and agents. The full summary of representations received to this consultation, along with the Council’s responses to these, are set out in Appendix 6, alongside the updated assumptions note consulted on at that point. This ensures that any assumptions relating to build out rates in particular reflect a variety of housing market conditions and are based on a larger sample of historic schemes.
- 5.51 As the size of a site often affects the rate at which it is built out, assumptions regarding site build out rates are split by site size. All assumptions set out in the tables below assume one sales outlet (i.e. developer) per site.

Lead-in time assumptions		
Sites of 1000+ dwellings	Without planning permission or local plan allocation	6 years to implementation
	With planning permission (outline) or local plan allocation	5 years to implementation
	With planning permission (full)	1 year to implementation
Sites of 500-999 dwellings	Without planning permission or local plan allocation	5 years to implementation
	With planning permission (outline) or local plan allocation	4 years to implementation
	With planning permission (full)	1 year to implementation
Sites of 100 – 499 dwellings	Without planning permission or local plan allocation	4 years to implementation
	With planning permission (outline) or local plan allocation	3 years to implementation
	With planning permission (full)	1 year to implementation
Sites of 50-99 dwellings	Without planning permission or local plan allocation	3 years to implementation
	With planning permission (outline) or local plan allocation	2 years to implementation

	With planning permission (full)	1 year to implementation
Sites of 16-49 dwellings	Without planning permission or with outline planning permission	2 years to implementation
	With planning permission (full)	1 year to implementation
Sites of 5-15 dwellings	Without planning permission or with outline planning permission	2 years to implementation
	With planning permission (full)	1 year to implementation
Assumed build out rate from year of implementation		
100 – 499 dwellings	45 dwellings per annum	
Sites of 50 – 99 dwellings	35 dwellings per annum	
Sites of 16-49 dwellings	20 dwellings per annum	
Sites of 5-15 dwellings	10 dwellings per annum	

5.52 The assumptions set out above reflect the size of sites the Council has typically permitted within the 2010-2020 period. These have never involved more than 400 dwellings and have always been built out by a single developer. However, there is the possibility that sites considered in the Local Plan review may involve much larger scales of development, involving numerous developers or outlets on a single site. The likely lead-in times on such sites will invariably be longer than those permitted by the Council historically, and will therefore need to be considered on a case by case basis in determining any future housing trajectory. To reflect the effect that multiple developers/outlets on a single site will have on site build out rates, the following assumptions will be made, as set out in the build-out rates and lead-in times update note 2022 (see Appendix 6):

- Sites up to 499 dwellings: assume single developer (45 dwellings per annum)
- Sites of 500-999 dwellings: assume two developers (80 dwellings per annum)
- Sites of 1000+ dwellings: assume three developers (120 dwellings per annum)

5.53 All assumptions set out above are intended as starting points for estimating delivery timescales. Where the Council is made aware of more appropriate site-specific information this will be used instead to more accurately set out the likely rate of delivery.

Non-Implementation Rates

5.54 In accordance with the PPG, a risk assessment of whether sites will come forward as anticipated should be made. In recent years, much of South Staffordshire’s housing supply has come forward on small sites, however these have historically been at significantly higher risk of non-implementation than sites of 10 or more dwellings. In calculating the delivery rate for planning permissions of less than 10 dwellings it will therefore be assumed that the site will be completed within 5 years subject to a lapse/non-implementation rate being applied across the board. Looking at past delivery rates 81% have been built out within 5

years of approval. A lapse rate of 19% will therefore be applied to small sites of less than 10 dwellings with permission when calculating the 0-5 year land supply.

Historic Build Out Rates for Small Sites (< 10 dwellings)

Years from approval to completion	01-02	02-03	03-04	04-05	05-06	06-07	07-08	08-09	Total	%
less than 1	4	5	3	10	1	1	2	0	26	4%
1-2	17	15	26	31	15	31	14	9	158	23%
2-3	28	40	29	13	16	34	9	3	172	25%
3-4	13	25	9	14	34	1	25	15	136	20%
4-5	12	18	9	3	12	2	9	10	75	11%
5-6	13	21	10	13	1	6	8	2	74	11%
6 plus	3	16	17	4	5	5	5	0	55	7%

5.55 The implementation of larger sites (>10 dwellings) has been considered on a site by site basis when determining the likely implementation timescales and delivery rate. This will be reflected in the land supply calculations and only those dwellings it is anticipated will be delivered within 5 years, taking account of any likely lead-in times and build out rates, will be included. Taking this approach means that each individual large site is evaluated annually and delivery rates will be adjusted to reflect market conditions or delays in the grant of permission etc. This should give a more accurate picture of delivery on site and therefore a general lapse rate will not be applied to large sites. It is also important to note that in the monitoring period this statement is based on (2006-2022), only two planning permissions for 10 or more dwellings have lapsed⁸, both of which have been on sites untypical of the majority of the Council's large scale site delivery. This means that it would not be appropriate to apply a blanket non-implementation rate to sites of 10 or more dwellings.

Stage 3: Windfall Assessment

5.56 Windfall sites are defined as sites not specifically identified in the development plan. NPPF para 72 states that LPAs may make an allowance for windfall sites in anticipated housing supply if they have compelling evidence that such sites will provide a reliable source of supply, having regard to the SHELAA, historic windfall delivery rates and anticipated future trends. In the context of South Staffordshire, where significant windfall developments have

⁸ A pub conversion at the Waggon and Horses, Wombourne (11/00644/FUL) and a 12 dwelling redevelopment of a nursery in Oaken (15/00215/FUL)

continued to occur over a number of years, it is appropriate to consider a windfall allowance going forward.

Windfalls in South Staffordshire

- 5.57 The Council’s previous windfall allowance had historically been set at 30 dwellings per annum, based on evidence gathered and analysed in the 2016 SHLAA, under the policy framework offered in the NPPF 2012 at the time. This was informed by historic windfall completions delivered exclusively on small sites (<10 dwellings), excluding any historic windfalls achieved on residential land (i.e. residential gardens). This approach had regard to national policy, guidance and best practice at that point in time. However, the methodology behind this allowance and the historic monitoring information used to inform the allowance have not been revisited since this date. It is therefore considered appropriate to revisit the Council’s approach to this issue to ensure it reflects the latest data on windfall allowances, national policy and guidance and the latest expected future trends.
- 5.58 In reviewing future expected windfall rates, a key action is to review and update the historic windfall rates achieved in the District. To inform this, historic windfall rates have been examined over the 2012-2020 period. This period has been selected to ensure historic windfall completions are largely reflective of the policies adopted in the Core Strategy 2012 DPD, such as existing policies relating to the re-use of existing developed land (e.g. employment or community facilities), infill development and space about dwellings standards. This is important as the current version of the Local Plan Review proposes to retain much of the existing policy approaches set out in the 2012 Core Strategy on these issues.
- 5.59 The historic windfall rates achieved within this period are set out below.

Windfalls in South Staffordshire 2012-2020		
Annual windfall rate	231	Dwellings per annum (DPA)
% Greenfield	25	%
% Former residential	12	%
% Former employment	36	%
% Other brownfield	27	%
Total windfalls	<i>1850</i>	<i>Dwellings</i>
Total: Greenfield	<i>458</i>	<i>Dwellings</i>
Total: Former residential	<i>229</i>	<i>Dwellings</i>
Total: Former employment	<i>657</i>	<i>Dwellings</i>
Total: Other brownfield	<i>506</i>	<i>Dwellings</i>

Source: South Staffordshire Housing Monitoring 2012 – 2020

- 5.60 It is clear from the above that there has been a large amount of windfall completions delivered within the District in the 8 year period assessed. The figures set out above are significantly above the historic windfall allowance of 30 dwellings per annum set out in the 2016 SHLAA. In part this is because of the inclusion of windfalls from residential garden land

in the historic rates, which is now permissible under certain circumstances in the NPPF 2023 but was not considered appropriate for inclusion under the previous NPPF 2012. However, a significant proportion of the historic windfall rates in the 2012-2020 period have also come through major (10+ dwelling) developments unlikely to be replicated or omitted from SHELAA (e.g. prematurely delivered safeguarded land, large former employment sites, major developed sites in the Green Belt). More recent SHELAA's and the Local Plan Review's site selection process have sought to examine all sites of 10 or more dwellings that could be allocated for future development, including typologies that have historically informed the overall windfall delivery rates.

- 5.61 Given the above it is considered unlikely that delivery on sites of 10+ dwellings can form a consistent part of the windfall allowance going forward without risking double counting with sites allocated in the Local Plan Review. This does not imply that large windfall sites will not occur during the period covered by the Local Plan Review, simply that there is not currently sufficient evidence to meet the national policy tests for incorporating such supply in a windfall allowance going forward. To address this issue, the historic windfall rates in the period can be adjusted further to remove these sites and to focus solely on historic windfalls from sites of 1-9 dwellings that are unlikely to be allocated in the Local Plan Review, as reflected below.

Windfalls in South Staffordshire 2012-2020 on sites of 1-9 dwellings		
Annual windfall rate on small sites	70	DPA
% Greenfield	34	%
% Former residential	38	%
% Former employment	1	%
% Other brownfield	27	%
Total windfalls on small sites	557	<i>Dwellings</i>
Total: Greenfield	187	<i>Dwellings</i>
Total: Former residential	214	<i>Dwellings</i>
Total: Former employment	5	<i>Dwellings</i>
Total: Other brownfield	151	<i>Dwellings</i>

Source: South Staffordshire Housing Monitoring 2012 – 2020

- 5.62 From this it is clear that, even on small sites, historic windfall rates under the 2012 Core Strategy are currently more than double the District's existing 30 dwellings per annum windfall allowance. This suggests that there is a case for increasing the windfall allowance to reflect this more realistic picture of windfall delivery. However, there is still potential for overlap between sites of 5-9 dwellings which are assumed to contribute to windfall supply and sites identified and then allocated through the Brownfield Land Register, which should include all suitable, available and deliverable sites capable of accommodating 5 or more dwellings. Therefore, before increasing the windfall allowance, it is considered important to look at windfall completions on sites that wouldn't be expected to be included on any Brownfield Land Register going forward (i.e. sites of 1-4 dwellings).

Windfalls in South Staffordshire 2012-2020 on sites of 1-4 dwellings		
Annual windfall rate on small sites	57	DPA
% Greenfield (G)	33	%
% Former residential I	41	%
% Former employment I	1	%
% Other brownfield (B)	24	%
Total windfalls on small sites	455	<i>Dwellings</i>
Total: Greenfield	151	<i>Dwellings</i>
Total: Former residential	188	<i>Dwellings</i>
Total: Former employment	5	<i>Dwellings</i>
Total: Other brownfield	111	<i>Dwellings</i>

Source: South Staffordshire Housing Monitoring 2012 – 2020

- 5.63 From the above, it is clear that windfall delivery since the adoption of the 2012 Core Strategy has nearly doubled the current assumed windfall allowance of 30 dwellings per annum, even when historic windfall is limited solely to sites of 1-4 dwellings (which is considered a heavily conservative assumption for the reasons given later in this section). This appears to be largely due to the significant contribution that windfall delivery on residential land makes to the supply, which would not have been included in historic windfall delivery in the 2016 SHLAA due to the national policy framework in place at the time.
- 5.64 This shows that residential garden land has been delivering a significant part of the Council’s land supply for some time, despite the Council having a number of development plan policies to restrict inappropriate versions of these developments. These include space about dwellings standards and protections for neighbour amenity, requirements for safe highways access and design requirements to safeguarded areas’ character and appearance. It is therefore clear that appropriate residential garden land development can form an important part of any windfall allowance whilst similar policy protections remain in place.
- 5.65 It is also important to have regard to future trends in considering whether this trend will be reflected in future supply. With that in mind, the emerging Local Plan Review currently proposes to retain many of the current policy mechanisms that have allowed small sites’ windfall supply to come forward over the last 8 years, such as policies to allow for the redevelopment of redundant uses, infill development (including Green Belt locations) and a similar Spatial Strategy approach to infill development in rural locations. This gives confidence that the policy mechanisms that have allowed windfall development historically will continue to apply through the course of the Local Plan Review.
- 5.66 There are also reasons to think this figure is likely a relatively conservative estimate of windfall land supply. In theory all brownfield sites of 5 or more dwellings should be included in the Brownfield Land Register as of the point of the Local Plan Review’s adoption. However, in reality it is likely that this is a conservative estimate as many sites in the District that could form part of the brownfield supply in future (e.g. re-use of existing redundant facilities) can only be demonstrated as suitable for inclusion on the Brownfield Land Register

through meeting policy tests applied at the planning application stage, making their delivery over the course of the plan period difficult to fully capture. Equally, the government appears to be widening, rather than limiting, the scope for small-scale residential development through permitted rights going forward. Examples of this include the Use Class E to residential right and the rights to extend dwelling houses and flats upwards, which are not currently reflected in historic windfall trends.

