

# Wirral Strategic Housing Land Availability Assessment Revised Methodology

## 1.0 Introduction

- 1.1 The SHLAA Update 2016 will form part of the evidence to support the Council's emerging Core Strategy Local Plan which will be submitted to the Secretary of State for public examination during 2017.
- 1.2 The publication of the National Planning Policy Framework (NPPF)<sup>1</sup> in March 2012 introduced new requirements for local authorities in relation to housing land supply.
- 1.3 Paragraph 47 of the NPPF states that in order to boost the supply of housing, local authorities should:
- identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land; and
  - identify a supply of specific developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.
- 1.4 Paragraph 159 of the NPPF sets out the requirement for local authorities to produce a SHLAA to establish realistic assumptions about the availability, suitability and economic viability of land to meet the identified need for housing over the plan period.
- 1.5 In March 2014 the Secretary of State launched the 'Housing and Economic Land Availability Assessment' Planning Practice Guidance (PPG)<sup>2</sup> as an on-line resource to replace the earlier Strategic Housing Land Availability Assessment: Practice Guidance (CLG, 2007). The PPG largely follows the earlier Practice Guidance but provides further clarity on the use of windfalls and the approach to meeting any 'backlog' in housing delivery within the first five years.
- 1.6 In order to reflect the publication of the NPPF and revised practice guidance, the Council consulted on a proposed revised SHLAA methodology between 5 January and 21 February 2014 alongside an updated 'Call for Sites'.

## 2.0 Background

- 2.1 Roger Tym & Partners, supported by A.P. Sheehan & Co, was jointly commissioned by Liverpool City Council and Wirral Council in May 2009 to

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<sup>1</sup> The NPPF and its associated practice guidance can be viewed on-line at:

<http://planningguidance.planningportal.gov.uk/>

<sup>2</sup> The Housing and Economic Land Availability Assessment Planning Practice Guidance can be viewed on-line at:

<http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>

undertake a Strategic Housing Land Availability Assessment across Liverpool and Wirral, to meet the requirements of Planning Policy Statement 3 (CLG, 2007). Consultation on the methodology used in the assessment was undertaken between April 2009 and May 2009. The final SHLAA Report for Wirral was published in July 2010 and set out the Council's housing land supply at April 2008 (SHLAA 2008).

- 2.2 Formal consultation on the SHLAA 2008 was undertaken alongside the Core Strategy Preferred Options Report between 15 November 2010 and 7 January 2011. Consultees were invited to submit additional sites for consideration. The results of consultation were reported to the Council's Cabinet on 21 July 2011 (Minute 80 refers).
- 2.3 A revised SHLAA Update was subsequently produced to the same methodology with a base date of April 2011 (SHLAA Update 2011). The majority of the SHLAA Update 2011 was undertaken in-house, with the achievability assessment element undertaken by A.P. Sheehan & Co. to ensure consistency with the SHLAA 2008.
- 2.4 The SHLAA Update 2011 was subject to consultation between 22 February and 4 April 2012. An updated SHLAA at April 2012 (SHLAA Update 2012) was reported to Cabinet on 27 September 2012 (Minute 92 refers) and published for public consultation alongside the Proposed Submission Draft Core Strategy in December 2012.
- 2.5 Following the publication of initial proposed modifications to the Proposed Submission Draft Core Strategy in July 2013 and further proposed modifications in December 2014 and the completion of a revised Strategic Housing Market Assessment, the Council now expects to publish a revised Core Strategy in early 17. The Council published a SHLAA updated to a 2014 position, using the revised methodology and the responses to consultation, in December 2014, and a SHLAA updated to a 2015 position, using the revised methodology and the responses to consultation, in December 2015.
- 2.6 It has been considered appropriate to undertake a further update to the SHLAA to a base date of April 2016, in accordance with the revised methodology.
- 2.7 The SHLAA will not allocate sites for development or grant planning permission for development and will only be used to provide a high level assessment of the likely potential deliverability of each site<sup>3</sup>.

### **3.0 Revised Methodology**

- 3.1 The methodology for the SHLAA Update 2016 is broadly in line with the original SHLAA 2008 methodology and subsequent SHLAA Updates but with the following amendments.

#### **Stage 1 – Site/Broad Location Identification**

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<sup>3</sup> the further consideration of detailed site-specific proposals and any relevant supporting information submitted as part of a formal planning application will need to be undertaken before any development will be approved or permitted

