

Wirral Strategic Housing Land Availability Assessment

Proposed Revised Methodology for Public Consultation

1.0 INTRODUCTION

- 1.1 The SHLAA Update 2017 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.
- 1.2 The publication of the National Planning Policy Framework (NPPF) in March 2012¹ 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 Planning Practice Guidance (PPG) as an on-line resource to replace the earlier Strategic Housing Land Availability Assessment: Practice Guidance (CLG, 2007). The national PPG on housing and economic land availability assessment² 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 The NPPF and its associated practice guidance can be viewed on-line at:
<http://planningguidance.planningportal.gov.uk/>

² 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/>

- 1.6 In order to reflect the publication of the NPPF and revised practice guidance, the Council last consulted on a revised SHLAA methodology between 5 January and 21 February 2014.
- 1.7 This current proposed revision responds to the results of further consultation on housing need and land supply undertaken by the Council in August 2016, following the publication of a revised Strategic Housing Market Assessment for Wirral in May 2016³.
- 1.8 This revised document has therefore been published for public consultation, before a final revised methodology is agreed to guide the preparation of the SHLAA Update 2017.
- 1.9 **Any comments must be submitted to the Council in writing and arrive at one of the addresses below no later than 17.00 hours on Monday 18 September 2017.**
- 1.10 Please note that the Council will not be able to keep any of the comments you make private and that your name and/or organisation as well as your comments may need to be recorded in a published report of consultation.
- 1.11 Copies of this document have also been placed for public inspection in the Forward Planning Section at the South Annexe at Wallasey Town Hall, Brighton Street, Wallasey CH44 8ED and at public libraries in Wirral and can be made available in alternative formats on request from the address below:

Forward Planning Section
Wirral Council Environmental Services
PO Box 290
Brighton Street
Wallasey
Wirral CH27 9FQ

Or

forwardplanning@wirral.gov.uk

- 1.12 A copy of the previous methodology can be viewed on the Council's website at <http://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-planning-evidence-and-research-reports-4>

³ Cabinet Report 27 February 2017 (Minute 96 refers) can be viewed at <http://democracy.wirral.gov.uk/ieListDocuments.aspx?CId=121&MId=5511>

2.0 BACKGROUND

- 2.1 The Council's first SHLAA for April 2008 was undertaken jointly with Liverpool City Council by Roger Tym & Partners, supported by A.P. Sheehan & Co., to meet the requirements of Planning Policy Statement 3 (CLG, 2007). The Council has since produced updates in 2011, 2012, 2014, 2015 and 2016.
- 2.2 A revised methodology has been applied, following public consultation, since the SHLAA Update 2014.
- 2.3 This document sets out how it will be proposed to undertake the SHLAA Update for April 2017, to take account of the comments submitted in response to further consultation on the Borough's housing needs and land supply in August and September 2016 and the additional changes that the Council now believes are necessary to reflect the wider review of the Borough's land supply.
- 2.4 National PPG states that the role of the SHLAA is to identify a future supply of land which is suitable, available and achievable for housing development over the next 15 years, by identifying sites and broad locations with potential for development; assessing their development potential; and assessing their suitability for development and the likelihood of development coming forward, in terms of their availability and achievability (Paragraph 001, Reference ID: 3-001-20140306 refers); to allow plan-makers to identify the sites that may be necessary to develop to meet objectively assessed needs and achieve sustainable development (Paragraph 002, Reference ID: 3-002-20140306 refers).
- 2.5 The assessment does not in itself determine whether a site should be allocated or approved for development, because not all sites considered in the assessment will be suitable for development and because it is for the Council's Local Plan to determine which sites are suitable to meet those needs (Paragraph 003, Reference ID: 3-003-20140306 refers).
- 2.6 The SHLAA will not, therefore, allocate sites for development or be used as a consideration to grant planning permission for development and will only be used to provide a high level assessment of the likely potential deliverability of each site to inform the future preparation of the Council's Core Strategy Local Plan⁴.
- 2.7 The inclusion of any site in the assessment should not be taken as a Council endorsement of its future development and does not in any way determine decisions to be taken by the Council on the preferred directions of growth in the Core Strategy Local Plan; in relation to site

⁴ 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

identification in a future Local Plan; or the determination of individual planning applications.

3.0 REVISED METHODOLOGY

- 3.1 The methodology for the SHLAA Update 2017 is broadly in line with the revised SHLAA 2014 methodology and subsequent SHLAA Updates but with the following amendments:

Stage 1 – Site/Broad Location Identification

- 3.2 National PPG states that plan makers should assess a range of different site sizes from small scale sites to opportunities for larger scale developments. All sites capable of delivering 5 or more dwellings should be assessed but 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 extant planning permission for new build housing development at April 2016 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.
- 3.4 As in previous SHLAA Updates, a minimum site size threshold will not therefore be applied in the SHLAA Update 2017.
- 3.5 National PPG states that plan makers should be proactive in identifying as wide a range as possible of sites for development, including sites that could be improved, intensified or changed. Sites which have particular policy constraints should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly including where they severely restrict development (Paragraph 011, Reference ID: 3-011-20140306 refers).
- 3.6 It is proposed that sites will continue to be identified from the following sources of supply:

(a) Sites already subject to the planning process

- sites with planning permission and under construction at 1 April 2017;
- sites with planning permission but yet to start at 1 April 2017;
- sites already approved for development subject to the signing of a section 106 legal agreement at 1 April 2017; and
- un-developed housing land allocations from the Unitary Development Plan for Wirral, adopted in February 2000.

(b) Sites not currently subject to the planning process

- all sites submitted for consideration by landowners, developers or the public or as part of a ‘Call for Sites’ exercise⁵;
- vacant sites allocated or designated 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) or register of brownfield land;
- sites for which a residential planning application has been refused or withdrawn since 1 April 2008 (where development has not yet taken place and the reason for refusal or withdrawal could potentially be overcome by a change 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 or by its public sector partners for potential future disposal;
- urban open space not in active use for recreation or subject to a designation for protection from development; and
- other sites identified by the Council through its normal monitoring activities

3.7 This approach is intended to ensure that as wide a range as possible of potential sites is identified for assessment.

3.8 All sites included in the SHLAA 2016, which are still undeveloped, 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 2016 will be excluded from the assessment and added to the list of sites with an existing planning permission.

3.9 Site surveys will be carried out for all sites to record their boundaries; current land use; the character of the site; the land use and character of the surrounding area; any obvious physical or potential environmental constraints; and development progress (where relevant).

Stage 2 – Site/Broad Locations Assessment

3.10 In order to ensure consistency, the original scoring system will broadly remain unchanged, subject to the variations explained below.

