

Nuneaton and Bedworth Borough Council

Housing and Economic Employment Land Availability Assessment (HELAA)

2023

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IMPORTANT INFORMATION

The Housing and Economic Land Availability Assessment (HELAA) is a technical study prepared to inform the review of the Borough Plan. The assessment and identification of sites has no status in formally allocating land for future development and does not guide any decision that the Local Authority makes on individual planning applications. The purpose of the HELAA is to consider a wide range of potential options for the future supply of housing and employment land. It does this through assessing sites with future development potential. The HELAA is not a statement of policy and it does not allocate sites for development.

The identification of potential development sites, within the HELAA, as deliverable does not oblige or mean the Local Authority will grant planning permission for development. **The inclusion of a site in this assessment does not indicate that it will be allocated for development, nor does it determine the acceptability of development on any site. Similarly, the non-inclusion of a site in the assessment does not in any way preclude future development, providing it meets the planning policy framework that exists at the time a site comes forward.**

Phasing, Constraints and Capacity

The phasing, constraints and capacity of sites are based on the Local Authorities' views at the time of the study and an assessment of deliverability, having regard to the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Circumstances or assumptions may change and this may mean sites come forward for delivery sooner or later than originally envisaged. Through the Borough Plan process, developers and landowners may provide evidence that sites can be delivered in different timescales to the ones estimated in the HELAA and officers will take this into account when such evidence becomes available.

The information published as part of the HELAA is based on information available at the time of the study, much of which is supplied by landowners or their representatives. As such, there may be some omissions and/or factual inaccuracies, for which the Local Authority does not take liability. Therefore, users of the study's findings will need to appreciate that there may be additional constraints on some sites that were not identified at the time of the study and that planning applications will continue to be treated on their merits at the time of the planning application, rather than on the information contained within the HELAA. Likewise, some of the identified constraints may have changed since the information was compiled. Issues may arise during the course of a detailed planning application that could not be, or were not foreseen, at the time of the assessment.

Generally, the housing capacity of a site, in the study, either relates to the number of dwellings granted in an unimplemented planning permission (where applicable) or is an estimate based on the methodology contained within the HELAA. However, the site capacities in the study do not preclude densities being increased or decreased on sites, nor does it mean that the densities envisaged within the assessment would necessarily be appropriate. Appropriate densities would need to be assessed through the planning process when a planning application is submitted.

1. Introduction

- 1.1 Housing and Economic Land Availability Assessment (HELAA) is a technical study which assesses sites with potential for housing or economic development. Nuneaton and Bedworth's HELAA comprises this HELAA report and two site assessment spreadsheets for potential housing and employment sites as well as accompanying site maps and a district wide map showing the location of individual maps along with an index of sites.
- 1.2 It is important that each Local Authority maintains an up to date assessment of sites to consider their suitability, availability and deliverability to meet the needs of the area. This is particularly important in enabling a Local Authority to demonstrate a five-year supply of housing sites, which is one of the government's key indicators for measuring the success of a Local Authority's planning policies, its success in delivering its stated ambitions for housing growth and in encouraging brownfield opportunities to come forward, thereby reducing pressure upon undeveloped land. The site assessment spreadsheet was previously called the Strategic Housing Land Availability Assessment (SHLAA). However, following changes in national policy and guidance it now includes sites being promoted for economic uses, so that a balanced and sustainable local economy can be achieved across the borough. For ease of reference, the housing and employment spreadsheets are separate.
- 1.3 The HELAA forms part of the evidence base for the Borough Plan Review. To keep this evidence up to date Nuneaton and Bedworth Borough Council carried out a Call for Sites and asked all landowners and developers, who were promoting sites for either housing, employment or other forms of development, to submit sites in order to be assessed and considered as part of the review process. The HELAA assesses the suitability, availability and achievability of the sites, submitted during this Call for Sites process, in coming forward for development.
- 1.4 Decisions on which sites will be taken forward as proposed site allocations, or broad locations in the Borough Plan Review, will be informed by HELAA as well as the outputs of a range of other evidence-based documents and factors.
- 1.5 It is also important to note that this is a high-level assessment and whilst a range of issues have been considered, the HELAA does not go into the level of detail that would be expected within a planning application. It is however sufficient to identify whether there are any major constraints or principal reasons why a site would not be considered suitable to take forward to site selection, or to identify any matters which may limit the estimated development potential of a site in some way.
- 1.6 In developing the HELAA, Nuneaton and Bedworth Borough Council have worked closely with neighbouring authorities in the Coventry and Warwickshire area, to ensure consistency across assessments. This is particularly important as there are strong strategic relationships relating to housing and the economy which stretch across these administrative boundaries. A common methodology was established and consulted on between 10th November and 22nd December 2021 and formally adopted by the Local Authority in May 2022. A copy of the joint methodology and Call for Sites proforma can be found in **Appendix 1**.

2. Context

- 2.1 The current Nuneaton and Bedworth Borough Plan was adopted on 11th June 2019 and covers the period up to 2031. It sets out the development strategy for the borough, to deliver at least 14,060 homes and 107.8 ha of employment land. The development strategy, of the adopted plan, seeks to deliver homes in the most sustainable locations, with most development directed to Nuneaton as the primary town, whilst other development is directed to, or adjacent to, other settlements at scale which reflects the role and function of the settlement. The Local Authority has committed to undertaking an immediate review of the adopted Borough Plan following the publication of the updated NPPF.
- 2.2 The Borough Plan Review will influence what development will take place, how much, and where within the borough it will be located. This Emerging Plan extends the timeframe covered by the adopted Borough Plan until 2039. The Plan considers a wide range of economic, social and environmental matters that together will enable the achievement of cohesive and sustainable communities. The Plan outlines a spatial vision and strategic objectives for the area, along with a strategy and policies to enable its delivery. Measures to monitor progress in achieving the aspirations of the Plan are also identified.
- 2.3 The HELAA will form part of the evidence supporting the progression of the Borough Plan Review and the monitoring of the current Borough Plan.
- 2.4 The report presents the findings from Nuneaton and Bedworth's HELAA using the base date of 31st March 2023. This supersedes the published 2016 SHLAA report and assessment and the 2021 assessment, by reviewing the status and conclusions previously reached for sites within the SHLAA process.

3. Methodology

3.1 This section sets out the methodology which has been used for the land availability assessment. The approach is consistent with the guidance provided within the PPG. Figure 1 below, shows a flow chart, extracted by the PPG, which establishes the basis of the approach for land availability assessment.

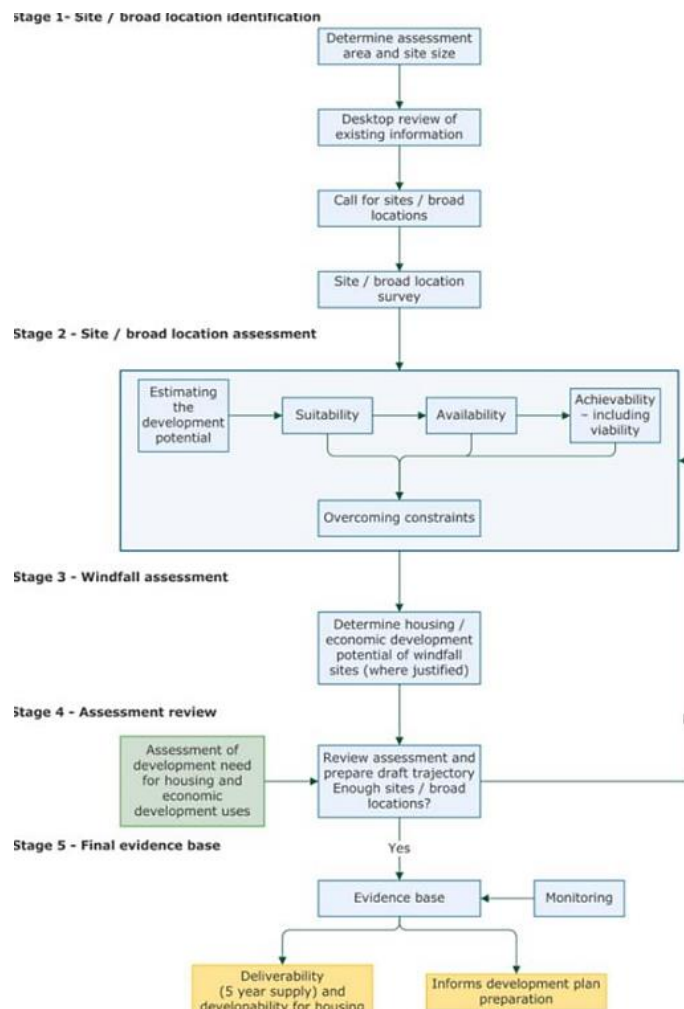


Figure 1: Land Availability Assessment Flowchart.

3.2 Further, the methodology follows the parameters of the Coventry and Warwickshire Sub-Regional Joint Method Statement: Housing and Economic Land Availability Assessment – Methodology. The Joint Methodology seeks to ‘front load’ issues and constraints as far as possible using the Call for Sites Proforma and then provides flexibility for each authority to determine how to assess sites and at what limitations may result in site omissions. As detailed below, given the context of the Borough, a number of constraints for example Green Belt sites have been omitted, however, depending the strategy and overall need this may not be the case for all authorities within sub-region. At the time of writing, no other authority in the sub-region had published its HELAA so no comparisons can be drawn between authorities approaches at this stage.

3.3 The following section details the approach carried out during each step of the methodology.

Stage 1: Identification of sites and broad locations

Geographical Area Covered

- 3.4 The PPG establishes that the geographical extent of site selection and assessment should be the plan-making area. This assessment will cover the administrative area of Nuneaton and Bedworth Borough.
- 3.5 The PPG suggests that land availability assessments should be prepared working with other local planning authorities within the relevant Housing Market Area (HMA) and Functional Economic Market Area (FEMA). The borough lies within the Coventry and Warwickshire strategic housing and function economic market areas. The joint methodology, which Nuneaton and Bedworth Borough Council has adopted, alongside Coventry and other Warwickshire authorities, establishes the basis of a consistent methodology between the parties involved, reflecting the functionality of the HMA and FEMA and complying with the provisions of the Duty to Cooperate.
- 3.6 The PPG also states that a range of stakeholders should be involved in plan preparation which includes the evidence base in relation to land availability assessments. The Council published its 2021 SHLAA alongside the Preferred Options consultation and this provided an opportunity for statutory bodies, stakeholders or interested parties to comment. Where necessary, specific bodies such as Warwickshire County Council have been contacted to clarify assessments.