- 3.2 The 'Housing and Economic Land Availability Assessment' PPG states that plan makers should be proactive in identifying as wide a range as possible of sites for development and that all sites capable of delivering 5 or more units should be assessed. It states that plan makers may also wish to consider even smaller sites where appropriate (Paragraph 010, Reference ID: 3-010-20140306 refers).
- 3.3 A previous assessment of sites with an extant planning permission for new build housing development at April 2015 showed a mean average yield of 8 units; with a corresponding median of 1 unit, demonstrating the significant contribution of small sites to Wirral's housing land supply. An updated assessment of sites with an extant planning permission for new build housing development at April 2016 has been undertaken and this reflects previous figures, with a mean average of 8 units and a median average of 1 unit. A minimum site size threshold has not therefore been applied in the SHLAA Update 2016.
- 3.4 Sites will be identified from the following sources of supply:
- Sites already subject to the planning process**
- Sites with planning permission under construction at 1 April 2016
  - Sites with planning permission yet to start at 1 April 2016
  - Sites already approved for development subject to the signing of Section 106 agreement at 1 April 2016
  - Undeveloped housing land allocations from the Unitary Development Plan for Wirral, adopted in February 2000
- Sites not currently subject to the planning process**
- All sites submitted as part of a 'Call for Sites' exercise
  - Vacant sites allocated for employment or commercial development in the Unitary Development Plan for Wirral
  - Other vacant and derelict sites and buildings identified in the National Land Use Database (NLUD)
  - Sites for which a residential planning application has been refused or withdrawn since 1 April 2008 (where the reason for refusal or withdrawal could be overcome with changes to the proposed scheme)
  - Sites where planning permission has previously been approved but where approval for development has lapsed without construction having commenced
  - Sites identified by the Council for potential future disposal
  - Other urban open space not in active use for recreation or subject to a designation for protection from development
- 3.5 This approach is intended to ensure that a wide range of potential sites is identified.
- 3.6 In order to update the base date to April 2016, all sites included in the SHLAA 2015 will be reassessed in line with the revised methodology. Sites where planning permission for housing or for an alternative use has been granted since 1 April 2015 will be excluded from this assessment.
- 3.7 Site surveys will be carried out for all sites to record their boundaries; current land uses; the character of the site; the land use and character of the surrounding area; and any obvious physical or environmental constraints.

## Stage 2 – Site/Broad Locations Assessment

- 3.8 In order to ensure consistency, the original scoring system will broadly remain unchanged, subject to the variations explained below.
- 3.9 Each site will be given a separate score for suitability, availability and achievability and will then be assigned an overall score with each of these three factors combined. Each site will then be placed into one of the following categories:
- **Category 1** - sites considered to be suitable for housing and which could be delivered within five years
  - **Category 2** - sites considered to be developable but which may have some additional constraints which mean that they are more likely to be delivered within a 6-10 year period
  - **Category 3** - sites considered not currently developable and subject to constraints which may only make them deliverable within an 11-15 year period

### 1. 'SUITABILITY' CRITERIA

- 3.10 Sites will be assessed against a number of suitability criteria and will be given a score against each criterion. These scores will be combined to produce an overall suitability score.
- 3.11 Criteria marked by an asterisk (\*) are considered to be particularly important in terms of existing policy priorities. If a site scores '0' against any of these criteria, the site can only achieve a maximum overall 'suitability' score of '1'.

#### 1a. Policy Restrictions or Limitations

- 3.12 The 'Housing and Economic Land Availability Assessment' PPG states that an assessment of the suitability of sites should be guided by the development plan and emerging planning policy. All sites will therefore be assessed against national policy and against the policies and proposals within the Unitary Development Plan (UDP, as saved by a Direction from the Secretary of State on 28 September 2007) and the Joint Waste Local Plan for Merseyside and Halton (adopted July 2013).

**Table 3.1 - Impact on Adopted Green Belt\*  
(UDP Policies GBT1, GB2, GB6, GB7, GB8 and GB9)**

Criteria	Score
The site is located within the existing urban area	5
The site is located within a designated Major Developed Site <sup>4</sup> or Infill Village within the Green Belt <sup>5</sup>	4

<sup>4</sup> Arrowe Park Hospital, Clatterbridge Hospital, Thingwall Hospital, Wirral Metropolitan College – Carlett Park Campus, and Pensby Schools are identified by UDP Proposal GB9 as Major Developed Sites in the Green Belt, where development will be permitted subject to UDP Policy GB8.

<sup>5</sup> UDP Proposal GB7 defines Infill Villages in the Green Belt at Barnston Village (outside the Conservation Area), Eastham Village (outside the Conservation Area), Thornton Hough, Raby Village and Storeton Village.

The site is located on previously developed land within the Green Belt where development subject to further consideration may not have a greater impact on the openness of the Green Belt than existing development	3
The site is located within the Green Belt (but not within a Major Developed Site or Infill Village) or is on previously developed land within the Green Belt that is likely to have a greater impact on the openness of the Green Belt	0

- 3.13 Sites score most highly for being within the existing urban area.
- 3.14 UDP Policy GB6 allows for 'limited infill development' within the boundaries of five 'Infill Villages in the Green Belt' designated under UDP Proposal GB7. UDP Policy GB8 also allows the 'infilling and redevelopment of existing buildings' at seven 'Major Developed Sites in the Green Belt', designated by UDP Proposal GB9. It is therefore assumed that some development within these locations could be acceptable in principle. A score of '4' is, however, considered more appropriate for such sites rather than '5' because they are still in the Green Belt and will normally be subject to additional policy restrictions because of their location outside the existing urban area.
- 3.15 NPPF paragraph 89 now also permits the limited infilling or the partial or complete redevelopment of previously developed sites, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Such sites may still, however, be subject to constraints on the basis of their impact on the openness of the Green Belt and a score of '3' is therefore considered appropriate.

