

COMPARING NATIONAL GUIDANCE WITH EXISTING SHLAA APPROACH AND 2015 APPROACH

Item no.	Matter	What the NPPF/ NPPG says, (including reference)	2013 Approach	2015 Approach
1.	Geographical area covered by the assessment.	<p>NPPG says that it should be the housing market area and functional economic area.</p> <p>Revision date: 06 03 2014 Paragraph: 008 Reference ID: 3-007-20140306</p>	Darlington Borough, as over 70% of all house moves were within the Borough,	<ul style="list-style-type: none"> Darlington Borough, which evidence indicates is the housing market area.
2	Who should plan makers work with?	<p>NPPG suggests the process should involve developers; those with land interests; land promoters; local property agents; local communities; partner organisations; LEP's; businesses; parish and town councils; Neighbourhood forums preparing Neighbourhood Plans.</p> <p>Revision date: 06 03 2014 Paragraph: 009 Reference ID: 3-008-20140306</p>	Steering Group currently comprises representatives of all groups indicated in NPPG, except local property agents, the local community, Parish Councils or neighbourhood forums, LEPs and businesses.	<ul style="list-style-type: none"> Process involves all NPPG suggested parties except the local community, Parish Councils, and neighbourhood forums through representatives on a SHLAA Steering Group. The LEP was invited but declined. Neighbourhood planning groups were invited to submit sites.
3	Should the assessment be constrained, e.g. by site size or by the need for development?	<p>NPPG says it should identify all sites and broad locations regardless of the amount of development needed.</p> <p>Revision date: 06 03 2014 Paragraph: 010 Reference ID: 3-009-20140306</p> <p>All sites that can deliver 5 or more dwellings should be considered. Plan makers can consider alternative site size thresholds. (Para 011, 3-010-20140306)</p>	<p>All sites of more than 5 dwellings or 0.17ha or more are included in the assessment, even if there is known policy or other constraints.</p> <p>More proactive and detailed information collection and updating is carried out on sites that best accord with the locational strategy, set out in Policy CS1 of the adopted LDF Core Strategy. Different combinations of adjacent sites are also considered.</p>	<ul style="list-style-type: none"> As per existing approach.
4	How should sites be identified & data sources used to ascertain info?	<p>NPPG says by desk top review, including existing sites that can be improved, intensified or changed. It lists sources of data that may be relevant. Constraints should be clearly identified, and revisited to see if they can be overcome.</p> <p>Actively identify sites & make a wide call for sites, setting out the key information required.</p>	<p>The Council is aware of all the sources of data listed in NPPG and draws on them as appropriate.</p> <p>Sites can be submitted for consideration in the SHLAA at any time, and a form is available permanently on the Council's website for this purpose.</p> <p>The Council also regularly reviews its own land, and</p>	<ul style="list-style-type: none"> As per existing approach, plus the Council actively identifies sites through the desktop review process.

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		Revision date: 06 03 2014 Paragraph: 011, 012 , 013, reference ID 3-011, 012, 013-20140306	identifies further sites for the SHLAA as a result of pre-application and other enquires received, and responses to local plan consultations.	
5.	Which sites should be included in the site survey?	NPPG says the ones that have reasonable potential for development, taking account of national policies and designations. Revision date: 06 03 2014 Paragraph: 014 Reference ID: 3-014-20140306	Site survey is carried out on all sites, but more proactive and detailed information collection and updating is carried out on sites that best accord with the locational strategy, set out in Policy CS1 of the adopted LDF Core Strategy. Monitoring information, a telephone survey and intelligence of the SHLAA Steering Group provide the up to date information on sites with planning permission.	<ul style="list-style-type: none"> As per existing approach
6	What characteristics should be recorded during the survey?	NPPG sets out a range of site characteristics that should be recorded. Paragraph: 016 Reference ID: 3-016-20140306 Revision date: 06 03 2014	<p>The existing approach captures all the information indicated in NPPF, except that for sites with planning permission, it only records that a site has started, and not how many unit. We also do not record whether ground works are completed.</p> <p>The existing approach treats sites with planning permission differently to those without.</p>	<ul style="list-style-type: none"> The 2015 approach captures all the information indicated in the NPPG. In future, DBC will contact house builders on sites of 6 dwellings or more to find out if/ when ground works are expected to be completed, plus for sites with planning permission, DBC will identify the number of units started as part of the trajectory information
7	How should development potential be calculated?	Locally determined policies, including density, taking into account site characteristics & physical constraints. Assessing achievability (including viability) and suitability can usefully be carried out in parallel. Revision date: 06 03 2014 Paragraph: 018 Reference ID: 3-017-20140306	Key local policy constraints are recorded for each site, referring to the adopted Core Strategy and other locally agreed documents, such as the Green Infrastructure Strategy. The Council's Design of New Development SPD, and any physical constraints are also identified for the site. The Council's Urban Design Officer sketches an indicative layout based on this to establish a realistic site capacity, which is considered and agreed (or not) by the SHLAA Steering Group, alongside their consideration of viability and policy constraints.	<ul style="list-style-type: none"> As per existing approach.
8	What factors should be	Should assess the suitability, availability and achievability, including whether the site is economically	Suitability, availability and achievability, including whether the site is economically viable, are all	<ul style="list-style-type: none"> As per existing approach

