PLYMOUTH STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA)

February 2017
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I. Introduction

I.1. Background

I.1.1. The purpose of the assessment is to identify sites within the Plymouth Administrative area which have potential to accommodate housing but which do not as yet have planning permission for residential use.

I.1.2. This Strategic Housing Land Availability Assessment (SHLAA) has been prepared by Plymouth City Council as part of the evidence base for the Joint Plymouth & South West Devon Local Plan (JLP). This update builds on and refreshes the previous Plymouth SHLAA’s published in 2009 and 2014.

I.1.3. The SHLAA has been prepared by officers of Plymouth City Council and has been prepared together with a SHLAA for the South Hams & West Devon Authority area. This ensures that the future housing supply across the Plymouth Housing Market Area can be fully understood in the context of meeting the National Planning Policy requirement to meet in full the housing needs of the Plymouth HMA. The JLP boundary and SHLAA boundaries for the Plymouth and South Hams/West Devon assessments are identified below (see figure 1.1 below)

I.1.4. The SHLAA has been prepared in consultation with a panel of developers, agents and public bodies. Planning consultants Peter Brett Associates have carried out the Market and Viability Assessment of the sites considered available, developable & suitable for both the Plymouth and South Hams & West Devon SHLAA’s in liaison with the combined SHLAA panel across the three authority areas.
Figure 1.1 Joint Local Plan Boundary & SHLAA boundaries for Plymouth and South Hams/West Devon.
1.2. **Purpose of this report**

1.2.1. The Plymouth SHLAA is an assessment of available land and premises sites across the city, which may have potential for housing development in the future. It considers land and policy constraints and development viability and is part of the evidence base that will inform the plan making process.

1.2.2. The SHLAA is a technical exercise to help identify possible land that could be made available and considered suitable for housing development and is has been carried out in accordance with the methodology set out in National Planning Practice Guidance (NPPG)\(^1\). The SHLAA does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which sites are the most suitable to meet housing need.\(^2\)

1.2.3. The SHLAA aims to ensure that there is enough land for new homes to meet the needs of communities. This SHLAA identifies potential sites in the Plymouth administrative area and has been done in parallel with a SHLAA for the South Hams and West Devon District administrative area in order to fully understand whether there is sufficient land across the Plymouth Housing Market Area (PHMA) to meets the needs of the PHMA in a sustainable way.

1.2.4. The primary role of this study is to:

- identify available and developable sites with the potential for housing;
- assess each site’s housing capacity; and
- assess when each site is likely to be developed.

1.2.5. The main outcomes from the SHLAA are:

- To support the Joint Plymouth and South West Devon Local Plan as part of the evidence base;
- An explanation of the methods, assumptions, judgements and findings of the study;
- A list of sites rejected from the SHLAA process and mapping showing the location of each site

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1 National Planning Practice Guidance – Housing and Economic Land Availability Assessment, paragraph 006 Reference ID:3-006-20140306

2 National Planning Practice Guidance – Housing and Economic Land Availability Assessment, paragraph:002 Reference ID:3-002-20140306
• A list of sites quantifying the amount of housing that could potentially be delivered on each site and mapping showing the location of each site;
• The identification of constraints that could affect the delivery of the development for each site; and
• An indication of when each site is realistically expected to be developed based upon an assessment of the deliverability and developability of each site in terms of its suitability, availability and achievability for future housing development;
• An indication of other potential uses that maybe appropriate;
• A list of sites that do not form part of the deliverable supply identified, including potential capacity.

1.3. Status of the SHLAA

1.3.1. The Plymouth SHLAA is not a planning decision making document. It makes broad assumptions in terms of suitability in order to bring forward a wide range of sites for consideration of housing potential. Sites that are identified in the SHLAA would be required to be further tested by the planning application or allocation processes including consideration of sustainability and planning criteria, development plan policies, national planning policies and consultation before they could be deemed suitable in planning terms.

1.3.2. The SHLAA is not development plan policy and does not indicate that sites will be allocated within the joint local plan nor indicate that sites will be granted planning consent. The SHLAA does not preclude sites from being developed for other suitable uses nor does it preclude other sites which have not been submitted or assessed during this process from coming forward for housing.