**Table 3.2 - Impact on Designated Recreational Open Space (UDP Policies GRE1, GR1, GR2, GR3, GR4, RE2 and RE6)<sup>6</sup>**

Criteria	Score
The site is not designated as Urban Greenspace, Allotments, New Recreation Facilities, Sports Grounds or School Playing Fields	5
Part of the site is designated as Urban Greenspace, Allotments, New Recreation Facilities, Sports Grounds or School Playing Fields	3
The site is wholly designated as Urban Greenspace, Allotments, New Recreation Facilities, Sports Grounds or School Playing Fields	0

- 3.16 Sites score most highly if they are not designated for protection from development in the Unitary Development Plan.
- 3.17 A new score of '3' has been included to take account of sites where only part of the site is designated for recreation.
- 3.18 NPPF paragraph 74 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless the land has been identified as surplus to requirements or where the loss resulting from the proposed development would be replaced by equivalent or better provision. A score of '0' is therefore proposed for land wholly designated as Urban Greenspace, Allotments, New Recreation Facilities,

<sup>6</sup> UDP Proposal GR2 lists 220 sites which are designated as Urban Greenspace; Proposal RE2 lists 3 sites identified as Land for New Recreation Facilities; Proposal GR4 lists 24 sites which are identified as Allotments to be Protected from Development; and UDP Proposal RE6 lists 23 sites which are identified as Sports Grounds for Protection from Development. School playing fields are also annotated separately on the UDP Proposals Map.

Sports Grounds or School Playing Fields, unless it can be demonstrated that the facilities provided at the site are no longer needed or would be satisfactorily replaced, in line with national policy, where a score of '5' will be applied.

**Table 3.3 - Impact on Nature and Earth Science Conservation Assets\* (UDP Policies NC5, NC6, NC7, NC8, NC10 and NC11)<sup>7</sup>**

Criteria	Score
The site is not designated as part of a defined key nature/wildlife conservation area	5
Part of the site falls within or is on land adjoining a defined key nature/wildlife conservation area	3
The site is fully within a key nature/wildlife conservation area	0

- 3.19 Sites that are unlikely to have an impact on an identified asset score most highly.
- 3.20 'Key nature/wildlife conservation areas' include Sites of International Importance for Nature Conservation (Special Protection Areas, Special Areas of Conservation, RAMSAR Sites and their supporting habitats); nationally important Sites of Special Scientific Interest; sites known to support nationally important Priority Habitats or Priority Species; or Ancient Woodland; and locally designated sites including Sites of Biological Importance and Sites of Local Importance to Earth Science.
- 3.21 NPPF paragraph 113 requires local authorities to distinguish between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.
- 3.22 Any part of a site located within a national or international designation will not be assessed as part of the SHLAA, as proposals within these areas are subject to separate national controls and would be required to demonstrate that they will cause no harm to any designated asset. While some development within the vicinity of local designations may be more acceptable (subject to national policy and the criteria set out in the UDP), they are still considered to be sensitive areas and any sites fully within these areas will achieve a score of '0' against this criterion. An additional criterion has been added to take account of sites partially within or adjoining a defined key nature/wildlife conservation area.
- 3.23 Nature conservation assets which may act as supporting habitat to designated European Sites have also been identified<sup>8</sup>. Where a site falls wholly within an area of supporting habitat, it has been removed from the SHLAA assessment, as further work will be required to assess the impact of development on designated European Sites. Where a site falls partially within

<sup>7</sup> Nature/wildlife conservation designations shown on the UDP Proposals Map include 3 'Sites of International Importance for Nature Conservation' identified under UDP Proposal NC2, which incorporate European Sites, Ramsar sites and Special Protection Areas, and 10 'Sites of Special Scientific Interest', identified under UDP Proposal NC4. An additional 2 'Sites of Special Scientific Interest' and 1 'Site of International Importance for Nature Conservation' have since been designated but do not appear on the UDP Proposals Map. The UDP also provides protection for Sites of Biological Importance (SBI's) under Policy NC5 and Sites of Local Importance for Earth Science under Policy NC10. The original schedule of SBI's is identified under UDP Proposal NC6 and the original schedule of Sites of Local Importance for Earth Science is identified under Proposal NC11. Wirral Council formally agreed a revised schedule of SBI's and Sites of Local Importance for Earth Science to update the designations in the UDP in 2011.

<sup>8</sup> Using Wetland Bird Survey (WeBS) Core Count Areas

an area of supporting habitat, site capacity has been reduced and further evidence will need to be demonstrated to assess the impact of development on supporting habitat.

- 3.24 Any newly designated sites identified in the 2011 review of Sites of Biological Importance<sup>9</sup> and Sites of Local Importance to Earth Science<sup>10</sup> will also be taken into consideration.

**Table 3.4 - Impact on Designated Employment Land (UDP Policies EMP1, EM1, EM2, EM3, EM4, EM5, EM8 and EM9)<sup>11</sup>**

Criteria	Score
The site does not fall within a designated Primarily Industrial Area or Employment Development Site	5
The site falls within a designated Primarily Industrial Area	1
The site falls within an allocated Employment Development Site	0

- 3.25 Sites that are unlikely to prejudice the provision of employment score most highly.
- 3.26 NPPF paragraph 21 supports sustainable economic growth and requires local authorities to set out a clear economic vision and strategy for their area which positively and proactively encourages economic growth. NPPF paragraph 22, however, states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.
- 3.27 The Proposed Submission Draft Core Strategy Local Plan seeks to focus economic development within the Mersey Waters Enterprise Zone; its surrounding industrial and commercial hinterland; Birkenhead Town Centre, including Hamilton Square and Woodside; the industrial and commercial areas along the A41 Corridor in Tranmere; Wirral International Business Park; the Unilever factory and research complex at Port Sunlight; and the existing employment areas at Moreton, Upton and Prenton.
- 3.28 In order to reflect existing and emerging policy, a score of '0' and '1' will therefore be assigned to sites falling within an Allocated Employment Site or designated Primarily Industrial Area respectively, unless it can be demonstrated through marketing information and a viability assessment that there is no reasonable prospect of the site being wholly or partially reused for employment purposes, where a score of '4' will be applied.