3.11 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:

⁵ Although a SHLAA assessment is only undertaken once a year, the Council allows sites to be submitted at any time, using a standard form which can be obtained on request from forwardplanning@wirral.gov.uk

- **Category 1** - sites considered to be suitable for housing and which could be delivered within five years; or
 - **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; or
 - **Category 3** - sites considered not currently developable and subject to constraints which may only make them deliverable within an 11-15 year period; or
 - **Category 4** – sites removed from the assessment because they are not considered to be suitable or developable for new housing development within the plan period.
- 3.12 An additional category (category 4) has been added, to allow greater transparency on the status and reasons for excluding identified sites from the SHLAA Assessment.

1 - 'SUITABILITY' CRITERIA

- 3.13 National PPG states that the comprehensive list of sites should be assessed against national policies and designations to establish which have reasonable potential for development (Paragraph 014, Reference ID: 3-014-20140306 refers)
- 3.14 Each site will therefore be assessed against a number of suitability criteria and will be given a score against each criterion. The scores against each individual criterion will be combined to produce an overall suitability score.
- 3.15 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

- 3.16 National PPG states that assessing the suitability of sites should be guided by the development plan, emerging plan policy and national policy (Paragraph 019, Reference ID: 3-014-20140306 refers).
- 3.17 All sites will therefore be assessed against national policy and against the policies and proposals set out within the Unitary Development Plan (UDP, as saved by a Direction from the Secretary of State on 28 September 2007); the Joint Waste Local Plan for Merseyside and Halton (adopted July 2013); and the adopted Neighbourhood Development Plans for Devonshire Park (made in December 2015) and Hoylake (made in December 2016).

**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 ⁶ or Infill Village within the Green Belt ⁷	4
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

- 3.18 This criterion remains unchanged from previous assessments.
- 3.19 Sites score most highly for being within the existing urban area.
- 3.20 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.
- 3.21 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.

⁶ 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.

⁷ 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.

**Table 3.2 - Impact on Recreational Open Space
(UDP Policies GRE1, GR1, GR2, GR3, GR4, RE2 and RE6)⁸**

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 or provides a facility for active recreation	3
The site is wholly designated as Urban Greenspace, Allotments, New Recreation Facilities, Sports Grounds or School Playing Fields or provides a facility for active recreation	0

- 3.22 It is proposed to amend the criteria to also recognise recreation facilities on un-designated sites.
- 3.23 Sites score most highly if they are not designated for protection from development in the Unitary Development Plan or in a Neighbourhood Development Plan or where they do not provide a facility for active recreation.
- 3.24 Sites where only part of the site is designated or used for recreation will score '3'.
- 3.25 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, 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.
- 3.26 Sites which contain parks, open spaces, playing fields or other existing facilities for active recreation, which are not subject to a site-specific designation will therefore also score '0' or '3'.
- 3.27 The SHLAA Update 2017 will include the findings from the Playing Pitch Strategy Update 2016.

⁸ UDP Proposal GR2 lists 220 sites which are designated as Urban Greenspace; Proposal RE2 lists three sites identified as Land for New Recreation Facilities; Proposal GR4 lists twenty-four sites which are identified as Allotments to be Protected from Development; and UDP Proposal RE6 lists twenty-three sites which are identified as Sports Grounds for Protection from Development. School playing fields are also annotated separately on the UDP Proposals Map.

Table 3.3 - Impact on Nature and Earth Science Conservation Assets* (UDP Policies NC5, NC6, NC7, NC8, NC10 and NC11)⁹

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

- 3.28 This criterion remains unchanged from previous assessments, with the exception of a reference to the role of the Wirral Local Sites Partnership, below.
- 3.29 Sites that are unlikely to have an impact on an identified asset score most highly.
- 3.30 ‘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.
- 3.31 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.
- 3.32 Any part of a site located within a national or international designation will be placed in Category 4 and 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.

⁹ Nature/wildlife conservation designations shown on the UDP Proposals Map include three ‘Sites of International Importance for Nature Conservation’ identified under UDP Proposal NC2, which incorporate European Sites, Ramsar sites and Special Protection Areas, and ten ‘Sites of Special Scientific Interest’, identified under UDP Proposal NC4. An additional two ‘Sites of Special Scientific Interest’ and one ‘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.

- 3.33 While some development within the vicinity of local or other designations may be more acceptable (subject to national policy and the criteria set out in a local development plan), they are still considered to be sensitive areas and any sites fully within these areas will achieve a score of '0' against this criterion. Sites partially within or adjoining a defined key nature/wildlife conservation area will obtain a score of '3'.
- 3.34 Nature conservation assets which may act as supporting habitat to designated European Sites have also been identified¹⁰. Where a site falls wholly within an area of supporting habitat, it will be placed in Category 4 and removed from the SHLAA assessment, unless further work has been undertaken to assess the impact of development on designated European Sites. Where a site falls partially within an area of supporting habitat, the site capacity will be reduced and further evidence will need to be submitted to assess the impact of development on supporting habitat.
- 3.35 Any newly designated sites identified by the Wirral Local Sites Partnership or identified within the 2011 review of Sites of Biological Importance¹¹ and Sites of Local Importance to Earth Science¹² will also be taken into consideration, with equivalent scores applied.

**Table 3.4 - Impact on Employment Land
(UDP Policies EMP1, EM1, EM2, EM3, EM4, EM5, EM8 and EM9)¹³**

Criteria	Score
The site has not previously been used for employment and does not fall within a designated Primarily Industrial Area or Employment Development Site	5
The site is or has previously been used for employment but does not fall within a designated Primarily Industrial Area or Employment Development Site	3
The site falls within a designated Primarily Industrial Area	1
The site falls within an allocated Employment Development Site	0

- 3.36 Sites that are unlikely to prejudice the future provision of continued employment score most highly.

¹⁰ Using Wetland Bird Survey (WeBS) Core Count Areas

¹¹ A revised schedule for Sites of Biological Importance can be viewed at <https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-plans/unitary-development-plan/sites>

¹² A revised schedule for Sites of Local Importance to Earth Science can be viewed at <https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-plans/unitary-development-plan/local>

¹³ 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.

- 3.37 The criteria have been modified to allow a score of '3' to be applied to sites which are or have been previously used for employment but which do not fall within a designated employment area.
- 3.38 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.
- 3.39 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.
- 3.40 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.
- 3.41 Sites that have been or still are in employment use but which are not allocated or designated for that use will score '3' for the purposes of the SHLAA assessment. The impact of a 'non-conforming' use will however be taken into account in more detail when a planning application is considered.
- 3.42 The Council is currently undertaking a comprehensive review of the Borough's employment land and premises. It is therefore proposed that the findings of this study, in terms of the level of protection to be afforded to each employment site and area identified, will also be used to inform the SHLAA assessment, with equivalent scores applied. Sites identified for continued protection will be excluded from the assessment and placed into Category 4. Sites identified as suitable for alternative uses or as no longer necessary to protect for future employment will score '3' or '5'.