Size of sites and broad locations

- 3.7 The PPG states that plan makers will need to assess a range of different site sizes from small-scale sites to opportunities for large scale developments. It sets out that in the first instance, sites of a smaller size than 0.25 ha/500 sqm of economic development, or with a capacity fewer than 5 dwellings, should not be considered as part of the HELAA process. This is the approach adopted by this assessment. Therefore, sites for residential development smaller than 0.25 ha or below the threshold of five dwellings, and for economic development smaller than 500 sqm, will not be included within the assessment.

Identifying Sites

- 3.8 National Guidance stipulates a desktop review and Call for Sites exercise are the two primary sources used to identify sites. These have both been used in the HELAA process.

Desktop Review

- 3.9 Guidance makes it clear that plan makers should not rely solely on sites which they have been informed about but should also actively identify sites through a desktop review process. This active desktop review ensures that all suitable sites can be identified, even in the case where they have not been submitted to a Local Authority for consideration.
- 3.10 The Council has undertaken a desktop review for site identification focusing on areas around Nuneaton, Bedworth and other settlements, which are defined within both the adopted Borough Plan settlement hierarchy emerging Borough Plan Review settlement hierarchy. This enabled the desktop survey to be proportionate and make effective use of resources.

3.11 The PPG provides guidance on the sources of data which can be used to identify potential sites through the assessment. Table 1 outlines the sources of data utilised by the Local Authority as part of the desktop review.

Type of site	Data source
Existing housing and economic development allocations	Borough Plan Planning application records
Planning applications refused or withdrawn	Planning application records
Sites with permission in principle and identified brownfield land	Brownfield Land Register (parts 1 and 2) Planning applications
Vacant and derelict land and buildings	Brownfield Land Register
Additional opportunities for un-established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Local authority records Planning applications
Land in the local authority's ownership	Local authority records
Sites in rural locations	Local Plan Gypsy and Traveller Site Allocations Development Plan Document
Business requirements and aspirations	Enquiries received by the Local Authority

Table 1: Data Sources utilised during the desktop review.

3.12 There are other sources outlined within PPG which can be utilised during the desktop review these include surplus or likely to become surplus public sector land, large scale redevelopment and redesign of existing residential economic areas, sites adjoining villages and potential urban extensions. Due to resourcing these sources have not been utilised at this stage, as it was considered that these sites have already or will be promoted through the Call for Sites process as detailed below.

3.13 Where sites already have planning permission or have been subject to prior notification/approval, they have been excluded from the assessment process but where relevant, added to the list of sites with planning permission as part of future land supply calculations and housing trajectory.

3.14 As shown above, the data is collected from a wide range of sources including local planning authorities' records, local plans, other information held by the authority, ordinance survey mapping and data, and the desktop analysis. Each site identified has been individually mapped and assigned a unique reference number. The sites rolled forward from the previous 2016 SHLAA assessment also cross reference to the previous SHLAA numbers for clarity.

Call for Sites

3.15 In addition to a desktop review, a Call for Sites exercise was carried out to allow third parties to promote sites, to the Local Authority, for assessment. This ensured completeness in the HELAA process.

3.16 Nuneaton and Bedworth Borough Council has an ongoing Call for Sites process, which is an open process allowing sites to be submitted to the authority throughout the year. This is advertised on the Council's website. New submissions are assessed and included within the

land availability assessments. During the Issues and Options consultation, all the contacts on the SHLAA, at the time, were contacted about the Call for Sites, as well as a press release being released announcing the process. As part of this promotion all owners/agents of sites previously submitted were advised that if sites were not resubmitted through the process, it may be that the sites are considered no longer available.

3.17 A proforma, a copy of which can be found in **Appendix 1**, was provided on the website to third parties to provide site submissions to the Council. The proforma sought to establish as much information as possible, including details on the site location, suggested potential type of development, scale of development and constraints to development.

3.18 In respect of constraints, the proforma was developed to allow submissions to establish any mitigations possible, to overcome identified constraints. This was to 'front-load' site assessment as far as possible and assist in the overall assessment process. This ensured a more comprehensive assessment of proposed broad locations and potential sites, as established in the PPG. It also helped identify potential new broad locations where development may be suitable, such as clusters of individual sites; for example, where cumulatively they could provide suitable infrastructure to deliver growth in a sustainable way.

3.19 The PPG sets out that site surveys should be proportionate to the detail required for a robust appraisal. The site assessment approach and overall land availability assessment methodology, which has been adopted by each authority within the Coventry and Warwickshire HMA and FEMA, is considered to be robust and proportionate.

Stage 2: Site/broad location assessment

3.20 To enable a preliminary judgement to be made about whether a site or broad location can be considered deliverable or developable over the Plan period, its suitability, availability and achievability has been assessed via a desk-based assessment. Each site has been individually mapped on the Council's mapping system and assessed.

3.21 For those sites/broad locations judged to be suitable, available and achievable, an assessment of their development potential towards meeting housing and employment land needs over the Plan period has been identified.

Assessing suitability of sites for development

3.22 The PPG provides further guidance in relation to assessing the suitability of sites/broad locations for development within the land availability assessments. A site or broad location can be considered suitable if it would provide an appropriate location for development, when considered against relevant constraints and their potential to be mitigated. The PPG states that when considering constraints the information collected as part of the initial site survey, as well as other relevant information including those listed below, should be considered:

- National and local policy designations
- Appropriateness and likely market desirability of potential development.
- Contribution towards regeneration areas and priorities.
- Potential impacts on landscape, natural and heritage designations.

3.23 The assessment of suitability has taken into consideration the development plan, emerging planning policy and national policy as well as the principle of development established by planning permissions or Permissions in Principle.

3.24 Each site has been assessed to identify its overall 'suitability' for new housing development based on the information gathered to date. This information comprises of technical evidence such as flood risk mapping, green belt boundaries and heritage data including conservation areas and heritage assets within the Borough.

3.25 The sites have been presented under the following categories:

- Suitable (included in the trajectory).
- Suitable (not included in trajectory, further information required).
- Uncertain (further information required).
- Unsuitable.
- Remove (no longer available for development).

3.26 A site is first assessed using a 'red, amber/yellow, green' (RAG) approach against a number of major planning considerations such as green belt, flood risk and local wildlife sites; as well as other planning considerations, including accessibility and transport. Those sites for which constraints are absolute and cannot be mitigated would be scored red. Amber sites would have the potential to be mitigated and could be 'upgraded' to green depending on the level of information supplied which could demonstrate this mitigation. Green sites would have no constraints and could be considered suitable and readily form part of the short-term supply.

3.27 Table 2 below outlines how the planning considerations have been assessed for the purpose of this assessment. In most cases a precautionary approach has been followed, before including a site which has a significant constraint, in the future housing trajectory.

Consideration	Solution
Major planning consideration	
Area of Outstanding Natural Beauty Sites located within an Area of Outstanding Natural Beauty	There are no AONB's within the Borough
Conservation Areas A site being located within a conservation area does not always prevent development, but careful design and mitigation would be required to enhance the significance of the Conservation Area before the site could be deemed suitable for development.	Consideration of the Conservation Area Appraisals would be required to ensure development conserves and enhances the area.
European / National Wildlife Site / Protected Species Sites located within important wildlife habitats are considered unsuitable where development would cause harm to geological and conservation interests.	Ecological Appraisals and surveys required to assess the potential impact of any future development.
Flood Risk Sites located within Flood Zones 2 or 3 or	Most types of flood risk can

Consideration	Solution
which are subject to surface water flooding, will need a more detailed site assessment. Any flood risk would need to be assessed and mitigated before the site could be deemed suitable for housing.	potentially be addressed through design and engineering solutions in consultation with the relevant bodies, but this may impact on the viability and developable area of the site.
Designated Green Belt Sites within the Green Belt are considered unsuitable as they conflict with national planning policy and their suitability would need to take account of wider considerations.	Green Belt boundaries can only be altered through the Local Plan where exceptional circumstances are fully evidenced and justified.
Heritage Assets Sites likely to affect an identified heritage asset are normally deemed unsuitable due to the unknown impact of the development. The presence of a heritage asset does not always prevent development, but the type and nature of the constraint would need to be addressed and mitigated before the site could be deemed suitable for development.	A Heritage Impact Assessment would be required, prepared in consultation with relevant agencies, to assess the potential impact of any future development.
Local Wildlife and Geological Sites Sites likely to affect Local Wildlife Sites or geology assets have generally been deemed unsuitable to the unknown impact of development. The presence of an ecological or geological asset does not always prevent development, the type or nature of the constraint would need to be addressed and mitigated before the site could be deemed suitable for development.	A specialist site survey and assessment would be required to assess the potential impact of any future development.
Major Infrastructure Infrastructure covers a wide array of issues. Sites likely to be affected by major infrastructure projects such as HS2 would be deemed unsuitable for development. Site which are constrained by infrastructure such as HSE pipelines or pylons would require mitigation through design measures in order to be deemed suitable.	Sensitive master planning and design would be required to overcome site constraints, where possible.

Consideration	Solution
Minerals and Waste Sites allocated for or safeguarded for minerals extraction or waste management in the Minerals and Waste Local Plan would be deemed unsuitable for development.	Sites allocated or safeguarded for mineral extraction or waste management would need to be no longer designated within the Minerals and Waste Local Plan.
Other planning considerations	
Accessibility and transport Sites which are subject to ransom strips or where no vehicle access can be gained have normally been discounted on the basis that they are currently unsuitable. Other sites that maybe constrained by limited or difficult access are considered on a case-by-case basis.	Where there is evidence or reasonable likelihood that a solution to the access constraints could be achieved, or highways solutions can mitigate known highways issues then the site is considered suitable.
Built Environment and Heritage Sites which make an important contribution to defining and maintaining the separate identity of a settlement or are not considered to integrate well with the existing settlement, are generally considered not suitable.	Sensitive master planning and design would be required to overcome site constraints.
Land and Landscape Sites which are assessed as high landscape sensitivity, or excellent or good agricultural land, are generally considered not suitable.	A Landscape Visual Impact Assessment and soil survey would be required before development could be permitted.
Site Characteristics Pollution or contamination issues are often related to the previous use of a site and indicate further assessment is needed. The presence of TPOs on site does not mean a site would be discounted but would often require careful design. The topography and shape of a site could deem it unsuitable for development.	Ground quality issues may require remedial measures which could affect the viability of a site coming forward for development. A detailed tree survey is required to assess the impact of any future development before it can be permitted.
Designated Land Sites designated for employment uses or as recreational open space have normally been considered unsuitable. Their suitability would need to be established through re-designation in the Borough Plan or through a planning application.	Redesignation through the Local Plan process or following appropriate assessments or evidence base studies.