**Table 3.5 - Impact on Heritage Assets (UDP Policies CH01, CH1, CH2, CH24, CH25, CH26)**

Criteria	Score
The site does not contain, fall within, or affect the setting of an identified heritage asset	5
Part of the site contains, falls within, or affects the setting of, an identified heritage asset	3

<sup>9</sup> A revised schedule for Sites of Biological Importance can be viewed at <http://www.wirral.gov.uk/downloads/2909>

<sup>10</sup> A revised schedule for Sites of Local Importance to Earth Science can be viewed at <http://www.wirral.gov.uk/downloads/3629>

<sup>11</sup> The Wirral Employment Land and Premises Study Refresh 2012 shows a shortage of employment land within Wirral which will need to be taken into account when considering alternative uses for sites subject to these designations.

The site wholly falls within an identified heritage asset	0
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- 3.29 Sites that would have the least impact on identified heritage assets score most highly.
- 3.30 Heritage assets include Listed Buildings, Conservation Areas, Historic Parks and Gardens, Scheduled Ancient Monuments and Non-Scheduled Remains<sup>12</sup>.
- 3.31 NPPF paragraph 17 states that planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Great weight should be given to the asset's conservation and any harm or loss will require a clear and convincing justification (NPPF paragraph 132 refers).
- 3.32 The presence of an identified heritage asset would not necessarily preclude development but may affect the type, nature or scale of development that may or may not be acceptable. It is therefore proposed that a site partially or wholly within, or adjoining, an identified heritage asset will be assigned a lower score, unless it can be demonstrated that the development proposed can be undertaken without harm to the character or setting of the identified heritage asset, where a score of '5' will be applied.
- 3.33 The density of sites affected by an identified heritage asset will also be reduced, as detailed in Section 4 of this report.

### 1b. Physical Problems or Limitations

- 3.34 It is outside the scope of a high level study of this nature to collect and assess information on physical constraints in any significant depth. Sites will therefore be scored on the basis of available information, based on published data and the findings of site visits, against the following criteria.

**Table 3.6 - Access Infrastructure Constraints**

Criteria	Score
Existing road access to the site appears adequate	5
Existing road access to the site may require upgrading (e.g. to accommodate increased volumes of traffic)	3
No independent road access to the site appears to be available.	0

- 3.35 This criterion remains unchanged from the SHLAA 2008, SHLAA 2011 and SHLAA 2012. Sites that would be more easily served by existing transport infrastructure score most highly.
- 3.36 Although access infrastructure may act as a constraint in bringing development forward, NPPF paragraph 32 states that development should

<sup>12</sup> The UDP Proposals Map identifies 20 Designated Conservation Areas. Additional Conservation Areas have since been designated at Clifton Park; Meols Drive; Mountwood; Kings Gap; and The Magazines. UDP Policy CH26 identifies 2 Historic Parks and Gardens, at Birkenhead Park and Thornton Manor Gardens. Additional Historic Parks and Gardens have since been designated at Flaybrick Memorial Gardens and Port Sunlight. UDP Policy CH24 identifies 6 Scheduled Ancient Monuments. Additional Scheduled Ancient Monuments have since been designated at St Barnabas Cross, New Hall and Standing Cross at Holy Cross (Woodchurch). All identified heritage assets will be taken into consideration in the SHLAA Update 2015.



only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

- 3.37 A detailed assessment of access infrastructure constraints will only be undertaken as part of a fully drawn up planning application, including a Design and Access Statement and Transport Assessment, where required, unless this information has been submitted as part of a 'Call for Sites' or as a result of a previous transport assessment.

**Table 3.7 - Drainage and Water Supply Infrastructure Constraints**

Criteria	Score
Limited new drainage or water supply infrastructure is likely to be required	5
Site is within or adjacent to the existing urban area but is of significant scale, and is likely to require some new drainage or water supply infrastructure	3
Site is separate from the existing urban area and of a significant scale to likely require extensive new drainage or water supply infrastructure	0

- 3.38 This criterion remains largely unchanged from the SHLAA 2008, SHLAA 2011 and SHLAA 2012 but now also includes water supply infrastructure constraints. Sites that would most easily be served by existing drainage and water supply infrastructure score most highly.
- 3.39 Policy CS35 – Drainage Management, in the Council's emerging Core Strategy will only permit development where the necessary water, drainage, foul drainage, and sewerage treatment capacity is available. It is therefore considered appropriate to assign a lower score to sites where substantial additional new drainage infrastructure is likely to be required, unless additional information has been submitted as part of a Call for Sites or as part of a previous infrastructure investigation report.