2. National and Local Planning Policy Framework


2.1.1. The NPPF sets out government’s planning policies for England and how these are expected to be applied. The framework acts as guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications.
The NPPF stipulates that Councils need to ensure that their Local Plans meet the ‘full, objectively assessed needs for market and affordable housing in the housing market area’, identifying and updating annually a supply of deliverable sites sufficient to provide 5 years’ worth of housing with an additional buffer of 5% to ensure choice and competition. Where there is a persistent record of under delivery an additional 20% buffer is required.

Beyond the first 5 years the NPPF requires Local Authorities to ‘identify specific, developable sites or broad locations for growth, for 6-10 years and, where possible, for years 11-15’.

In planning for housing, there are a number of other key considerations that need to be taken into account. The government recognises that managing flood risk, minimising pressures on water and waste infrastructure, and conserving and enhancing green space and biodiversity are all important concerns, as is design quality for helping to create successful and sustainable places. The government considers that more homes are needed across the whole country, in both urban and rural areas.

The strategic housing role is at the heart of local authority place shaping – creating vibrant mixed communities by ensuring that the right housing, of the highest quality, is in the right place with the necessary infrastructure and support.

Local authorities are required to prepare a SHLAA to establish realistic assumptions about the availability, suitability and achievability of land to meet the identified need for housing over the plan period. Guidance on how a SHLAA should be prepared is set out in Planning Practice Guidance (PPG) Housing and Economic Land Availability Assessment. The SHLAA follows the methodology set out in this guidance and references are made to this guidance throughout the assessment.

**Emerging Strategy & The Plymouth Plan Approved version**

The SHLAA is part of the extensive evidence base supporting the Plymouth and South West Devon Joint Local Plan (JLP). The JLP is being produced by South Hams District Council, West Devon Borough Council and Plymouth City Council, following formal decisions taken by three authorities to roll their existing Local Plan processes into a single Joint Local Plan. These decisions were taken between December 2015 and February 2016.
2.2.2. Before moving to the JLP, Plymouth City Council were working on the Plymouth Plan – an innovative single integrated strategy combining all the Council’s strategic plans into one. The Plymouth Plan therefore set out a number of development plan policies and the overarching development strategy for the city and its urban fringe. Although the Plymouth Plan had not reached the statutory Regulation 19 stage, it had passed through several consultation and engagement periods and had been formally approved by the City Council as its single policy framework.

2.2.3. The development plan policies contained in the Plymouth Plan have been refreshed in the light of up to date evidence and will be carried forwards into the pre submission draft of the JLP. For the purposes of the SHLAA analysis relating to Plymouth, clearly the SHLAA assessment of sites took place before the JLP polices were finalised. The SHLAA site assessment has, however, referred to and applied policies that were set out in the Plymouth Plan when assessing suitability. In addition, the viability assessment undertaken by PBA has also used policies set out in the Plymouth Plan when making viability assumptions which have underpinned the assessment of achievability. It is therefore considered that these assessments align well with the policy framework set out in the JLP as it applies to Plymouth.

2.2.4. The emerging JLP has been formulated using an approach that divides the plan area into two distinct “Policy Areas” – the Plymouth Policy Area and the Thriving Towns and Villages Policy Area. This concept was first consulted upon in July 2016 as part of the wider JLP sites engagement (“Crunch Time”)3, and then as part of the ‘Distribution Topic Paper’ in November 20164. The Plymouth Policy Area is geographically larger than the Plymouth administrative area. Since the Plymouth Policy Area will apply a single set of development plan policies to the city and the urban fringe, sites in the South Hams part of the Plymouth Policy Area have also been assessed in terms of suitability and viability against the policies in the Plymouth Plan. The assessment of these urban fringe sites is contained within the South Hams/West Devon part of the SHLAA report.

3 Plymouth and South West Devon JLP – Crunch Time
http://web.plymouth.gov.uk/homepage/environmentandplanning/planning/planningpolicy/plymouthplan/pthejourney.htm

4 Plymouth and South West Devon JLP – Considerations
http://web.plymouth.gov.uk/homepage/environmentandplanning/planning/planningpolicy/plymouthplan/pthejourney.htm
3. **Methodology**

3.1. **Introduction**

3.1.1. The approach to the assessment of housing potential in Plymouth follows the NPPG Housing and Economic Land Assessment Planning Practice Guidance\(^5\) which sets out the methodology for undertaking assessments to identify the capacity of potential housing sites within the study area.