**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
The site wholly falls within an identified heritage asset	0

- 3.43 This criterion remains unchanged from previous assessments.
- 3.44 Sites that would have the least impact on identified heritage assets score most highly.
- 3.45 Heritage assets include Listed Buildings, Conservation Areas, Historic Parks and Gardens, Scheduled Ancient Monuments and Non-Scheduled Remains¹⁴.
- 3.46 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).
- 3.47 The presence of an identified heritage asset may 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.
- 3.48 The density of development on sites affected by an identified heritage asset will also be reduced, as detailed in Section 4 of this report

¹⁴ The UDP Proposals Map identifies twenty 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 two 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 six 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 2017.

Table 3.6 - Impact on High Quality Agricultural Land (UDP Policies AGR1, AG1, AG2)

Criteria	Score
The site does not contain high grade agricultural land and has not been subject to agricultural or horticultural use	5
Part of the site contains high grade agricultural land or the site is or has previously been subject to agriculture or horticulture	3
The site comprises high grade agricultural land (falling within ALC Grades 1,2 or 3a)	0

- 3.49 This criterion is a new part of the SHLAA assessment for April 2017.
- 3.50 Sites unlikely to have an impact on continued agriculture or horticulture score most highly.
- 3.51 'High grade agricultural land' will be taken to mean land identified as falling within Grades 1, 2 or 3a of the national Agricultural Land Classification. Where site survey evidence has been submitted to demonstrate that these Grades do not apply, a score of '3' or '5' will be applied.

1b. Physical Problems or Limitations

- 3.52 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 3.7 - 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

- 3.53 This criterion remains unchanged from previous assessments. Sites that would be more easily served by existing transport infrastructure score most highly.
- 3.54 Although access infrastructure may act as a constraint in bringing development forward, NPPF paragraph 32 states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

- 3.55 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 3.8 - 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

- 3.56 This criterion remains unchanged from the previous 2014-based methodology. Sites that would most easily be served by existing drainage and water supply infrastructure score most highly.
- 3.57 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 3.9 - 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

- 3.58 This criterion remains unchanged from the previous 2014-based methodology. Sites that will not require any significant treatment, demolition or remediation will score most highly.
- 3.59 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.

- 3.60 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 3.10 - 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

- 3.61 This criterion remains unchanged from the previous 2014-based methodology. Sites that will have the lowest impact on flood risk score most highly.
- 3.62 The approach to flood risk is set out in the National Planning Policy Framework (NPPF, paragraph 100 refers) and national PPG provides further detail on the assessment of flood risk.
- 3.63 Flood Risk Zones 1 and 2 are both acceptable locations for housing, but under the sequential approach, Zone 1 is preferable to Zone 2 and land within Flood Zone 1, with critical drainage problems which have been notified to the Council by the Environment Agency, are also classified as 'areas at risk of flooding'.
- 3.64 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.
- 3.65 Sites within Flood Zone 1 with notified critical drainage problems will be assigned a score of '3', to reflect the 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'. 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.

- 3.66 Flood Risk Zone 3b comprises ‘functional floodplain’, and is unsuitable for residential development. Any site wholly located within Flood Zone 3b will therefore be moved to Category 4 and will not be considered as part of the SHLAA assessment unless evidence can be provided to demonstrate that a designation as ‘functional floodplain’ could no longer be supported.
- 3.67 Development within Flood Zones 2 and 3 may need to be supported by a level 2 Strategic Flood Risk Assessment; sites containing or adjacent to a main watercourse may require a permit under the Environmental Permitting (England and Wales) Regulations 2010; and the development of sites with aquatic habitat value or where contamination is known or suspected will need to be supported by investigative surveys, before an affected site will be considered to be fully deliverable.
- 3.68 The latest available information published by the Environment Agency will be used to inform the conclusions of SHLAA Update 2017.

1c. Environmental Conditions

Table 3.11 - 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

- 3.69 This criterion remains unchanged from the previous 2014-based methodology. 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 3.12 - Accessibility

Criteria	Score
Site is within 400 metres walking distance of an existing centre ¹⁵ or high-frequency public transport corridor ¹⁶	5

¹⁵ Existing centres are identified in UDP Policy SH1, UDP Policy SH2, or Policy CS25 of the Proposed Submission Draft Core Strategy (December 2012)

¹⁶ 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

Criteria	Score
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

3.70 This criterion remains unchanged from the previous 2014-based methodology 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.

3.71 Sites which are the most sustainable will score most highly.

Overall Score for ‘Suitability’

3.72 The overall scoring mechanism for suitability remains largely unchanged but with the additional scoring under Criterion 1a incorporated. The higher the score the more suitable the site is likely to be for new residential development.

3.73 National 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 (Paragraph 022, ID: 3-022-20140306). Any measures that could be taken to remove constraints will therefore be included in the accompanying Site Assessment Database.

3.74 The overall scoring will remain as follows:

- A maximum possible unweighted ‘suitability’ score = 60 (i.e. 12 criteria, each with a maximum potential score of 5, Tables 3.1 to 3.12 refer)
- Sites with a total ‘suitability’ score of over 44 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 33-44 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)
- Sites with a total ‘suitability’ score of under 33 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)

3.75 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

- 3.76 National PPG states that a site is considered available for development when, 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. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop or the landowner has expressed an intention to sell (Paragraph 020, Reference ID: 3-020-20140306 refers)
- 3.77 A detailed assessment of legal and ownership issues is outside the scope of a SHLAA. Sites will therefore continue to be scored on the basis of two key factors: market interest and site ownership, as follows:

2a. Market Interest

Table 3.13 – 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

- 3.78 Sites where market interest for new housing development can be clearly demonstrated score most highly.
- 3.79 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 3.14 - 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

Criteria	Score
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

- 3.80 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’

- 3.81 To calculate an overall score for availability, the following scoring system will continue to apply:
- A maximum possible un-weighted ‘availability’ score of 10 (i.e. two criteria, each with a maximum potential score of 5, Tables 3.13 to 3.14 refer)
 - 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.
- 3.82 This approach is intended to reflect a realistic assessment of the timescale for delivery.
- 3.83 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 years or ‘2’ where this will take between six and ten years.
- 3.84 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

- 3.85 National PPG states that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time and that this is essentially a judgement about the economic viability of a site and the capacity of the developer to complete and let or sell the development over a certain period (Paragraph 021, Reference ID: 3-021-20140306 refers).

3a. Market/Cost/Delivery Factors

- 3.86 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.”

- 3.87 In order to reflect the changing market context and the increased definition and emphasis on viability presented through the NPPF, the Council commissioned Keppie Massie to undertake a Core Strategy Local Plan and Community Infrastructure Levy Viability Study (the Council's Baseline 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.
- 3.88 The methodology for the Council's Baseline 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 Report¹⁷.
- 3.89 The Council's Baseline 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.

¹⁷ The Local Plan and Community Infrastructure Levy Baseline Report can be viewed at <http://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/community-infrastructure-levy>

3.90 The assumptions made in relation to viability for development typologies within each zone in the Baseline Report will again be used to inform the assessment of ‘achievability’ in the SHLAA Update 2017, pending the completion of the final viability study for the Core Strategy Local Plan, which will be subject to separate public consultation.

