

CAB1697(LDF)
FOR DECISION
WARD(S): ALL

CABINET (LOCAL DEVELOPMENT FRAMEWORK) COMMITTEE

15 July 2008

STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT UPDATE REPORT

REPORT OF HEAD OF STRATEGIC PLANNING

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RECENT REFERENCES:

Review of Urban Capacity Study and Proposed Strategic Housing Land Availability Assessment. 11th September 2007 [CAB1522(LDF)]

Central Hampshire Housing Market Assessment. 25th July 2007 [CAB1503(LDF)]

EXECUTIVE SUMMARY:

The SHLAA is fundamental to the Local Development Framework preparation process, as part of the evidence base, and for the Council to be able to show that it has a 5-year housing supply. The SHLAA will determine how much housing land is expected to come forward in the future on identified sites which are deliverable and developable. It can then be determined whether further land is required and if an allowance should be made for small scale development and/or new sites should be identified. The report provides an update on the progress of the SHLAA.

RECOMMENDATIONS:

That the progress of the Strategic Housing Land Availability Assessment be noted.

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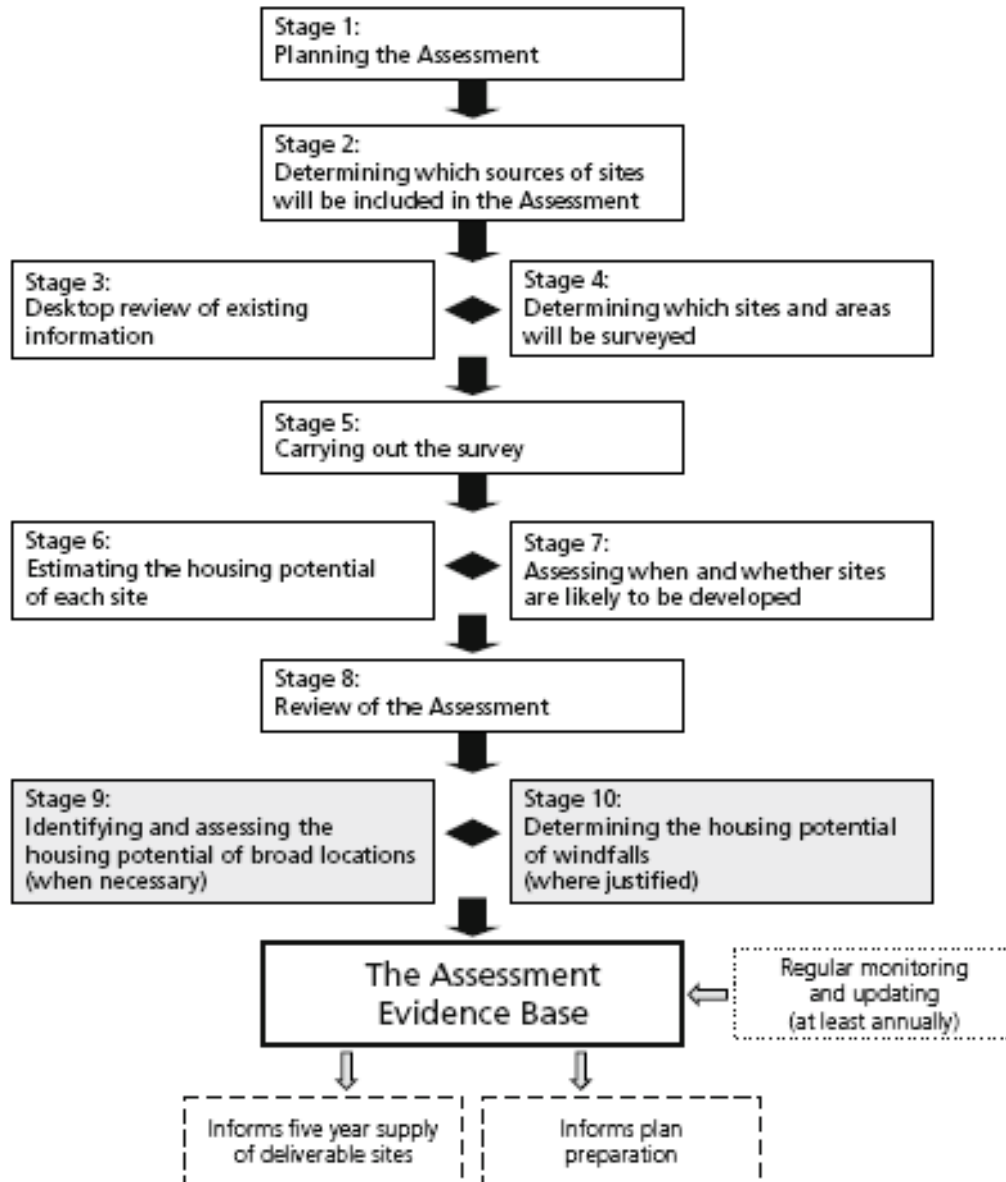
DETAIL:

1 INTRODUCTION

- 1.1 In 2001, an Urban Capacity Study for the District was produced, this identified potential housing opportunities. The success of this study in identifying sites which subsequently were developed was reviewed and reported in 2007 (CAB1522(LDF)). This review also provided a useful insight into the patterns in the site size and location of development within the district. In addition, this provided information on the contribution made by 'windfall' sites (housing sites which have not been previously identified), which may come forward in future.
- 1.2 The purpose of the Strategic Housing Land Availability Assessment (SHLAA) is to determine how much housing land is expected to come forward in the future on identified sites which are deliverable and developable. It can then be determined whether further land is required and if an allowance should be made for small scale development and/or new sites should be identified.
- 1.3 To assist with the SHLAA, Government has published the following guidance: Strategic Housing Land Availability Assessments Practice Guidance, July 2007. This guidance cancels Tapping the Potential, Assessing Urban Housing Capacity: Towards Better Practice (2000) DETR which was used for the original Urban Capacity Study (UCS) in 2001. The guidance states that 'when followed, a local planning authority should not need to justify the methodology used in preparing its assessment' whereas, if a different methodology is used, the reasons for this will need to be explained and may need to be justified at the public examination stage.
- 1.4 The Strategic Housing Land Availability Assessment (SHLAA) is a fundamental requirement for the Local Development Framework (LDF). It is essential both for the LDF preparation process, as part of the evidence base, and for the Council to be able to show that it has a 5-year housing supply (or to indicate how it will achieve one) as part of its Annual Monitoring Report. It is important that the methodology set out in the Practice Guidance is followed so as to minimise the need to develop and justify an alternative, which could have the risk of being found to be 'unsound' at the examination stage.

2 THE SHLAA PROCESS

- 2.1 The new guidance mentioned above increases the level of detail needed to assess urban potential within the District. The process for the SHLAA is outlined below.



- 2.2 Appendix 2 gives more detail on the methodology for the SHLAA. In addition, a Member's briefing session will be held on the 9th July to explain the SHLAA process.
- 2.3 During Stage 1 a methodology was produced addressing how the requirements of the guidance would be addressed for each different stage. In addition, a stakeholder group was set up to advise on the proposed methodology.

- 2.4 For Stage 2, all data sources available on housing sites were identified. An extensive desktop review of all the information was subsequently carried out during Stage 3, including the identification of new sites through the use of aerial photography. The aim at this stage was to include as many sites as possible, even if they are later found to be unsuitable or unachievable. In total, over 750 sites have been identified in this way. However, it has been determined from the review of the UCS that there was little benefit in identifying sites smaller than 5 dwellings (unless they already have planning permission), especially in view of the amount of site survey work that is needed (see Stages 6-7 below).
- 2.5 A constraints matrix was developed during stage 4, which was applied to the identified sites so that any site with major constraints was then excluded from further survey. During Stage 5 a survey of all remaining sites and the identification of any new sites identified from the ground survey was carried out for all the sites within a settlement boundary as defined in the adopted Local Plan (2006).
- 2.6 Work is now progressing on Stages 6 and 7; Estimating the housing potential for each site and assessing when and whether sites are likely to be developed. Each site must be assessed in some detail, including assessing their capacity, site features and constraints, and availability/ suitability/ achievability. This will involve making contact with the landowner/developer to determine development interest and likely timing of development. Officers are also working with East Hampshire District Council who are at a similar stage of the process, to follow a common methodology. Meetings have also been held with different departments within the Council, with Estates, Strategic Housing and Development Control to discuss some sites and how these stages should be carried out.
- 2.7 Stage 7 and 8 will also involve narrowing down the original site list further to those which have the greatest potential of being delivered during a particular time period.
- 2.8 During Stage 8, when the assessment of sites available is compared to the housing requirement for the coming 5, 10, etc year periods so that it can be seen whether any additional housing land is required. If so, the options are to assess additional locations for housing and/or to seek to justify an allowance for windfall development.
- 2.9 The guidance is not explicit about what justification would be needed to be able to include windfall sites and neither is this clear from guidance published by the Planning Inspectorate ('Demonstrating a 5 Year Supply of Deliverable Sites'). However, PPS3 implies that the focus must be on identifying specific sites which can be demonstrated to be deliverable, achievable and developable.