3.1.2. This review provides an update to the previous SHLAA's produced in 2009 and 2014. Given that this study is a review and update of previous SHLAA’s it is not necessary to have a new formal steering group to consider a methodology as the methodology contained in the NPPG remains consistent with previous methodologies in practice guidance.

3.1.3. The NPPG\(^6\) advocates a partnership approach involving key partners from the outset. Peter Brett Associates facilitated a combined SHLAA panel for the joint plan area to agree the study parameters that relate the achievability test. The report relating to the achievability test is attached as Appendix 1.

3.2. **Methodology Overview**

3.2.1. The NPPG identifies five main stages to the assessment as shown in figure 3.1 below.

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\(^6\) Housing and Economic Land Availability Assessment
3.2.2. The following sections explain the process undertaken in relation to the stages set out above for this assessment.

3.3. **Stage 1 – Site/Broad location identification**

**Base date**

3.3.1. A base date of 1st April 2016 was identified in order that a clear baseline is established for the study.
3.3.2. The date is used in order to ensure consistency with other information sources and provides a cut off for those sites with planning consent.

Study extent

3.3.3. The SHLAA Review has considered sites within and immediately adjacent to the urban area and is consistent with the 2014 SHLAA by only including sites within Plymouth City Council’s boundary. Sites outside the City boundary are assessed as part of the South Hams/West Devon SHLAA. Both assessments have been carried out in parallel using a joint SHLAA panel to understand the potential housing supply across the Plymouth HMA in order to establish whether there is sufficient supply to meet the needs of the HMA\(^7\). (See Figure 1.1)

Time periods

3.3.4. It is necessary, in the context of the NPPF and PPG, to provide an assessment of potential housing land in a series of time bands. The NPPF states in paragraph 47 that “to boost significantly the supply of housing, local planning authorities should:…identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements…identify a supply of specific developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15” As the Joint local plan period is 2014-34 with a based date of the study set at April 1\(^{st}\) 2016 the final time period extends to 8 years (2026-2034).

3.3.5. The PPG sets out the parameters for determining whether sites can be considered ‘deliverable’ years 1-5 and ‘developable’ beyond 6 years and references the respective definitions from the NPPF\(^8\).

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\(^7\) This is consistent with paragraph 007 reference ID:3-007-20140306 of NPPG Housing and Economic Land Availability Assessment

\(^8\) NPPF paragraph 47 footnote 11. “To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that the development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. Footnote 12 states “To be considered
3.3.6. The assessment adopts this approach when determining when a site is capable of being delivered. A site is therefore considered ‘deliverable’ within the first 5 years of the study period if: the site can be considered to be available, if it has planning consent, is the subject of a planning application and/or the site is controlled by a developer or Registered Provider who has expressed an interest to develop within 5 years.

**Site size threshold**

3.3.7. The PPG states that “the assessment should consider all sites and broad locations capable of delivering 5 or more dwellings…on sites of 0.25 hectares…and above. Where appropriate, plan makers may wish to consider alternative site size thresholds” This assessment therefore adopts the threshold of 0.25 Hectares.

3.3.8. Sites with planning permission for 4 or less dwellings have been included in the potential supply and a lapse rate has been applied. (see paragraph 3.3.11)

3.3.9. There has therefore been no rigorous site search for these ‘small sites’ as the identification of every individual plot would be unrealistic given the study area and resources available. A small site windfall allowance has been applied based on historical data from this source in line with NPPG\(^9\). (see section 3.5)

**Overview of sources**

3.3.10. The maximum ranges of sources for sites should be considered in order to provide a robust evidence base. Sites from the following sources have been included in the study.