3.91 The existing Baseline Report assumes 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

3.92 The viability assessment of typical sites within the Baseline Report will therefore continue to be used to assign the following scores:

Table 3.15 - 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

3.93 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.

3.94 Since April 2013, the Council has undertaken an annual survey of sites with planning permission for new housing development, with questionnaires posted to all applicants and/or agents for all sites where development had not yet commenced requesting information about when they were intending to bring their site forward for development. Respondents who were no longer intending to bring the site forward are asked to state their reasons and to answer questions relating to funding, ownership issues and site constraints.

3.95 The survey responses will continue to be used in the following ways:

Table 3.16 - 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

3.96 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 Council’s Baseline Viability Study and will be scored in the same way as sites without planning permission, on the basis of baseline 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 supply¹⁸
- sites within Category 2 are likely to be ‘developable’ over the next 10 years but are unlikely to be delivered within the first 5 years¹⁹
- sites within Category 3 are not likely to come forward within the first ten years²⁰
- sites within Category 4 are not suitable for development and/or are not likely to come forward within the plan period²¹

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

¹⁸ NPPF footnote 11 will apply

¹⁹ NPPF footnote 12 will apply

²⁰ where the evidence available does not demonstrate that their constraints will be overcome and/or mitigated to allow development to be brought forward within an earlier period

²¹ where the evidence available does not demonstrate that their significant constraints will be overcome and/or mitigated to allow development to be brought forward within an earlier period

Table 4.1 - Overall Site Scoring Method

Category	Overall Score (out of 3)		
	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
Category 4	Unsuitable or unlikely to be developed within the plan period and/or subject to over-riding constraints, such as flood risk (Flood Zone 3b); national or international nature conservation; or strategic importance for employment, with reasons set out within the database.		

- 4.3 The approach to overall scoring remains unchanged from previous SHLAAs, with the exception of the treatment of previously undeveloped sites in the Green Belt, set out below.
- 4.4 Undeveloped sites in the Green Belt have previously been scored against each of the criteria but placed in Category 3 and excluded from the calculation of the future land supply because they can only be released for development in an adopted Local Plan.
- 4.5 Undeveloped sites in the Green Belt will now be scored against each of the criteria and assigned a ‘theoretical’ category (between Categories 1 and 4) but will continue to be listed separately because they can only be released for development in an adopted Local Plan.

5.0 CALCULATION OF THEORETICAL DWELLING YIELDS

- 5.1 The following factors will continue to be taken into consideration when calculating a theoretical dwelling yield for each site.
- (i) Gross Site Area**
- 5.2 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**
- 5.3 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 site visits, mapped features and/or the extent of features shown on aerial photography.

(iii) Gross to Net Ratio

- 5.4 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 5.1 - Gross to Net Ratio Application²²

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

(iv) Mixed Use Factor

- 5.5 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.
- 5.6 A mixed-use factor of 50 per cent will no longer automatically be applied to sites with an employment or commercial designation or allocation, subject to the findings of the Council’s Employment Land and Premises Study Update 2017.
- 5.7 A mixed-use factor of 30 per cent will be applied to all sites falling within a designated Key Town or Traditional Suburban Centre²³.

(v) Density Assumptions

- 5.8 NPPF Paragraph 47 states that local authorities should set their own approach to housing density in order to boost the supply of new housing.
- 5.9 National 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 policies on density. 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, adjusted for any

²² 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.

²³ Existing centres are identified in UDP Policy SH1, UDP Policy SH2, or Policy CS25 of the Proposed Submission Draft Core Strategy (December 2012)

individual site characteristics and physical constraints (paragraph 017, Reference ID: 3-017-20140306).

- 5.10 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’.
- 5.11 Policy CS2 – Broad Spatial Strategy of the Council’s emerging Core Strategy Local Plan 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 and on urban sites within an easy walking distance of an existing town, district or local centre or a high-frequency public transport corridor, subject to the impact on local character and amenity. Outside these areas, only smaller scale, lower-density development of up to 20 dwellings per hectare will normally be permitted²⁴.
- 5.12 The Council’s Baseline Viability Study has assessed 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.
- 5.13 Previous SHLAA Updates, to avoid the under or over-estimation of potential capacity, have applied a density of 30 dwellings per hectare to all sites, except where:
- a site is within a designated Conservation Area;
 - a site contains a listed building or other identified heritage asset;
 - a site contains trees subject to a Tree Preservation Order; or
 - a site falls outside an easy walking distance of an existing centre or high-frequency transport corridor.
- 5.14 In these circumstances, a density of 20 dwellings per hectare was applied.
- 5.15 This approach will be continued in the SHLAA Update 2017 but it is proposed that the SHLAA Update 2017 will now also include additional separate calculations, showing the impact of capacities of up to 50 dwellings per hectare on sites within areas of greatest need or within an easy walking distance of an existing centre or high frequency public transport corridor, to reflect the previous commitment to (stage 4) assessment review.

²⁴ The Proposed Submission Draft Core Strategy (December 2012) can be viewed at <http://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-plans/core-strategy-local-plan-0> (page 18 and the Glossary refers)

Overall Calculation of Theoretical Yield

- 5.16 The overall calculation for potential site capacity will remain as follows:

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

- 5.17 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

- 5.18 The following build-out rates will continue to be applied in line with the Council's Baseline Viability Study assumptions:

Table 5.2 - 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

6.0 WINDFALL ASSESSMENT AND ASSESSMENT REVIEW

- 6.1 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.
- 6.2 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."
- 6.3 National PPG also states that local authorities have the ability to identify broad locations in years 6-15, which could include a windfall

allowance based on a geographical area (paragraph 24, Reference ID: 3-24-20140306).

Stage 3 – Windfall Assessment

- 6.4 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 and SHLAA Updates since 2008, as set out below:

Residential Conversions and Changes of Use

- 6.5 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.
- 6.6 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 again be excluded from the SHLAA Update 2017, in favour of an annual allowance, based on actual recorded rates of delivery; and an updated analysis based on conversions and changes of use completed between 2003 and 2017 will be prepared for inclusion in the SHLAA Update 2017.

Other Unidentified Windfalls

- 6.7 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.
- 6.8 As windfalls have continued to consistently become available and are still considered to provide a reliable source of supply, it is proposed that an allowance for windfalls will continue to be included within the five year supply set out in the Council's monitoring reports.
- 6.9 An allowance for windfalls will now also be included for years 6-15 in the SHLAA Update 2017 and will remain the subject of ongoing monitoring, for inclusion in the Core Strategy Local Plan.
- 6.10 In line with national policy, residential garden land will be excluded from the calculation of windfalls.

Stage 4 – Assessment Review

- 6.11 In line with previous commitments to assessment review, the revisions to the SHLAA methodology set out within this document are intended to reflect the need to maximise the development potential of suitable sites

within the existing urban area, to meet objectively assessed needs, which will:

- 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.