The proposed updated windfall allowance

- 5.67 Having regard to all relevant factors set out in paragraph 72 of the NPPF 2023 it is considered appropriate to increase the windfall allowance to 40 dwellings per annum (DPA) in future housing land supply estimates. This is based on clear evidence of historic windfall delivery in the District since 2012 on sites which will not be reflected elsewhere in future supply estimates (i.e. sites of 1-4 dwellings) and is considered a relatively conservative estimate in light of the factors highlighted in the previous section which may well be exceeded in reality. As with the previous windfall allowance, this will not be applied in years 1-3 of future housing land supply to avoid any potential double counting with existing planning permissions.

Stage 4: Assessment Review

- 5.68 Following an assessment of the deliverability and developability of sites, the information has been used to provide a housing trajectory. The trajectory sets out the total amount of housing that can be provided under current planning policies and the timescales for development. This indicative trajectory is set out in Appendix 4.
- 5.69 It is clear from the summary table set out in Appendix 3 that there is very little scope to identify new housing supply within South Staffordshire within the current policy framework. There is very little suitable housing site supply left within the District that is not already accounted for within planning permissions.
- 5.70 The 2018 Site Allocations Document allocated further safeguarded land to deliver 1750 dwellings offering some potential sources of supply for the Local Plan Review. There is also potential for a significant amount of new housing supply to be identified in Open Countryside locations adjacent to existing villages (e.g. Penkridge and Wheaton Aston) or neighbouring urban areas, subject to review of Open Countryside restrictions in these areas (Policy OC1 of the Core Strategy). However, as set out in the Council's 2019 Spatial Housing Strategy and Infrastructure Delivery consultation, maximising potentially suitable Open Countryside land options would not deliver the Council's proposed housing target, nor would it likely represent a sustainable and deliverable pattern of development⁹.
- 5.71 Beyond these options, the vast majority of the remaining potentially suitable land supply lies in villages or urban edge locations within the Green Belt. Delivering new housing growth within these areas would require a review of the existing spatial strategy (Core Policy 1) and would require an examination of whether exceptional circumstances existed to justify a

⁹ See pages 18-20 of the 2019 Spatial Housing Strategy and Infrastructure Delivery consultation (<https://www.sstaffs.gov.uk/doc/181104/name/LPR%20SHSID%20Final%20October%202019.pdf/>)

review of Green Belt boundaries. Both of these tasks will be undertaken through the preparation of the Local Plan Review.

Stage 5: Final Evidence Base

5.72 The results of the SHELAA's assessment of housing capacity are given in the section below. Tables containing detailed information about each site are provided in Appendix 7. These tables can be cross referenced with maps of the relevant broad location, which are colour coded to be consistent with the tables in Appendix 7.

6. Assessment findings

Summary of existing commitments as at 1st April 2023

6.1 The Council's most recent 5 year housing land supply position is given in Appendix 5. This shows that, as at April 1st 2023, there was 4.51 years of housing land supply against the Council's local housing needs, based upon existing and anticipated planning permissions within the District. This equates to a housing supply of 1123 dwellings between 2023 and 2028. However, the District is needing to review its Local Plan to accommodate a housing target of its own housing needs and a 640 dwelling contribution to the Greater Birmingham Housing Market Area. This is estimated to imply a housing target of 4,726 dwellings between 2023-2041 as of 1st April 2023. The scale of housing growth required will not be accommodated by current planning permissions and allocations, meaning it is important to review wider sources of supply and consider areas where policy constraints could be removed through the Local Plan Review.

Summary of other housing supply identified in SHELAA as at 1st April 2023

6.2 In addition to existing deliverable supply identified in the district, the SHELAA's assessment of housing capacity has sought to identify future sources of deliverable/developable supply which could assist in addressing the district's own housing needs and a potential contribution to the unmet needs of other local authorities (as required by Policy SAD1 of the Council's Site Allocations Document).

6.3 In accordance with the methodology set out above, sites have been categorised into the following:

S1 Sites currently suitable for housing and deliverable within 5 years

S2 Sites currently suitable for housing and developable between 5 and 10 years

S3 Sites currently suitable for housing and developable 10+ years

NCD1 Sites potentially suitable for housing but not currently developable because of a policy designation (eg Green Belt/Open Countryside/Employment Land/outside current Spatial Strategy/Safeguarded Land Policy)

NCD2 Sites potentially suitable for housing but not currently developable because of other constraints

NS Sites which are unsuitable because of constraints which cannot be overcome

6.4 Assessments of sites as they fall into the above categories are given in the tables in Appendix 7. These tables are accompanied by maps showing the location and the assessment conclusions of the SHELAA’s assessment of housing supply, which will be published on the Council’s website alongside this assessment. A detailed summary of potential sources of supply and the key constraints holding back potential supply in each broad location is given in the summary table in Appendix 3.

6.5 The findings of this exercise can be summarised as per the below table:

Summary of other sources of housing supply within the district (excluding existing sites with outline or full planning permission)

	Suitable (S1-3)	Potentially suitable/not currently developable (NCD1 & NCD2)	Not suitable (NS)
DISTRICT-WIDE TOTAL (dwellings)	316	71,839	29,941

6.6 It is clear from the above that there is very little limited opportunity to realise extra housing supply in the district within the scope of current development plan policies, with the majority of additional supply arising from the supply allocated in the Council’s Site Allocations Document. The indicative trajectory in Appendix 4 indicates that supply currently identified as suitable is unlikely to meet the district’s local housing needs in the medium/long term. This is reflected in Policy SAD1 of the Council’s Site Allocations Document, which identifies a number of matters that the Council will need to reconsider in preparing the Local Plan review.

6.7 In light of the need to find future housing supply, there will be a need to review existing planning policies constraining housing supply, through the Local Plan review. In particular, the following matters will need to be addressed through the Local Plan review, having regard to the latest areas of potentially suitable development land in the SHELAA:

- The existing spatial strategy (Core Policy 1) as it relates to the existing settlement hierarchy, the potential for urban extensions to neighbouring urban areas and the potential for freestanding new settlements.
- Areas of potential housing supply identified as safeguarded land in the Site Allocations Document (Policy SAD3).
- The potential to amend Green Belt and Open Countryside boundaries adjacent to existing settlements and urban edges.
- The potential to amend Green Belt and Open Countryside boundaries in potential locations for freestanding new settlements.

- 6.8 The Council’s consultations on the Local Plan review in 2019, 2021 and 2022 have undertaken work to review these policy assumptions and to identify how additional growth could be accommodated. To enable this review to take place, a number of evidence base studies have been prepared as part of the Local Plan review. These have in turn informed decisions as to where local policy constraints may be altered to accommodate further housing supply. This evidence base includes a full Green Belt Study, Landscape Sensitivity Assessment, Rural Services and Facilities Audit, Historic Environment Site Assessment, Nature Recovery Network mapping, Sustainability Appraisal and joint working with key stakeholders. This work has been summarised in the Housing Site Selection Topic Paper 2022, allowing the Council to determine which ‘potentially suitable’ sites may be made ‘suitable’ through policy alterations in the Local Plan review.

Appendix 1 – SHELAA Housing Panel Meeting Minutes 2017

SHELAA Panel Meeting Notes and Actions

**South Staffordshire Council Offices
10am Monday 13th November 2017**

Present:

Lesley Birch	Housing Plus Group
Abby Brough	Stafford Borough Council
Neil Cox	Pegasus Group
Richard Hodson	DBA Estates
Phil McConnachie	First City
Andy Rhoades	Bromford Housing
Michele Ross	City of Wolverhampton Council
Max Whitehead	Bloor Homes
Andy Williams	Advance Planning
Kelly Harris	Strategic Planning Team Leader – SSDC
Ed Fox	Assistant Team Manager (Local Plans) – SSDC
Jen Lawton	Housing Strategy Officer – SSDC
Karen Richards	Senior Local Plans Officer – SSDC
Patrick Walker	Senior Local Plans Officer – SSDC

1. Introduction and Local Plan Review Update

- 1.1 Kelly Harris welcomed everyone to the Panel meeting and there was a round table introduction. It was noted that the HBF had provided written comments but were unable to send a representative.
- 1.2 Kelly updated the panel on current Local Plans work including the SAD forthcoming Examination hearing sessions, the Local Plan review, Green Belt studies, and joint work with the Black Country. The aim is for Local Plan review Issues and Options to be published for consultation late summer 2018.
- 1.3 It was noted that the joint Green Belt Study with the Black Country was anticipated to begin in early 2018, with a 4-6 month timescale for completion. The study would be informed by the wider GBHMA Green Belt Study (G L Hearn), but this is a higher level strategic piece of work. Neil Cox (NC) asked if South Staffordshire's Green Belt Review would be more detailed than the LUC study. Kelly Harris (KH) explained that the current LUC work was based on a partial review of the Green Belt which only looked at the villages in South Staffordshire highlighted for growth in the Core Strategy, and that the new study would have a different approach. KH confirmed that as an evidence base study, the Green Belt review would be without political bias.

2. SHELAA Assessment

- 6 KH explained that the purpose of the SHELAA Panel was to agree the methodology; give feedback on market/industry experience of site delivery, capacity/density and lead in times

etc but not the 5 year housing land supply. The previous SHLAA categorised sites in line with the settlement hierarchy in the adopted Core Strategy. The new SHELAA will have a wider remit considering sites for the review of the Local Plan and a new strategy approach. KH confirmed that the window for submission of sites was still open and that if strategic locations for growth were identified through evidence and land had not been promoted that the Council would be proactive in looking for land assembly.

3. Key Methodology Assumptions – Suitability, Availability and Achievability of Sites

- 3.1 Patrick Walker (PW) gave a brief overview of the methodology focussing on the changes that are proposed in the new SHELAA. It was noted that SAD sites, including any that come forward through Modifications to the SAD, would be classified as Suitable. In terms of potentially suitable sites this category had been expanded to include all villages, not just Main and Local Service villages; sites adjacent to neighbouring authorities; large edge of settlement sites; and potential new settlements (1500 threshold). This is a significant change which recognises the requirement for higher housing numbers. There was discussion around threshold size and Max Whitehead (MW) stated that 1000 could deliver shop/school. NC suggested that large sites in close proximity to facilities and services in an existing settlement should be considered. PW noted that although such sites were not self-contained they could be considered if such sites could be successfully integrated. It was agreed that the site size threshold for new settlements and disassociated sites would be reconsidered, with **SSDC to use 1,500 threshold as a starting point, but add further caveat that smaller could be considered where site promoters confirm the required infrastructure would be provided** (e.g. in some cases sites of 1,000 could provide shops, primary schools, public transport links etc.). It was also agreed that **footnote 4 defining ‘disassociated’ sites would be amended. The revised footnote would recognise that (on a case-by-case basis) it may be appropriate to include sites as ‘potentially suitable’ extensions to a nearby village/urban area where the site is a short distance from the settlement to the site and where strong visual and physical links could be demonstrated to the host settlement (e.g. legible pedestrian connections).**
- 3.2 Michele Ross (MR) asked about thresholds and site sizes for new employment sites. PW explained that the equivalent assessment for employment sites was being carried out independently. Ed Fox (EF) employment sites were market driven and would be picked up in the new EDNA. NC asked how the Council would deal with sites which were bigger than the housing requirement as the current SAD split large sites. KH confirmed that the SHELAA would assess sites as a whole, but that smaller areas might be considered in the context of future requirements for the Local Plan review. It was agreed that this was an acceptable approach.

4. Build Rates, Lead-in Times and Yield

- 4.1 PW explained that assumptions on developable area and capacity reflect viability evidence and monitoring data on site typologies. Andy Williams (AW) commented that the SAD open space requirements were high and would impact on density as would a requirement for bungalows. MR noted that density is policy driven and suggested consideration of a minimum density requirement. KH/PW stated that the viability study has influenced numbers but that this may be revisited through the Local Plan review.
- 4.2 NC said there was a tension between Open Space requirement and other policy requirements in that densities were too low and net to gross assumptions too high. He noted that the

Council had limited experience of developing large sites in recent years and that developable area of sites might be significantly reduced by open space standards, particularly for higher density schemes. There was considerable round table discussion around density assumptions and the difference between character of existing villages and possible new settlements/urban extensions. It was agreed that **a density assumption of 35 dwellings per hectare should be used for urban extensions on edge of adjacent urban areas (e.g. Black Country)**, reflecting different patterns of development in these locations.