Table 2: Typical Planning Considerations.

3.28 Where a site has scored red and is highly constrained, if these constraints are unlikely to be easily lifted, or where new housing development is unlikely to be accepted, for example in

the green belt, these sites have been deemed as 'unsuitable' and have not been added to the future housing trajectory.

Assessing availability of sites for development

3.29 The PPG provides guidance on how the availability of a site should be considered, through the land availability assessment. The assessment of availability has been informed through submissions via Call for Sites by agents, landowners and/or promoters. Extant or expired planning permission can also inform availability and will establish 5-year timeframes, or beyond, of developability. The availability of a site is established by looking at the current use of a site, the intentions of the landowner, outstanding legal issues or ownership issues (e.g., multiple ownerships or ransom strips). A site is considered available where, based on the information present, there are no reasons that will prevent the development coming forward.

3.30 Where potential problems have been identified, sites have been deemed 'uncertain' or 'unavailable' depending on the nature of the information available and their likely implications for the future availability of the site. The availability of sites, where the intentions of the landowner are unknown or no further information has been obtained, is deemed 'uncertain' and not included in the future housing trajectory.

3.31 If a site was considered suitable and available at this stage, it was then assessed for achievability.

Assessing achievability of sites for development

3.32 A site will be considered achievable for development where there is a reasonable prospect of the particular type of development being developed, on the site, at a particular point in time. This is assessed through best judgement on the economic viability of a site and its desirability to be delivered within particular market conditions. This can also be informed via submissions by third parties, where an indication can be made of the potential type of development and how this will influence viability/desirability. In this case, where applicable the site history, local market analysis and viability were considered to determine achievability of a site.

Employment Assessments

3.33 The economic assessment followed the same methodology as the housing assessment set out above. Constraints were assessed and given a red, amber or green rating. However, the rating was assessed in a slightly different way due to the proposed use. For example, access to local facilities was less significant to employment than housing. An assumption on land use for employment was made on a site-by-site basis, informed by indicated developer aspirations.

3.34 The assessment considered 19 sites; 15 of these were subsequently discounted and 5 strategic sites with planning permission were considered separately but included in the trajectory analysis. The analysis comprises:

- Strategic Employment Site (SEA) allocations with planning permission, as defined by the Preferred Options Borough Plan (2022 Consultation version).
- Other significant sites, predominantly identified in the Call for Sites exercise (2022).

Calculating Development Potential for Housing

3.35 In relation to development potential, the PPG states the estimation of the development potential of each site, can be guided by the existing or emerging planning policy whilst in the context of the policies in the NPPF, seeking to make the most efficient use of land.

3.36 To estimate how many dwellings could be expected to be provided on each site, deemed suitable and available, it was necessary to calculate a site's capacity. This involved measuring the overall site area (in hectares), then calculating the net developable area for residential development, once land has been deducted from the total site area to account for provision of other land uses, infrastructure provision and constraints mitigation. Once the net developable area was known, then a housing density could be applied to estimate how many dwellings could be provided on a particular size of site.

3.37 Density: The site density assumptions which have been used within the HELAA for housing sites are as follows, where information has been provided on development potential, from the Call for Sites form this was considered and used as the density where it was assessed as appropriate and realistic. Where capacities were informed by a planning application, this figure was used for the assessment where it is considered reasonable when assessed against the density calculation.

3.38 In other cases, on sites where a figure was not provided, the following assumptions were applied to provide an indication of the potential development at a site. 35 dwellings per hectare for sites which are located in rural locations, which includes the edge of settlements, and 100 dwellings per hectare on urban sites, which can accommodate apartments, was used. Sites located within the urban area which cannot accommodate apartments also used the assumption 35 dwellings per hectare. These assumptions have been derived using housing monitoring data from a sample of residential permissions from strategic sites across the Borough and with consideration given to the assumptions in the National Model Design Guide.

3.39 Net Developable Area: The net developable area ratios of 60% of the site on greenfield land and 80% of the site on previously developed land was used where there is no information on the area of the site which is to be developed. These ratios have been derived using housing monitoring data from a sample of residential planning permissions to enable calculation of an average net developable area for the borough. These ratios are designed to take account of ancillary uses of land within a development, for example roads and infrastructure.

3.40 Where possible, known constraints have been taken into account when estimating the possible capacity of a site and it is important to recognise that capacities may also be affected by issues not evident at the time a site assessment is undertaken. The potential capacity of a site derived through this assessment, therefore may potentially change throughout the planning process.

Calculating Development Potential for Economic Development

3.41 For economic development a land area has been included. It has been assumed that the total would not be developed and count towards economic floorspace. This is because a certain proportion of the land would be required for infrastructure provision such as requirements for access, landscaping and drainage. Taking this into account it is considered

that 40% of the gross site area would be developed and used for an economic use. This figure has been used unless further information relating to the site has been submitted to the Local Authority. Given that the end user(s) of potential employment sites are not currently known, it would be difficult to convert land area into a realistic estimate of jobs total at this stage.

Timescales for development - Housing

3.42 In accordance with the definitions set out in the NPPF, for a site to be considered deliverable and included in the housing trajectory it should be available now, offer a suitable location for development and be achievable, with a realistic prospect that housing will be delivered on the site within five years. For a site to be considered developable and included in the housing trajectory, sites should be in a suitable location with a reasonable prospect that it will be available and could be viably developed at the point envisaged for housing.

3.43 Lead in times: The lead in times required for development to commence, have been considered within the assessment. This assists in assessing the anticipated rates of delivery and the overall housing trajectory. Where no details were provided, the following lead in times will be applied to sites based on local knowledge and experience of the development process both historically but also in light of future ambitions for the planning service at the authority following a recent restructure and recruitment drive to bolster resources. Taking this into account, it is estimated that for major developments of 10 more dwellings without planning permission, it will take 3 years from validation to implementation and for minor developments up to 10 dwellings it will take 2 years.

3.44 Buildout rates: The build-out rates for housing developments have been established and are based upon local knowledge of the housing market or where information has been submitted. In the absence of detailed site specific information, the following estimates have been used when estimating the potential annual delivery of a site:

- Up to 25 completed in the first year of building
- Maximum of 50 dwellings per year for a single developer.
- Sites up to 250 dwellings – assume one developer (50 dwelling per annum).
- Sites up to 500 dwellings – assume two developers (100 dwellings per annum).
- Sites more than 500 dwellings – assume three developers (150 dwellings per annum).
- Assume a ceiling of 150 dwellings per annum for all sites unless sufficient evidence is provided to the contrary.

3.45 Where a site has been assessed as not suitable and not available, therefore not developable, then no timescale estimate has been provided.

Timescales for development - Employment

3.46 Drawing on a combination of availability, deliverability and suitability factors, each site has been allocated a five-year period. Those sites assessed as being unsuitable or unavailable are not included in the trajectory. On the basis of those factors assessed, a judgement was made on the overall achievability of each site coming forward for development as follows:

- Developable now – sites where ownership, planning permission for B-class space and developer/landowner aspirations indicate that the site can be considered available now for development.

- Developable in future – sites with some constraints in terms of ownership/current occupation, absence of planning permission or lack of clear developer/landowner aspirations, but there is a reasonable prospect that these can be overcome during the Plan period.
- Not developable – sites with significant constraints in terms of ownership, planning status or conflicting developer/landowner aspirations which imply very limited prospect of the site being available for development during the Plan period.
- Uncertain - insufficient information available to make an assessment at this time.

Stage 3: Windfall Assessment

Housing

- 3.47 Windfall sites are defined in the NPPF as sites not specifically identified in the development plan. The NPPF and PPG make it clear that windfall allowance in respect of residential development can be included within the five-year supply where an authority has compelling evidence to support the allowance.
- 3.48 The adopted Borough Plan includes a windfall allowance of 22 dwellings per annum, across the Plan period, however this is considered a very conservative figure. As part of the evidence base for the Borough Plan Review the Local Authority have produced a Small Site Windfall Housing Study to examine whether a higher figure would be more appropriate.
- 3.49 The Small Site Windfall Housing Study looked at historical data which showed that small site windfall completions have been an important source of housing completions in the borough. The trend indicates an increasing amount of small site completions. The increase is despite larger development sites being available and the adoption of the Borough Plan. Therefore, this would not be an accurate representation if small windfall sites were not included in the Housing Trajectory.
- 3.50 The HELAA data shows there is capacity for small sites to come forward during the plan period. The windfall study found the HELAA data was not considered to be a reliable assessment of the total contribution of small site windfalls. The HELAA excludes small sites of less than 5 dwellings and omits sites with planning permission and prior notification thereby reduces the amount of small site historic housing completions. The windfall study acknowledges the HELAA evidence that there is a potential source of windfall sites but does not include figures from the HELAA in determining a windfall amount. The windfall calculation solely relies on historical data to reach conclusions when determining the windfall allowance.
- 3.51 The windfall study examined historic completions and trends of small windfall sites. It defined small sites as less than 10 units in line with the definition of major development in national policy. When considering the context of completions and the need to adjust the final windfall figure to ensure the approach is consistent with guidance, the study recommended a windfall allowance for the borough of 42 dwellings per year.

Employment

3.52 The Nuneaton & Bedworth Housing & Economic Development Needs Assessment (2022)¹ provides an analysis of gross completions of employment land, within the borough, over the last 10 years. According to the report there has been an average of 1.08 ha per annum of windfall employment land delivered.

Stage 4: Assessment Review

3.53 Following the completion of the site assessment the findings will be presented to illustrate the development potential of sites considered through the land availability assessments and therefore, will determine if there are sufficient sites within the borough to meet the development needs. If this is the case, the PPG suggests assessments should be revisited with consideration of some of the assessment assumptions on development potential. Section 4 sets out core outputs of the assessment and it is concluded that there are sufficient sites to meet the identified need including those sites which have been delivered during the Plan period.