“PPS3 (paragraph 59)

...Allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified...”

- 2.10 Like many other Local Authorities it has been agreed that sites with a potential for less than 5 dwellings should be excluded from the site survey. This is due to the difficulty in accurately estimating which small sites will emerge and the sheer number of sites that could be identified and subsequently surveyed and landowners consulted; this is not realistic given resources and existing time constraints. It is therefore appropriate to make some allowance for small sites and this approach has been adopted by other authorities within their SHLAAs.
- 2.11 While a substantial amount of the work has already been completed for the SHLAA there are still a number of major tasks that are being carried out such as the assessment of housing potential and availability of sites. It is estimated that this process will be completed before the end of 2008.

3 RELEVANT POLICY

- 3.1 **PPS12: Spatial Planning** requires the production of a comprehensive evidence base to support the LDF
- 3.2 **PPS3: Housing** (paragraph 54-57) requires a Local Authority to use information from a Strategic Housing Land Availability Assessment (SHLAA) and or other relevant evidence to identify ‘sufficient specific deliverable sites to deliver housing in the first five years (5-year supply of housing land)...and developable sites for years 6-10 and, where possible, for years 11-15’. However, references to the SHLAA do not correspond precisely to the new practice guidelines.
- 3.3 In practice it will be necessary to produce the SHLAA for the Council’s Annual Monitoring Report, as well as part of the evidence base for the Core Strategy and other parts of the LDF. For the first SHLAA a detailed assessment will be needed, which can be updated annually for future Annual Monitoring Reports. At any point in time the Council should be able to demonstrate that it has a 5-year supply of housing land, or what measures it is taking to release land to ensure that it does have such a supply.
- 3.4 The Council’s ‘Assessment of the Need for Local Reserve Sites Release’ was published in January 2007 and concluded that there was adequate land available as at April 2006 to meet the strategic requirements to 2011. This equated to a 5-year housing land supply but the methodology used at that time is not the same as that now advised in the Practice Guidance. Also, the housing requirement was based on the Hampshire County Structure Plan Review rather than the emerging South East Plan. A full SHLAA is therefore essential, which may or may not show an adequate supply.

4 HOUSING ALLOCATION

- 4.1 The South East Plan sets out how many houses Winchester District must provide between 2006-2026. In total, the requirement recommended by the EIP Panel is 12,240 dwellings, although the Secretary of State proposed modifications are still awaited. This is split into 6,740 dwellings in the Partnership for Urban South Hampshire (PUSH) sub-region and 5,500 in the rest of the district.
- 4.2 The table below gives an indication of the amount of land that is already committed for housing purposes as of the 31/03/2007, and what is left to be found up to 2026 :-

Area	PUSH	Rest of District	District total
Housing requirement (SEP Panel Report)	6740	5500	12 240
Completed 2006 - 2007	150	350	500
Commitments @ 2007 (permissions and allocations)	2040	1485	3525
Remaining requirement	4550	3665	8215

Source : Winchester City Council

- 4.3 The SHLAA will determine how much of the requirement can be met on identified sites and how many new allocations will be needed.