**Table 3.8 - Ground Condition Constraints**

Criteria	Score
Treatment or demolition is not expected to be required or the site has not previously been subject to development	5
Treatment or demolition is expected to be required on part of the site (e.g. sites where an existing developed area occupies only a small proportion of the overall site area)	3
Treatment for contamination, major demolition or a significant change in ground levels is expected to be required on the majority of the site.	0

- 3.40 This criterion remains largely unchanged from the SHLAA 2008, SHLAA 2011 and SHLAA 2012 but now also includes demolition works. Sites that will not require any significant treatment or remediation will score most highly.
- 3.41 NPPF paragraph 121 requires that planning policies and decisions must ensure that a site is suitable for new development, taking account of ground conditions and land instability, including from natural hazards or former activities; pollution arising from previous uses; and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation. It is therefore considered appropriate to assign a lower score to sites where significant treatment is expected before development can be allowed to take place.

- 3.42 A detailed site-specific assessment of ground conditions will only be undertaken as part of a fully drawn up planning application, unless this information has been submitted as part of a 'Call for Sites' or as part of a previously verified site investigation.

**Table 3.9 - Impact on Flood Risk\*  
(as defined by the most up-to-date Environment Agency Flood Maps)**

Criteria	Score
Site is within Flood Zone 1	5
Site is within Flood Zone 1 but has critical drainage problems which have been notified to the Council by the Environment Agency	3
Site is within Flood Zone 2	2
Site is within Flood Zone 3a	0

- 3.43 Sites that will have the lowest impact on flood risk score most highly.
- 3.44 The sequential approach to flood risk previously set out in PPS25 (CLG, 2009) is now reflected in the National Planning Policy Framework. The Technical Guidance to the National Planning Policy Framework provides further detail on the assessment of flood risk.
- 3.45 Flood Risk Zones 1 and 2 are both acceptable locations for housing, but under the sequential approach, Zone 1 is preferable to Zone 2. The Technical Guidance also identifies land within Flood Zone 1, with critical drainage problems which have been notified to the Council by the Environment Agency, as an 'area at risk of flooding'. Housing development can be acceptable in Flood Zone 3a, provided an 'Exception Test' is passed. Nevertheless, under the sequential approach, the suitability of sites in Flood Zone 3a should only be considered where there are no reasonably available sites in Flood Zones 1 or 2, taking into account the flood risk vulnerability of land uses and the Exception Test.
- 3.46 Sites within Flood Zone 1 with critical drainage problems which have been notified to the Council by the Environment Agency will be assigned a score of '3', to reflect potential mitigation measures that may need to be put in place to overcome flood risk constraints and sites within Flood Zone 2 will be assigned a score of '2'. Any sites within Flood Zone 3a will be given a score of '0' and a Category 3 rating, unless an independent flood risk assessment has been submitted which has demonstrated that the site can be developed without any significant impact on flood risk.
- 3.47 Flood Risk Zone 3b comprises 'functional floodplain', and is unsuitable for residential development. Any site wholly located within Flood Zone 3b will therefore not be considered as part of the SHLAA Update 2015.

### 1c. Environmental Conditions

**Table 3.10 - Impact on Adjoining Uses**

Criteria	Score
No 'bad neighbour' constraints are anticipated	5
Constraints exist but with potential for mitigation (e.g. sites within residential areas with bad neighbours that could effectively be screened or sites where development could be designed appropriately to mitigate any negative impact)	3

A major constraint exists with limited potential for mitigation (e.g. sites enclosed on all or most sides by heavy industry/employment areas or where housing development could significantly affect the continuing safe operation of surrounding uses)	0
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- 3.48 This criterion remains unchanged from the SHLAA 2008, SHLAA 2011 and SHLAA 2012 but the examples have been amended to provide further clarity. Sites that are unlikely to give rise to any harmful impact on new residents or on surrounding land uses score most highly.

#### 1d. Transport Accessibility

**Table 3.11 - Accessibiliy**

Criteria	Score
Site is within 400 metres walking distance of an existing centre <sup>13</sup> or high-frequency public transport corridor <sup>14</sup>	5
Site is within 600 metres walking distance of an existing centre or high-frequency public transport corridor	3
Site is greater than 600 metres walking distance from an existing centre or high-frequency public transport corridor	0

- 3.49 A new criterion relating to transport accessibility has been introduced to reflect Policy CS2 - Broad Spatial Strategy in the emerging Core Strategy Local Plan, which seeks to direct new development to areas within 400 metres walking distance of an existing centre or high-frequency public transport corridor. Sites which are the most sustainable will score most highly.

#### Overall Score for 'Suitability'

- 3.50 The overall scoring mechanism for suitability remains largely unchanged but additional scoring for Criteria 1d has now been incorporated. The higher the score the more suitable the site is likely to be for new residential development.
- 3.51 Paragraph 022 (Reference ID: 3-022-20140306) of the Housing and Economic Land Availability Assessment PPG states that where constraints have been identified, the assessment should consider what action could be taken to remove them. This may include investment in new infrastructure, environmental improvement or the need to review planning policy. Any measures that could be taken to remove constraints will therefore be included in the accompanying Site Assessment Database.
- 3.52 The overall scoring is as follows:
- A maximum possible unweighted 'suitability' score = 55 (i.e. 11 criteria, each with a maximum potential score of 5)
  - Sites with a total 'suitability' score of over 42 will be given an overall suitability score of 3 (the site is suitable and could contribute to the five year supply)
  - Sites with a total 'suitability' score of 30-42 will be given an overall suitability score of 2 (the site is potentially suitable but faces some constraints and should not be included in the five year supply)

<sup>13</sup> Existing centres are identified in UDP Policy SH1, UDP Policy SH2, or Policy CS25 of the Proposed Submission Draft Core Strategy (December 2012)

<sup>14</sup> A public transport route providing a passenger rail service or a day-time public transport service that runs at least every 30 minutes or more frequently in each direction

- Sites with a total 'suitability' score of under 30 will be given an overall suitability score of 1 (the site faces significant suitability constraints and should not be included in the five or 6-10 year supply)

3.53 In exceptional circumstances, suitability factors not listed above may be taken into account to give a different overall score. If it can be demonstrated that suitability constraints can acceptably be overcome, this may also be used to contribute towards an alternative overall score. These exceptions will, however, always be recorded and explained in the accompanying Site Assessment Database.