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	considered for when and whether sites/broad locations are likely to be developed?	viable. Revision date: 06 03 2014 Paragraph: 018 Reference ID: 3-018-20140306	considered in the current approach, with information prepared and presented to the SHLAA Steering Group, who add to the information with their own market intelligence and site information.	
9	What factors should be considered when assessing suitability?	Should consider the types of development that may meet needs of community i.e. market housing, private rented affordable housing, self-build plots, and should be guided by local plan policies and how up to date they are, market requirements. Sites with planning permission are generally considered suitable for development, unless circumstances have changed to alter that. Suitability considerations should also include physical constraints, potential impacts on the environment and to neighbours if development proceeded, likely market attractiveness, and contribution to regeneration priorities. Revision date: 06 03 2014 Paragraph: 019 Reference ID: 3-019-20140306	SHLAA steering group meeting provides forum for different parts of the market to comment on whether sites are suitable for their markets, and for different types of development. Market requirements are accommodated as far as is possible within the spatial framework set out in the adopted Core Strategy. All the factors identified in NPPG are considered in the existing process.	<ul style="list-style-type: none"> As per existing approach, plus give more explicit consideration as to whether sites could be suitable for self-build plots, e.g. these could be sites that are suitable and available, but for which no volume house builder is currently known to have an interest, and/or could be small infill sites. Also, the Steering Group will be reconvened to look at any new sites that are identified as a result of the OAN number.
10	What factors should be considered when assessing availability?	Sites are considered available if there is confidence of no legal or ownership problems, generally with a landowner/developer who has expressed an intention to develop/sell. Consideration should be given to delivery record, e.g. unimplemented permissions, of developers and landowners putting forward sites. Revision date: 06 03 2014 Paragraph: 020 Reference ID: 3-020-20140306	Gather information from landowner/promoter of site & establish land ownership & carry out legal and land searches to establish situation, if any doubt. Delivery record of developer/landowner not currently considered.	<ul style="list-style-type: none"> As per existing approach
11	What factors should be considered when assessing achievability Including whether development is	NPPG reiterates NPPF regarding achievability. It suggests economic viability and the capacity of the developer to complete and let/sell the development over a certain period are key factors. (Para 21, 3-021-20140306)	Detailed viability assessments of each site are not carried out, as this would be resource prohibitive. Instead, the local market knowledge of the SHLAA Steering Group is tapped to make this assessment, alongside information about whether sites are in high or low value parts of the Borough, and whether sites, such as Council owned land, could come forward at	<ul style="list-style-type: none"> As per existing approach, plus more detailed site assessments will be published as an appendix to the SHLAA, as well as summaries about site constraints

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	viable?		less than full market value. Capacity of developers to complete is determined by the Steering Group with reference to past annual build out rates on large and small sites and any economic factors that may mean this could be different going forward.	included within the document.
12	What happens when constraints are identified that impact on suitability, availability and achievability?	NPPG suggests considering the action needed to remove constraints, and when, how, and likelihood of this being achieved. (Para 22, 3-022-20140306) Revision date: 06 03 2014	Action needed is identified and recorded.	<ul style="list-style-type: none"> As per existing approach, plus add timing and likelihood of constraint being overcome.
13	How should timescale & rate of development be assessed & presented?	Indicative lead in times & build out rates for different scale & types of site. Allow for more than one developer on large sites. Draw on advice of developers and local agents to assess lead in times and build out rates. (Para 23, 3-023-20140306) Revision date: 06 03 2014	Telephone survey establishes build out rates and lead in times on small and larger sites, where possible. Generic assumptions agreed with Steering Group applied to those for which specific information is not available. Deadlines for spending funding on RSL schemes is also taken into consideration.	<ul style="list-style-type: none"> As per existing approach, plus local property agent have been added to the Steering Group. Steering Group suggested 60 dpa build out rate for sites with multiple developers. HBF will be contacted to see if an update to 2008 letter regarding build out rates can be provided.
14	Determining windfall allowance.	Compelling evidence required if windfall allowance is included in 5 year supply. LPA's can identify windfalls from broad locations for years 6-15. (Para 24, 3-024-20140306) Revision date: 06 03 2014	The Council reports a time series of past windfall data back to 2006 (excluding garden land) to justify its proposed windfall allowance to the SHLAA Steering Group.	<ul style="list-style-type: none"> As per existing approach
15	How should the assessment be reviewed?	The development potential of all sites can be collected to produce an indicative trajectory. An overall risk assessment should be made as to whether sites will come forward as anticipated. (Para 25, 3-025-20140306) Revision date: 06 03 2014	The headline figures for all sources of supply are recorded for each year in tables in the SHLAA, and the projected first 5 years delivery is set out for sites without planning permission. No risk assessment is explicitly included.	<ul style="list-style-type: none"> As per existing approach.
16	What if the trajectory indicates there is not enough	The assessment should be revisited to see if any assumptions could be changed to release more supply. If not, consideration will need to be given to how this shortfall should be best planned for.	This circumstance has not arisen previously. The SHLAA Steering group would be recalled if there was a shortfall, to consider the evidence further, and further investigations would be made into whether	<ul style="list-style-type: none"> As per existing approach, plus consideration to the role the Steering Group could play in identifying