5 CONCLUSIONS

- 5.1 Sites within the settlement boundaries (as identified in the adopted Local Plan Review) have been identified from desktop and ground surveys as well as from information provided by other officers as having some potential for housing development. This information is at the stage where it will enter the public domain as the landowners and occupiers are approached to identify if they have any intention in developing their sites. This report therefore reminds Members of the process and gives an update on the process and expected timescales.

OTHER CONSIDERATIONS

6 CORPORATE STRATEGY (RELEVANCE TO):

- 6.1 The LDF is a key corporate priority and will contribute to achieving the Council's vision through the outcomes set out under providing better services.

7 RESOURCE IMPLICATIONS:

- 7.1 Budget provision has been made for the work associated with the LDF, and this stage of work can be accommodated within the budget.

APPENDICES: Appendix 1 – SHLAA Methodology

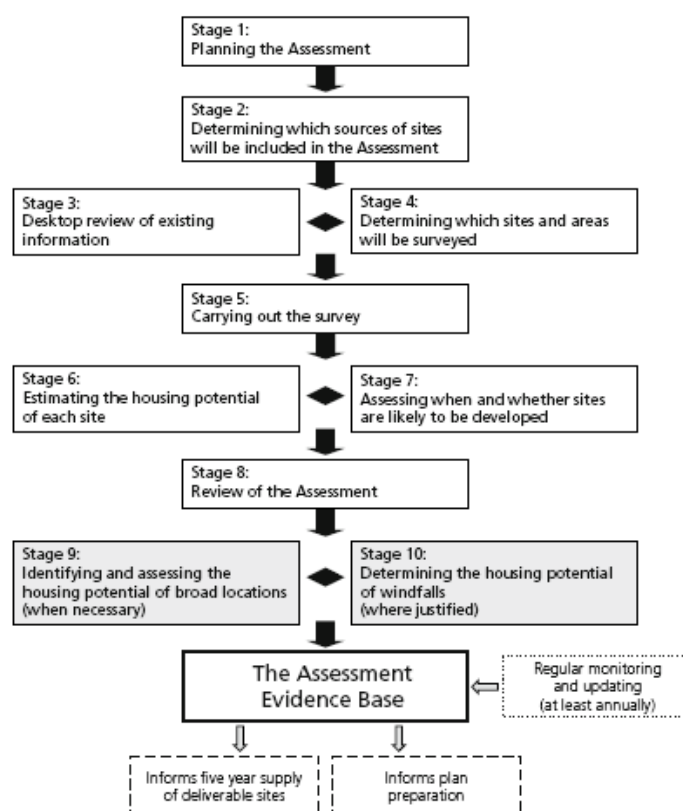
Appendix 1

Strategic Housing Land Availability Assessment

Methodology – based on practice guidance from DCLG¹

1 Introduction

- 1.1 The methods used in the SHLAA are based on the guidance: Strategic Housing Land Availability Assessments, Practice Guidance July 2007 DCLG. The diagram below comes directly from this guidance, and sets out the stages in the process. Work is currently proceeding on stages 6 and 7.



2 Stage 1: Planning the Assessment

- 2.1 The DCLG guidance recommends that local authorities should work with neighbouring authorities, existing housing market partnerships and other stakeholders.
- 2.2 The methodology has been produced in conjunction with East Hampshire District Council who are at a similar stage of producing a SHLAA. Together, we set up a Stakeholder Group to which other local authorities (Eastleigh, Basingstoke and Deane and New Forest) alongside representatives from housing developers and agents, housing associations and Winchester District Association of Parish Councils were invited. A meeting of the Stakeholder Group was held in November 2007 to discuss the methodology.

¹ Strategic Housing Land Availability Assessments: Practice Guidance (July 2007) DCLG

2.3 **Project team**

Winchester City Council is carrying out the SHLAA work in-house. The survey has been carried out by planning officers under the supervision of the Head of Strategic Planning. Other officers within the Council have been asked to provide advice as necessary. This ensures that there is a consistent approach in the survey and analysis of the data.

3 **Stage 2: Determining which sources of sites will be included in the Assessment**

- 3.1 The different sources of information used are listed below. To ensure consistency between the various data sources, the different types of information have been broadly prioritised by how likely they are to result in housing, as shown below. All sites have been surveyed to ensure that similar information is available for each site and the same constraints are used to look at the suitability of sites.