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\(^9\) Unless there is clear evidence of non-implementation

\(^10\) Housing & Economic Land Availability Assessment
### Table 3.1. Capacity Sources

<table>
<thead>
<tr>
<th>Type of Site</th>
<th>Data Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing planning consents for housing. NB. Sites form part of the housing supply unless evidence to suggest non-delivery. Lapse rate applied to applications yet to be implemented</td>
<td>Plymouth City Council (PCC) Planning Application records</td>
</tr>
<tr>
<td>Existing Development Plan Allocations not yet implemented.</td>
<td>PCC Area Action Plans for Devonport, Millbay &amp; Stonehouse, Sutton Harbour, Central Park, City Centre, North Plymstock &amp; Minerals</td>
</tr>
<tr>
<td>Site Development Briefs without consent and Masterplanning</td>
<td>PCC site development briefs PCC Waterfront and City Centre masterplans</td>
</tr>
<tr>
<td>Planning applications that have been refused, withdrawn an validated yet to be determined</td>
<td>PCC application records</td>
</tr>
<tr>
<td>Land in the Local Authority Ownership</td>
<td>PCC landowner records</td>
</tr>
<tr>
<td>Surplus and likely to become surplus public sector land</td>
<td>National register of public sector land One public Estate</td>
</tr>
<tr>
<td>Vacant and derelict land and buildings</td>
<td>PCC National Land Use Database records Employment Land Review</td>
</tr>
<tr>
<td>Previous Housing Land Assessments</td>
<td>SHLAA 2009 and 2014</td>
</tr>
<tr>
<td>Specific Call for Sites exercises</td>
<td>July 2013, Plymouth Plan Collect September 2015 to January 2016, Plymouth and South West Devon JLP – Crunch Time July 2016 to August 2016, Plymouth and South West Devon JLP – Considerations November 2016 to December 201612</td>
</tr>
<tr>
<td>Additional opportunities in established uses</td>
<td>Desktop ordnance survey/Aerial photography/site survey</td>
</tr>
<tr>
<td>Potential urban extensions</td>
<td>Existing development plan/Area Action Plans, call for sites exercises for the JLP</td>
</tr>
</tbody>
</table>

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11 This is consistent with paragraphs 010 reference 3:010-20140306, 011 reference ID:3-011-20140306, 012 reference ID:3-012-20140306 & 013 reference ID:3-013-20140306 of NPPG Housing and Economic Land Availability Assessment

12 Plymouth Plan and JLP consultation/call for sites exercises

Sites with planning consent for housing

3.3.11. Sites with unimplemented planning permissions for housing and those which are under construction are included as long as the permission was still extant on the 1st April 2016. Delivery on sites with planning consent/under construction has been assumed unless there is evidence to suggest non-delivery. A 10% lapse rate has been applied to sites yet to be implemented to account for non-delivery. A schedule of these sites together with maps identifying their location can be found in Appendix 2. The methodology to support the lapse rate being applied can be found in Appendix 3. The evidence and assumptions were presented to the Joint SHLAA Panel for ratification. No alternative approaches or lapse rate was offered.

Planning applications for housing

3.3.12. Current planning applications for housing as at April 1st 2016 awaiting determination have been assessed. It should be reiterated that the assessment reflects the position as at April 1st 2016. Some sites may well have gone on to attain consent post April 1st however the SHLAA records the status of the site as at April 1st 2016. Future revisions of the SHLAA will update the progress and status if sites at that time.

Existing allocations, site development briefs and master planning

3.3.13. Unimplemented allocations from existing Area Action Plans have been reassessed together with any sites subject to development briefs where consent has yet to be obtained and from the City Centre and Waterfront master planning exercises.

Land in local authority ownership & surplus public sector land

3.3.14. In addition to analysis of the National register of public sector land, consultation with key public landowner groups formed part of the numerous “call for sites” exercises (see section 3.3.17 to 3.3.19 below), most notably Plymouth City Development plans include the Waste Development Plan Document and Area Action Plans for Devonport, Millbay & Stonehouse, Sutton Harbour, Central Park, North Plymstock & Minerals and the City Centre.
Council, National Health Service, Ministry of Defence, Police and fire services, the One Public Estate programme. A significant number of sites were sourced from the above organisations.

**Vacant and derelict land and buildings**

3.3.15. Sites were sourced from Plymouth City Council’s National Land Use Database records and from the Employment Land Review to establish whether any existing employment land no longer required warranted consideration in the SHLAA.

**Previous SHLAA’s**

3.3.16. Sites identified in previous SHLAA processes were reviewed, this included sites that were previously considered unsuitable or unavailable.