6.12 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

6.13 The final SHLAA Update Report for April 2017 with its accompanying Site Assessment Database and data analysis tables, with site plans for each site, will be reported to the Council's Cabinet and published on the Council's website and will be used to inform the content of the Council's Core Strategy Local Plan.

Appendix 1 – Comments on SHLAA Methodology (received September 2016)

General Comments

ID	Summary of Comments Received	Council's Response
008 277 416	Sites where a planning application has been refused or withdrawn should not be included, as their delivery is uncertain and they are predicated on a subjective analysis of whether the reasons for refusal/withdrawal can be overcome.	The range of sites to be included must be as wide as possible (paragraph 3.5 refers). Sites that have been subject to the refusal or withdrawal of a planning application may still have potential for development and will be assessed in line with the criteria for suitability, availability and achievability, in line with the most up-to-date information available.
009 278 417	Expired planning permissions should not be included as their delivery is uncertain.	The range of sites to be included must be as wide as possible (paragraph 3.5 refers). Sites with an expired planning permission will normally still be suitable for development and will be assessed in line with the criteria for suitability, availability and achievability, in line with the most up-to-date information available.
010	Further information is required on the deliverability of Council-owned sites, even where there has been a resolution for disposal.	Council owned sites will be assessed in the same way as every other site, in line with the criteria for suitability, availability and achievability, in line with the most up-to-date information available.
104	It is wrong to include sites in the SHLAA if there are valid planning reasons for those sites to not be suitable for development. It is up to the market to challenge planning policies and the idea of planning is to direct development to sites that are suitable for development. The current "throw everything in the bucket" approach causes confusion for landowners and distrust for residents.	The range of sites to be included must be as wide as possible and national PPG states that an important part of the review is to test again the appropriateness of other previously defined constraints rather than simply to accept them (paragraph 011 ID 2-011-20140306). The methodology nevertheless still allows for sites to be excluded from the assessment where they are not suitable, available or achievable, in terms of national and local policies or constraints (paragraph 3.11 – Category 4; paragraph 4.1; and Table 4.1 now refer).
107	Disagree with the assessment of land in the SHLAA. Much of this land is currently Green Belt.	The range of sites to be included must be as wide as possible (paragraph 3.5 refers). Greenfield Green Belt sites have therefore been assessed in line with the same methodology but are recorded separately, outside the existing housing land supply, because they can only be released for development in an adopted Local Plan (paragraph 4.3 now refers).

ID	Summary of Comments Received	Council's Response
121	Question the availability and strategic value of using existing employment and recreation sites for housing.	The range of sites to be included must be as wide as possible (paragraph 3.5 refers). The Council is currently undertaking a comprehensive review of employment land and premises, which it is proposed to reflect within the findings of the SHLAA Update 2017 (paragraph 3.42 now refers). National policy for recreation sites is set out in paragraph 3.25 and reflected in Table 3.2 and will be further informed by the completion of a Playing Pitch Strategy Update (paragraph 3.27 new refers).
170	Consider that sites with a likely impact on recreational open space, SSSI's, SBI's, SPA's, RAMSAR sites or Green Belt should not be considered for housing and should be placed in a new "Category 4", which means they should be subject to long-term restriction. Infill sites in the Green Belt should be not given such a high score as this would also reduce the area of Green Belt.	The range of sites to be included must be as wide as possible (paragraph 3.5 refers). The methodology already provides for national or international designations to be excluded from assessment (paragraphs 3.31 and 3.32 refer); for national policy for recreation sites to be applied (paragraph 3.25 refers); and for sites in the Green Belt to be separately assessed (paragraph 4.3 now refers). Infill development in the Green Belt is subject to separate national controls, which would not prevent appropriate development in identified locations (paragraphs 3.20 and 3.21 refer). The methodology nevertheless still allows for sites to be excluded from the assessment where they are not suitable, available or achievable, in terms of national and local policies or constraints. A new Category 4 has now been added to allow for greater transparency (paragraph 3.11 – Category 4; paragraph 4.1; and Table 4.1 now refer).
204	There is no need to include Green Belt sites in the SHLAA. This looks like urbanisation and a loss of open character and the gradual merging of villages which are part of Wirral's open and village character. There are 568 sites already identified within the urban area and within infill villages. These sites will have a substantial impact on places like Greasby, Irby and Bromborough.	The range of sites to be included must be as wide as possible (paragraph 3.5 refers). Greenfield Green Belt sites have been assessed in line with the same methodology but are recorded separately, outside the existing housing land supply, because they can only be released for development in an adopted Local Plan (paragraph 4.3 now refers). They are not being proposed for development in the SHLAA Update 2017 (paragraph 2.5 refers).

ID	Summary of Comments Received	Council's Response
268	The site identification process may not have considered all brownfield sites in the Council area, as the National Land Use Database may not have been kept up to date.	A record of brownfield land has continued to be maintained by the Council, on the basis of the National Land Use Database and in anticipation of a separate requirement to prepare a statutory register of brownfield land. All these sites were included in the SHLAA April 2016 and will be included in the SHLAA Update 2017 (paragraph 3.6, section (b), bullet 3 now refers).
276	Object to the inclusion of undeveloped housing allocations from the UDP, as these are unlikely to come forward if they have not done so already.	The range of sites to be included must be as wide as possible (paragraph 3.5 refers). Undeveloped housing allocations may still have potential for development and will be assessed in line with the criteria for suitability, availability and achievability, in line with the most up-to-date information available.
279 418	Object to the inclusion of sites identified by the Council for future disposal, as it appears to assume that all land owned by the Council is suitable for development, when it may not be and there is no certainty that sites identified by the Council for future disposal are deliverable.	Council owned sites will be assessed in the same way as every other site, in line with the criteria for suitability, availability and achievability, in line with the most up-to-date information available. Only Council owned sites with an approved resolution for disposal will obtain an appropriate market interest score (paragraph 3.79 now refers)
280	Object to the inclusion of undeveloped land not in active use for recreation or subject to a designation for protection from development, as these should be subject to a specific greenspace review.	The range of sites to be included must be as wide as possible (paragraph 3.5 refers). The basic network of recreational and other open space to be protected from development is already identified on the Unitary Development Plan Proposals Map and is subject to policies in the emerging Core Strategy Local Plan (Policies CS21, CS30 and CS42 refer). Table 3.2 is proposed to be amended to take account of any facilities for active recreation on un-designated sites (paragraph 3.22 now refers); criteria for nature conservation (Table 3.3) and heritage assets (Table 3.5) may also be relevant; and all sites in the SHLAA Update 2017 will be assessed in line with the criteria for suitability, availability and achievability, in line with the most up-to-date information available.
359	Support the position that no land that is SSSI or SBI is on the included lists.	Noted. The approach to nature and earth science conservation is proposed to remain unchanged (paragraph 3.28 now refers).