## 2. 'AVAILABILITY' CRITERIA

3.54 A detailed assessment of legal and ownership issues is also outside the scope of a SHLAA. Sites will therefore be scored on the basis of two key factors: market interest and site ownership, as follows:

### 2a. Market Interest

**Table 3.12 – Market Interest**

Criteria	Score
The site is controlled by a willing developer/owner; and/or has been submitted through a 'Call for Sites' exercise; and/or is being actively marketed; and/or has been the subject of a recent planning application	5
The site is held by an unknown owner, has not been previously marketed or submitted through a 'Call for Sites', and has not been subject to a recent planning application.	0

3.55 Sites where market interest for new housing development can be clearly demonstrated score most highly.

3.56 With regard to Council-owned sites, only sites with an approved Council resolution for disposal will be assigned a score of '5'.

### 2b. Site Ownership

**Table 3.13 - Site Ownership**

Criteria	Score
The site and any buildings within the site are vacant and are otherwise available for new development	5
The site is subject to low intensity land uses that can easily be extinguished or relocated (e.g. informal car parking)	4
The site is in single ownership and is subject to an established single use (e.g. business, sports club, school) which would need to be extinguished or relocated before development could commence	3
The site is in multiple ownership and is subject to established multiple uses (e.g. industrial estate, retail parade) which would need to be extinguished or relocated before development could commence	2
The site is thought to be in particularly complex/multiple ownership and is not considered to be available for development within 10 years.	0

3.57 Vacant sites and sites subject to low intensity land uses that can easily be extinguished or relocated will score most highly, unless evidence is submitted to demonstrate that established uses could be extinguished or relocated to an earlier timetable.

### Overall Score for 'Availability'

- 3.58 To calculate an overall score for availability, the following scoring system will apply:
- An initial score of 9-10 will give an *overall* 'Availability' score of 3 (the site is available and can be included in the five year supply)
  - An initial score of 4-8 will give an *overall* 'Availability' score of 2 (the site is potentially available but faces some limited constraints which mean that it should not be included in the five year supply), unless it can be clearly demonstrated that any constraints can be overcome within 5 years
  - An initial score of 0-3 will give an *overall* 'Availability' score of 1 (the site is not currently available and should not be included in the five or 6-10 year supply), unless it can be clearly demonstrated that any constraints can be overcome within 10 years.
- 3.59 This approach is intended to reflect a realistic assessment of the timescale for delivery.
- 3.60 If a site is currently in single or multiple ownership but is held by a developer, willing owner or public sector body with the intention for disposal for development, the site will be assigned an overall 'Availability' score of '3' where it can be demonstrated that the relocation and/or cessation of existing use(s) will not take longer than five or '2' where this will take between six and ten years.
- 3.61 In exceptional circumstances, availability factors not listed above may be taken into account to give a different overall score. These exceptions will, however, always be recorded and explained in the accompanying Site Assessment Database.

## 3. 'ACHIEVABILITY' CRITERIA

### 3a. Market/Cost/Delivery Factors

- 3.62 Footnotes 11 and 12 of the NPPF provide detail on the assessment of deliverable and developable sites, stating that:

*"To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years..."*

*"To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged."*

- 3.63 In order to reflect the changing market context and the increased definition and emphasis on viability presented through the NPPF, the Council has commissioned Keppie Massie to undertake a Core Strategy Local Plan and Community Infrastructure Levy Viability Study (The Viability Study) to assess the

economic viability of the scale and location of development and of the policies proposed in the Core Strategy Local Plan at a strategic level.

3.16 The methodology for the Viability Study was considered at a stakeholder workshop on 27 June 2013 and a further workshop was held on 25 September 2013 to test the initial findings, before producing a final Baseline Report<sup>15</sup>.

3.65 The Viability Study sets out the likely profitability of a range of development typologies set within the existing planning policy framework based on geographical viability zones, reflecting variations in housing market strength. The assumptions made in relation to viability for development typologies within each zone in the Baseline Report will be used to inform the assessment of 'achievability' in the SHLAA.