Level 1: Sites in the planning process

- Planning permissions/sites under construction (particularly those being developed in phases) and Dwelling starts and completion records
- sites with planning permission: outstanding (under construction and not started)
- recently lapsed planning permissions (within last 3 years)
- sites which have had preliminary enquiries
- Planning application refusals (if principle of development acceptable)
- Site allocations not yet subject of planning permission. We will reassess the density of allocated/reserved sites (from 30 to 40 dwellings per hectare) and put them through the constraints map.
- MDA (North Winchester, WoW);
- Land reserved in the Local Plan – include mixed use development;
- Local Reserve sites
- Local Plan omission sites within settlements (where acceptable for housing in principle)

Level 2: Sites not in the planning process

- Vacant and available brownfield
- Employment/commercial land – no longer ‘fit for purpose’ according to results of the Employment Land Review
- Surplus Public Sector Land (only 3 sites for Winchester)
- Sites identified from consultation with builders and developers
- Car parks

Level 3: New Sites

- Unidentified land including new sites identified using aerial photos and GIS and new sites identified through the site survey
- Local Planning Authority Urban Capacity Study – larger UCS sites which have not come forward but which have potential

These sites were plotted on the Geographical Information System (GIS)

3.2 **Initial Sieve of Sites: Applying initial constraint level**

In accordance with the DCLG guidance (2007), at this stage an initial broad evaluation of the sites was made and particular types of land have been excluded from the assessment. The land excluded had major constraints on the site and are therefore unlikely to provide sites for future housing. These initial constraints are:

- The site is a listed building or within the curtilage of a listed building.
- The site is within the curtilage of a place of worship (i.e. consecrated ground)
- The site is a key facility or service (e.g. school, village hall, medical or health care service)
- On the site of a scheduled monument, English Heritage registered park or garden or on a battlefield.
- Where there are Tree Preservation Order on the sites which are likely to constrain any development
- where the site is significantly compromised by overhead cables
- where the site is significantly compromised by oil pipeline
- where the site is significantly compromised by overhead cables
- County Minerals Sites
- English Heritage Parks and Gardens
- Important recreation and amenity areas identified within the current Local Plan (policies RT1 or RT2 site (open areas with an important amenity value or recreation value, Policy RT3 is also an important implication, but these sites have not been identified and this will have to be considered at a later stage).
- Within a nationally or internationally designated site (for nature or geological interest):- Ramsar, Special Areas of Conservation, Special Protection Area and Sites of Special Scientific Interest sites.
- National Nature Reserves

3.3 A more refined sieve of sites is being undertaken as part of Stage 7a: Assessing the suitability of housing.

4 **Stage 3: Desktop review of existing information**

4.1 An Urban Capacity Study (UCS) was completed in 2001 by Winchester City Council. The study assessed the potential housing opportunities within the Winchester District. In 2007 a review of the Urban Capacity Study was presented to the LDF committee on the 11th September. This document reviewed how successful the Urban Capacity Study was in anticipating sites which were likely to be brought forward for development and in particular, looked at:

- Which of the sites predicted in the UCS were brought forward for development (given planning permission or completed);
- Which sites predicted in the UCS did not come forward for development and why;
- Which sites have been developed, but were not identified within the Urban Capacity Study (windfall sites).

4.2 The information from this review was used to help determine a suitable methodology for the SHLAA. The information helped with the identification of potential new urban sites in the SHLAA by examining whether there are patterns in the type and location

of sites which came forward for development since 2001. In addition, the information helped to establish the contribution that has been made by windfall sites; potential housing sites which can not easily be identified, but which may continue to come forward in future, as well as providing information on a suitable size threshold to identify new sites.