Lesley Birch (LB) said that it was important that a minimum dwelling size influenced density assumptions. It was suggested that new thresholds were considered on the basis of:

- **70% developable area on sites 0.4 – 2ha**
- **60% developable area on sites > 2ha : As per Lichfield/Cannock**

Action 1: Officers to research developable area thresholds further and reconsider thresholds (see Appendix 1)

- 4.3 In term of build out rates and lead in times, HBF said proposals were too optimistic with respect to lead-in times, noting a recent Barratt’s report. NC stated that future sites would be bigger than historic and that thresholds in 2016 NLP report were more realistic. It was noted that for large sites with more than one developer, some Panel members expressed concerns that it may not be appropriate to double build out rates. However, it was noted that other Staffordshire authorities (e.g. Stafford, Lichfield) used a similar approach. The Council also highlighted that the assumed uplifted rates (80dpa, 120dpa) were broadly consistent with national data on the matter (as per Figure 8 of the 2016 NLP report). Officers voiced their concerns that many sites in South Staffordshire would be greenfield/Green Belt and that delivery would be different than other Market areas such as Telford/Black Country. After considerable discussion, the following thresholds were agreed:

Lead-in Times

50 – 99	as proposed
100 – 499	3 years to full approval, one year to begin
500+	4 years to full approval, one year to begin

Build Out Rates from year of implementation

50 – 99	35 dws/pa
100 – 499	40 dws/pa

Larger Sites with one or more developer

500 – 999	80 dws/pa (i.e. 2 developers on site)
1000+	120 dws/pa (i.e. 3 developers on site)

Action 2: Officers to consider findings of 2016 NLP report and consider if 4 year lead-in time is appropriate for larger sites (see Appendix 1)

5. Other Issues

- 5.1 MR asked if the Open Space Strategy was to be refreshed for the Local Plan review. KH confirmed that it would, but unlikely to be complete prior to Issues and Options.

- 5.2 MW asked if the windfall allowance had been tested. PW confirmed that it was based on monitoring data and was deliberately conservative at 30 dws/pa against actual of at least 47 dws/pa. MR noted that the non-implementation rate was high at 19%. KH confirmed this was only against small sites and that large sites were assessed individually, with almost no non-implementation on large sites (i.e. 10+) historically. **MR suggested this was explicitly noted in the SHELAA text.**
- 5.3 KH said that new site suggestions would continue to be accepted and that due to the forthcoming SAD hearing session work would not begin on the assessment of sites until the New Year. KH thanked the Panel for their attendance and further information would be disseminated once additional research had been carried out.

Summary of additional comments received by non-attendees of the meeting

7 Home Builders Federation:

- Indicated that the stated lead-in times assumed in the report may be overly ambitious
- Referenced the Council to a September 2017 report from Barratt Developments PLC which sets out information on lead-in times that may be useful

These comments were discussed at the panel meeting and the lead-in times assumed were amended with agreement from the SHELAA Housing Panel, having regard to the Barratt Developments report and a similar 2016 NLP report (see Action 2 below).

2. Cannock Chase District Council:

- Made several suggestions to assist in clarifying the methodology to be used in the SHELAA
- Noted the difference in build out rates and windfall assumptions as compared to CCDC's SHLAA methodology, but considered that these reflected local circumstances and were justified by NPPF/NPPG.

The suggested amendments to clarify the methodology were made and the support for the local assumptions regarding build out rates/windfall assumptions noted.

Actions arising from the meeting

Action 1: Officers to research developable area thresholds further and reconsider thresholds

For sites of >2ha, the Council have examined other Staffordshire authorities suggested by the SHELAA Housing Panel at the 13th November meeting. Lichfield apply a 60% developable area threshold on sites of 2 hectares or above¹⁰. Cannock apply a 75% developable area threshold on sites of 2 hectares or above, noting that they have far more 'medium scale' sites closer to the 2 hectare threshold than Lichfield, albeit acknowledging that sites significantly below this threshold may have a net developable area as low as 60%¹¹.

For the purposes of South Staffordshire's Site Allocations Document (SAD), which allocates numerous 'medium scale' sites, it is not considered appropriate to apply a 60% developable area assumption to each site of 2ha or above. Many of the sites nearer the 2ha threshold have been viability tested assuming a developable area assumption of 70%, and all allocation site promoters have confirmed deliverable capacity in line with this assumption. However, the Council recognises that the SAD is delivering many small sites near to the 2ha threshold and in reviewing the Local Plan larger sites may be relied upon, meaning a more conservative approach to developable areas may be appropriate.

Therefore, the Council agrees that applying a 60% developable area threshold to sites of 2ha may be appropriate in modelling sites in the revised SHELAA.

Action 2: Officers to consider findings of 2016 NLP report and consider if 4 year lead-in time is appropriate for larger sites (see Appendix 1)

¹⁰ <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Evidence-base/Housing/Downloads/SHLAA/SHLAA-2017.pdf>

¹¹ https://www.cannockchasedc.gov.uk/sites/default/files/final_cannock_chase_shlaa_to_publish_october_2017_0.pdf

Having considered the findings of the 2016 NLP report¹², the Council has reconsidered the lead-in times set out in 2.40 of the draft SHELAA methodology. The Council has also considered the information provided by the Home Builders Federation (HBF), who were not able to attend the meeting but provided a brief written comment and industry research regarding lead-in times. Having taken account of this and the data in Figure 4 of the 2016 NLP report, the draft methodology would be made more robust by including the following assumptions:

- A lead in time of 4 years (3 years to full approval, one year to begin) for sites of 100-499 dwellings
- A lead in time of 5 years (4 years to full approval, one year to begin) for sites of 500+ dwellings

In light of the information provided by the Panel (including the HBF) regarding lead-in times, the Council will update the draft SHELAA methodology to reflect these assumptions.

¹² <http://lichfields.uk/media/1728/start-to-finish.pdf>

Comments provided following consultation on the Draft SHELAA Assessment of Housing Land report (29th August – 19th September 2018)

Panel member	Comment	Council response and changes made
Advance Land & Planning Limited	As a general comment, I think it is unreasonable to suggest that a site is not adjacent to a development boundary when it is on the opposite side of a road. I think that is rather semantic.	This is noted, although it is difficult to see any sites where this raises concerns as the comment suggests none. Whether or not a site is disassociated is a case by case judgement (see para 5.37 of the report). Roads have only resulted in sites being considered as disassociated where they currently prevent satisfactory pedestrian access to the host settlement. No change made.
Advance Land & Planning Limited	Is there any significance for the yellow coloured 'Site Ref' boxes on some but not all entries? Ditto the grey coloured 'Land Owner/Developer/Agent' boxes?	These are cartographic errors and will be removed from the assessment.
Advance Land & Planning Limited	Site 485 – Penkrige: Is visual impact to/from Cannock Chase etc not be mentioned since this land is open and slopes down to the east and so is very prominent from that perspective?	As set out in the methodology, such factors will be considered consistently through landscape sensitivity evidence. Where a site is within an AONB this has been noted. No change proposed.
Advance Land & Planning Limited	Site 026 – Bednall: I think that there is a Listed Building (barn) on this site?	The assessment text in the table of site results has been amended to reflect this.
Advance Land & Planning Limited	Site 487 – Dunston: I don't understand why some sites that are not adjacent to the development boundary such as this one (but there are others) are assessed as potentially suitable, whereas others are not?	See para 5.37 of the report; on a case by case basis, some sites not directly adjoining development boundaries have been considered potentially suitable if in close proximity to the existing settlement and a legible pedestrian route and means of access can be demonstrated. This was introduced having regard to comments received at the 2017 SHELAA Panel meeting. No change made.
Advance Land & Planning Limited	Site 588 – Dunston: I don't understand why some sites such as this one (but there are others) that are being promoted for employment use and not housing or mixed use are assessed as suitable for housing having regard for the issues of 'availability' and deliverability'? Site 633 – Four Ashes: ditto	The PPG requires the Council to be proactive in considering sites, and not to rely solely on site suggestions for a given use. As such, many sites suggested for employment have been assessed for their potential housing capacity, but in each case where the landowners are not proposing a housing use, the sites have been assessed as being 'not currently available'. Assessing site 'suitability' involves consideration of policy and physical constraints affecting the land. Landownership issues (i.e. whether there is a willing

		landowner for the use in question) are addressed under a site’s ‘availability’. No change made.
Advance Land & Planning Limited	Site 119 – Cheslyn Hay: I have already written to you to advise that land to the west of the safeguarded land has been suggested by me for assessment in the SHELAA and its omission should be rectified. The land is in the same ownership as the remainder of the agricultural land within Site 119 (Stephens) and it is adjacent to the existing development boundary (to the north). It is not particularly prominent in the landscape and its allocation would represent a logical rounding-off in this location, with the Green Belt boundary following Saredon Road. The quarry to the north (Site 489) is a protected mineral resource and once it is exhausted some years in the future, it might represent a potential development opportunity associated with its restoration. There is no reason to retain the quarry to the north within the Green Belt (it should be noted that the northern part of the quarry is already within the development boundary). In any event, consideration of this land should not have a bearing upon the development potential of Stephens land to the south-west, merely in order to maintain a narrow and relatively meaningless ‘umbilical cord’ of Green Belt between the two sites.	The SHELAA site maps and the assessment of site 119 has been corrected to reflect this information. Other matters relating to amendment of Green Belt boundaries and landscape sensitivity of the site are not for consideration through the SHELAA and will be addressed through a future Green Belt review and Landscape Sensitivity Study.
Advance Land & Planning Limited	Site 119 – Cheslyn Hay: The Safeguarded Land is adjacent to the allocated site, is now within the development boundary and so the comments about the development boundary may now warrant revision.	Site 119 distinguishes between the parcel identified for safeguarded land and the parcel of the site still within the Green Belt. The commentary in Site 119 sets out that the safeguarded land parcel adjoins the development boundary (as the SAD has been adopted). Therefore, no change is made.
Advance Land & Planning Limited	Site 119 – Cheslyn Hay: The former sewage treatment works is in separate ownership (Wilkes) and is	The boundary of this parcel has been drawn to reflect the full extent of the safeguarded land (including the sewage treatment works)

	currently in commercial use (see live planning application). To date, the landowner has shown no interest in making it available for residential development, preferring to retain it in commercial use, but I suppose that may change.	but the site's capacity has been amended to reflect the area of safeguarded land currently being made available for housing (i.e. excluding the sewage treatment works). The site's potential capacity has been reduced to reflect the fact that part of the safeguarded land site area is not currently being promoted for housing.
Advance Land & Planning Limited	Site 119 – Cheslyn Hay: I don't agree that the Site 'does not have satisfactory walking access to the village'. In terms of distance, it is no further away from the 'village centre' (such as it is) than other potential sites, which don't have this comment and in terms of infrastructure, a footpath will be extended along the frontage of the allocated site when it is developed, so as to provide adequate connectivity. It is also within short walking/cycling distance to the schools and leisure centre. I think this comment should be deleted.	See para 5.37 of the report; on a case by case basis, some sites not directly adjoining development boundaries have been considered potentially suitable if in close proximity to the existing settlement and a legible pedestrian route and means of access can be demonstrated. This requires consideration of the current pedestrian linkages to the village, as they currently stand, if a site does not adjoin the village development boundary. As a matter of fact, no footway to the parcel of the site beyond the safeguarded land currently exists, but the site has still been recorded as potentially suitable recognising the opportunity for the parcel to be incorporated into a scheme including the safeguarded land (as the site is within the same land ownership). No change made.
Advance Land & Planning Limited	Site 153 – Essington: I think this now has a planning permission for residential development.	The site is included in the SHELAA for completeness as no start has been made on site to implement the current outline permission and no reserved matters permission has been secured at this time. No potential supply has been recorded from this site to avoid potential duplication with existing planning permissions. The site assessment notes against this site have been updated to clarify this position.
Advance Land & Planning Limited	Site 397 – Featherstone: Vehicular access to this site could be provided through the adjacent allocated site.	This site assessment notes have been updated to reflect this point.
Advance Land & Planning Limited	Site 198 – Long Lane/Broad Lane: If this relates to the coal yard, surely it is brownfield land?	Site 198 relates to the field to the east of the existing coalyard and is therefore a greenfield site. No change made.
Advance Land & Planning Limited	Site 522 – Hatherton Marina, Calf Heath: This site represents brownfield land (car park, buildings etc). Only the very southern part of the site is Flood Zone 3.	The fact that only part of the site is within Flood Zone 3 is reflected in gross site area recorded in the site assessment table, as well as the site's 'potentially suitable' scoring. The text in the site assessment table has been amended to clarify the location of flood zone 3 in relation to the site. From reconsidering

		aerial photography of the site, the site has now been reassessed as being brownfield land.
Advance Land & Planning Limited	Site 417 – Hartford House, Wombourne: The summary is incorrect. I have previously provided written evidence from the County Highways to confirm that the proposed access (inc visibility splays) are acceptable (see attachments).	Having considered the correspondence provided from County Highways regarding the site, the comment relating to access/visibility splays has been removed.
Advance Land & Planning Limited	Site 417 – Hartford House, Wombourne: The site lies within the well- defined curtilage of the existing property, which itself lies within the physical and visual confines of the settlement and does not form part of the surrounding countryside.	This comment is noted, but the containment of the site within the wider landscape will be examined more fully through the Landscape Sensitivity Study and Green Belt Review. No change made.
Advance Land & Planning Limited	Sites 637, 639, 640 and 649 – Hilton Main: I don't understand why Site 649 is unsuitable and the others are potentially suitable and I also refer to my comment above re: employment and not housing land? Sites 652, 641, 642 and 643 – I54 Corridor Featherstone: ditto re employment not housing land?	<p>The comments for site 649 have been amended to clarify that this site is considered to be disassociated from any nearby settlement, due to its relative proximity for the linear ribbon of development extending north along the A460 (i.e. West Croft).</p> <p>The PPG requires the Council to be proactive in considering sites, and not to rely solely on site suggestions for a given use. As such, many sites suggested for employment have been assessed for their potential housing capacity, but in each case where the landowners are not proposing a housing use, the sites have been assessed as being 'not currently available'. Assessing site 'suitability' involves consideration of policy and physical constraints affecting the land. Landownership issues (i.e. whether there is a willing landowner for the use in question) are addressed under a site's 'availability'.</p>
Cannock Chase District Council	<ul style="list-style-type: none"> - Welcome opportunity to continue cross boundary working relationships on key pieces of Local Plan evidence. - No specific comments on methodology- note there are some subtle differences in assumptions to those of the Cannock Chase SHLAA (e.g. lapse rates) but recognise these reflect local 	Comments and support noted. No changes made.