Stage 5: Final Evidence Base

3.54 The core outputs of the assessment are presented in Section 4. The primary role of the HELAA is to inform the preparation of the Borough Plan Review and the 5 year housing land supply assessment.

¹ [Borough Plan Review: Preferred Options | Nuneaton & Bedworth \(nuneatonandbedworth.gov.uk\)](https://nuneatonandbedworth.gov.uk/Borough-Plan-Review-Preferred-Options)

4. Assessment of Supply and Final Evidence Base

4.1 This section sets out the assessment of supply for housing and economic land, promoted and identified through the HELAA process to inform the Borough Plan Review.

4.2 In drawing conclusions on each site, the Council has considered information provided by stakeholders, the planning histories of sites along with an assessment of any risks and actual rates of delivery.

Number of Sites and Nature of Sites Identified

4.3 All of the sites the Council identified through the desktop review and promoted through the Call for Sites process were assessed within site assessment spreadsheets providing they met thresholds for residential and employment development outlined within paragraph 3.7. In total, 122 sites were assessed for housing and 23 sites assessed for employment through the HELAA process. The site assessment matrix for housing is set out in **Appendix 2** and the site assessment matrix for employment is set out in **Appendix 3**. This provides an overview of each site, including its status, and whether it is considered deliverable, developable or omitted. If the site is assessed as deliverable or developable the assessment sets out the expected timeframe for delivery to be completed. A map showing all the sites assessed can be found at **Appendix 4**.

4.4 Within the assessment, the status of each site is based on a planning judgement at the time of the assessment, given the information available. Sites assessed as 'Suitable – further information required' were considered suitable for new housing development but their availability was uncertain, mainly due to lack of up-to-date contact with a landowner or developer.

4.5 Sites deemed 'uncertain- further information required' are not included within the trajectory because of a known physical or policy constraint that would need further, more detailed resolution before their suitability for residential development could be confirmed. This includes sites where there are access or highway network constraints, heritage or flood risk constraints which would require more detailed work to resolve the issues before permission could be granted. It is thought these sites could only be brought forward, through a detailed planning application, to directly address the issues of concern before they could be added to the housing trajectory.

4.6 Further sites were assessed as 'unsuitable' and have major physical or policy constraints that are currently unlikely to be capable of being resolved. 34 of these sites fell within the Green Belt. National policy states that Green Belt boundaries should only be altered in a Local Plan where exceptional circumstances are fully evidenced and justified. Before concluding that exceptional circumstances exist, all other reasonable alternatives for meeting development needs should be fully examined. The latest evidence identifies that exceptional circumstances are not justified and therefore Green Belt sites are currently deemed as not suitable.

4.7 Following a review of the sites, in total 15 sites have been removed from the assessment as they are either no longer available for development or now benefit from planning permission.

4.8 Table 3 below summaries the initial HELAA results for housing and employment sites respectively.

Use	Site Assessment Category	Number of Sites
Housing	Suitable, achievable and available and therefore included within the housing trajectory	26
	Suitable but not included within the trajectory as further information would be required before the site could be considered deliverable or developable	28
	Not suitable due to major constraints including that are unlikely of being resolved due including designated green belt land, designation open space or playing pitches, designated for employment uses.	54
Employment	Developable in the future	4
	Suitable but not included within the trajectory as further information would be required before site could be considered developable in the future	3
	Outline applications pending on the site	3

Table 3 Summary of initial HELAA results

Assessment of Housing Supply

4.9 For the purposes of this study, to inform the Borough Plan Review, the housing supply position has been separated into the following categories:

- Identified sites (sites assessed suitable, achievable and available)
- Windfall yield.
- Developments with planning permission or prior notifications.

Identified sites

4.10 A total of 122 sites were assessed for their housing land potential. Of the sites assessed, 26 were considered suitable, achievable and available for development. These sites all form allocations within the Borough Plan Review and are included within the future housing trajectory, with the exception of any sites less than 10 dwellings as these sites are accounted for in the supply position as windfall sites. A further 28 sites were considered suitable but not included within the trajectory as further information would be required before the site could be considered deliverable or developable and therefore allocated for development. The remaining 69 sites were omitted either due to major constraints or removed from the assessment as the site benefitted from planning permission. The table below shows the potential capacity of the sites assessed.

	No. of sites	Housing potential of sites
Total number of sites assessed using HELAA methodology for housing	124	30,476
HELAA sites assessed to be suitable, available and achievable for housing	26	5,548

Table 4: Potential capacity of sites assessed

4.11 The trajectory, arising from the housing assessment contained within the HELAA for suitable sites is shown in Figure 2 below. This has been broken down into those sites which are considered deliverable i.e. short term and will come forward within 5 years, and those which are developable i.e. medium to long term sites coming forward within 6-10 and 11-15 years. In forming these assessments for timescales for development, the information that is available through the submission of a planning application or a pre-app, or through the submission of Call for Sites, has been taken into consideration.

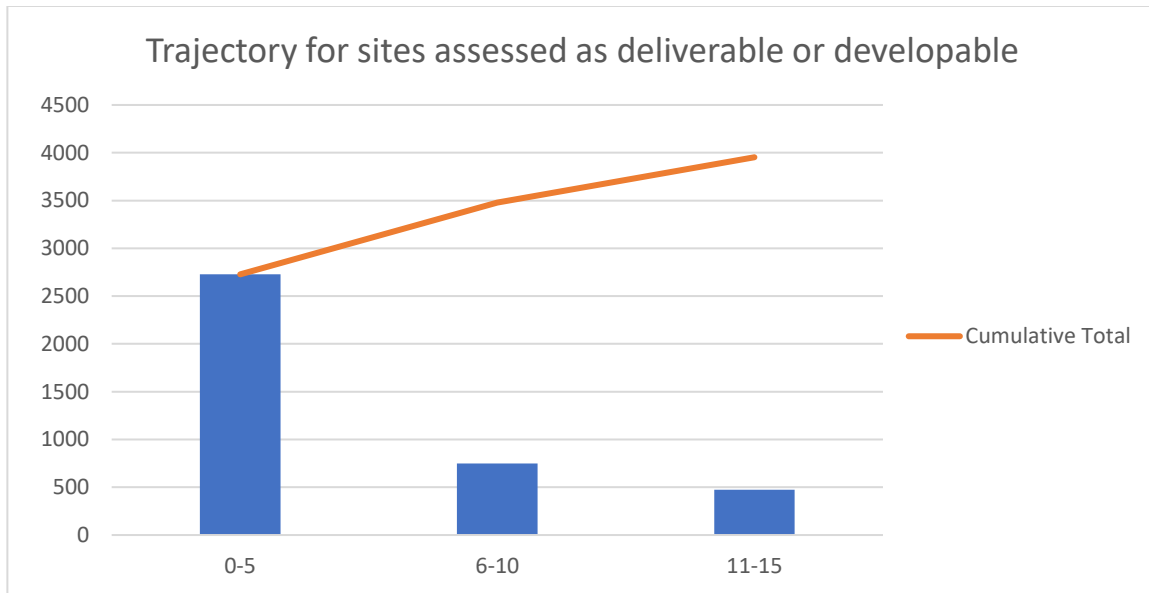


Figure 2: Trajectory taken from site assessment broken down into years 1-5, 6-10 and 11-15.

Windfall

4.12 Section 3 sets out the approach towards windfall calculation. Windfall allowance was calculated as 42 dwellings per year from 2024/25 onwards, which is the anticipated year of adoption of the Borough Plan Review to avoid double counting, totaling 630 dwellings.

Development with planning permission

4.13 As at the baseline date of 31st March 2023, planning permissions and prior approvals have been issued for 4207 homes. All these commitments are considered to be deliverable under the definition set out in the NPPF and PPG.

Future housing trajectory

4.14 Following an assessment of housing supply, a future housing trajectory has been produced as shown in Figure 3. This comprises of sites with planning permission, strategic and non-strategic sites and windfalls broken down on an annual basis. For clarity, the sites identified as suitable and therefore included housing trajectory within the housing assessment spreadsheet form either strategic or non-strategic site allocations within the Borough Plan Review.

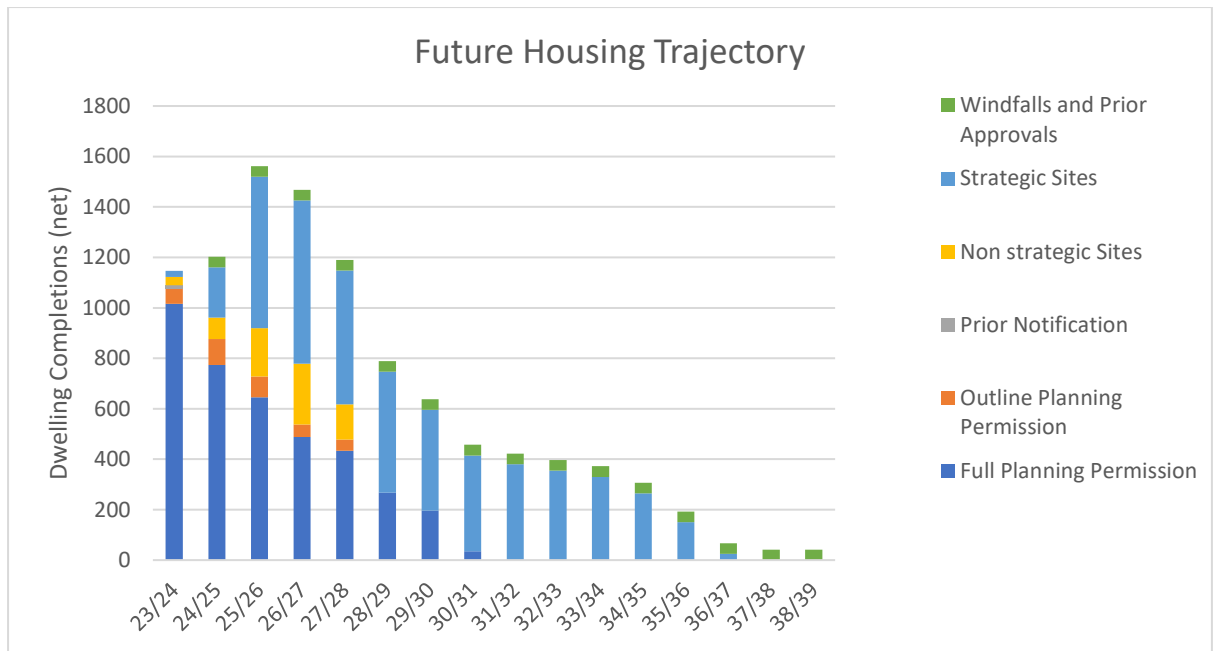


Figure 3: Future Housing Trajectory at April 2023

4.15 The housing trajectory shows a significant amount of sites being delivered within years 1-5, this is primarily due to a number of the strategic development sites identified within the adopted Borough Plan currently being under construction and those identified within the Borough Plan Review benefitting from planning permission.