4.3 The following recommendations for the SHLAA were made as a result of the review:-

- The identification of land with housing potential should be focused particularly (though not exclusively) on current residential sites, where there is already housing on the site and also within the gardens of single properties. For larger sites, the focus should also be on identifying industrial/commercial land which may be available for future housing development, subject to the outcome of the Economic and Employment Study, which will establish the future need for employment land.
- This should be split between the different settlements in the following way:-
- Within the smaller H.3 settlements the focus should be on existing housing and single garden sites.
- In the larger H.3 settlements the focus should be on existing housing sites and industrial land. On smaller sites (but above the 5 dwelling threshold), single gardens may also have potential and on large sites open space should be examined.
- In the City the examination of potential sites should be directed particularly towards existing housing land and single/multiple gardens, especially on small sites (but with a housing potential above the 5 dwelling threshold).
- The SHLAA will need to identify sites with urban potential, focusing on the location and type of land used to identify sites, rather than simply on site size.

4.4 Following this, a review of existing planning permissions was carried out in Oct-Nov 07. A letter was sent out to all registered landowners/developers who had submitted a planning application within the last three years. This included a letter to all applicants who had received permission, but had either not implemented the permission, or where construction had started but had not been completed. In addition, a letter was sent to all those where planning permission had been refused. The letter asked for information on whether the permission was likely to be implemented and when, or completed, or whether the applicant was planning to submit an amended application.

4.5 During this time the sites were mapped on GIS. Additional sites were identified using aerial photography based on the recommendations from the Urban Potential Review.

5 **Stage 4: Determining which sites and areas will be surveyed**

5.1 The guidance states that as a minimum, all sites identified by the desk-top review should be visited. It was decided that a pragmatic approach was needed, given the resources available, which removed those sites that were obviously unsuitable for any development from the survey list. Therefore the coarse filter described in Stage 2 was applied to the initial sites identified, which allowed us to focus on sites which are likely to deliver more dwellings and are in more sustainable locations.

- 5.2 The work on reviewing the UCS had already concluded that a size threshold of 5 should be used, below which sites would not be surveyed. Any sites which could not provide 5 dwellings or more (calculated using different densities as described below) were excluded from the survey as being impractical to identify such small sites. This decision also reflects SEERA guidance used in the review of the UCS. Some Local Authorities have used a site threshold of 10 or more dwellings, however as many of our sites are small (as shown through the UCS Review) a lower threshold was used which will pick up more sites than the 10 dwelling threshold. Although this will still exclude a high percentage of smaller sites, the need to be pragmatic about the identification of sites and the resources needed to carry out a full assessment on these, required a threshold to be set.
- 5.3 Winchester district is not a homogeneous area. The survey therefore had to take account of the diverse nature of the settlements and land supply. To address some of the differences, we used different potential densities to calculate the potential number of dwellings which could be built on the site. For the defined area of Winchester Town Centre (as defined on the Local Plan Map), an average site density of 50 dwellings per hectare was used, and 30 dwellings per hectare elsewhere for all new sites identified as part of the desktop survey. For all sites which were identified as still having potential through the Urban Capacity Study, the housing potential calculated for this study was used for the threshold where available.
- 5.4 The information gathered on developments started and completed can help build up a picture of development hotspots which due to existing policies are predominantly in Winchester Town and larger settlements, fitting in well with the site survey.
- 5.5 Specific locations outside settlements will be considered after it is determined how much land is available within the settlements for housing. However, information from sources such as the Surplus Public Sector Land Registry and consultations with landowners and developers has already provided a wealth of potential sites outside the current settlement boundaries for future consideration.

6 Stage 5: Carrying out the Survey

- 6.1 Between October 2007 to April 08 sites above the 5 dwelling threshold were visited where access allowed, bar those that were excluded from the initial sieve as having major constraints which would seriously impede any development(as explained in Stage 2). Due to the difficulty of multiple ownership, it was considered that the delivery of these sites is significantly constrained and therefore unless a landowner had specifically identified his site as having potential, these sites were not visited. Due to the nature of the district and the resources available, it was not feasible to do a detailed street by street survey, but a general examination of the area, through which some additional sites were also identified through the site survey.
- 6.2 The survey team consisted primarily of officers from the Strategic Planning Team. Maps and site details gathered through the desktop review were taken out on site to ensure consistency of information gathered. Surveyors were also asked to record where development had started, and give an estimation of completion dates so that the timing of housing delivery can be considered.