ID	Summary of Comments Received	Council's Response
364	Support the position that sites wholly within Supporting Habitats are excluded. Despite the uncertainty over the future of European nature conservation provisions, it is vital that wildlife is protected in the interim.	Noted. The approach to supporting habitat is proposed to remain unchanged (paragraph 3.34 now refers).
477	The section delineating Green Belt sites must be deleted because it is unnecessary and dangerous. The presence of this list in the SHLAA and the discussion of a process of formal review of the Green Belt could be interpreted as a marker for future destruction of the Borough's Green Belt.	The range of sites to be included must be as wide as possible (paragraph 3.5) and national PPG states that sites which have particular policy constraints should be included in the assessment for the sake of comprehensiveness (paragraph 011 ID 2-011-20140306). Greenfield Green Belt sites have been assessed in line with the same methodology but are recorded separately, outside the existing housing land supply, because they can only be released for development in an adopted Local Plan (paragraph 4.3 refers). They are not being proposed for development in the SHLAA (paragraph 2.5 refers)

Comments on Assessment Criteria

ID	Summary of Comments Received	
011 419	The SHLAA should be based on up-to-date evidence particularly in relation to urban greenspace, ecology, recreation and employment land. This evidence is currently out-of-date and based on the UDP.	The SHLAA Update 2017 will be based on the latest available information, including a Pitch Strategy Update (paragraph 3.27 now refers) and Employment Land Study Update (paragraph 3.42 now refers).
012 421	Table 3.4 of SHLAA Methodology does not support paragraph 3.28 which states that a score of 4 will be applied where "there is no reasonable prospect of the site being reused for employment purposes".	A score of 4 is an exceptional score, which will only be applied where additional marketing and viability evidence has been submitted. Where this information is not submitted sites will continue to be scored in accordance with Table 3.4 (paragraph 3.40 now refers).
013 422	Clarification is required on the justification for "existing road access to the site appears adequate" in Table 3.6.	This assessment will be derived from a high-level visual analysis of the site (former paragraph 3.34, now paragraph 3.52 refers) unless a detailed analysis of site access has been submitted and approved (former paragraph 3.37 now paragraph 3.55 refers). The reason for any particular score will be included in the site database.

ID	Summary of Comments Received	
014 423	Clarification is required on the terms "significant scale" and "substantial scale" in Table 3.7 and paragraph 3.39.	This assessment will be derived from a high-level analysis of the site (former paragraph 3.34 now paragraph 3.52 refers) unless further information has been submitted to indicate that some new or extensive drainage and water supply infrastructure will not be required. The reason for any particular score will be included in the site database.
015 424	Clarification is required as to what constitutes "significant" ground treatment in Table 3.8 and paragraph 3.40.	This assessment will be derived from a high-level analysis of the site (former paragraph 3.34 now paragraph 3.52 refers) based on whether treatment is likely to be needed on all or part of the site unless further information has been submitted to indicate an alternative conclusion. The reason for any particular score will be included in the site database.
016 425	Clarification is required on what is meant by "has been the subject of a recent planning application" under the Market Interest criterion.	The criterion sets out examples of evidence of market interest, which could include the previous submission of a planning application, which could have been refused or withdrawn or which was still undetermined at the base date. The reason for any particular score will be included in the site database.
017 426	Question whether sites with a Council resolution for disposal dating back to 2013/14 can be classified as deliverable.	Council owned sites will be assessed in the same way as every other site, in line with the criteria for suitability, availability and achievability, in line with the most up-to-date information available. The reason for any particular score will be included in the site database.
018 427	Further information is required on the assessment of the 'availability' of vacant sites to show they are "otherwise available for new development".	The criterion is intended to differentiate between sites that are vacant and no longer occupied and available for development as opposed to sites that are not vacant or unoccupied and are not currently available for development. The reason for any particular score will be included in the site database.
019 428	The achievability assessment is still based on the 2013/14 Local Plan and CIL Viability Report and should be based on a more up-to-date position.	The viability assessment in the SHLAA Update 2017 will be fully updated once the next stage of the Council's Local Plan and Community Infrastructure Levy Economic Viability Study has been completed, unless further information has been submitted to indicate an alternative conclusion should be reached.

ID	Summary of Comments Received	
020 429	Clarification is required on what is meant by "achievability constraints" in Table 3.14.	The criterion is intended to allow a wide-ranging, high-level view of the likelihood of a site being brought to development within the time frames indicated in line with NPPF footnote 11. The reason for any particular score will be included in the site database.
021 430	It would be useful to know how many sites, considered to be deliverable by landowners in the planning permissions questionnaire, have actually come forward.	No further analysis has yet been undertaken but the survey information is updated annually. An analysis could, however, be included as part of the SHLAA Update 2017.
022	The assessment of permanent features should be subject to a site visit and/or as part of the SHLAA Review panel.	Site visits are undertaken for all sites (former paragraph 3.7 now paragraph 3.9 refers) but a more accurate site-specific calculation is more likely to be obtained through the assessment of mapped features and/or aerial photography, where this is available (paragraph 5.3 now refers).
023 432	The assumption that all developments over 2ha will be delivered at a 75% net developable area is unrealistic, especially when making allowances for factors such as open space. A further category should be added for developments on sites of over 10ha, to be delivered at 70% net developable area.	The gross to net ratios were based on the assumptions used in the Council's Baseline Viability Study, following previous stakeholder consultation. The case for revised assumptions will be reviewed as part of the next stage of the Council's Local Plan and Community Infrastructure Levy Economic Viability Study.
024 433	Clarification is required on what constitutes an "easy walking distance" and a "high frequency corridor" when calculating densities.	The definitions are set out in the Glossary to the Proposed Submission Draft Core Strategy Local Plan (December 2012) and were set out in the footnote to former Table 3.11 – Accessibility and former paragraph 3.49 (paragraph 3.70 and footnote 17 now refer).
025 434	Assumptions around build out rates lacks sufficient clarity as the Local Plan and CIL Viability Study should be updated; no differentiation is provided between sites with full or outline permission or where there is more than one developer on site; and factors leading to different lead-in times are not taken into account. A further category should be included for sites of 150 units or more, where a 4 year allowance should be made for sites without planning permission and a 3.5 year allowance for sites with outline consent.	Only sites without planning permission are included in the SHLAA assessment. The number of developers would at that stage be unknown. The build-out rates were based on the assumptions used in the Council's Baseline Viability Study, following previous stakeholder consultation. The case for revised assumptions will be reviewed as part of the next stage of the Council's Local Plan and Community Infrastructure Levy Economic Viability Study.