	<p>context and issues in accordance with the NPPF/NPPG.</p> <ul style="list-style-type: none">- Note a number of sites suggested for development lie adjacent to the Cannock urban area and in proximity of the District boundary elsewhere e.g. Huntington. Welcome continued cross boundary working in relation to the consideration of such site options.	
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Appendix 2 – SHELAA Housing Panel 2017/18 – Invitees and Terms of Reference

Invitees

- Natural England
- Historic England
- Environment Agency
- Staffordshire County Council
- Black Country authorities
- Stafford BC
- Cannock DC
- Shropshire Council
- Home Builders Federation
- Taylor Wimpey
- Bloor Homes
- Welcome Homes
- Bromford Homes
- Housing Plus
- Richborough Estates
- Barton Wilmore
- AJM Planning Associates
- Advance Planning
- DBA Estates
- Pegasus Group
- Plan IT
- Firstplan
- First City Ltd

Terms of Reference

South Staffordshire District Council
Strategic Housing and Economic Land Availability Assessment (SHELAA)
Housing Panel
Terms of Reference

Context

The role of the Strategic Housing and Economic Land Availability Assessment (SHELAA) Housing Panel is to assist in the production and annual revision of a robust assessment of housing land availability. This will in turn inform the evidence base for the review of South Staffordshire District Council's Local Plan, which is anticipated for adoption in 2022, by identifying a range of potential sites to assist in meeting housing needs.

The SHELAA Housing Panel will add value to the SHELAA process through the skills, expertise and knowledge of the Panel members.

Purpose

- To assist production of a robust assessment of housing capacity within the SHELAA prepared by South Staffordshire District Council.

- To help achieve agreement on methodology for the assessment of housing capacity within the SHELAA.
- To ensure all reasonable options to meet housing needs are considered in the SHELAA
- To share information and intelligence on market conditions, viability and delivery timescales for sites.
- To assist the Council in forming a view on the deliverability and developability of sites, including consideration of site constraints.
- To work to a timetable which will enable the assessment of housing capacity within the SHELAA to be produced on a timely annual update basis (post 31st March for monitoring purposes).

Operational matters

- South Staffordshire District Council (the Council) will facilitate and chair SHELAA Housing Panel meetings
- Membership of the SHELAA Housing Panel will be undertaken on a voluntary basis. The Council will not be liable for any expenses incurred during the SHELAA Housing Panel process.
- No commercial or other advantage will be sought by Panel members. Panel members are required to declare any interest they may have on a site when contributing towards its assessment.
- Members' primary role is to represent their sector as a whole and not just the interests of their particular organisation.
- The names and contact details of Panel members will be recorded and made available on public request.
- Panel members will be expected to send a suitable substitute in the event that they cannot attend a meeting.
- Members may call on additional people to assist them in Panel work outside of meetings, e.g. checking site information etc. However, only one member of an organisation should attend the Panel meeting itself.
- Panel members will be provided with an opportunity to provide comments on the methodology used in the assessment of housing capacity within the SHELAA prior to the assessment being prepared. Panel members will then be asked to approve the assessment of housing capacity in the SHELAA prior to the document being finalised. Where agreement cannot be reached on an aspect of the housing capacity assessment in the final SHELAA, the point of disagreement will be noted and responded to by the Council in the final document.
- The SHELAA housing database will remain the property of the Council

Appendix 3 – Summary of Capacity by Broad Location

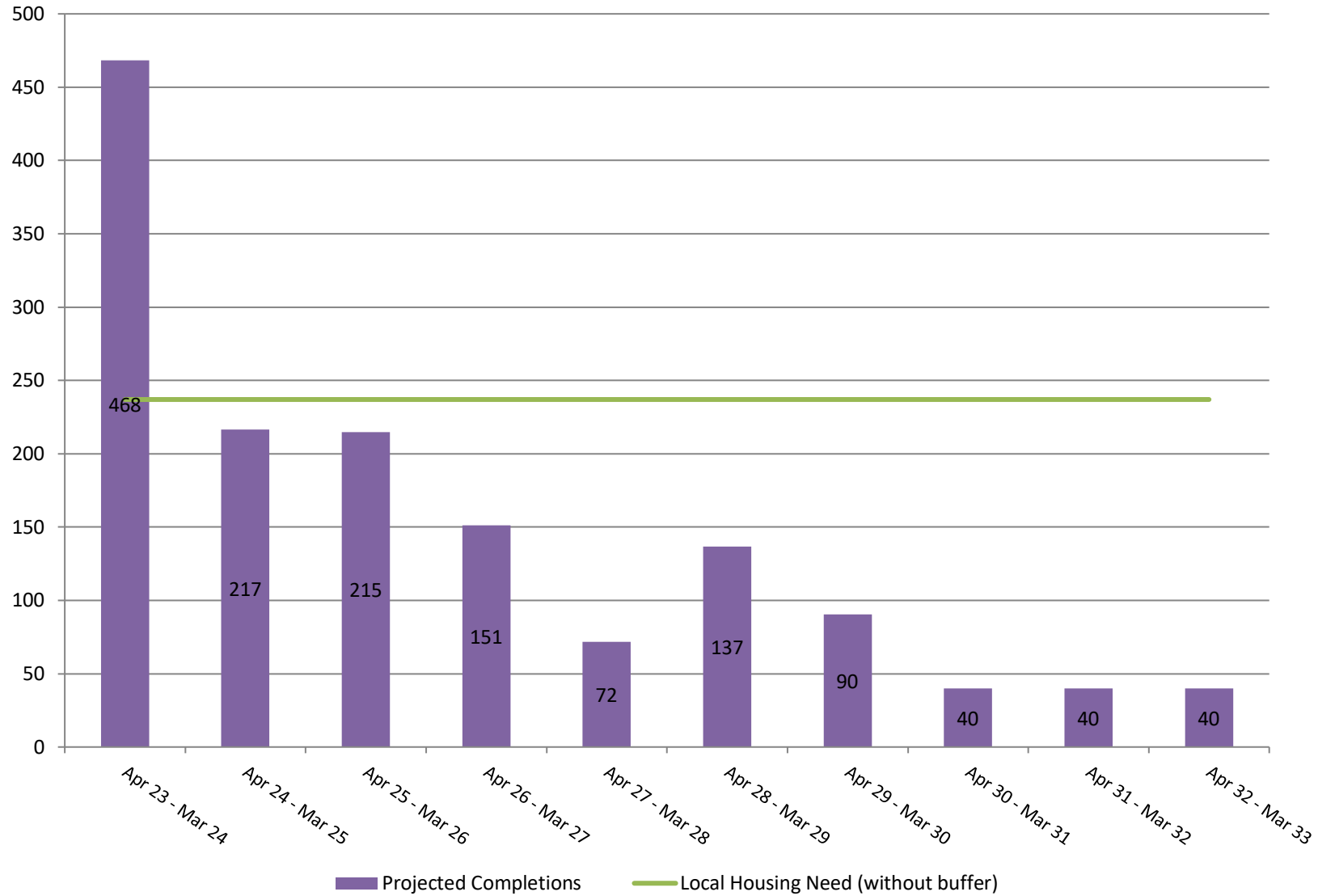
SUMMARY OF SUPPLY IDENTIFIED IN SHELAA 2022 (xvstrategyxv sites with planning permission)				
	Suitable (S1-3)	Potentially suitable/ not currently developable (NCD1 & NCD2)	Key factors constraining NCD1/NCD2 sites	Not suitable (NS)
Villages xvstrategyxv in the updated Settlement Hierarchy Study 2021				
Penkridge	0	2025	Vast majority of sites are in village edge locations, constrained by Green Belt, Safeguarded Land or Open Countryside designations. Constraint affecting the largest amount of potential supply is Open Countryside.	3218
Bilbrook/Codsall	42	2097	A large portion of potential supply comes from one site (Site 519), which is either constrained by both Green Belt and Safeguarded Land designations. Remaining potential supply comes from Green Belt sites, safeguarded land and sites within the development boundary which are not currently available. Constraint affecting the largest amount of potential supply is Green Belt.	3193
Cheslyn Hay/Great Wyrley	123	4328	Wide variety of policy and availability constraints, including development boundary land which is currently not available or is required as employment land under Policy EV1, active quarrying uses, or which are covered by Green Belt or safeguarded land supply designations. Green Belt policy constraints affect majority potential supply, of which a significant proportion may not be available due to requiring the re-use of operational quarrying uses.	1139
Wombourne	0	2779	Wide variety of policy and physical constraints, as well as availability issues, affect potentially suitable supply options. Majority of potential supply is village edge sites constrained by either Green Belt or Safeguarded Land designations. Part of this is on a large brownfield Green Belt land parcel (Sites 310a&b), but these are currently affected by employment site constraints and availability. Constraint affecting the largest amount of potential supply is Green Belt.	1057
Brewood	0	795	Almost all potential supply is on village edge sites in the Green Belt. Constraint affecting the largest amount of potential supply is Green Belt.	787
Kinver	41	653	Almost all potential supply is on village edge sites in Green Belt or Safeguarded Land. Very small amount of supply could come forward in development boundary, but sites not currently available. Constraint affecting the largest amount of potential supply is Green Belt.	95
Perton	0	1709	All sites are in village edge locations in either Green Belt or Safeguarded Land. Constraint affecting the largest amount of potential supply is Green Belt.	951
Huntington	0	546	All potential supply is on village edge sites either in the Green Belt or Safeguarded Land. Sites providing the majority of this potential supply (sites 017, 022, 591 and 592) are either adjacent to or partially within the Cannock Chase AONB. Constraint affecting the largest amount of potential supply is Green Belt.	69

Essington	1	598	Majority of supply arises from Green Belt village edge sites. There is also a limited amount of potential supply within the village development boundary, that is not currently indicated as being available. Constraint affecting the largest amount of supply is Green Belt.	892
Coven	0	584	Almost all potential supply arises on village edge Green Belt/Safeguarded Land sites, with only one small site in the village development boundary (which is not currently available). Constraint affecting the largest amount of potential supply is Green Belt.	79
Featherstone/Hilton	81	1809	Constraints on supply include employment land allocations (ROF Featherstone), Safeguarded Land and Green Belt, with the vast majority of supply being outside the existing development boundary. Constraining the largest amount of potential supply is Green Belt.	835
Swindon	10	1252	All potential supply is on village edge Green Belt and Safeguarded Land sites. Constraint affecting the largest amount of potential supply is Green Belt.	239
Shareshill	0	89	All potential supply is on village edge Green Belt sites. All sites are constrained by the existing spatial strategy (Core Policy 1) which restricts housing growth in Shareshill.	59
Pattingham	0	568	All potential supply is on village edge Green Belt and Safeguarded Land sites. Constraint affecting the largest amount of potential supply is Green Belt.	48
Wheaton Aston	18	396	Majority of sites are in village edge locations constrained by Open Countryside, with some additional supply on sites which are within the development boundary but are not currently available. Constraint affecting the largest amount of potential supply is Open Countryside.	227
Himley	0	114	Supply consists of one development boundary site and village edge Green Belt sites. All sites are currently constrained by existing spatial strategy (Core Policy 1) which restricts housing growth in Himley. Other than Core Policy 1, the constraint affecting the largest amount of potential supply is Green Belt.	173
Seisdon	0	251	All potential supply is on village edge Green Belt sites. All sites are constrained by the existing spatial strategy (Core Policy 1) which restricts housing growth in Seisdon.	8
Bishops Wood	0	202	All potential supply is on village edge Green Belt sites. All sites are also constrained by the existing spatial strategy (Core Policy 1) which restricts housing growth in Bishops Wood.	0
Dunston	0	1328	All potential supply is on village edge Open Countryside sites. All sites are also constrained by the existing spatial strategy (Core Policy 1) which restricts housing growth in Dunston.	0
Bobbington	0	133	All potential supply is on village edge Green Belt sites. All sites are also constrained by the existing spatial strategy (Core Policy 1) which restricts housing growth in Bobbington.	0
Bednall	0	92	All potential supply is on village edge Green Belt sites. All sites are also constrained by the existing spatial strategy (Core Policy 1) which restricts housing growth in Bobbington.	0
Trysull	0	165	All potential supply is on village edge Green Belt sites. All sites are also constrained by the existing spatial strategy (Core Policy 1) which restricts housing growth in Trysull.	124
Total	316	22,513		13,193