6.3 The list below shows how many sites were identified from each source.

Aerial Photography	261
Consultation with developer/landowner	227
Local Plan Site other than reserve	7
National Land Use Database	4
Planning Application Implemented	62
Planning Application Refusal	52
Planning Permission lapsed	1
Planning Permission started but not complete	70
Planning Permission not yet implemented	23
Register of Surplus Public Sector Land	2
Survey of site	23
Urban Capacity site not brought forward	68
WCC Officer	40
Total	840

6.4 Each of these sites have been mapped and recorded. From these, 334 sites within the settlement boundaries were suitable for further survey.

7 NEXT STEPS

7.1 A substantial amount of background work has been completed for the SHLAA with over 300 sites identified. The next stages require a more detailed analysis of the sites and their housing potential, alongside which, the owners and occupiers of the sites will need to be consulted.

8 Stage 6: Estimating the housing potential of each site.

8.1 Estimating the housing potential for each site identified and surveyed is the next stage in the process. The guidance states that the estimations should be guided by existing or emerging plan policy. For Winchester, Policy H7 is therefore relevant.

8.2 Policy H.7

8.3 “Residential development, which accords with other policies of this Plan, will be permitted on sites capable of accommodating 2 or more dwellings where:

- (i) it includes a range of dwelling types and sizes, with at least 50% of the properties provided as small 1 or 2 bedroomed units suitable for small households;
- (ii) it includes, wherever appropriate, types of dwellings known to be in short supply in the District or locality, particularly flats and terraced houses;
- (iii) it achieves a net density of 30-50 dwellings per hectare, and potential for a higher density is utilised on sites close to town centres or public transport corridors. Where the site contains features that contribute to the character of the wider area (whether natural or man-made) it may be appropriate to exclude these from the developable area for the purposes of calculating net density.”

8.4 As described for Stage 4, these densities have been used to provide an initial rough estimation of housing potential. The guidance states that where this doesn’t provide a sufficient basis on which to make a local judgement, sketched schemes, comparison with other relevant schemes or comparison with sample schemes could be used. It is considered that while the densities provided a useful initial assessment, a more robust method of calculating housing density would be more useful. Other local authorities have used different densities depending on the site location (distance to services) and characteristic of the surrounding area, or have used exemplar sites as examples of densities they would wish to achieve.

8.5 It is proposed that while we can use current plan policies to guide housing densities (unless a landowner suggests otherwise), we should refine this further by looking at the local character of the site and assessing the sustainability of the location. For large sites (to be defined), we will look at the densities achieved by sample developments in the locality with advice from Development Control.

9 **Stage 7: Assessing when and whether sites are likely to be developed**

10 **Stage 7a – Assessing the suitability for housing–**

- 10.1 The requirement for a suitable housing site is that it ‘offers a suitable location for development and would contribute to the creation of sustainable, mixed communities’.
- 10.2 At this stage, a finer constraints filter will be applied to all sites. This will flag up where there is a constraint where more investigation is needed (mitigation is possible) and will also take into account any new information received through the site surveys. Any major constraint should have excluded the site in stage 4. This stage will pick up whether there are any further policy restrictions, physical problems or limitations, potential impacts on landscape and conservation or environmental conditions.
- 10.3 Other areas that require more refined sieving include:-
- Sites of importance for nature conservation (SINCs)
 - Other archaeological sites where no mitigation is possible
 - On an active landfill site or where remediation still required
 - Sites within Flood Risk zones 2 or 3.
 - Contaminated land, with no remediation solution
 - Land locked sites
 - Major constraints have been raised through the infrastructure Audit
 - Known landowner opposition to development.
 - Conservation Areas
 - Air Quality
 - Sustainability (distance to facilities and access)
- 10.4 It is proposed that a matrix of constraints is used to allow us to score each site based on the type and number of constraints the site has, from which we can make an assessment of whether the site is suitable for any housing development. All sites with a planning permission will be deemed automatically as being suitable as they have already been through the planning process.