3.66 The Viability Study will assume that:

- a site is 'viable' if the development surplus is equivalent to or greater than 5% of the Gross Development Value
- a site is 'marginal' if the development surplus is equivalent to between 0-5% of the Gross Development Value. In such cases a relatively small increase in costs or reduction in revenue could make the scheme unviable
- a site is 'unviable' if it demonstrates a loss or deficit against the Gross Development Value

3.67 The viability assessment of typical sites within the Viability Study will therefore be used to assign the following scores:

**Table 3.14 - Achievability Assessment**

Criteria	Score
The site is considered to be viable. The site faces few achievability constraints and is likely to be achievable within five years	3
The site is considered to be marginal. The site is potentially achievable but faces only limited constraints which mean that it should not be included in the five year supply	2
The site is considered to be 'unviable'. The site faces significant achievability constraints and is unlikely to be achievable within the next 10 years unless these constraints can be removed.	1

### **Treatment of Sites with Planning Permission**

3.68 Footnote 11 of the NPPF states that sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years.

3.69 The Council has undertaken three rounds of consultation surveys for sites with planning permission for new housing development where development had not commenced as at April 2013, April 2014, April 2015 and April 2016. A questionnaire was posted to all applicants and/or agents requesting information about when they were intending to bring their site forward for development. Respondents who were no longer intending to bring the site

<sup>15</sup> The Local Plan and Community Infrastructure Levy Baseline Report can be viewed at <http://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Community%20Infrastructure%20Levy/Local%20Plan%20%26%20Community%20Infrastructure%20Levy%20Economic%20Viability%20Study%20Interim%20Baseline%20Report.pdf>

forward were asked to state their reasons, including questions relating to funding, ownership issues and site constraints.

3.70 The survey responses will be used in the following ways:

**Table 3.15 - Sites with Planning Permission**

Criteria	Score
A survey response indicates that the site will be brought forward for development within 5 years (the site faces few achievability constraints and is likely to be achievable within five years)	3
A survey response indicates that the site will not be brought forward within five years but the site is potentially achievable within 10 years (the site faces some constraints which mean that it should not be included in the five year supply)	2
A survey response indicates that the site will not be brought forward within ten years	1

3.71 Where no evidence has been presented to confirm that the site will not be developed within five years (either where survey responses indicate that it was unclear whether a site would be brought forward or where no response had been received), the site will be assessed against the findings of the Viability Study and will be scored in the same way as sites without planning permission, on the basis of viability alone.

#### 4.0 OVERALL SCORE AND SITE CATEGORISATION

4.1 In line with previous SHLAAs, individual scores for suitability, availability and achievability will be combined to assign each site to an overall Category band:

- sites within Category 1 will form part of the Council's five-year housing land supply
- sites within Category 2 are likely to be 'developable' over the next 10 years but are unlikely to be delivered within the first 5 years<sup>16</sup>
- sites within Category 3 are not likely to come forward within the first ten years<sup>17</sup>

4.2 Table 4.1 demonstrates how the overall score will be calculated:

**Table 4.1 - Overall Site Scoring Method**

Category	Overall Score (out of 5)		
	Suitability Score	Availability Score	Achievability Score
Category 1	3	3	3
Category 2	2	2-3	2-3
	2-3	2	2-3
	2-3	2-3	2
Category 3	1	1-3	1-3
	1-3	1	1-3
	1-3	1-3	1

4.3 The approach to overall scoring remains unchanged from previous SHLAAs.

<sup>16</sup> NPPF footnote 12 will apply

<sup>17</sup> unless evidence is brought forward to demonstrate that their significant constraints will be overcome and/or mitigated to allow development to be brought forward within an earlier period

## CALCULATION OF THEORETICAL DWELLING YIELDS

- 4.4 The following factors will continue to be taken into consideration when calculating a theoretical dwelling yield for each site.

### (i) Gross Site Area

- 4.5 The gross site area specified in the database will be the geographical area within the digitised site polygon measured using GIS.

### (ii) Permanent Features Factor

- 4.6 A permanent features factor will be used to represent the percentage of the gross site area that will remain available for development after taking account of any site specific capacity constraints relating (for example) to site shape, topography or permanent obstructions to development such as substations, easements, trees or water bodies. This may also include parts of sites falling within a flood plain or an area of supporting habitat. The appropriate percentage reduction will be assessed on a site by site basis for all sites in the database on the basis of mapped features or the extent of features shown on aerial photography.

### (iii) Gross to Net Ratio

- 4.7 A gross to net ratio will be applied to the residual site area following the application of the permanent features factor. The gross to net ratio will also be used to take account of any additional requirements to provide other supporting facilities at the site.

**Table 4.2 - Gross to Net Ratio Application<sup>18</sup>**

Gross site area (ha)	Percentage net
Less than 0.4ha	100%
0.4ha to 2ha	90%
Greater than 2ha	75%

### (iv) Mixed Use Factor

- 4.8 A mixed use factor will be applied to sites which are likely to be developed for mixed uses, in order to indicate the notional proportion of the site's gross area which could be used for residential uses. A mixed-use factor of 50 per cent will be applied to sites currently subject to an employment or commercial designation or allocation. A mixed-use factor of 30 per cent will be applied to sites falling within a designated Key Town or Traditional Suburban Centre<sup>19</sup>.

### (v) Density Assumptions

- 4.9 NPPF Paragraph 47 states that local authorities should set their own approach to housing density in order to boost the supply of new housing. The Housing and Economic Land Availability Assessment PPG goes further to note that the estimation of the development potential of each site should be guided by existing or emerging planning policy, including locally-determined

<sup>18</sup> The application of a gross to net ratio is based on 'Tapping the Potential' (DETR, 2000) and reflects the assumptions made in the Council's Viability Study Baseline Report.