ID	Summary of Comments Received	
047 091 329	The placing of all greenfield Green Belt sites in Category 3 is considered to be unsound as it does not give full and proper consideration to the unmet need in the Borough nor to individual site scores.	The placing of greenfield Green Belt sites in Category 3 reflects their policy status, in line with existing local and national priorities. A revised approach to Green Belt sites is now, however, set out in paragraph 4.3.
048	The SHLAA does not take into account the locations where housing demand is greatest, particularly for affordable housing and does not therefore give due consideration to delivering sustainable development. Sites should be re-assessed to take this into account, alongside a review of the Green Belt boundaries.	The SHLAA is not a study of housing demand or need or of the future of the Green Belt, which are matters for determination through the Council's Local Plan.
077	It appears that no regard has been given to the impact of a site being in a flood plain, which would have implications for the viability/deliverability of some Category 2 and Category 3 sites, further reducing the Council's overall land supply assumptions.	Former Table 3.9 set out criteria for the consideration of flood risk. Land within a functional floodplain is identified as unsuitable for residential development and will be excluded from the assessment (paragraph 3.66 now refers).
090 328	Disagree with the weighting of scores for criteria relating to the Green Belt, flood risk and nature conservation, as to restrict an overall score based upon one criteria seems harsh and ineffective, as in some cases these factors could be easily overcome, for example by only releasing a proportion of a site in the Green Belt.	The weighting of scores for criteria relating to Green Belt, flood risk and nature conservation reflects national policy for sustainable development (NPPF, paragraph 14 refers) and the importance the Government attaches to Green Belts (NPPF, paragraph 79 refers). Updated or revised site boundaries can be submitted at any time (footnote 5 refers).
094 332	The SHLAA assessment criteria rely on out-of-date UDP policies. This was raised in previous consultations but has not been addressed.	National planning practice guidance indicates that the suitability of sites should be guided by the development plan, emerging plan policy and national policy and by the appropriateness of identified constraints, which are reflected in the methodology being applied (paragraph 019, ID 3-019-20140306 refers).
097 098	The SHLAA should fully consider a site's historic environment and contextual features, including designated historic assets and non-designated features of local interest, when assessing suitability and calculating potential capacity. Strongly advise the Council to engage conservation, archaeology and urban design colleagues at the local and/or county level to inform the SHLAA	The SHLAA is a high level assessment of the suitability, availability and achievability of sites for future housing development. Criteria for the high-level consideration of heritage assets (Table 3.5 refers) with provision for site densities to be adjusted accordingly (paragraph 5.13 refers), will serve to indicate where further information is likely to be required before a planning application or site allocation is considered.

ID	Summary of Comments Received	
164	Local authorities should refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river.	This requirement will now be set out within the emerging Core Strategy Local Plan.
169	Concerned about the criteria relating to nature conservation. The Council has a duty to ascertain that a site does not contribute to the integrity of a nature conservation area, for example, as a roosting area for birds. Concerned about the scores given to such sites without further investigation of their ecological value.	The SHLAA is a high level assessment of the suitability, availability and achievability of sites for future housing development, based on the latest available information. The findings of the assessment will serve to indicate where further information, including ecological assessment is likely to be required before a planning application or site allocation is considered.
211	It does not appear that the SHLAA has had regard to National Trust 'inalienable' land, the importance of such land or the potential impacts of nearby development upon its significance.	The SHLAA takes account of the land use and character of the surrounding area and any obvious physical or potential environmental constraints, where this is relevant to the development of the site in question (paragraph 3.9 and entries within the accompanying site database will refer). Any additional site-specific impacts should be identified in response to public consultation.
220	The Council should consider environmental constraints which may affect the size, scale, form and delivery of housing sites. Biodiversity; geodiversity; landscape character and quality; green infrastructure; access to the countryside and other open space; protection and enhancement of soils; and environmental land management should be fully considered in the process of selecting and assessing sites for allocation.	The SHLAA is a high level assessment of the suitability, availability and achievability of sites for future housing development, based on the latest available information on a wide variety of environmental criteria and constraints, which will also serve to indicate where further information is likely to be required before a site allocation can be confirmed (paragraph 2.6 refers).
248	Flexibility should be built into the assessment for the impact on nature and earth science conservation assets (Table 3.3). The Council should have regard to "the hierarchy" referred to in paragraph 3.21, giving "appropriate weight to their importance" rather than unilaterally applying a zero score and effectively ignoring the hierarchy approach.	The approach, based on the national hierarchy, was set out in former paragraph 3.22 (paragraphs 3.32 and 3.33 now refer), which allows for a precautionary approach to what are still sensitive areas that are rarely appropriate for development. The methodology does however allow for a different overall score to be given, under any criterion, if it can be demonstrated that any suitability constraint can be successfully overcome (paragraph 3.75 (former paragraph 3.53) refers).

ID	Summary of Comments Received	
249	Flexibility should be built into the assessment of the impact on designated open space (Table 3.2). It is possible to relocate 'protected' playing fields to other sites which are not suitably located for housing, thereby giving weight to sites which are potentially suitable for housing.	The approach to replacement provision, in line with national policy, was set out in former paragraph 3.18 (paragraph 3.25 now refers), including provision for a revised score where it can be demonstrated that a facility will be satisfactorily replaced.
250	A universal and consistent approach needs to be taken so that sites of whatever designation are not excluded or wrongly scored zero if only part of a site capable of being scored a three is designated.	The approach to consistent site scoring is set out in the SHLAA methodology.
251	A flexible approach which recognises that facilities can be relocated, allowing a score of five should be applied, so that sites which are not nationally significant sites of nature conservation can be satisfactorily relocated to release otherwise well-located sites for housing.	The relocation of sites of importance for nature conservation is in practice rarely achievable. The methodology does however allow for a different overall score to be given, under any criterion, if it can be demonstrated that any suitability constraint can be successfully overcome (paragraph 3.75 (former paragraph 3.53) refers).
252	Consider that paragraph 3.19 which states that "sites that are unlikely to have an impact on an identified asset score most highly" makes no allowance for paragraphs 3.26, 3.49 and 3.53 which seek to direct development to locations supportive of sustainable economic growth and in high frequency public transport corridors.	Former paragraph 3.19 related to impacts on nature and earth science conservation. Former paragraph 3.26 related to separate criteria for the impact on employment land; and former paragraph 3.49 related to the impact on transport accessibility; which are intended to be assessed separately, side by side and in combination, in the calculation of an overall suitability score, subject any exceptions under former paragraph 3.53.
269	Agree it is appropriate to place all Green Belt sites in Category 3 due to the need to undertake a strategic Green Belt review through the Local Plan before any Green Belt sites are released for housing.	Noted but a revised approach is now set out in paragraph 4.3
281	Agree with the Council's approach to Stage 2 of the methodology, however, disagree with the 5% 'surplus' or profit margin, which seems particularly low.	The viability assumptions were based on the assumptions included in the Council's Baseline Viability Study, following previous stakeholder consultation. The case for revised assumptions will be reviewed as part of the next stage of the Council's Local Plan and Community Infrastructure Levy Economic Viability Study.