4.16 Informed by the future housing trajectory above, the five year supply position as at April 2023 is set out in the table below.

5-year Housing land supply position	
Suitable identified sites (Desktop review and Call for Sites)	2693
Windfall (42 dpa from 2024/2025 ²)	168
Planning permission or prior notifications	3709
Total Yield	6570

Table 4: Five year housing supply at April 2023

4.17 Whilst there is a significant number of sites shown as deliverable within the 1-5 year period which feed into the five year supply, there is a risk, however, that any constraints are not so easily overcome and that these sites and the delivery timeframe may slide into the longer term. Regular monitoring will assist in managing risks proactively. Risk can also be mitigated by maintaining a healthy supply, by granting planning permission for other applications where they are deemed to be acceptable in planning terms. It must be acknowledged however that the Council has no direct control over whether sites get built out or when they will be delivered.

² Anticipated year of adoption of the Borough Plan Review.

Assessment of Economic Supply

Identified sites

4.18 A total of 23 sites were assessed for their economic land capacity, with a total potential capacity of 476 hectares. Of the sites identified, 11 were found not to be suitable due to site constraints. The main constraint affecting those sites was their location in the Green Belt. 5 sites required further information whilst 7 sites were found to be suitable and available, providing a potential employment land capacity of 53 hectares.

	No of sites	Size total (ha)	Potential supply (sqm)
Total number of sites assessed using HELAA methodology for employment use	23	476	4759450
HELAA sites assessed to be suitable, available and have capacity for employment use	7	53.38	533210
HELAA sites not suitable due to site constraints	11	283	2828540
HELAA sites require further information	5	140	1397700

Table 5: Summary of identified employment land sites.

Extant Allocations

4.19 SEA-2 Wilsons Lane, which has outline planning permission subject to the signing of a Section 106 agreement, will provide 18 ha of employment land, SEA-3 Prologis extension, has outline planning permission, will provide 5.3 ha of employment land. SEA-4 – Coventry Road has an outline application in preparation, the site is anticipated to deliver 9 ha of employment land. SEA-6 Bowling Green Lane has submitted an outline application which is yet to be determined which should deliver 19 ha of employment land. SEA 1 Faultlands and SEA5 School Lane/Longford Road are currently under construction and form part of the employment land supply.

Reference	Site Name	Size (ha)	Status
SEA2	Wilsons Lane	19.09	037237 – Outline conditional approval – B8 / B2
SEA3	Prologis Extension	3.58	038023 – Outline – Conditional approval – B8/B2 and ancillary office
SEA4 (WEM 2 & 3)	Coventry Road	9.59	An outline planning application is under preparation. Estimated to be submitted Autumn 2023
SEA6	Bowling Green Lane	19.89	039611 – Outline application to be determined

Table 6: Summary of existing employment allocations

4.20 Based on the assessment of site availability and deliverability, set out in the HELAA analysis and the strategic sites table, a potential supply trajectory has been compiled for employment land.

4.21 Drawing on the combination of availability and deliverability factors, each site has been allocated to a five-year period (i.e., 2022-2027, 2027-2032 or 2032-2037). Sites assessed as being 'not available, suitable, deliverable' or 'Uncertain further information required', are not included in the trajectory analysis.

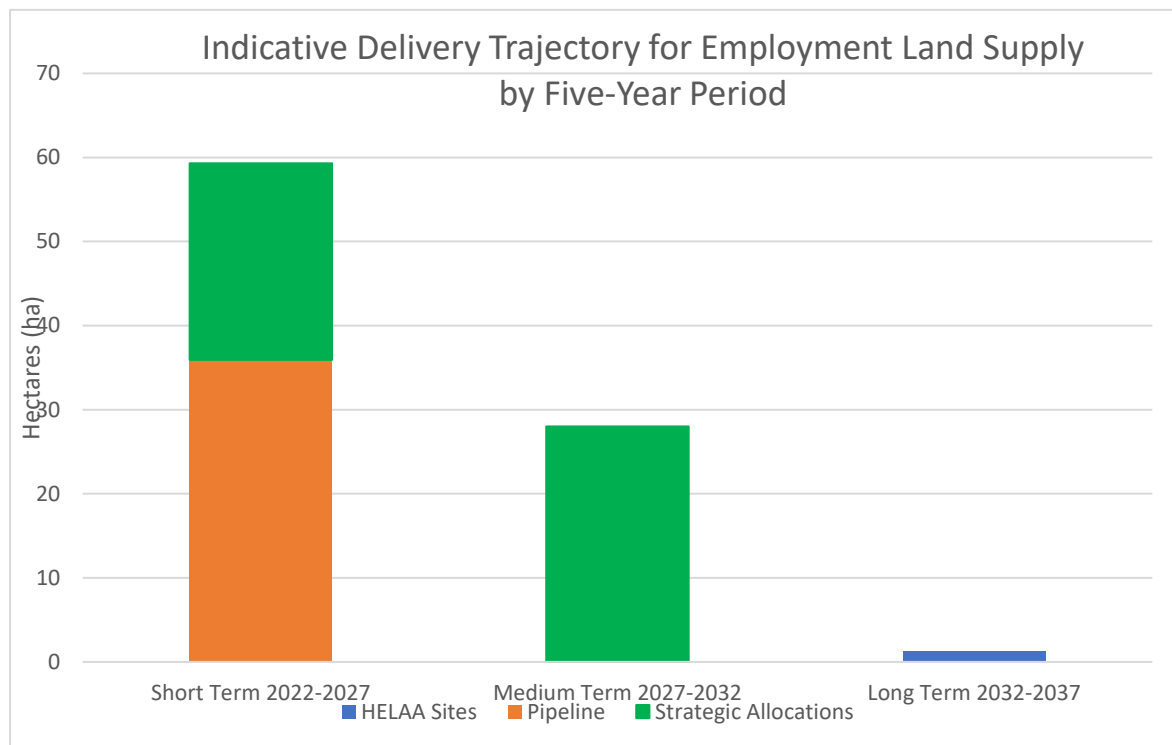


Figure 4: Indicative delivery trajectory for employment land supply by five-year period

4.22 The anticipated profile of delivery is predominantly short term. The anticipated delivery reflects the progress made with planning applications on large strategic sites. There is a comparatively small amount of employment land, which could be deliver in the medium term, of the Plan period. This figure includes strategic site SEA-4 Coventry Road, which has not made a formal planning application, although it is understood progress has been made on site assessment work. No long-term strategic sites have been identified due to constraints, predominantly related to the Green Belt. In the future, dependant on employment land needs, the Council will need to consider releasing land from the Green Belt to meet the requirement.

Reference	Site Name	Size (ha)	Gross site area (Sqm)	Potential supply (sqm) (ratio 0.4)	Status
SEA-2	Wilsons Lane (allocated site)	19.09	1909900	76360	Developable now – Outline conditional approval – B8/B2
SEA-3	Prologis Extension (allocated site)	3.58	35800	14320	Developable now – Outline – Conditional approval – B8 / B2

SEA-6	Bowling Green Lane (allocated site)	19.89	198900	79560	Developable now – 039611 – Outline application – to be determined
WEM-2	Land at the former Griff School (part of SEA-4 Coventry Road) (allocated site)	2.031	20310	8124	Developable in the future - Allocated site
WEM-3	Land at The Former Griff School (part of SEA-4 Coventry Road) (allocated site)	7.558	75580	30232	Developable in the future - Allocated site
ABB-7	Mill Street/ Bridge Street	0.54	5400	2160	Developable in the future
WHI-2	Land Adjoining Eastboro Way - Townsend Drive	0.692	6920	2768	Developable in the future

Table 7: Summary of potentially deliverable employment land sites

Windfall

4.23 The NBBC draft HEDNA (May 2022) provided an analysis of gross employment land completions in the Borough over the past 10 years, informed by the Council's monitoring data. There were no allocated sites delivered over this period, with development occurring representing windfall completions on existing employment sites. It provides evidence of a consistent trend of windfall development occurring from the existing portfolio of sites, with on average 1.08 ha of windfall development per annum taking place on existing sites.

4.24 Further analysis by Iceni Projects in the Review of Nuneaton & Bedworth Employment Land Portfolio (June 2023) supports the inclusion of a windfall allowance. The analysis excluded windfall development over the period to 2025 to avoid any overlap with other sources of supply, in particular extant permissions. A 30% discount to historical windfall trend data was applied to ensure that the future supply of employment land is not overly reliant on windfall development.

4.25 It is considered that the average of 1.08 ha per annum of windfall employment land delivered over the last 10 years is likely to continue over the next 15 years.

Development with planning permission

4.26 The Council's most recent Authority Monitoring Report shows, up to April 2023, there is 34.69 ha of employment land with full planning permission. 34.2 ha of employment land with full planning permission is under construction.

Completions

4.27 In the years 2021/22 and 2022/23 2.12 ha was completed comprising of 0.87 ha in 2021/22 and 1.25 in 2022/23.

Development on existing employment sites

4.28 Guidance states that the identification of sites should include existing sites that could be improved, intensified, or changed. The Review of Nuneaton & Bedworth Employment Land Portfolio identifies 2.99 ha of employment land which is vacant on existing employment sites. These sites form part of the Council's employment land supply.

4.29 The table below provides the Council's potential economic land supply for the borough's 15-year Employment Land Supply Position. It is considered the HELAA identified sites of less than one hectare are not of sufficient size to allocate in a Local Plan. These sites are accounted for in the 15-year employment land supply position within the windfall allowance.