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	supply to meet the objectively assessed need? If more land is needed, what is the balance between housing need and constraints on the use of land.	(Para 26, 3-026-20140306, and Para 44, 3-044-20140306, and Para 45, 3-045-20140306) Revision dates: 06 03 2014 (26) and 06 10 2014(44 and 45)	Council owned land could be released earlier, and whether there was any flexibility in the policy constraints identified, taking into account the policies of the NPPF considered as a whole.	more land for housing and getting constraints removed.
17	Identifying sites or broad locations beyond 5 years.	This should be done for years 6-15 where possible. Plans can still be found sound if LPAs have not been able to identify these for years 11-15. (Para 27, 3-027-20140306) Revision date: 06 03 2014	Specific sites are identified up to 2026.	<ul style="list-style-type: none"> As per existing approach
18.	Core outputs	Sets out a list of standard outputs that should be available in a publicly accessible form. (Para 28, 3-028-20140306) Revision date: 06 03 2014	<p>All sites (except small sites with Planning permission) are listed and identified on maps. A summary of the assessment of each site (except small sites with planning permission), and whether and when it can be realistically developed is included. More detail is included for sites that are more realistic candidates for development. Reasons for discounting others are given.</p> <p>For sites without planning permission, the potential type and quantity, estimated build out rates and how and when constraints can be overcome is set out in a single table.</p> <p>An indicative trajectory on a site by site basis is only provided for sites without planning permission.</p> <p>The final SHLAA is published on the Council's website, as soon as possible after its completion.</p>	<ul style="list-style-type: none"> As per existing approach
19	Determining deliverability and developability in relation to housing supply	Need to determine in accordance with the definitions in footnote 11 and 12 of NPPF. (Para 29, 3-029-20140306) Revision date: 06 03 2014	NPPF footnotes are applied to determine this, but may need to say this explicitly in the document/methodology.	<ul style="list-style-type: none"> As per existing approach

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20.	Starting point for 5 year supply.	<p>Housing requirements in an up to date adopted local plan should be used as the starting point for calculating 5 year supply. Such plans should be given considerable weight unless new evidence has come to light. Evidence that is drawn from revoked regional strategies may not adequately reflect current needs. If local plan figures are not appropriate to use, information in the latest full assessments of housing needs should be considered.</p> <p>Where there is no robust recent assessment, CLG household projections should be used, but the weight given to these should take account of the fact they have not been tested.</p> <p>(Para 30, 3-030-20140306) Revision date: 06 03 2014</p>	<p>Since 2011, the updates to the SHLAA have relied on the Core Strategy housing requirement to assess the 5 year land supply position.</p> <p>The Inspectors report into the appeal by Public Inquiry of Gladman homes against the Council's decision to refuse its application for 250 dwellings at Middleton St. George may give cause to consider this.</p>	<ul style="list-style-type: none"> The benchmark against which the 5 year supply will be measured will be based on the OAN as soon as this is known.
21	What constitutes a deliverable site in the context of housing policy?	<p>Can include sites allocated in an adopted plan and sites with planning permission, unless clear evidence sites will not come forward. Sites without planning permission can be included if there is deliverability evidence, and no infrastructure constraints. Evidence/method needs to be robust and transparent.</p> <p>(Para 31, 3-031-20140306) Revision date: 06 03 2014</p>	<p>Where possible, information is obtained direct from developers and landowners for small and large sites to ascertain delivery prospects for allocated sites and sites with planning permission. The current approach also includes sites without planning permission where there is evidence of deliverability, and no infrastructure constraints, and takes account of lead in times for larger sites. A review with SHLAA Steering Group is carried out, to examine the assumptions used about lead in times for developing out different sizes of sites.</p>	<ul style="list-style-type: none"> As per existing approach, plus discussion with Steering Group on how to moderate the industry's own forecasts on deliverability of sites without planning permission, to make SHLAA more realistic.
22	What constitutes a developable site in the context of housing policy?	<p>There should be a reasonable prospect that it will be available and could be viably developed at the point envisaged in years 6-15.</p> <p>Para 32, 3-032-20140306) Revision date: 06 03 2014</p>	<p>Evidence collected on each site is presented to the SHLAA Steering Group which considers it and agrees/amends the Council's draft conclusions, using their local market knowledge and intelligence.</p>	<ul style="list-style-type: none"> As per existing approach.
23	Updating evidence on the 5 year supply.	<p>LPAs must identify and update the 5 year land supply each year, considering delivery against the forecast trajectory and the deliverability of all sites identified. An annual thorough approach provides a strong position to demonstrate 5 year supply.</p> <p>Para 33, 3-033-20140306) Revision date: 06 03 2014</p>	<p>The Council does this and includes any new sites identified by itself and others on an annual basis</p>	<ul style="list-style-type: none"> As per existing approach, plus once available, the Council will use the OAN to calculate its 5 year supply and apply a 5% buffer.
24	Dealing with past undersupply.	<p>Whether there has been persistent under delivery is a matter of judgement, there is no 'universally applicable</p>	<p>The SHLAA currently doesn't cover these matters. They are dealt with in housing technical papers</p>	<ul style="list-style-type: none"> As per existing approach, plus once available, the