ID	Summary of Comments Received	
282	Unclear how the Council has assessed development potential, particularly the assumptions around net to gross land take. A general rule of thumb is that only 70% of a greenfield site will be net developable acreage.	The assumptions were set out in former Table 4.2 (Table 5.1 now refers), based on the assumptions used in the Council's Baseline Viability Study, following previous stakeholder consultation. The case for revised assumptions will be reviewed as part of the next stage of the Council's Local Plan and Community Infrastructure Levy Economic Viability Study.
291	The SHLAA does not reflect the need set out in the SHMA and is therefore not fit for purpose. Every site should be reassessed in the context of the increased level of need.	The revised methodology for the SHLAA Update 2017 is intended to respond to the findings of further consultation on the Borough's housing needs and land supply (paragraphs 2.3 and 6.11 now refer). Decisions on individual sites will however still be subject to planning permission and the Core Strategy Local Plan (paragraph 2.6 refers).
309	No objection to the assessment of the housing land supply in the SHLAA but proposed allocations within Flood Zones 2 and 3 may need to be supported by a level 2 Strategic Flood Risk Assessment; sites containing or adjacent to a main watercourse may require a permit under the Environmental Permitting (England and Wales) Regulations 2010; and the development of sites with aquatic habitat value or where contamination is known or suspected will need to be supported by investigative surveys. The effect of these constraints must be fully considered prior to any allocation/ re-allocation to ensure sites are deliverable. The Environment Agency has not notified Wirral of any critical drainage areas within Flood Zone 1.	Relevant text has now been added to paragraph 3.67 of the draft methodology.
312	The categorisation of potential sites in Clatterbridge Ward in Category 3 raises concerns amongst local people, as this means they are categorised as available within 10-15 years.	The SHLAA does not allocate sites or grant planning permission for development. Any sites will need to be allocated in the Council's Local Plan and/or granted planning permission and made subject to further consultation before development will be permitted for any specific proposal (paragraph 2.6 now refers).
331	Support the statement that the SHLAA will be reviewed to review constrained sites to assess whether such considerations could be overcome more quickly to bring the site forward sooner but there is no detail on how or when this review will take place.	The SHLAA Update 2017 is intended to form part of that review (paragraph 6.11 now refers)

ID	Summary of Comments Received	
355	Urge the Council to look at the latest Environment Agency flood maps when assessing land for development.	As with previous updates, the SHLAA Update 2017 will use the latest available Environment Agency Flood Map (paragraph 3.68 now refers)
431	Assessment of permanent features should be subject to a site visit as it is dependent on when aerial photographs were taken	The assessment of every site will be subject to a site survey (paragraph 3.9 now refers), which will be verified against the latest information available.
508	Taking the example of Eastham Conservation Area, the current planning policies and the Appraisals and Management Plans are paramount and cannot be superseded by later plans such as this report.	The SHLAA is a high level assessment of the suitability, availability and achievability of sites for future housing development, based on the latest available information. The findings of the assessment will serve to indicate where further information, including heritage assessment, is likely to be required, before a planning application or site allocation is considered, which will also need to take account of any relevant appraisal and master plans.
580	Where sites are being considered for inclusion in the housing supply up to 2037, proper account should be taken of their impact on the setting and character of Wirral's 26 Conservation Areas, particularly in relation to Eastham, Thornton Hough, Saughall Massie, Barnston, Heswall and Meols Drive.	The SHLAA is a high level assessment of the suitability, availability and achievability of sites for future housing development, based on the latest available information. The findings of the assessment will serve to indicate where further information, including heritage assessment, is likely to be required before a planning application or site allocation is considered (Table 3.5 now refers)
628	The SHLAA should be revisited once the results of the Playing Pitch Review are known.	SHLAA Update 2017 will include the findings from the Council's Playing Pitch Strategy Update (paragraph 3.27 now refers).
629	The SHLAA includes examples of proposed development sites which could be and should be opposed through the planning process.	The range of sites to be included must be as wide as possible and national PPG states that an important part of the review is to test again the appropriateness of other previously defined constraints rather than simply to accept them (paragraph 011 ID 2-011-20140306). The methodology nevertheless still allows for sites to be excluded from the assessment where they are not suitable, available or achievable, in terms of national and local policies or constraints (paragraph 3.11 – Category 4; paragraph 4.1; and Table 4.1 now refer).

Comments on the inclusion of ‘Windfalls’

ID	Summary of Comments Received	
026	The number of windfalls expected from conversion/ changes of use and on previously developed sites is likely to reduce once the Local Plan is adopted and sites are allocated and the SHLAA should reflect this.	The proposed approach towards the assessment of windfalls, which includes provision for ongoing annual monitoring, is now set out in section 6.0 of the proposed methodology.
049	Calculation of windfalls should be considered in the context of an ageing UDP and the lack of new allocations. Going forward, an up-to-date Local Plan with site allocations to follow will result in a reduction in windfalls.	The proposed approach for the assessment of windfalls, which only includes sites not previously identified in a previous SHLAA (rather than sites identified in the UDP), is now set out in section 6.0 of the proposed methodology (paragraphs 6.6 and 6.8 refer).
050	A lower windfall allowance equating to no more than 5% of total supply should be applied.	The proposed approach towards the assessment of windfalls, based on actual rates of delivery, is now set out in section 6.0 of the proposed methodology.
053 065 071	The windfall estimates are an over-estimate due to the number of sites now assessed in the SHLAA and the absence of up to date allocations. There should be no windfall allowance for years 1 to 3 as the majority of those sites will have planning permission at the base date.	The proposed approach for the assessment of windfalls, which only includes sites not previously identified in a previous SHLAA rather than sites identified in the UDP, is now set out in section 6.0 of the proposed methodology (paragraphs 6.6 and 6.8 refer). National policy allows a realistic allowance for windfalls based on local evidence to be included in the five year supply (NPPF, paragraph 48 refers) and previously unidentified sites will continue to be generated in the first 3 years.
293	A flat rate of 54 dwellings per annum is optimistic and should fall over time as more sites are picked up through the SHLAA processes throughout the Plan Period.	The proposed approach towards the assessment of windfalls, based on actual rates of delivery and including ongoing annual monitoring, is now set out in section 6.0 of the proposed methodology.
435	It is not clear why the future delivery through conversions/changes of use have been calculated based on data from between 2003-2016 while windfalls from new build PDL sites are based on data from 2008-2016. It is also unclear whether dwellings provided on garden land have been included in this assessment	The calculation of new build windfalls is based from the first SHLAA, in April 2008. The calculation of conversions and changes of use is based on data collected for the former Regional Spatial Strategy, which was backdated to 2003. Windfalls on garden land are excluded, in line with national policy (NPPF, paragraph 48 and paragraph 6.10 now refers).

ID	Summary of Comments Received	
436	Windfalls should only be counted from years 3-5 to avoid double counting.	National policy allows a realistic allowance for windfalls based on local evidence to be included in the five year supply (NPPF, paragraph 48 refers) and previously unidentified sites will continue to be generated in the first 2 years. Windfalls are not double counted, as sites that have been granted permission are not included in the SHLAA.

Site specific comments and comments addressed towards the findings of the SHLAA Update 2016 will be addressed in the SHLAA Update 2017.

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