15-year Employment land supply position	
Sites completed in plan period	2.12 ha
Extant allocations (included in HELAA)	52.15 ha
Windfall (1.08 per annum with a reduced delivery period to ensure no overlap with extant planning permissions.)	15.1 ha
Extant full planning permissions	34.69 ha
Vacant plots within employment areas	2.99 ha
Total Employment Land	107.05 ha

Table 8: Potential employment land supply position

Future employment trajectory

4.30 Following an assessment of employment land supply, a future employment land trajectory has been produced as shown in Figure 5. This comprises of sites with full planning permission (including sites under construction), strategic employment sites, windfalls and vacant plots within employment areas broken down on an annual basis.

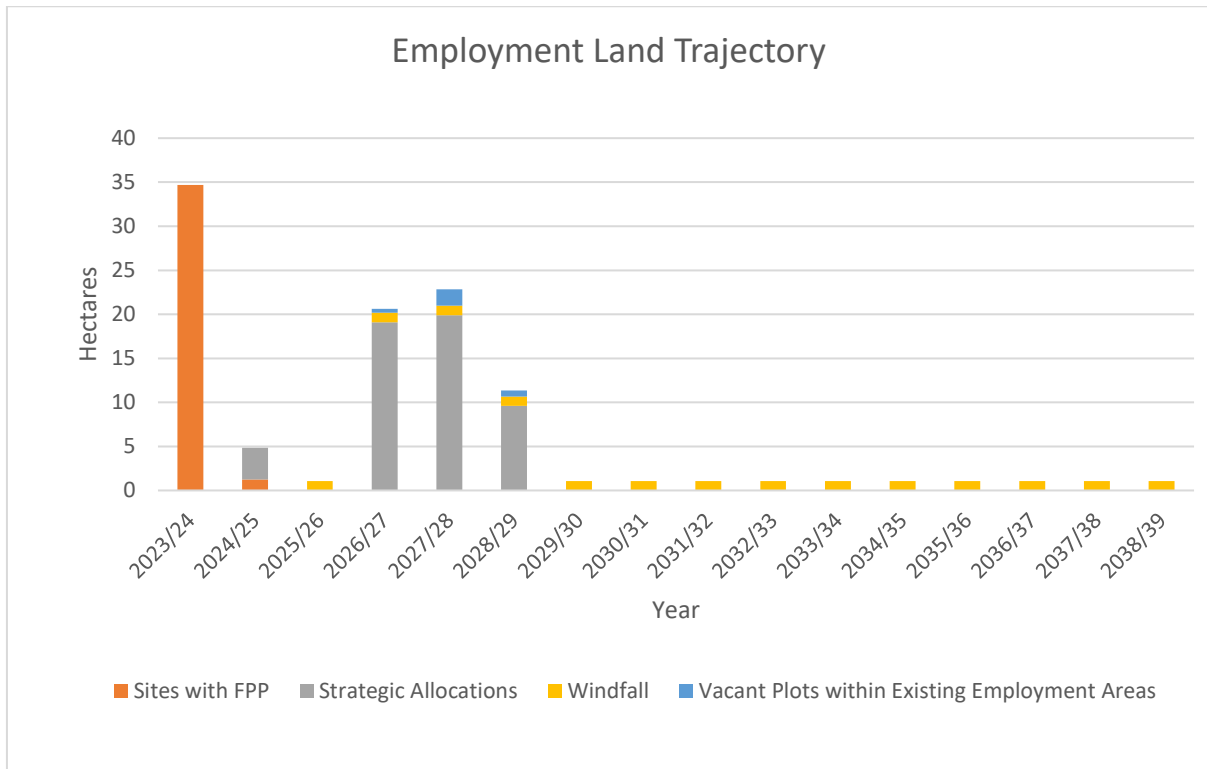


Figure 5: Future employment land supply trajectory at April 2023

5. Monitoring and Review

5.1 In accordance with national guidance, the HELAA is to be updated on an annual basis to ensure it remains an effective and up to date evidence base for the future monitoring of housing provision against targets in the Emerging Borough Plan Review. The proposed updates will not alter the methodology unless the NPPF or PPG is amended in a way which would require a review.

5.2 Housing completions monitoring and employment land completions monitoring will also continue to be undertaken on an annual basis through the published Authority Monitoring Report (AMR).

6. Addendum (October 2023)

6.1 This addendum has been published as an update to the HELAA report to incorporate a further seven sites (SLO-1, SLO-2, SLO-4, ARB-3, WEM-4, EXH-5 and EXH-21) promoted for residential development and / or employment land. All these sites were assessed as part of the process but the tables were accidentally omitted from the report. The site assessments can be found in Housing and Employment Assessment tables and all the sites have been assessed as either 'Suitable but not included within the trajectory as further information would be required before the site could be considered deliverable or developable' or 'Not suitable due to major constraints that are unlikely of being resolved including designated green belt land.'

6.2 The inclusion of these sites means that in total the number of sites assessed using HELAA methodology for housing equates to 31,260 and the total number of sites assessed using HELAA methodology for employment use equates to 330.8 hectares.

Appendix 1 – HELAA Methodology and Call for Sites Proforma

Coventry and Warwickshire Sub-Regional Joint Method Statement

Housing and Economic Land Availability Assessment - Methodology

September 2021

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1. Introduction
2. Methodology
3. Implementation

APPENDICES

Appendix 1. Example Proforma

1. Introduction

- 1.1 The National Planning Policy Framework (the “NPPF”) specifies that policy-making authorities should prepare strategic assessments of land availability for their areas. Arising from this assessment, strategic policies can be formulated to identify areas and locations for growth that can meet development need.
- 1.2 This joint statement has been prepared between the authorities that comprise the Coventry and Warwickshire sub-regional area and is an update from the Joint Statement published in May 2015 to ensure that it reflects the most up to date national guidance from Government.
- 1.3 In line with the recommendations of the Planning Practice Guidance (PPG)¹ the methodology is an agreed approach between the Local Planning Authorities (LPAs) that make up the Coventry and Warwickshire Housing Market Area (the HMA) and the Functional Economic Market Area (FEMA) where these two areas overlap. The LPAs are:

- Nuneaton and Bedworth Borough Council
- Coventry City Council
- Rugby Borough Council
- Warwick District Council
- Stratford on Avon District Council
- North Warwickshire Borough Council

- 1.4 Forming part of this update is a joint movement away from the original sole focus on housing land assessment, which was referenced as a Strategic Housing Land Availability Assessment (SHLAA) to a **Housing and Economic Land Availability Assessment (HELAA)**, which considers both housing and employment sites . This has been agreed by the LPAs to more appropriately reflect the updates made by the PPG in 2019:

“Plan-making authorities may carry out land availability assessments for housing and economic development as part of the same exercise, in order that sites may be identified for the use(s) that is most appropriate.”

- 1.5 It is not the objective of this joint methodology to standardise the methods made to assess land availability in each Local Authority, but rather provide a broad framework to ensure a consistent approach, which each Local Authority can then adapt to reflect their own local circumstances.
- 1.6 The detailed HELAA produced by each Local Authority should:
- Identify sites and broad locations with development potential (housing, economic or other);
 - Assess their potential for development in terms of:
 - o their availability for development and whether they can be brought forward as locations for housing, economic or other form of development;

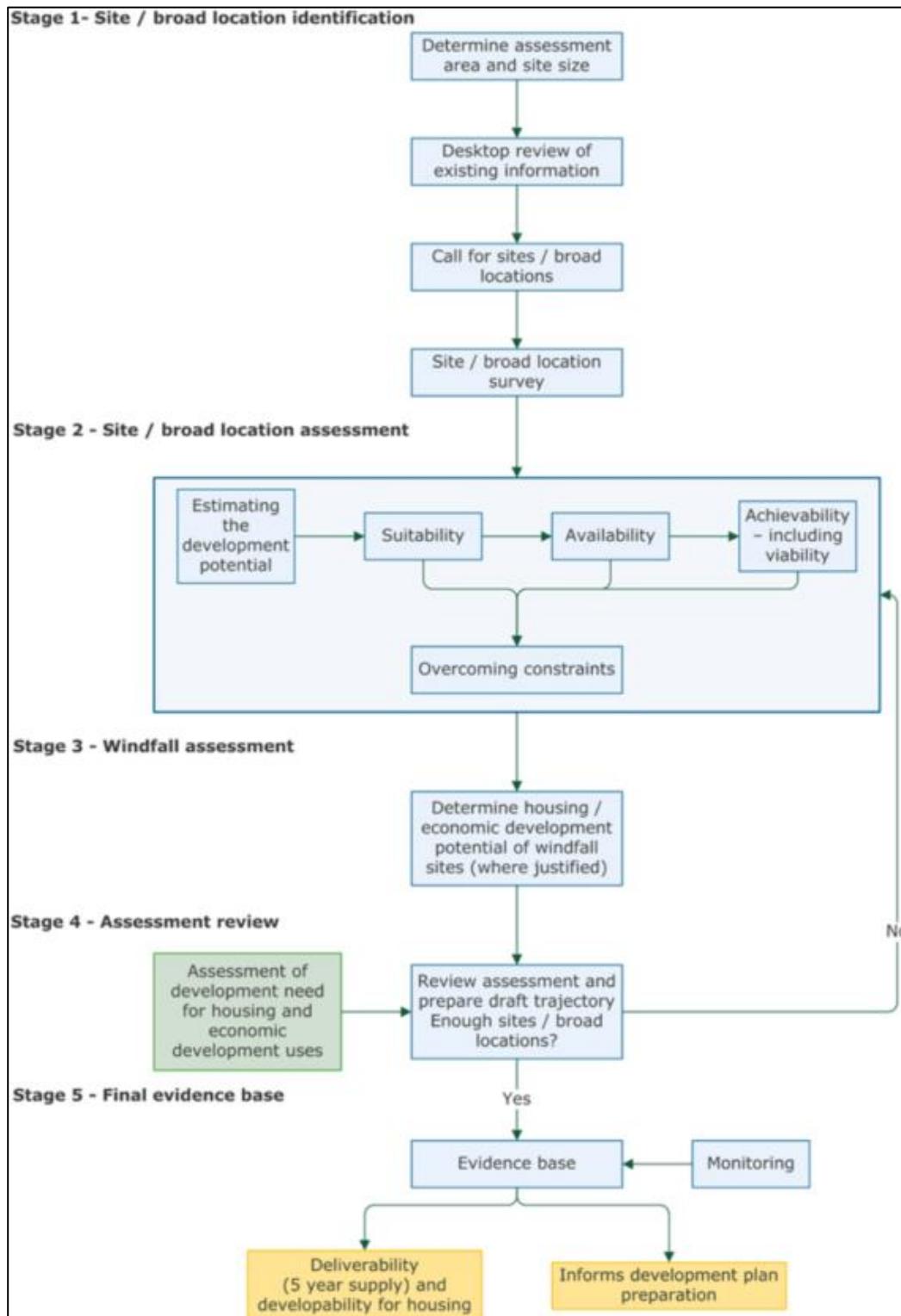
¹ Paragraph 007 Reference 3-007-20190722

- their suitability to accommodate development, taking into consideration their context, constraints and policy designations;
- their achievability in terms of market desirability and viability for development.