**Call for sites**

3.3.17. As identified in table 3.1 above a total of 4 specific ‘call for sites’ exercises have occurred to inform the Plymouth Plan and latterly the JLP. These consultation exercises gave landowners, developers and agents numerous opportunities to put forward sites for inclusion in the SHLAA and to inform the production of the JLP. Given the process has evolved into a JLP, in addition to the specific exercises sites have been accepted for inclusion in the SHLAA to inform the JLP outside of these call for sites exercises when appropriate to do so i.e. provided the sites came forward prior to the ‘crunch time’ July/August 2016 consultation & or prior to the JLP ‘considerations’ consultation in November/December 2016.

3.3.18. Anyone submitting a site was encouraged to provide detail with regard to a site’s availability, its current use, the site’s potential for housing including type and

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14 Confirmation that the site is being promoted for residential development and that there are no ownership/legal constraints that prevent the site from being made available and/or that the site will could become available during the JLP plan period. This is consistent with paragraph 013 reference ID:3-013-20140306 and paragraph 020 reference ID:3-020-20140306 of NPPG Housing and Economic Land Availability Assessment
tenure, anticipated quantum’s, delivery vehicle and timescales for delivery. Where this information was not forthcoming in the submission material a follow up letter and form was sent to those who submitted sites to establish this further information to inform the SHLAA process as well as the production of the JLP. The letter and form can be found in Appendix 4.

3.3.19. The assessment has not merely relied upon call for sites exercises to establish and confirm availability of land. Sites identified from the other sources outlined above that were deemed suitable for residential development and therefore worth pursuing have not been immediately ruled out on the grounds of lack of availability i.e. ownership not being known or that the sites have not been submitted. PCC has endeavoured to investigate ownership of a number of sites through land registry searches and has written to landowners in order to establish whether availability could be established. This letter can be found in Appendix 4.

Additional opportunities

3.3.20. A desktop review of locations using aerial photography and ordnance survey together with site visits and internal officer consultation was undertook to establish any additional sites/location opportunities such as additional opportunities within established uses.

Sites rejected at stage I

3.3.21. Several hundred sites were identified from the sources outlined above. Prior to undertaking detailed assessments of specific sites, it was necessary to screen the list of sites for inclusion within the assessment. As discussed earlier (paragraph 3.3.7 to 3.3.9) sites below the 0.25Ha threshold are excluded. In addition sites/land was excluded from the assessment at this stage for one or more of the following reasons; Sites in current use where there is no evidence of future development potential, Registered Parks and Gardens, Scheduled Ancient Monuments, Sites of Special Scientific Interest, Special Areas of Conservation, Special Protection Areas, Local Nature Reserves, Landfill site & Flood Risk Zone.

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15 Including timescales for submission of planning application, lead-in times and anticipated delivery rates. This consistent with paragraph 023 reference ID:3-023-20140306 of NPPG Housing and Economic Land Availability Assessment

16 This is consistent with paragraph 011 reference ID:3-011-20140306 of NPPG Housing and Economic Land Availability Assessment
3b. A total of 270 sites were rejected at stage 1. The list of sites and reasons for rejection at this stage are identified in Appendix 5.

3.3.22. As explained in paragraph 3.3.11, land with planning consent for housing as at 1st April 2016 is excluded from the assessment process unless there is evidence of non-implementation. These sites are included in the future housing supply with a 10% lapse rate applied where appropriate.

**Desktop Review**

3.3.23. For each site assessed the following characteristics were recorded, checked or observed as part of the desktop/site assessment review\(^\text{17}\):

- Site size, boundaries, and location;
- Current use(s) and character;
- Land uses and character of surrounding area;
- Physical constraints;
- Potential environmental constraints;
- Where relevant development progress;
- Site suitability for residential or other uses

**Data Management**

3.3.24. The boundaries of each site were digitised using a GIS system and relevant site details entered into a database. A unique reference number was assigned. Sites have been assembled and are reported on the basis of the 8 Plymouth Plan areas as per the SHLAA 2014. (see Appendix 6) The unique site reference assigned differs from the references used in previous SHLAA’s.

\(^{17}\) This is consistent with paragraph 016 reference ID:3-016-20140306 of NPPG Housing and Economic Land Availability Assessment.
3.4. **Stage 2 – Site/Broad Location Assessment**

**Estimating the Housing Potential of Each Site - Density**

3.4.1. As per previous SHLAA’s a density multiplier was arrived at through consideration of council records regarding delivery of housing in the city. Analysis revealed a variety of average density delivered in different locations around the city.