Areas of Search for sites adjoining adjacent urban area (Black Country)				
North of Wolverhampton/ Walsall	0	9700	The majority of sites in this broad location are Green Belt edge of conurbation areas, and also contains available non-Green Belt land in employment areas (though these are not currently available for housing). All sites are constrained by the existing spatial strategy, which does not allow for urban extensions to adjacent urban areas. Aside from Core Policy 1, the constraint affecting the largest amount of potential supply is Green Belt.	1820
Western edge of Black Country conurbation between Wolverhampton and Stourbridge	0	12721	All sites in this broad location are Green Belt sites. All sites are also restricted under the existing spatial strategy (Core Policy 1), which does not allow for urban extensions to adjacent urban areas.	2093
Total	0	22,421		3,913
Other Areas of Search for sites adjoining adjacent urban areas				
West/south-west of Cannock	0	1533	All sites in this broad location are Green Belt sites. All sites are also restricted under the existing spatial strategy (Core Policy 1), which does not allow for urban extensions to adjacent urban areas.	887
South of Stafford	0	2967	The majority of supply in this broad location comes from one site (Site 036a) which has a capacity for approximately 2823 dwellings and is constrained by the Open Countryside policy. All sites in this area are also restricted under the existing spatial strategy (Core Policy 1), which does not allow for urban extensions to adjacent urban areas.	381
TOTAL	0	4,500		1,268
New settlement options				
Total	0	13701	The majority of site options lie within the Green Belt, with this constraint effecting 11386 dwellings worth of supply. All sites are also restricted under the existing spatial strategy (Core Policy 1), which does not allow for freestanding new settlements.	3209
Other broad locations				
Isolated sites/sites adjacent other settlements (Locality 1)	0	6581	Sites are all constrained by Core Policy 1, which does not permit housing growth outside of specific villages. The majority of sites adjacent/within existing settlements in this area are within the Green Belt/Open Countryside. The vast majority of potential supply in this location arises from a large freestanding site at Four Ashes, which is not currently available for housing and is being proposed for a Strategic Rail Freight Interchange by the West Midlands Interchange group, which is estimated to be capable of accommodating approximately 5776 dwellings if brought forward for housing. The only non-Green Belt/Open Countryside site is a small development boundary site exists within Acton Trussell.	1377
Isolated sites/sites adjacent other settlements (Locality 2)	0	433	Sites are all constrained by Core Policy 1, which does not permit housing growth outside of specific villages. All sites adjacent existing settlements in this area are within the Green Belt/Open Countryside.	2463
Isolated sites/sites adjacent other settlements (Locality 3)	0	773	Sites are all constrained by Core Policy 1, which does not permit housing growth outside of specific villages. All sites adjacent existing settlements in this area are within the Green Belt.	2732

Isolated sites/sites adjacent other settlements (Locality 4)	0	371	Sites are all constrained by Core Policy 1, which does not permit housing growth outside of specific villages. All sites adjacent existing settlements in this area are within the Green Belt.	312
Isolated sites/sites adjacent other settlements (Locality 5)	0	546	Sites are all constrained by Core Policy 1, which does not permit housing growth outside of specific villages. All sites adjacent existing settlements in this area are within the Green Belt.	1474
Total	0	8,704		8,358
DISTRICT-WIDE TOTAL	316	71,8399		29,9417

Appendix 4 – Indicative housing trajectory as of 31st March 2023



Appendix 5 – Five Year Housing Land Supply as of 31st March 2023

Housing Supply Statement – 1st April 2023 to 31st March 2028

1. The Council’s Local Housing Need

- 1.1 Revised national planning guidance requires that for the period within five years of a plan being adopted (or where a plan housing target has been subsequently formally reviewed) the strategic housing requirement of that plan should be used to calculate the five year supply. This is not applicable to South Staffordshire, where the last strategic housing requirement was set over five years ago in the 2012 Core Strategy. Planning practice guidance mandates that where there is no adopted strategic housing requirement policy, the authority’s local housing need figure using the standard method must be used for calculating a five year housing land supply¹³. This must be determined using the Government’s standard methodology¹⁴ for calculating each local authority’s annual housing need, involving a simple three-step process. Firstly, the annual average increase in households for the next 10 years is calculated using the 2014 national household projections. An uplift is then applied to this annual average growth, based on nationally published affordability ratios. Finally, if necessary, a cap is applied to the extent of any uplift above the annual need in stage 1.
- 1.2 The implications of this standard methodology for South Staffordshire’s local housing need (as at 1 April 2023) are set out below:

Step 1 - Setting the Baseline

- 1.3 The relevant projections are the 2014 Household Projections¹⁵. Looking at a consecutive ten year period, starting from the current year consistent with this monitoring (2023), this implies growth of 1808 dwellings over the period 2023-2033. This averages out as an annual household growth of 180.8 dwellings per annum.

Step 2 – An Adjustment to Take Account of Affordability

- 1.4 The most recent median workplace-based affordability ratios were published on 23 March 2023¹⁶. These imply an affordability ratio of **9.00** for South Staffordshire, when comparing median house prices to median gross annual

¹³ Housing supply and delivery, Paragraph: 003 Reference ID: 68-003-20190722

Revision date: 22 July 2019

¹⁴ NPPF 2023 footnote 39

¹⁵ <https://www.gov.uk/government/collections/household-projections>

¹⁶

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricestoworkplacebasedearningslowerquartileandmedian>

workplace-based earnings. These are used in the following formula to calculate an 'adjustment factor', using the following formula:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

- 1.5 The baseline annual household growth identified in Step 1 is then multiplied by the resulting adjustment factor.
- 1.6 South Staffordshire's most recent affordability ratio is 9.00. Therefore, an adjustment factor of **1.3125** can be calculated. This results in a minimum annual local housing need figure of 237 dwellings per annum using the formula above and projected household growth set out in Step 1.

Step 3 – Capping the Level of Any Increase

- 1.7 National planning guidance sets out a number of scenarios where a cap may apply to the annual housing need identified in Step 2. Having reviewed these scenarios and the level of annual household growth in Step 1, the Council has concluded that none of the applicable scenarios would cap the housing need set out in Step 2, particularly as the Council's current Core Strategy housing requirement is now over 5 years old. Therefore, the Council's need remains the same as at Step 2.
- 1.8 In conclusion, having followed the steps set out in national planning guidance, **the Council's local housing need figure is 237 dwellings per annum.**

2. Housing Land Supply

- 2.1 The following table sets out the housing land supply position as at 1 April 2023.

Sources which contribute dwellings to supply 1 April 2023 – 31 March 2028	Dwellings
Small sites under construction (net) excluding long standing starts	109
Small sites with planning permission (full or outline) with a 19% non-implementation rate applied	249
Large sites with full permission or under construction (net)	551
Large sites with advanced full planning applications and developer (net)	104
Large sites with only outline permission or a local plan allocation (net/deliverable sites only)	30
Windfall allowance (40 dwellings per annum in years 4 & 5)	80
Total Commitments as at 1 April 2023	1,123

3. Dwellings with Planning Permission

3.1 The remaining housing supply with permission is split between those sites not yet started, and the remaining capacity on sites which are already under construction. Replacement dwellings to be lost from supply are also discounted in calculating the five year supply to ensure any figures are 'net' increases. Further discounts are also applied to these figures on a site-by-site basis (for large sites) and using a non-implementation rate (on small sites), as set out later in this report.

4. Supply from other Sources (outline permissions and site allocations)

4.1 The NPPF indicates that sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years. Additionally, the NPPF also clarifies that sites with outline planning permission or which are allocated in the development plan, may be considered deliverable, but only when there is clear evidence that housing completions will begin on site within five years.

4.2 To ensure we have examined all sources of supply in accordance with the new NPPF, an audit has been undertaken of all major development housing sites with outline permission or which are allocated in the development plan. This has been done to ensure that supply is only included from these sources where there is clear evidence that they will deliver homes in the five year period.

4.3 The extent of supply included from allocated sites and sites with outline permission is set out in the site-specific housing trajectory included in Appendix 2. To summarise, the Council has taken into account numerous sources of evidence to determine the extent of deliverable supply likely to be realised from these sites. These include the following factors:

- The rate of delivery implied on these sites using the district-wide build rates/lead-in times agreed the Council's SHELAA Housing Panel (which included development industry representatives and agents bringing forward housing sites in the district).
- Where necessary, site specific trajectories discussed with the developers attached to the sites, confirming their intended timescales for disposing of the land/commencing on site.
- The progress of planning applications to deliver the housing allocations.

4.4 In line with the NPPF/PPG, SAD sites without full planning permission have only been included in the deliverable supply where there was (as of 1 April 2023) clear evidence that supply would be realised within the next five year period. In most cases, this means that such sites are only counted towards the five year supply where a housing developer is attached to deliver the site. Therefore, sites promoted by landowners/land agents where there is not sufficient site-specific evidence at this stage to confirm that the development

industry will complete dwellings on the site within the next five years are not included in the five year supply. Where a planning application has been submitted to deliver the site, any deliverable supply is based off the capacity of these applications in the first instance. This recognises that the housing allocations in the SAD are expressed as minimum requirements and that all full planning permissions approved on allocations site since the SAD was adopted have seen significant increases above the minimum allocated numbers on the sites in question.

- 4.5 Having regard to all of these factors a conservative estimate has been made of the deliverable supply which will be realised from allocated sites in the five year period. The level of deliverable housing supply assumed is presented in the trajectory set out in Appendix 2. This is set out alongside the information supporting the site's likely delivery timescales.
- 4.6 Where remaining allocated sites are not included in the five year supply at this moment in time, this usually reflects the fact that (as of 1 April 2023) landowners/site promoters were not sufficiently advanced in disposing of the site and particularly could not show that a housing developer had agreed to deliver a scheme on the relevant land. In such cases, a conservative assumption is made that delivery will only commence in the 6-15 year period until such time as the Council has clear evidence to show otherwise. This situation will likely change as the disposal of the remaining allocated housing sites progresses, which may also lead to an increase in housing delivery as planning applications come forward on the sites. Future five year supply statements will reflect the latest evidence on this matter.

Supply from large C2 full planning permissions

- 4.7 The most recently published Planning Practice Guidance indicates that, for the purposes of the five year supply, local planning authorities will need to count housing provided for older people, including institutions in C2 use, towards their supply¹⁷. This is to be done using census data on the average number of adults living in households¹⁸. The census data referred to in the Planning Practice Guidance indicates that the average number of adults living in households in South Staffordshire is **1.92**.
- 4.8 Using the methodology provided for counting C2 older persons accommodation towards overall C3 supply in the Housing Delivery Test¹⁹, this would imply that the following formula can be used for the purposes of the five year supply:

¹⁷ Housing supply and delivery, Paragraph: 035 Reference ID: 68-035-20190722, Revision date: 22 July 2019

¹⁸ Housing for older and disabled people, Paragraph: 016a Reference ID: 63-016a-20190626, Revision date: 26 June 2019

¹⁹ [Housing Delivery Test: 2021 measurement technical note - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/814242/Housing-Delivery-Test-2021-measurement-technical-note.pdf)

Contribution towards five year supply = number of C2 units/1.92

- 4.9 The Council currently has three large schemes predominantly or entirely made up of C2 accommodation. These sites, and the equivalent C3 dwellings contribution they make to the trajectory, are set out below.