- 1.7 Sites that are identified through the HELAA are assessed as to whether they could be developed. The assessment does not make a judgement whether they should be developed. **Assessment does not allocate land for development, nor does it determine the acceptability of development on any site.**
- 1.8 The HELAA will form a part of the Local Plan evidence base for each Local Authority, and sites identified as being developable will need to be considered further in the light of additional evidence.
- 1.9 It will also assist in the preparation of Local Plans by quantifying the availability of land for housing, economic and other development
- 1.10 In preparing the update to the joint methodology, the LPAs consider it to be good practice to publish a draft (this document) and invite feedback for a six-week consultation period to be held in Autumn 2022.
- 1.11 In terms of the further work which each Local Authority will undertake relating to their detailed Call for Sites and assessment processes, it will be the decision of individual Authorities to develop the detail and separately consult on this in a way in which they feel most appropriate within their local context.

2. Methodology

- 2.1 The methodology will establish the basis of the approach to site assessment, but will allow appropriate provisions for further detail to be made to reflect the individual contexts of each LPA area.
- 2.2 The Planning Practice Guidance provides the following flow chart which establishes the basis of the approach to site selection and assessment:



Stage 1: Identification of sites and broad locations

- 2.3 The PPG establishes that a geographical extent of site selection and assessment should be the plan-making area. This joint statement seeks to establish the basis of a consistent methodology between the parties involved to reflect the functionality of the HMA and FEMA and comply with the provisions of the Duty to Cooperate.
- 2.4 Guidance states that in the first instance, sites of a smaller size than 0.25ha, or with a capacity fewer than 5 dwellings, should not be considered as part of the HELAA process. The joint methodology will adopt this approach, but LPAs which comprise this joint method may individually opt to consider smaller sites where appropriate justification can be made.

Site Identification

- 2.5 National Guidance stipulates two primary sources in identifying sites:
- Desktop Review
 - Call for Sites Exercise
- 2.6 Active desktop review ensures that all suitable sites can be identified even in the case where they have not been submitted to an LPA for consideration.
- 2.7 A desktop review of sites may utilise, but not limited to, the following sources²:

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning application records Development briefs
Planning Permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completion records
Planning applications that have been refused or withdrawn	Planning application records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, central government, NHS, police, fire services, utilities services, statutory undertakers
Sites with permission in principle, and identified brownfield land	Brownfield land registers (parts 1 and 2) National Land Use Database

² Extracted from PPG Paragraph 011 ID: 3-011-20190722

	Valuation Office database Active engagement with sector
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, eg offices to residential)	Local Authority empty property register English Housing Survey National Land Use Database Commercial property databases (eg estate agents and property agents) Valuation Office database Active engagement with sector Brownfield land registers
Additional opportunities for un-established uses (eg making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector
Sites in rural locations	Local and neighbourhood plans Planning applications Ordnance Survey maps Aerial photography Site surveys
Large scale redevelopment and redesign of existing residential or economic areas	
Sites in adjoining villages and rural exception sites	
Potential urban extensions and new free-standing settlements	

2.8 In addition to a desktop review, a Call for Sites exercise can also enable third parties to promote sites to the LPAs for assessment. This ensures completeness in the HELAA process.

2.9 A Call for Sites conducted independently by each LPA (or LPAs where a joint plan is being prepared) will ensure that sites suitable for all land uses can be submitted for assessment. Submissions can be from any third party, with information stored to comply with data protection regulations.

2.10 A proforma, a copy of which can be seen at **Appendix 1**, will be provided to third parties to provide site submissions to the LPAs. This will provide as much information as possible, including the following details:

- Site location
- Suggested potential type of development
- Scale of development
- Constraints to development

2.11 In respect of constraints, the proforma at Appendix 1 has been developed to

allow submissions to establish any mitigations possible to overcome identified constraints. This is to “front-load” site assessment as far as possible and assist in the overall assessment process. This will ensure a more comprehensive assessment of proposed broad locations and potential sites as established in the PPG. It could also help identify potential new broad locations where development may be suitable, such as clusters of individual sites for example where cumulatively they could provide suitable infrastructure to deliver growth in a sustainable way.

- 2.12 Significant constraints should be considered at this stage where they will affect the assessment of broad locations and sites. This is to ensure that they are appropriately assessed before the detailed assessment stage. The joint statement allows provisions for LPAs to decide on what designations / limitations / constraints might result in site omission at this stage, given the unique contexts of each administrative area.

Stage 2: Site/broad location assessment

- 2.13 The PPG outlines that at this stage site assessments should analyse sites for their capacity, developability, suitability and achievability.
- 2.14 *Capacity* should be determined by adopted and/or emerging policy determining appropriate densities, in the context of the National Planning Policy Framework in achieving efficient use of land. This should also take into consideration viability, given the quantum may affect viability and therefore, achievability and so inform developability within 5 years or beyond.
- 2.15 *Suitability* should be assessed against locational factors, identifiable constraints, their potential for mitigation as well as balancing on their potential impacts as a result of their development. Relevant information to inform this assessment may include:
- National (and local) policy designations
 - Appropriateness and likely market desirability of potential development
 - Contribution towards regeneration areas and priorities
 - Potential impacts on landscape, natural and heritage designations
- 2.16 Assessment should take into consideration existing Local Plans, but also emerging policy as well as the principle of development established by planning permissions or permissions in principle.
- 2.17 *Availability* can be assessed on the best information obtainable by the LPAs. This can be confirmed through submissions via Call for Sites by agents, landowners and/or promoters. Extant or expired planning permission can also inform availability and will establish 5-year timeframes, or beyond, of developability.
- 2.18 *Achievability* is assessed through best judgement on the economic viability of a site and its desirability to be delivered within particular market conditions.

This can also be informed via submissions by third parties, where indication can be made of the potential type of development and how this will influence viability/desirability.

- 2.19 Assessment of overall developability should take into consideration any constraints and how they may influence the suitability of the site and its achievability. Desktop review will take this into account but this will need to draw on various sources of information to make an appropriate best judgement. In the case of a submission via a Call for Sites, front-loading information will be vital in identifying constraints and establishing mitigation. This will provide evidence in presenting the overall developability of a site.
- 2.20 When taking all of the above into account, the LPAs will be able to identify a timescale and rate of development that could be realised on those sites determined as deliverable and developable (suitable, available and achievable). This will take into account size, scale and quantum of development, which in turn should take into consideration lead-in times and build-out rates.
- 2.21 Whilst best judgement by the LPAs can guide these timescales and development rates, advice will also be sort from developers and other third parties submitting sites for assessment.

Stage 3: Windfall assessment

- 2.22 Development sites that come forward outside of identification through the HELAA (or any other Planning Authority spatial assessment) are defined as windfall sites.
- 2.23 The PPG outlines that an allowance of windfall sites may be included within the land supply identified through the HELAA, but must be appropriately justified as established at Paragraph 71 of the National Planning Policy Framework (July 2021);

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will 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. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

- 2.24 It is not the objective of this joint statement to establish windfall allowances for each LPA. The windfall allowance is specific to each Local Authority area and the local evidence base for each will be used to inform this work and decide the extent to which windfall development should be considered in the HELAA process. An explanation of this assessment, with justification of conclusions will be provided by each LPA individually.

Stage 4: Review of the assessment

- 2.25 Following assessment of sites and broad locations, an indicative trajectory will be produced. This will express the development quantum potentially available in terms of housing numbers and employment land and potentially the amount of other land uses that have been identified.
- 2.26 The trajectory will outline the forecasted delivery of development in three increments; 1 to 5 years, 6 to 10 years and 11 years and beyond. A risk assessment will accompany any trajectory, explaining specific issues to delivery which may impact on the trajectory.
- 2.27 At this stage, an LPA may identify a shortfall in supply to meet the needs of the plan area. The PPG advises that a Local Authority should re-visit their assessment, including enhancing or changing site capacities and densities in line with the NPPF's promotion of efficient use of land.
- 2.28 If evidence shows that a shortfall in provision continues to exist, LPAs should consider continued cross-boundary provisions in accordance with the statutory Duty to Co-operate. This will enable the necessary Statements of Common Ground and other joint agreements to be formulated as Local Plan work progresses, helping to achieve sound Local Plans.

Stage 5: Final evidence base

- 2.29 The final HELAA report for each Local Authority (or Authorities where a joint plan is being prepared) will establish the approaches taken and identify the deliverable and developable sites and show a clear supply trajectory. All sites will be cross-referenced with location maps and their site assessments. The final report should also include sites that have been omitted from the supply, with reasons why.
- 2.30 The HELAA will be used by the Local Authorities to demonstrate a 5-year housing land supply position, as well as informing other spatially strategic policies within the plan preparation process.
- 2.31 A final report with appendices where appropriate and relevant will be published on each Authority's website for public view.

