

Appendix 1

Relationship between the Urban Capacity Study and the DCLG's Strategic Housing Land Availability Assessments Practice Guidance

Introduction

In 2007 the Council commenced work on updating the 2000 Urban Capacity Study as part of the evidence base for the Local Development Framework (LDF). The updated document – the Urban Capacity Study 2007 (UCS) – was finalised in July 2007.

In July 2007 the Department for Communities and Local Government (DCLG) issued guidance on producing Strategic Housing Land Availability Assessments which superseded previous guidance (Tapping the Potential – Assessing urban housing capacity: towards better practice).

The purpose of this note is to examine how the Council's UCS relates to the new guidance issued, and whether the UCS can be considered part of a sound evidence base.

In producing the UCS, the Council was aware that previous guidance was outdated and that empirical evidence from within the district showed that the guidance was flawed. This is explained in detail within the UCS itself. As such, the UCS does not follow previous guidance to the letter. In any case, the guidance issued by the then DETR makes clear it was never intended to be used in such a way.

New guidance and the UCS compared

The new guidance lists the following as the primary purposes of a strategic housing land availability assessment:

- Identify sites with potential for housing
- Assess their housing potential
- Assess when they are likely to be developed

The UCS examines a variety of possible sources of housing land, assesses their potential, and makes a judgement as to the probability of the site coming forward in the plan period. As such the UCS covers the three primary purposes of assessments as set out in guidance.

The UCS also provides the minimum core outputs as listed in figure 1 on page 7 of the practice guidance which are as follows:

- A list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary).

- Assessment of the deliverability/developability of each identified site (ie in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed.
- Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified).
- Constraints on the delivery of identified sites.
- Recommendations on how these constraints could be overcome and when.

The guidance recommends that assessments should identify sufficient sites for at least the first 10 years of the plan period, and that where it is not possible to identify sufficient sites assessments should provide the evidence base to support judgements around broad locations. The Council's UCS has taken a slightly different approach. As it has examined all known potential sources of housing land and examined their suitability, but it has not provided guidance on appropriateness of other general locations to meet the housing requirements. Given that the only other sites that have not been examined within the assessment are predominantly Green Belt sites, often with other constraints, it is not considered appropriate for the UCS to attempt to determine possible Green Belt release locations at such an early stage. It would be more appropriate to take a more holistic approach, using the UCS in conjunction with other evidence and data available such as the housing needs survey, historic characterisation report, the forthcoming local wildlife sites review and others, together with extensive community and stakeholder involvement.

The UCS builds upon the previous study carried out in 2000 together with empirical data to produce estimates for the provision of residential development from non-site specific sources. As the methodology and justification for this is stated in the UCS, it is considered to be in line with DCLG guidance.

The production process for the UCS was broadly as DCLG is now recommending. One difference is that the DCLG recommends that a partnership approach be utilised in the development of assessments. Figure 2 on page 7 lists the process requirements for an assessment as follows:

- The survey and assessment should involve key stakeholders including house builders, social landlords, local property agents and local communities. Other relevant agencies may include the Housing Corporation and English Partnerships (a requirement in areas where they are particularly active).
- The methods, assumptions, judgments and findings should be discussed and agreed upon throughout the process in an open and transparent way, and explained in the assessment report. The report should include an explanation as to why particular sites or areas have been excluded from the assessment.

Planning worked with the Council's own economic development officer in the production of the UCS, and took into account NLUD data from English Partnerships and recent action on the part of landowners in considering whether sites were likely to come forward. There was, as such, stakeholder involvement to a degree, but not as significant an amount as DCLG now recommends. DCLG recommends the

involvement of stakeholders such as English Partnerships, house builder, local property agents and local communities at the outset of the process. This is clearly now not possible, but the UCS will be continually assessed as part of the Annual Monitoring Report and it will be possible to involve other stakeholders at this time.

Conclusion

It is a matter of fact that, as guidance on producing assessments, Local Development Documents etc are being constantly produced and amended, it will not be possible for all of the Council's documents at any one time to be perfectly inline with the most recent guidance on their production. Notwithstanding this, and despite the UCS being developed prior to the practice guidance on such assessments being published, many of the elements promoted in the guidance are included in the UCS.

Certain elements which are absent can either be rectified in future reviews when carried out, are not appropriate for Rochford District due to specific local circumstances, or will be examined in other evidence base documents (for example, the Council's 'call for sites' exercise) or as part of production of Development Plan Documents.

The one omission from the UCS which is not so simple to overcome is that of involvement of certain stakeholders at the beginning of the process. It is not felt that this, on its own, renders the UCS invalid. The UCS will not sit as a standalone piece of evidence, put as part of an evidence base comprises numerous sources of information including that from the Council's 'call-for-sites' which involved the Council obtaining information regarding which land developers, land-owners and agents were keen to develop for residential purposes through consultation with these groups.

Having regard to the above, the UCS can still be viewed as a valid component of the Council's evidence base which should be given consideration in the production of Local Development Documents and reviewed as part of the Annual Monitoring Report.