Site	Number of C2 bed spaces	Equivalent C3 contribution using PPG method
Former Gorsty Lea Garage, Wolverhampton Rd, Codsall	28	15 dwellings
Former Great Wyrley Community Support Unit, 156 Walsall Road, Great Wyrley	122	63 dwellings
Bilbrook House, Carter Avenue, Bilbrook	80	41 dwellings

5. Past Housing Delivery

- 5.1 The Council has delivered 622 net completions in the 2022/23 monitoring year. The NPPF (paragraph 74) requires five year supply calculations to consider whether there has been significant under delivery over the previous three years to determine whether a 5% or 20% buffer should be added to the local authority's five year supply target. The NPPF specifies that this will be measured against the Housing Delivery Test, and a 20% buffer will be applied where the Housing Delivery Test indicates that delivery was below 85% of the housing requirement. This is done with the purpose of improving "the prospect of achieving the planned supply" (NPPF paragraph 74(c)).

- 5.2 The most recent housing delivery test results were published on 14 January 2022²⁰. This indicates that South Staffordshire delivered 136% of the relevant housing requirement over the measurement period. **Therefore, for the purposes of calculating five year housing land supply, a 5% buffer should be added, as there is no evidence of significant under delivery over the previous three years.**

6. Non Implementation and Adjustments

Large Sites (10 or more dwellings)

²⁰ [Housing Delivery Test: 2021 measurement - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/106121/housing-delivery-test-2021-measurement.pdf)

- 6.1 The NPPF is clear that all sites with detailed planning permission should be considered deliverable until that permission expires. This is reflected in the land supply calculations, which applies this presumption and then estimates the amount of housing supply that will be delivered within the five year period for each large site with full planning permission. In determining sites' delivery trajectory the Council has had regard to the number of units under construction on site and the likely lead-in times and build out rates established through the Council's SHELAA, which involved development industry engagement, as set out in Appendix 3 and Appendix 4 of this statement. Taking this approach means that each individual large site is evaluated annually to reflect its likely contribution towards the five year supply in any given year providing an accurate picture of delivery on site. Given the site-specific estimations of likely delivery and the presumption in the NPPF regarding sites with full planning permission, a general lapse rate is not applied to large sites. It is also important to note that in the last 27 years (1996-2023) only two full planning permissions for newbuild schemes of 10 or more dwellings have lapsed once permission was granted²¹. Therefore, it is not considered appropriate to apply a blanket non-implementation rate to sites of 10 or more dwellings with full planning permission.
- 6.2 With regard to sites with a housing allocation or outline permission, the Council has taken a conservative approach to estimating likely site delivery, examining each site in detail as previously set out in Section 4. This means that large sites with outline permission or an allocation are only considered to be deliverable where there is specific and clear evidence to indicate the amount of dwellings which will be realised on the site within the five year period. This means that sites that are not sufficiently progressed to meet this test are not currently included within the five year supply on a precautionary basis, despite it being likely that these sites will become deliverable in subsequent monitoring years as the sites are progressed. Given this cautious approach to assumed site delivery, the Council does not consider there is any further need to discount supply from outline permissions or allocated sites through a blanket non-implementation rate.

Small Sites (fewer than 10 dwellings)

- 6.3 Historic delivery rates for small sites were assessed for the SHELAA (para 5.53-5.54). This analysis showed that 81% of small sites were completed within 5 years from the date of approval. A lapse rate of 19% has therefore been applied as a discount to all small sites where work has not yet begun on site. This assumption was reconsidered through the Council's SHELAA Housing Panel in late 2017 and was considered to be an appropriate indication of non-implementation if only applied to small sites, as set out in the agreed panel

²¹ These are a 10 dwelling redevelopment of the Waggon and Horses, Wombourne (11/00644/FUL) and a 12 dwelling redevelopment of a nursery in Oaken (15/00215/FUL). Permissions which have been replaced by an alternative similar residential development permission are excluded from these figures.

meeting minutes in Appendix 3. Since this time, the NPPF has established a general presumption that all small (i.e. non-major) housing sites benefitting from a planning permission should be considered deliverable until the permission expires. Therefore, the Council has continued to apply the 19% non-implementation rate on small sites not yet under construction.

- 6.4 Where construction on small sites has begun, these permissions are closely monitored through site visits, aerial photography, Council tax records and building control records to ensure that sites which appear to have stalled for extended period of time are excluded from the supply. Taken together with the 19% non-implementation rate, this is considered to ensure that the Council is only relying on a conservative contribution to be made to the deliverable supply from small sites.

7. Windfalls

- 7.1 An analysis of windfall development was undertaken in the SHELAA 2022 paragraphs 5.55-5.66. It is clear that South Staffordshire has consistently delivered windfall sites and that such sites have continued to become available year on year throughout the Core Strategy plan period. Between 2012 and 2020 there were approximately 231 gross windfall completions/pa within the District, falling to 57 windfall completions/pa solely from windfall completions on sites of 1-4 dwellings over the same period. Given this it is considered reasonable and pragmatic to assume that a minimum of 40 dwellings each year will come from windfall sites. The allowance is only applied in years 4-5 to ensure there is no prospect of double counting with any existing planning permissions.

8. Summary of Housing Supply Position

- 8.1 Drawing together the information set out earlier in this report, the two tables below present the Council's final housing supply position for the period 1 April 2023 – 31 March 2028. Based on the figures set out below, it can be shown that the District currently has a **4.51 year housing land supply**.

Sources which contribute dwellings to supply 1 April 2023 – 31 March 2028	Dwellings
Small sites under construction (net) excluding long standing starts	109
Small sites with planning permission (full or outline) with a 19% non-implementation rate applied	249
Large sites with full permission or under construction (net)	551
Large sites with advanced full planning applications and developer (net)	104
Large sites with only outline permission or a local plan allocation (net/deliverable sites only)	30
Windfall allowance (40 dwellings per annum in years 4 & 5)	80

Total Commitments as at 1 April 2023	1,123
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5 Year Housing Land Supply (5YHLS)

Requirement (Local Housing Need)	Dwellings
Local Housing Need 2023 -2028 (5 x 237 dwellings per annum)	1,185
Add 5% buffer (59 dwellings)	59
Sub total	1,244
Supply	
Supply at 1 April 2023	1,123
Calculation of 5YHLS	
Revised annual rate incl 5% buffer (1244/5)	249
Total housing supply 1 April 23 - 31 March 28 (1123/249)	4.51 Years

Appendix 6: Note on build rate and lead-in time consultation and responses to the April 2022 build rate and lead-in time consultation

**Strategic Housing and Economic Land Availability Assessment
Build-out rates and lead-in times update note 2022**

1. Introduction

The purpose of this note is to review and update the build rate and lead-in times for housing sites contained in the 2018 Strategic Housing and Economic Land Availability Assessment (SHELAA). Planning Practice Guidance is clear that *“information on suitability, availability, achievability and constraints can be used to assess the timescale within which each site is capable of development. This may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year”*²².

To address these matters and to reflect more recent market conditions since the original 2018 SHELAA was prepared, updated assumptions on lead-in times and build-out rates have been collated in the following technical note. This note will be circulated to targeted representatives from the following key stakeholder groups to help the District Council identify other information that may inform these assumptions going forward:

- Key housebuilders operating in the District and wider region and the Home Builders Federation
- Local planning agents with a track record of involvement in significant housing schemes in the District
- Adjacent local authorities and wider housing market area authorities

Once the Council has considered the evidence submitted by other bodies to this targeted consultation and made any necessary adjustments it will update the next iteration of the SHELAA to reflect the latest evidence on these points.

²² Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 022 Reference ID: 3-022-20190722

2. Build-out rates

The following section reviews the Council's existing build-out rate assumptions that were previously set out in the 2018 SHELAA. It summarises some of the key national research on build-out rates, the rationale for arising at the existing 2018 SHELAA build-rates, key comparators from other nearby authorities and more recent monitoring information from South Staffordshire. Having regard to all of these factors it then goes on to recommend build-out rate assumptions to be taken forward as starting point assumptions for estimating build rates in the next update of the SHELAA.

National build-out rate data

Lichfields' 'Feeding the Pipeline 2021' report indicates that nationally there is a range of 30-60 completions per outlet per year and annual average (mean and median) completions per outlet of 45 per year across the 'top 10' volume housebuilders. This is based on based on 2016-2021 historic build rates with an average a site size of 216 homes (page 7, Figure 3).

In addition to this research, Lichfields' 'Start to Finish 2020' report includes important information on the build rates achieved on a range of medium to large scale housing schemes nationally. This shows how build rates can differ across schemes of 50 – 2000+ dwellings, with average annual national build rates varying from 22 – 160 dwellings per annum.

Comparing site size to build rate	
Site size (dwellings)	Average build-out rate (dpa)
50 – 99	22
100 – 499	55
500 – 999	68
1,000 – 1,499	107
1,500 – 1,999	120
2,000+	160

Source: Lichfields – Start to Finish 2020, Figure 7

Related to this, the report also concludes that an increasing number of outlets on a site strongly correlates to an increased number of dwellings per annum completions, although the number of completions per outlet diminishes with each additional outlet operating on site at the same time (Lichfields – Start to Finish 2020, Figure 13).

Finally, the report also compares large-scale (500+ dwelling) greenfield and brownfield build rates to examine whether this element of site typology make a difference to build rates. This concludes that, on average, large-scale greenfield housing schemes deliver a 34% higher build rate (Lichfields – Start to Finish 2020, Figure 12) compared to brownfield land. This was not broken down by site size in the most recent edition of the research but was noted as confirming findings found in the previous 2016 edition of the 'Start to Finish' report. This previous edition included a comparison of brownfield and greenfield build rates by site size, showing that the increase in build rates on greenfield sites was significant and held across all site typologies of 500+ dwellings, particularly on sites between 500 and 1,999 dwellings in size.

Comparing brownfield and greenfield build rates			
Site size (dwellings)	Greenfield site build-out rate (dpa)	Brownfield site build-out rate (dpa)	Increase greenfield vs brownfield
500 – 999	86	52	65%
1,000 – 1,499	122	73	67%
1,500 – 1,999	142	84	69%
2,000+	171	148	16%

Source: Lichfields – Start to Finish 2016, Table 3

South Staffordshire build-out rate data

The 2018 South Staffordshire SHELAA included a series of build rate assumptions that were initially based on 10 years of historic monitoring information (2007-2017) and were then refined through consultation with the District's SHELAA panel who provided additional evidence and expertise to revise these assumptions. The panel included local land agents, developers and adjacent local authorities. It is important to note that this work was intended to establish indicative assumptions that could be used as starting points for estimating site delivery, and that where better site-specific information is available (e.g. an agree delivery trajectory with the site promoter) this may offer better evidence than the indicative assumptions set out in the SHELAA. Notwithstanding this point, the following set of indicative build rate assumptions were agreed:

Local existing build rate assumptions	
Site size (dwellings)	Assumed build out rate (dpa)
5 – 15	10
16 – 49	20
50 – 99	35

100 – 499	40
500 – 999	80 (two outlets)
1,000+	120 (three outlets)

Source: South Staffordshire SHELAA 2018

To update these assumptions historic monitoring information has been collected for the 2010 – 2020 period for all sites of 5+ dwellings. This monitoring includes all 5+ dwelling housing sites completed within the 2010 – 2020 period and has been supplemented with sites of 100+ dwellings or more that have been commenced, but not yet completed, as of 1st April 2020. This reflects the longer build periods for 100+ dwelling sites and the need to include more sites of this size to ensure a more robust sample size.

Average build rates 2010 – 2020	
Site size (dwellings)	Historic build out rate (dpa)
5 – 15	6
16 – 49	20
50 – 99	35
100 – 499	48

Source: South Staffordshire Housing Monitoring 2010 – 2020 (see Appendix 1)

The above figures do not include any sites of 500+ dwellings as the Council has not had any sites of this size completed in the 2010 -2020 period or under construction as of 1st April 2020. This is similar to the position faced in the 2018 SHELAA. Previously this led to an approach of multiplying the annual build rate of 100-499 dwelling schemes by the number of likely outlets on larger schemes of 500 – 999 and 1000+ dwellings. If the Council were to use a similar approach to that agreed with the previous SHELAA panel using 2010 – 2020 monitoring data this would lead to the following set of assumptions:

- **Sites of 500 – 999 dwellings** (assume two outlets): 96 dwellings per annum
- **Sites of 1000+ dwellings** (assume three outlets): 144 dwellings per annum

Comparable nearby local authority build-out rates

To offer a sense check to local evidence on build-out rates, similar assumptions from comparable nearby local authorities have been examined. Primarily, these are areas adjoining South Staffordshire or within the wider southern Staffordshire area that have significant housing growth on greenfield edge of settlement sites, to ensure that the assumptions used reflect similar site typologies to those found within the District. This analysis has also focused on authorities with readily available indicative assumptions to ensure clear comparators are available.