11 **Stage 7b: Assessing the availability for housing.**

- 11.1 For sites to be included within the SHLAA, they have to be available, that is to say, the owners must have an interest in developing the site. This process will mean that owners will be identified (through Land Registry searches where necessary) and will be sent a map showing the site identified with a letter asking whether they have any intention or interest in developing their site for housing and, if so, the likely timescale. Any legal or ownership problems with the sites will also need to be identified through this process. At this point, the information and more specifically, the maps for the SHLAA will start to emerge into the public domain.
- 11.2 A large number of sites will have been excluded from the survey prior to contacting owners due to their constraints. This means that we can focus on contacting only the owners of sites that have some potential for housing development. Any site where the landowner has expressed no intention of developing the site over the next 20

years will not be 'deliverable' and would therefore be excluded from the estimated supply of sites.

- 11.3 We have already contacted all landowners and developers with planning permissions who have not implemented or completed their developments to establish their intentions, so this process will only involve contacting landowners of new sites identified. Also, various sites have been promoted by the landowners. However, not all sites may be on the land registry and identifying ownership may be more difficult.
- 11.4 In general we propose that the following criteria are used to assess the availability of sites.
- 5 Year Availability sites which are expected to come forward (sites currently within the planning process) and others we are satisfied will come forward;
 - 5-10 Year Availability sites which are likely to come forward (sites not within the planning process, but which have had development interest) and
 - 10+ Year Availability sites which may come forward for development in future (new sites which have been identified through survey)

12 **Stage 7c Assessing the achievability for housing**

- 12.1 An achievable site is defined as having a 'reasonable prospect that housing will be developed on the site at a particular point in time'. This involves a judgement on 'economic viability and the ability of the developer to complete and sell the housing over a certain time period'.
- 12.2 The guidance advises that market factors, cost factors and delivery factors should all be considered through this process. A meeting with the Estates Division was set up to discuss how we may achieve these objectives. It was advised that there was not much benefit in calculating land values for a sample of sites and extrapolating these values out to all other sites, as each site would have a unique land value based on its individual characteristics.
- 12.3 There are market reports available from commercial agents, however these are not specific to Winchester but provide a general overview of the current market conditions. In general the demand for flatted development is in the short term curtailed due to an over supply, but otherwise the demand for family and other housing continues to be high.
- 12.4 Any assessment of costs would have to consider the construction costs, including any remediation work required, ground conditions, any tariffs required as well as all the building costs, legal and sales fees. Some of these costs will be unique to the site and therefore difficult to estimate across the board. It is therefore proposed to limit the assessment of costs to those sites which have a number of constraints and which lie on the borderline of being suitable for housing.

13 **Stage 7d Overcoming constraints**

- 13.1 Where we have assessed a shortfall of housing sites, we will then look in more detail at the constraints identified and the site to assess if mitigation is possible. This may help to identify more sites, but will limit the amount work required to those sites which are borderline. This stage will involve consultation on specific sites either internally with different departments (e.g. landscape, Access & Infrastructure) or externally (Environment Agency – flood issues) depending on the type of constraints.

14 **Stage 8: Review of the assessment**

- 14.1 The information from the SHLAA will be used to provide two initial housing trajectories; one for the PUSH area and one for the rest of the district. A risk assessment will also be required on when and how sites are developed.
- 14.2 If not enough sites are identified within the settlements that are deliverable, developable and achievable to meet our housing allocation, we will need to start looking at sites outside policy boundaries to assess how much green field we would need for the 5/10/15/etc yr land supply. There is a case for and allowance to be made for small sites and those which may come forward in smaller settlements. However, a windfall site allowance is only likely to be acceptable if at all, in the 10+ year target, although recent advice indicates it is unlikely to be acceptable in the 0-10 yr time period. The use of Broad Locations will be investigated further to pick up any smaller sites.

15 **Stage 9/10: Identifying and assessing the housing potential of broad locations and windfall (where necessary)**

- 15.1 Any shortfall will be addressed through looking for other potential sites and making an allowance for small sites as the site survey will only deal with sites of 5 or more dwellings. As part of the 'front-loading' of the Development Provisions/Allocations DPD, landowners and developers have been invited to put forward site suggestions. A contribution for small sites will be identified at this point looking at what tends to come forward on sites under 5 dwellings and whether any other significant sources of supply have been omitted.