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		<p>test' to quantify it, and the issues are likely to be locally unique. Analysis of delivery record is likely to be more robust if a longer view is taken, to take account of peaks and troughs in the housing market. A LPA should aim to deal with any undersupply within the first 5 years of the plan period where possible. If not, it should work with neighbouring authorities under 'duty to cooperate'. Para 35, 3-035-20140306) Revision date: 06 03 2014</p>	<p>associated with the preparation of the Making and Growing Places DPD.</p>	<p>Council will use the OAN to calculate its 5 year supply and apply a 5% buffer.</p>
25	Dealing with housing for older people.	<p>Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. (Revision date: 06 03 2014 Paragraph: 037 Reference ID: 3-037-20140306)</p>	<p>Only self-contained C2 units have been counted to date.</p>	<ul style="list-style-type: none"> Set out an approach to counting C2 in SHLAA and local plan methodologies.
26	How should local planning authorities deal with student housing?	<p>All types of student accommodation can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. (Revision date: 06 03 2014 Paragraph: 038 Reference ID: 3-038-20140306)</p>	<p>None.</p>	<p>None.</p>
27	How should local planning authorities deal with empty housing and buildings?	<p>Any approach to bringing empty homes back into use and counting these against housing need would have to be robustly evidenced by LPA at the independent examination of the draft Local Plan, for example to test the deliverability of the strategy and to avoid double counting. Paragraph: 039 Reference ID: 3-039-20140306) Revision date: 06 03 2014</p>	<p>Empty homes brought back into use are not counted in the SHLAA, to avoid double counting. The same applies to conversion of other buildings to residential use, which is picked up when prior approvals/planning permission is granted, or as potential sites for assessment.</p>	<ul style="list-style-type: none"> As per existing approach
28	Relationship of 5 year supply to neighbourhood planning	<p>The LPA should share evidence used to prepare the local plan, such as the SHLAA. Neighbourhood plans should deliver against objectively assessed needs. Paragraph: 040 Reference ID: 3-040-20140306) Revision date: 06 03 2014</p>	<p>The SHLAA evidence is publicly available via the Council's website, and outside of the SHLAA process, communities considering NPs are signposted to it.</p>	<ul style="list-style-type: none"> As per existing approach
29	Frequency of update	<p>Should be annually. Full resurvey only needed if new development plan is being prepared or circumstances change significantly. Paragraph: 041 Reference ID: 3-041-20140306) Revision date: 06 03 2014</p>	<p>The SHLAA is updated about annually.</p>	<ul style="list-style-type: none"> SHLAA will be updated annually.

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30	What information should be recorded when monitoring?	<p>The NPPG indicates 5 main things to record:</p> <ol style="list-style-type: none"> 1. progress on allocated and sites with planning permission; 2. which SHLAA sites/locations now have planning applications/permissions 3. progress on removing constraints on development and changes to deliverability/ developability; 4. unforeseen constraints that have emerged, and how they could be addressed; 5. Whether the windfall allowances (where justified) is coming forward as expected, or may need to be adjusted. <p>Paragraph: 041 Reference ID: 3-041-20140306) Revision date: 06 03 2014</p>	<p>The existing approach encompasses all the matters identified in NPPG. This information is all captured and reported in the SHLAA. See 14. above for windfall approach.</p>	<ul style="list-style-type: none"> • As per existing approach