Indicative build-out rate assumptions	
Local authority	Comparable assumptions
<i>Shropshire Council</i>	Range of 25-38 dwellings per annum assumed dependent on the market area within Shropshire. Sites of 250 dwellings or more assumed to have multiple outlets. Proactive discussions with landowners, land promoters and developers used to refine these assumptions. Source: Table 6 – Shropshire Five Year Supply Statement 2020
<i>Cannock Chase District Council</i>	Range of 25 dwellings per annum minimum per developer on major (10+ dwellings) sites rising to 50 dwellings per annum per developer on 100+ dwelling sites. Clarifies that sites of 100+ dwellings may exceed these build rates where multiple developers are operating but that 50 dwellings per annum is considered a reasonable maximum for a single developer outlet on such sites. Source: Appendix 4 – Cannock Chase SHLAA 2020
<i>Telford Council</i>	Analysis of average build rates from previously delivered sites indicates an average build rate of 40 dwellings per annum per developer outlet for national housebuilders, 20 dwellings per annum per outlet for regional housebuilders and 10 dwellings per annum per outlet for local housebuilders. These rates also appear to correspond to site size (e.g. national housebuilders occupying larger sites and local housebuilders occupying smaller sites). Source: Telford Housing Land Supply Statement 2019-2024
<i>Lichfield District Council</i>	Sites of 25 dwellings per annum are assumed to complete within 1 year of commencement. For larger sites a maximum rate of 50 dwellings per annum per developer outlet is assumed, multiplied by 2 outlets on sites of 251-500 dwellings and 3 outlets on sites of 500+ dwellings. Source: Lichfield SHLAA 2021

With the exception of Shropshire, all other local authorities appear to allow for 40 – 50 dwellings per annum on sites of 100+ dwellings. This appears broadly consistent with the existing SHELAA 2018 build rate assumptions and updated 2010 – 2020 monitoring evidence for sites of 100+ dwellings in South Staffordshire (40 dwellings per annum and 48 dwellings per annum respectively). Where local authorities include standard assumptions about numbers of sales outlets on each site these tend to assume that two outlets will feature on sites of 250+ dwellings, with three site outlets being present on sites of 500+ dwellings. This appears to present a more optimistic picture than the assumptions set out in the SHELAA 2018, which assumes two outlets on sites of 500 – 999 dwellings and three outlets on sites of 1000+ dwellings.

Recommended approach to build-out rates

Having reviewed the national evidence provided by the Lichfields’ research, comparative information from other local authorities and updated South Staffordshire monitoring information, **the following build out rates are proposed:**

Proposed South Staffordshire Build-Out Rates	
Site size (dwellings)	Assumed build out rate (dpa)
5 – 15	10
16 – 49	20
50 – 99	35
100 – 499	45
500 – 999	80 (two outlets)
1,000+	120 (three outlets)

These largely reflect the assumptions already contained within the 2018 SHELAA, with the exception of an increase to 45 dwellings per annum on sites of 100 – 499 dwellings. This change in approach on sites of 100-499 dwellings reflects the more optimistic picture of build out presented by historic 2010 – 2020 monitoring information and average national build-out rates²³ when compared against the lower 40 dwellings per annum figure assumed in the previous SHELAA. However, that higher rate of dwellings per annum delivery per outlet has not been carried over into larger site typologies. This reflects the findings of national research which indicates that delivery rates per outlet can fall where multiple outlets are involved²⁴. Therefore, sites with multiple outlets retain a more conservative build rate of 40 dwellings per annum per outlet. This is considered to be a relatively conservative approach, as the District’s Local Plan Review is likely to be planning for greenfield sites which national research indicates typically experience above average build rates, particularly on sites of 500 – 1,999 dwellings²⁵.

²³ Lichfields’ ‘Feeding the Pipeline 2021’ page 7, Figure 3 and Lichfields ‘Start to Finish 2020’, Figure 7

²⁴ Lichfields ‘Start to Finish 2020’ Figure 13

²⁵ Lichfields ‘Start to Finish 2020’ Figure 12

3. Lead-in times

The following section reviews the Council's existing lead-in time assumptions that were previously set out in the 2018 SHELAA. It summarises some of the key national research on lead-in times, the rationale for arising at the existing 2018 SHELAA assumptions, key comparators from other nearby authorities and more recent monitoring information from South Staffordshire. Having regard to all of these factors it then goes on to recommend lead-in time assumptions to be taken forward as starting point assumptions in the next update of the SHELAA.

National lead-in time data

The Lichfields' 'Start to Finish 2020' report includes national averages for the time taken from validation of planning application to first completions being achieved on medium to large scale housing sites. This shows that the time taken from initial planning submission to eventual delivery on site can take between 3.3 and 8.4 years, depending on the size of site. On the largest sites (500 – 2000+ dwellings), this average figure varies from 5.0 – 8.4 years depending on site size.

The research does not appear to differentiate between unallocated or allocated sites, the degree of pre-app work undertaken on such sites or whether a developer is already attached to the site or not. However, despite these limitations, it does suggest that sites of 500+ dwellings which are not already within the planning approval process are on average unlikely to contribute towards supply within the 5 year period. It also suggests that whilst the period between achieving planning permission to first delivery of homes on a site does not vary significantly by size, larger sites (500+ dwellings) are more likely to have a significantly longer period from validation to determination than smaller site typologies (50-499 dwellings).

Comparing site size to lead-in times			
Site size (dwellings)	Planning approval period (years)	Planning to delivery period (years)	Time from planning submission to delivery (years)
50 – 99	1.4	2.0	3.3
100 – 499	2.1	1.9	4.0
500 – 999	3.3	1.7	5.0
1,000 – 1,499	4.6	2.3	6.9
1,500 – 1,999	5.3	1.7	7.0
2,000+	6.1	2.3	8.4

Source: Lichfields – Start to Finish 2020, Figure 4

Unlike site build out-rates, this research does not suggest there is a significant difference in terms of the time taken from validation to first completion on greenfield and brownfield sites.

Site typology	Build rate (dpa)	Planning to delivery period (years)	Planning approval period (years)	Total validation to first completion period (years)
Greenfield	131	2.0	5.1	7.1
Brownfield	98	2.3	4.6	6.9

Source: Lichfields – Start to Finish 2020, Figures 11 & 12

Local lead-in time data

The 2018 South Staffordshire SHELAA included a series of lead-in time assumptions that were initially based on 10 years of historic monitoring information (2007-2017) and were then refined through consultation with the District's SHELAA panel who provided additional evidence and expertise to revise these assumptions. The panel included local land agents, developers and adjacent local authorities. It is important to note that this work was intended to establish indicative assumptions that could be used as starting points for estimating site delivery, and that where better site-specific information is available (e.g. an agreed delivery trajectory with the site promoter) this may offer better evidence than the indicative assumptions set out in the SHELAA. Notwithstanding this point, the following set of lead-in time assumptions were agreed:

Local existing lead-in time assumptions		
<i>Sites of 500+ dwellings</i>	Without planning permission or local plan allocation	5 years to implementation
	With planning permission (outline) or local plan allocation	4 years to implementation
	With planning permission (full)	1 year to implementation
<i>Sites of 100 – 499 dwellings</i>	Without planning permission or local plan allocation	4 years to implementation
	With planning permission (outline) or local plan allocation	3 years to implementation
	With planning permission (full)	1 year to implementation
<i>Sites of 50-99 dwellings</i>	Without planning permission or local plan allocation	3 years to implementation
	With planning permission (outline) or local plan allocation	2 years to implementation
	With planning permission (full)	1 year to implementation
<i>Sites of 16-49 dwellings</i>	Without planning permission or with outline planning permission	2 years to implementation
	With planning permission (full)	1 year to implementation
<i>Sites of 5-15 dwellings</i>	Without planning permission or with outline planning permission	2 years to implementation
	With planning permission (full)	1 year to implementation

Source: South Staffordshire SHELAA 2018

To update these assumptions historic monitoring information has been collected for the 2010 – 2020 period for all sites of 5+ dwellings. This monitoring includes all 5+ dwelling housing sites completed within the 2010 – 2020 period and has been supplemented with sites of 100+ dwellings or more that have been commenced, but not yet completed, as of 1st April 2020. This reflects the need to include more sites of this size to ensure a more robust sample size.

Average time taken from application validation to commencement 2010 – 2020	
Site size	Average historic lead-in times
<i>Sites of 100+ dwellings</i>	3.2 years from planning application validation to commencement
<i>Sites of 50-99 dwellings</i>	1.9 years from planning application validation to commencement
<i>Sites of 16-49 dwellings</i>	1.3 years from planning application validation to commencement

<i>Sites of 5-15 dwellings</i>	1.4 years from planning application validation to commencement
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Source: *South Staffordshire Housing Monitoring 2010 – 2020 (see Appendix 1)*

This suggests that the average time taken from submission of valid planning application to commencement on the scheme typologies above are consistent with the indicative lead-in times previously agreed in the SHELAA 2018.

Comparable nearby local authority lead-in time assumptions

To offer a sense check to local evidence on lead-in times, similar assumptions from comparable nearby local authorities have been examined. Primarily, these are areas adjoining South Staffordshire or within the wider southern Staffordshire area that have significant housing growth on greenfield edge of settlement sites, to ensure that the assumptions used reflect similar site typologies to those found within the District. This analysis has also focused on authorities with readily available indicative assumptions to ensure clear comparators are available.

Indicative lead-in time assumptions	
Local authority	Comparable assumptions
<i>Shropshire Council</i>	A range of 10 – 27 months assumed to allow for the period starting from preparation of a planning application through to building of first dwelling. Source: Table 6 – Shropshire Five Year Supply Statement 2020
<i>Cannock Chase District Council</i>	A range of 2 – 3 years allowed for lead-in times on all sites of 10+ dwellings, dependent on whether or not a site already has planning permission. Source: Appendix 4 – Cannock Chase SHLAA 2020
<i>Telford Council</i>	Where relevant allowances have been included for: <ul style="list-style-type: none"> - considering outline applications (six months from validation to committee) - determination (four months) - signing legal agreements (six months in most cases) - discharging pre-commencement conditions (six months for larger sites, three months for smaller sites) - selling sites (six months) - time to first dwelling completions (between 3 and 12 months) <p>Taking all of these together in total, this implies a maximum lead-in time of 3.5 years for the most complex large sites which go through the outline applications route, with the majority of sites falling significantly below this. Source: Telford Housing Land Supply Statement 2019-2024</p>
<i>Lichfield District Council</i>	A range of 2-3 years is allowed for lead-in times on all sites of 10+ dwellings, dependent on whether or not a site already has planning permission. Source: Table 2 – Lichfield SHLAA 2021

This seems to indicate that a range of 10 months to 3.5 years has been considered a realistic lead-in time for housing schemes by other local authorities, dependent on the size and complexity of the proposal in question. These appear less conservative than the existing lead-in time assumptions set out in South Staffordshire’s 2018 SHELAA, which assume lead in times ranging between 1 and 5 years to implementation dependent on the scale of the site. Some of the comparator authorities listed also emphasise the role of site-specific delivery information being used to refine or replace some of these indicative assumptions where available, which also reflects the existing approach in the 2018 SHELAA assumptions.

Recommended approach to lead-in times

In light of all of the above information, as a starting point for estimating indicative site delivery **it is proposed to retain the existing lead-in time assumptions set out in the 2018 SHELAA**, which are as follows:

Proposed lead-in time assumptions		
<i>Sites of 500+ dwellings</i>	Without planning permission or local plan allocation	5 years to implementation
	With planning permission (outline) or local plan allocation	4 years to implementation
	With planning permission (full)	1 year to implementation
<i>Sites of 100 – 499 dwellings</i>	Without planning permission or local plan allocation	4 years to implementation
	With planning permission (outline) or local plan allocation	3 years to implementation

	With planning permission (full)	1 year to implementation
<i>Sites of 50-99 dwellings</i>	Without planning permission or local plan allocation	3 years to implementation
	With planning permission (outline) or local plan allocation	2 years to implementation
	With planning permission (full)	1 year to implementation
<i>Sites of 16-49 dwellings</i>	Without planning permission or with outline planning permission	2 years to implementation
	With planning permission (full)	1 year to implementation
<i>Sites of 5-15 dwellings</i>	Without planning permission or with outline planning permission	2 years to implementation
	With planning permission (full)	1 year to implementation

In addition, it will be noted that on some sites (particularly larger-scale sites) better site-specific information from the site promoter may be needed inform a realistic delivery trajectory that has regard to key infrastructure provision and the complexities of such strategic sites.

This approach reflects the fact that the existing assumptions appear to be more conservative than both comparator local authorities' assumptions and the lead-in times implied by monitoring information from the 2010-2020 period. The indicative upper limit of 5 years for lead-in times on sites of 500+ dwellings appears consistent with national research on lead-in times for sites of around 500 dwellings, although there is a risk of longer lead-in times on sites of 1000+ dwellings²⁶, though this does not appear to be reflected in the assumptions of nearby authorities. However, this risk can be mitigated by direct work with developers on such sites through the local plan preparation process to establish and agree realistic delivery trajectories which have regard to the specific infrastructure needs of a site. It is therefore proposed to address this issue on a site-by-site basis through the preparation of the Local Plan Review evidence base.