3. Implementation

- 3.1 This statement establishes the joint methodology in implementing a HELAA across the Coventry and Warwickshire sub-region.
- 3.2 The Planning Practice Guidance determines how housing and economic land assessment should be conducted and this has been closely woven into the joint methodology.
- 3.3 How this is implemented in practical terms is dependent on the local context. As such, this joint methodology references the functional relationships of the HMA and FEMA, whilst also providing sufficient flexibility for assessing sites in a range of contexts.
- 3.4 For example, the LPAs have agreed the importance of “front loading” information as far as possible. Previous experience has identified issues with understanding constraints and how they can be mitigated. The model Call for Sites proforma (Appendix 1) has therefore been updated from the previous version, allowing for additional information to be submitted, and each LPA can adapt this as it sees fit. This will assist in the site assessment stage.
- 3.5 Understanding the broader context of promoted sites is helpful and this is also reflected in the model proforma, where promoters are encouraged to indicate land for assessment (red line), and other land under the same ownership (blue outline). This provides additional flexibility in site assessment, especially in the case where the ‘red-line’ areas may be particularly constrained, but the additional ‘blue-line’ land may be available for mitigation purposes.
- 3.6 Although a detailed approach to assessment is not specified in this joint statement, to allow for flexibility for each individual LPA, it is expected that final assessments will produce conclusive commentary as to how sites have been assessed in either narrative or pictorial form, or both.
- 3.7 To illustrate this point, an example is set out below. In this instance, a ‘red-amber/yellow -green’ approach (RAG) has been used. Sites would be scored using particular suitability, achievability and availability considerations. Those sites for which constraints are absolute and cannot be mitigated would be scored red. Amber sites would have the potential to be mitigated and could be ‘upgraded’ to yellow depending on the level of information supplied which could demonstrate this mitigation. Green sites would have no constraints and could readily form part of the short-term supply.

Figure1: Example of a site assessment matrix (illustrative: each LPA would develop its own methodology for this level of detail)

		Availability & Achievability		
Suitability				

3.8 To summarise: this document has been prepared jointly to ensure a consistent shared approach to identifying and assessing sites for housing and employment uses, which will be used by each Local Authority (or alliance of Local Authorities where shared plans are developed) as the framework within which they will develop their detailed assessment and selection processes.

Appendix 1 Example Call for Sites Proforma

Housing and Economic Land Availability Assessment (HELAA)

Call for Sites Proforma

- Please complete this form if you would like to suggest proposals for future land use and development within XX Council on sites capable of delivery 5 or more homes, or sites larger than 0.25ha.
- The sites will be assessed as part of the HELAA and used as an evidence base document for the Local Plan preparation process.
- Please complete a separate form for each site. Complete each section clearly and legibly to the best of your knowledge. If you require more space, please use Section 9, or append additional pages.
- You must attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site and details of site ownership.

Data Protection Disclaimer

Details submitted to the Council as part of a Call for Sites will help inform the HELAA and assist in identifying land for development to contribute to a land supply to meet local need. The submitted information will not be confidential as it will be published as part of a comprehensive land assessment via published reports available for public consumption. This information will also be shared with other parties, including employees of the Council, other Council departments and third parties, such as the Planning Inspectorate and other Local Planning Authorities.

Details provided in Section 1 will be kept and stored confidentially by the Council. Details in Section 2, the names of which should match those provided in Section 1, will be made publicly available as established above. As such, only names of organisations/agents/applications will be made public where it has been clearly declared through this submission form. No other details, such as addresses or contact information, will be made available.

By submitting this form to the Council, you are providing consent for us to retain your details on our Planning Policy as part of the Call for Sites process, the HELAA and to enter your details to our consultation database so that we may contact you in future to advise on the Local Plan preparation process.

1. Your Confidentially Held Details				
Title		Name		
Organisation (if relevant)			Representing	
Address				
Postcode		Telephone		
Email				
Signature				
Date				

2. Your Publicly Viewable Details	
Name/Organisation	
Status in relation to site	
Representing (if applicable)	

3. Site Location			
Site Name			
Site address (inc. postcode if known)			
OS Grid Easting		OS Grid Northing	
Total Site Area		Developable Area	
<p>Please attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site. The area of the site you wish to be formally assessed should be enclosed by a red line. Any other relevant land under your ownership should be enclosed by a blue line</p>			

4. Site ownership (please mark as appropriate and/or provide details)				
Do you own the site?	Yes – sole owner	Yes – part owner	Yes – acting on behalf of the owner(s)	No
Is the site available?	Yes – immediately	Yes – In 5-10 years	Yes – 11+ years	No
Have you notified the landowner/other landowners that you have submitted the site?			Yes	No

5. Site Constraints (on site or at boundary – please mark as appropriate and/or provide details)					
Current/previous use					
Adjacent land uses					
Planning History					
Existing Infrastructure	Electricity	Gas	Mains Sewer	Mains Water	Telecoms
Access from Highway	Yes – Classified Road		Yes – Unclassified Road		No
Highway Works					
Ransom Strips					
Legal Issues					
Existing Occupiers					
Public Access/Rights of Way					
Wildlife Designations	Yes – Details:		Reports/Mitigation Strategy:		No
Ecology Designations	Yes – Details:		Reports/Mitigation Strategy:		No

Unexploded Ordnance	Yes – Details:	Reports/Mitigation Strategy:	No
Land Contamination	Yes – Details:	Reports/Mitigation Strategy:	No
Heritage Designations	Yes – Details:	Reports/Mitigation Strategy:	No
Other Physical Constraints (flooding, topography)	Yes – Details:	Reports/Mitigation Strategy:	No
Infrastructure Constraints (pylons, gas mains)	Yes – Details:	Reports/Mitigation Strategy:	No
Other Knowns Issues/Constraints			

6. Site Accessibility (please provide distance as measured from the middle of the site “as the crow flies” and utilise journey planner to determine walking time)			
Distance to closest bus stop (m/km)		Walking time to closest bus stop (mins)	
Distance to closest amenities (m/km)		Walking time to closest amenities (mins)	
Distance to closest rail station (m/km)		Walking time to closest rail station (mins)	

7. Previous site promotional work (please cross reference with Section 5 where relevant)		
Has any work been undertaken to promote the site and/or to overcome constraints?	Yes	No
If yes, please provide more details and copies of reports where available:		
Have any viability appraisals been undertaken?	Yes	No
If yes, please provide more details and provide copies of reports where available:		
Are there any specific or immediate intentions to start development?	Yes	No
If yes, please provide more details (such as Pre-application discussions)		

8. Proposal Details (please mark as appropriate and/or provide details)					
Description of Proposed Development					
Proposed Land Use	Residential	Employment	Retail	Mixed	Other
Site capacity/density (homes/floor space)			Details of mixed/other land uses		
Potential Development	For sale/marketed for development		Negotiations with developer	In control of developer	Ready for release by owner
Development time scales	Short term (within 5 years)		Medium term (6-10 years)	Long term (11-15 years)	Beyond (16+ years)
Development Timescale/Phasing (incl. build-out rates)					

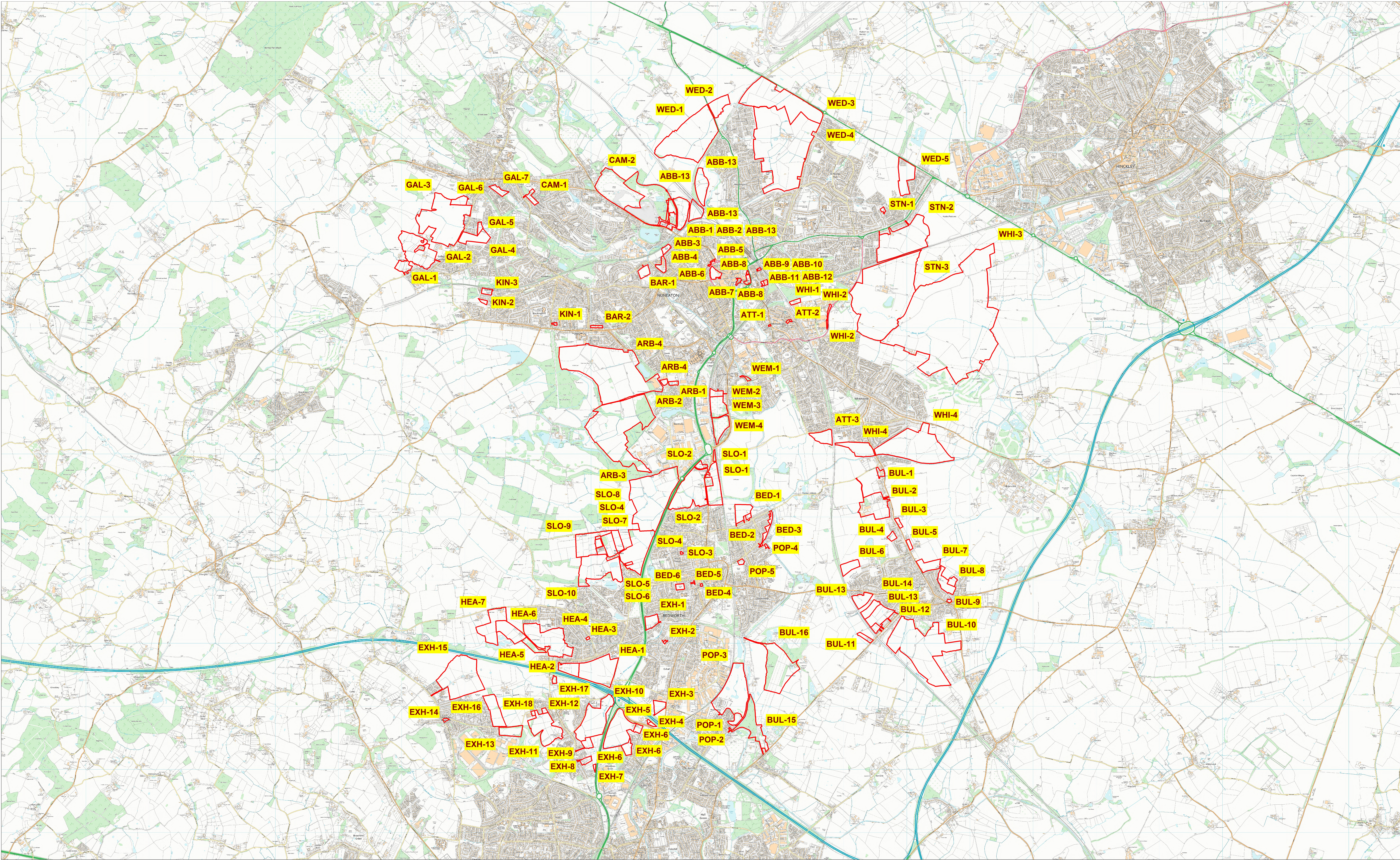
9. Additional information					

Appendix 2- Housing Assessment Matrix (separate spreadsheet)

Appendix 3- Employment Assessment Matrix (separate spreadsheet)

Appendix 4 – Map of Sites

HELAA 2023



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