3.4.2. Data from the Plymouth Annual Monitoring Report shows that the bulk of development that has occurred in the city between 2001 and 2016 has achieved high densities of 50+dwellings per hectare, hitting a peak of 97% in 2008/09. (See figure 3.2 below)

![Figure 3.2 Density of new development 2001-2016](image)

3.4.3. Since the economic downturn densities have fallen largely due to the fall in demand for flatted development. Another factor however is that the first decade of the 21st century saw a prioritisation of significant brownfield waterfront regeneration programmes built at high density with a proportion of flatted development. In recent times a wide variety of schemes in the outer parts of the city predominated by more houses than flats which additionally explains the
density range seen in recent years. Nevertheless since 2009 approx. 90% of homes provided have been above 30 dwellings per hectare.

3.4.4. Figure 3.3 below shows the density assumptions that have been applied to sites to determine their capacity potential. The evidence and assumptions were presented to the Joint SHLAA panel for ratification. No alternative approaches or density ranges were offered.

3.4.5. The density ranges will be applied unless an alternative realistic capacity assumption has been provided through; call for sites exercise, previous planning consent, master planning studies/exercises and site development briefs.

Figure 3.3 Plymouth Density Ranges
Estimating the housing potential of each site – Net Developable Area

3.4.6. Gross to net developable land assumptions are important in enabling a calculation of potential capacity. The larger the site the more it is likely to require provision for infrastructure i.e. roads, open space, parks, facilities, trees etc. and thus reducing the developable area for housing.

3.4.7. Based on real local examples and past guidance estimation of the net developable area from the gross site area a default formula has been used for size thresholds (see table 3.2 below). The formula is applied progressively. This was presented to the joint SHLAA panel for ratification. No alternative approaches or size trigger assumptions were offered. Comments were made with regard to ratios varying by location given flood risk and issues and topography. Where sites have been considered to have these or other constraints that suggest the formula isn’t appropriate adjustments have been made to reduce the net developable area.

Table 3.2 Net Developable Area

<table>
<thead>
<tr>
<th>Gross area (ha)</th>
<th>Gross to net ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;=0.75</td>
<td>100%</td>
</tr>
<tr>
<td>&lt;=1</td>
<td>96%</td>
</tr>
<tr>
<td>&lt;=1.5</td>
<td>92%</td>
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<td>&lt;=2</td>
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<td>&lt;=3</td>
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<td>69%</td>
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<tr>
<td>&lt;=20</td>
<td>62%</td>
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<tr>
<td>&gt;20</td>
<td>62%</td>
</tr>
</tbody>
</table>
Estimating the housing potential of each site – Lead in times\(^1\).

3.4.8. Having established the capacity figure for individual sites, the next stage in the assessment was to establish whether a site can be considered deliverable, developable or not currently developable for housing development which in turn would inform assumptions with respect to when each site is likely to come forward. Paragraphs 3.3.4 to 3.3.6 above discuss these definitions and how this is applied in the assessment.

3.4.9. The assessment of sites involved a judgement of when and whether sites were likely to come forward for development based on their suitability, availability and achievability. To inform this judgement analysis was carried out on lead in times between submission of planning applications and commencement on site experienced in the city over the last 10 years. Furthermore as explained in paragraphs 3.3.18 to 3.3.19 intelligence on expected applications, commencement and delivery was also gathered from those promoting sites.

3.4.10. The analysis of lead in times over the past 10 years can be found in appendix 7. Table 3.3 below presents the lead in times applied to a range of sites that were used in the assessment. This analysis was presented to the Joint SHLAA panel for ratification\(^2\). No comments or alternative approaches/times were put forward by panel members.

Table 3.3 Lead in Times

<table>
<thead>
<tr>
<th>Site size (dwellings)</th>
<th>Lead-in time range full permission (weeks)</th>
<th>Lead-in time range outline permission (weeks)</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 to 49</td>
<td>26-53</td>
<td>N/a</td>
</tr>
<tr>
<td>50 to 99</td>
<td>28-63</td>
<td>N/a</td>
</tr>
<tr>
<td>100-350</td>
<td>42-63</td>
<td>182-203</td>
</tr>
<tr>
<td>350+</td>
<td>63+</td>
<td>182-203+</td>
</tr>
</tbody>
</table>

\(^1\) Lead in time includes; time taken to determine a planning application, where ‘outline’ time between outline approval and submission of reserved matters (approval of reserved matters), time taken between approval of permission (full or reserved matters) and commencement of dwellings.