²⁶ Lichfields 'Start to Finish 2020' Figure 4

Consultation responses to build-out rates and lead-in times update note 2022

Respondent	Summary of comments made on consultation note	Council response
<i>Acres Land</i>	<ul style="list-style-type: none"> - Support use of Lichfields' research - Land East of Bilbrook would take many years to complete, some of the proposed housing should be distributed to smaller sites - Growth elsewhere in Codsall has achieved 55.3 DPA - Sites should focus on smaller sites which can come forward earlier - Pendeford Mill Lane site took 3 years from allocation to start - Anticipated build rates would mean Land East of Bilbrook may not deliver in plan period - Land in control of single housebuilder will take longer to complete - Object to site specific scoring of Site 222, including an overassessment of capacity (should be 125 dwellings), incorrect assumptions about the first school and lack of recognition of GL Hearn report 	<p>No response required on points relating to landscape scoring, the selection of sites to include in the local plan and infrastructure delivery points. These are matters relevant to the wider Local Plan Review and are considered through consultations on that document.</p> <p>No response is given on specific site build rates as this consultation intends to establish indicative starting point assumptions, whilst the Local Plan Review can consider if better credible information is available to deviate from these on specific sites.</p> <p>Capacity of Site 222 is noted and will be reflected in the latest version of the SHELAA.</p> <p>No evidence has been submitted to quantify the impact of large sites being controlled by a single housebuilder and on larger sites will be supported by site-specific engagement on delivery trajectories. As such no change is proposed.</p>
<i>Gladman</i>	<ul style="list-style-type: none"> - Consider the proposed lead-in times and built out rates to be realistic starting points 	No response required.
<i>IM Land C/O RPS</i>	<ul style="list-style-type: none"> - Due to the sharp dip in build rates during 2020/21 the increased 45 DPA assumption should be reduced back to 40 DPA or given as a range - Clarity should be given that all assumptions are purely indicative and should be supported by site specific information where practicable - Any approach to lead-in times should reflect that past trends may not be applicable - Current uncertainties facing the construction industry are markedly different to the 2010-2020 period, with 2020 representing a peak year post 2008/09 recession - Lead-in times are overly optimistic and should be revisited 	Data submitted by RPS shows that many years within the sample period used in the SHELAA (2010-2020) are years with far slower delivery than 2020/21 completion rates. This suggests that the 2010-2020 sample period includes a balance of higher delivery years (e.g. 2019/20) and years of suppressed delivery (20010/11 – 2014/15). Given the lack of alternative locally relevant information provided off which to base build rates and lead-in times the Council does not consider there is reason to revise these assumptions in light of this information.
<i>Baratt West Midlands c/o Savills</i>	<ul style="list-style-type: none"> - Clarity should be given on whether build rates include affordable housing - Build out rates and lead-in times should consider the likelihood of an economic downturn every 10 years - The Council should consider a buffer for timescales proposed for sites over 250 dwellings as it has not recently determined an application above this scale, meaning the Lichfields case studies don't apply. - Lead-in times should include a category specifically to deal with 1000+ dwelling sites, as per the Lichfields report. 	<p>Historic build rate data includes affordable housing completions. Data submitted by RPS shows that many years within the sample period used in the SHELAA (2010-2020) are years with far slower delivery than 2020/21 completion rates. This suggests that the 2010-2020 sample period includes a balance of higher delivery years (e.g. 2019/20) and years of suppressed delivery (20010/11 – 2014/15). As such the effects of a previous economic downturn have already influenced these assumptions.</p> <p>As set out in the consultation note, the highlighted national research makes no differentiation between sites granted on appeal, sites which were allocated prior to an application being submitted and sites with significant pre-application engagement with the Council. As the sites proposed in the local plan will be allocated with significant upfront engagement with infrastructure providers (particularly on larger sites) there is also reason to think that the national rates highlighted may also be more cautious in some respects. As such no change is proposed and site specific engagement will be used to refine likely lead-in times on larger sites.</p> <p>The differentiation in lead-in times between sites of 500+ dwellings and other large-scale sites in the Lichfields research is noted. To address this a category of 1000+ dwellings will be introduced (as for build rates), with an additional year added on to lead-in times relating to sites with outline permission or local plan allocation.</p>
<i>Savills</i>	<ul style="list-style-type: none"> - Clarity should be given on whether build rates include affordable housing - Build out rates and lead-in times should consider the likelihood of an economic downturn every 10 years 	Historic build rate data includes affordable housing completions. Data submitted by RPS shows that many years within the sample period used in the SHELAA (2010-2020) are years with far slower delivery than 2020/21 completion rates. This suggests that the 2010-2020 sample period includes a balance of higher delivery years (e.g. 2019/20) and years of suppressed delivery (20010/11 – 2014/15). As such the effects of a previous economic

		downturn have already influenced these assumptions.
<i>Stansgate</i>	<ul style="list-style-type: none"> - Highlight strength of the market in the last 12 months and this not being reflected in build rates - A rate of 50 DPA for schemes of 100-499 dwellings is more realistic and may increase as some sites will have 2 developers - Should clarify that lead-in times are to first dwelling completions, not starts on sites - Lead-in assumptions appear to be at odds with national research (Lichfields indicate 500+ dwelling schemes have lead-in times of between 5 and 8.4 years, whereas South Staffordshire assume 4 years) - Lichfields research indicates the local plan's large sites of 1,200 dwellings would have a lead-in time of 6.9 years each, whereas SSDC rely on 4 years, increasing risk of local plan over-estimating delivery - More categories for larger sites should be included with increased expected lead-in times for these 	<p>Given the likely temporary affects of the COVID pandemic on house sales and construction it is not considered to appropriate to adjust build rates to reflect this smaller sample period.</p> <p>Considering other local authority examples, it is usual for lead-in times to relate to time taken for sites to commence and this is consistent with historic monitoring data used by the Council to measure historic build rats, which measures time taken to commencement and average build rate from that point onwards.</p> <p>As set out in the consultation note, the highlighted national research makes no differentiation between sites granted on appeal, sites which were allocated prior to an application being submitted and sites with significant pre-application engagement with the Council. Given this and the measurement to first dwelling completion (rather than commencement) the assumptions will not always be directly analogous to all large-scale sites. In South Staffordshire's case, large-scale sites proposed in this local plan will be subject to significant high level masterplanning and engagement with infrastructure bodies prior to adoption of the Local Plan, offering an opportunity to address issues that would slow delivery at a later stage.</p> <p>The differentiation In lead-in times between sites of 500+ dwellings and other large-scale sites in the Lichfields research is noted. To address this a category of 1000+ dwellings will be introduced (as for build rates), with an additional year added on to lead-in times relating to sites with outline permission or local plan allocation.</p>
<i>Vistry Group</i>	<ul style="list-style-type: none"> - Anticipate promoted site south of Pendeford Hall Lane, Bilbrook would achieve 50 DPA per outlet and would cumulatively reach 150DPA from three separate outlets. 	No response required.

Appendix 7: Sources of supply considered in the SHELAA

Type of site	Potential data source	How this has been addressed
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning applications records Development Briefs	The Site Allocations Document 2018 existing allocations, safeguarded land and employment areas have been reviewed where not already granted planning permission and assessed for redevelopment potential through the Strategic Housing and Employment Land Availability Assessment (SHELAA) and Site Selection Topic Papers for housing and Employment.
Planning Permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completions records	The 5 Year Housing Land Supply statement contains up-to-date monitoring of all permissions and completions in the District.
Planning applications that have been refused or withdrawn	Planning application records	Historic refused or withdrawn planning applications from the Council's planning application records have been reviewed to identify any additional suitable brownfield site opportunities with potential housing capacity of 5 or more dwellings (in line with the Brownfield Land Register criteria). Lapsed planning permissions for sites with potential to accommodate 5 or more dwellings have also been considered.
Land in the local authority's ownership	Local authority records	Call for sites submissions have been made by the local authority's property team and considered through the SHELAA and Site Selection Topic Papers.
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, central government, National Health Service, police, fire services, utilities services, statutory undertakers	The national register of public sector land was considered but currently contains no surplus land within South Staffordshire. Call for sites exercise have encouraged land to be submitted by numerous public bodies with significant land holdings in South Staffordshire including: Staffordshire County Council, Housing Plus Group, Severn Trent Water and Staffordshire Police. Recognising their historically high number of site suggestions within the District's villages the Council also proactively re-engaged Staffordshire County Council and Housing Plus Group to ensure that all non-Green Belt land holdings with potential for redevelopment had been considered prior to preparing the Publication Plan.
Sites with permission in principle, and identified brownfield land	Brownfield land registers (parts 1 and 2) National Land Use Database Valuation Office database Active engagement with sector	Call for sites have been carried out a number of times prior to and during the Local Plan Review's preparations and have informed the Council's Brownfield Land Register. Manual site searches using OS maps and local officer knowledge, alongside engagement with key landowners (e.g. Staffordshire County Council and Housing Plus) have also helped to identify potential brownfield site opportunities – see sections below.
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, eg offices to residential)	Local authority empty property register English Housing Survey National Land Use Database Commercial property databases (eg estate agents and property agents) Valuation Office database Active engagement with sector Brownfield land registers	The National Land Use Database is no longer available but has been considered through historic SHLAA exercises and historic sites have been retained in more recent SHELAA's. Call for sites have been carried out a number of times prior to and during the Local Plan Review's preparations and have informed the Council's SHELAA/Brownfield Land Register and Site Selection Topic Papers. This has included consideration of vacant employment land which can be demonstrated as being surplus to requirements and considered for residential development. The Brownfield Land Register has also been updated using other sources in this table to ensure all suitable brownfield sites have been identified. Long term vacant properties have also been considered through liaison with the Council's enforcement team, to establish whether any of these offer an opportunity for redevelopment of 5 or more dwellings (in line with the Brownfield Land Register criteria). The District's windfall allowance has also been updated to ensure that it fully reflects opportunities for small site supply set out in recent versions of the National Planning Policy Framework (i.e. including garden land) and to reflect permitted development contribution to supply.
Additional opportunities for unestablished uses (eg making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys	Historically, a large number of the District's under-utilised redevelopment opportunities (e.g. garage blocks, relocated community facilities) have been identified through active engagement with Staffordshire County Council and Housing Plus Group. These bodies have participated in multiple Call for Sites process and have been directly reengaged after the Preferred Options 2021 consultation to confirm any remaining additional vacant/under-utilised land opportunities within their control that could deliver 5 or more dwellings (in line with the Brownfield Register criteria). The Council's Commercial Services Team have also considered all Council-owned land that could potentially be put forward for redevelopment and submitted these to historic Call for Sites exercises. The Council's Open Space Audit has also assessed whether any of the District's open space are surplus to

		<p>requirements and this has informed the SHELAA. Officers have also undertaken a manual desktop exercise in Tier 1-3 settlements to identify any larger infill site opportunities potentially capable of accommodating 5 or more dwellings (in line with Brownfield Land Register criteria). This was done using aerial photography and OS maps and has fed site options into the site selection process.</p> <p>The District's windfall allowance has also been updated to ensure that it fully reflects opportunities for small site supply set out in recent versions of the National Planning Policy Framework (i.e. including garden land).</p>
Business requirements and aspirations	<p>Enquiries received by local planning authority</p> <p>Active engagement with sector</p>	<p>Call for sites have been carried out a number of times prior to and during the Local Plan Review's preparations and have informed the Council's SHELAA/Brownfield Land Register and Site Selection Topic Papers.</p>
<p>Sites in rural locations</p> <p>Large scale redevelopment and redesign of existing residential or economic areas</p> <p>Sites in adjoining villages and rural exceptions sites</p> <p>Potential urban extensions and new free-standing settlements</p>	<p>Local and neighbourhood plans Planning applications</p> <p>Ordnance Survey maps</p> <p>Aerial photography</p> <p>Site surveys</p>	<p>Call for sites have been carried out a number of times prior to and during the Local Plan Review's preparations and have informed the Council's SHELAA/Brownfield Land Register and Site Selection Topic Papers. Previous Major Developed Sites in the District's Green Belt have been re-assessed through the SHELAA/Site Selection Topic Papers. Potential areas of search for urban extensions and new settlements have also been supplemented by work undertaken in the GBHMA Strategic Growth Study 2018, which was not limited to Call for Sites suggestions and based growth recommendations on a consistent Green Belt, infrastructure and sustainability assessment across the GBHMA.</p>

Appendix 8 Table of SHELAA Housing Site Suggestions

See separate PDF table