<sup>19</sup> Existing centres are identified in UDP Policy SH1, UDP Policy SH2, or Policy CS25 of the Proposed Submission Draft Core Strategy (December 2012)



policies on density (paragraph 017, Reference ID: 3-017-20140306). It notes that where the plan policy does not provide a sufficient basis to make a local judgement then relevant existing development schemes can be used as the basis for assessment.

- 4.10 The Wirral UDP only applies specific housing density controls within seven designated areas in the Borough (Policy HS5 – Density and Design Guidelines) but Policy HS4 – Criteria for New Housing Development expects the scale of new housing development ‘to relate well to surrounding property, in particular with regard to existing densities and form of development’.
- 4.11 Policy CS2 – Broad Spatial Strategy of the emerging Core Strategy states that densities of 30 dwellings per hectare or above could be permitted within areas of greatest need of physical, social, economic and environmental regeneration, particularly within the older urban areas of east Wirral, and on urban sites within an easy walking distance of an existing town, district or local centre or a high-frequency public transport corridor. Outside these areas, only smaller scale, lower-density development of up to 20 dwellings per hectare will normally be permitted.
- 4.12 The Council’s Viability Study will assess the viability of sites at densities of 20, 30 and 50 dwellings per hectare; informed by the density of extant planning permissions within each individual area of the Borough. To avoid the over-estimation of potential capacity, however, a density of 30 dwellings per hectare will be applied to all sites, except in the following circumstances:
- where a site is within a designated Conservation Area;
  - where a site contains a listed building or other identified heritage asset;
  - where a site contains trees subject to a Tree Preservation Order; and
  - where a site falls outside an easy walking distance of an existing centre or high-frequency transport corridor.
- 4.13 In such instances, a density of 20 dwellings per hectare will be applied.

#### **Overall Calculation of Theoretical Yield**

- 4.14 The overall calculation for potential site capacity is as follows:

*Gross site area x permanent features factor x gross to net factor x mixed use factor x density*

- 4.15 Where further information identifies that an alternative capacity would be appropriate, for example through a planning permission or ‘Call for Sites’ submission, an alternative yield will be entered manually and explained within the accompanying Site Assessment Database.

#### **Proposed Build-out Rates**

- 4.16 The following build-out rates will be applied in line with the Council’s Viability Study assumptions:

**Table 4.3 - Assumed Build-Out Rates**

No Units	Construction (months)	Sales Start	Sales (months)
2	6	Month 6	1
4	8	Month 6	3
10	9	Month 5	5
25	14	Month 5	12
50	17	Month 5	17
100	24	Month 5	24
250	46	Month 5	46
500	87	Month 5	87
750	129	Month 5	129

## 5.0 Windfall Assessment and Assessment Review

### Stage 3 – Windfall Assessment

- 5.1 NPPF paragraph 48 states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends but should not include residential gardens.
- 5.2 Annex 2 of the NPPF defines windfall development as "sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available."
- 5.3 Wirral has a long history of windfall generation, as identified in successive Monitoring Reports. A different approach has, however, been adopted following the regular preparation of the SHLAA's and SHLAA Updates since 2008, as set out below.

### Residential Conversions and Changes of Use

- 5.4 The SHLAA 2008 assessed the number of completions arising from changes of use and conversions between 2001 and 2009, which showed that a total of 781 dwellings were completed over an eight-year period, contributing to an average of 98 net dwellings per year.
- 5.5 As it is difficult to reliably assess the future delivery of small sites with potential for conversion or a change of use, these sites will now be excluded from the SHLAA Update 2016, in favour of an annual allowance, based on previous rates of delivery, as part of the ongoing five year supply set out in the Council's latest Monitoring Report.
- 5.6 An updated analysis based on conversions and changes of use completed between 2003 and 2016 will be prepared for inclusion in the SHLAA 2016.

### **Other Unidentified Windfalls**

- 5.7 The Council granted planning permission for 430 new build units on previously developed sites between April 2008 and April 2016 on sites not previously identified in a SHLAA, at an average rate of 54 units per annum.
- 5.8 As windfalls have continued to consistently become available in the local area and are still considered to provide a reliable source of supply, it is proposed that an allowance for windfalls will be included within the five year supply set out in the Council's latest Monitoring Report.
- 5.9 Paragraph 24 of the Housing and Economic Land Availability Assessment PPG states that plan makers should not need to rely on a windfall allowance in years 6-15 and should rather identify broad locations if required, to allow a degree of flexibility to meet development needs where specific sites cannot be identified (Reference ID: 3-24-20140306).
- 5.10 Although it is considered likely that windfalls will continue to deliver housing beyond the first five years, windfalls will not be included in the 6-15 year supply but will remain the subject of ongoing monitoring, for inclusion in successive assessments of the ongoing five year supply.

### **Stage 4 – Assessment Review**

- 5.11 If insufficient sites within the urban area have been identified to meet objectively assessed need, the SHLAA assessment will be reviewed to:
- reconsider the development potential of each site; and
  - review constrained sites to assess whether such constraints could be overcome more quickly to bring the site forward sooner.
- 5.12 If, following this review, there are still insufficient sites, the Council will need to consider whether it will be appropriate to meet this shortfall through other means, in consultation with surrounding authorities and other relevant stakeholders, through proposals to be contained within the Council's Core Strategy Local Plan.

### **Stage 5 – Final Evidence Base**

- 5.13 The final SHLAA 2016 Update Report with its accompanying Site Assessment Database and data analysis tables, with site plans for each site, will be published on the Council's website.