\(^2\) This is consistent with paragraph 023 reference ID:3-023-20140306 of NPPG Housing and Economic Land Availability Assessment.
3.4.11. The ranges were used as a default unless alternative additional realistic evidence was submitted by those promoting sites.

**Estimating the housing potential of each site – delivery rates**

3.4.12. Having established timescales for development commencement it is also necessary to establish indicative build out rates. As was the case with lead in times analysis was carried out on past delivery rates in the city over the last 10 years. Furthermore as explained in paragraph 3.3.18 to 3.3.19 intelligence on expected delivery rates was gathered from those promoting sites.

3.4.13. The analysis of delivery rates over the past 10 years can be found in appendix 8. This analysis concludes that the delivery rates for a range of sites presented in table 3.4 below are to be used for the purposes of the assessment. This analysis was presented to the Joint SHLAA panel for ratification\(^\text{20}\). No comments or alternative approaches/rates were put forward by panel members.

**Table 3.4 Delivery Rate Range**

<table>
<thead>
<tr>
<th>Site size (dwellings)</th>
<th>Default Delivery Range (dwellings per year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 to 49</td>
<td>27 to 37</td>
</tr>
<tr>
<td>50 to 99</td>
<td>41 to 63</td>
</tr>
<tr>
<td>100-350</td>
<td>73 to 101</td>
</tr>
<tr>
<td>350+</td>
<td>101 bespoke dependent on site size</td>
</tr>
</tbody>
</table>

3.4.14. The delivery rates were used as a default unless additional alternative realistic evidence was submitted by those promoting sites.

---

\(^\text{20}\) This is consistent with paragraph 023 reference ID:3-023-20140306 of NPPG Housing and Economic Land Availability Assessment
Assessing the suitability of sites for housing

3.4.15. The suitability of sites was assessed against a range of factors:

- The development plan, the Plymouth Plan strategy and policies & the emerging Joint Local Plan development strategy;
- Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- Appropriateness and likely market attractiveness for the type of development proposed;
- Contribution to regeneration priority areas;
- Environmental/amenity impacts experienced by would be occupiers and neighbouring areas

3.4.16. This stage of the assessment consisted of checking sites against a wide range of development factors and constraints. Those factors included the following designations and attributes:

- Brownfield/greenfield/garden
- Sustainable location – disconnection & access to local facilities, greenspace, playspace, bus stops
- Existing green space designation
- Existing employment land /economic importance to the city
- Landscape value
- Agricultural land
- Allotments
- Playing Pitches
- Parks
- Local Nature Reserves
- County Wildlife Sites
- Sites of Special Scientific Interest
- Registered Parks and Gardens
- Conservation Areas
- Listed Buildings

21 This is consistent with paragraph 019 reference ID:3-019-20140306 of NPPG Housing and Economic Land Availability Assessment
22 This is consistent with paragraph 019 reference ID:3-019-20140306 of NPPG Housing and Economic Land Availability Assessment
All of the sites submitted to the SHLAA process were consulted on during the summer 2016 ‘crunch’ consultation stage and the Winter 2016 ‘considerations’ stage. It was important to ascertain feedback from communities and stakeholders on whether there were any constraints affecting sites that had not been identified or whether constraints had inappropriately been identified. These consultation exercises provided initial assessments of why sites were to be rejected from the SHLAA process for the reasons set out in section 3.3.21 and an initial assessment of site suitability for communities and stakeholders to help inform the assessment process.

Assessing the availability of sites for housing

For a site to be considered deliverable in the first 5 years there needs to be evidence that it is available now. (see paragraphs 3.3.4 to 3.3.6) Sites identified in the first 5 years consist of sites under construction, with planning consent and where availability has been confirmed through the call for sites exercises or through additional correspondence from promoters relating to expected commencement and delivery of sites.

Some sites where availability is confirmed are not anticipated to deliver dwellings in the first 5 years as in some cases they are not available now, these fall into the developable site category. There are some large sites where delivery commences during the first 5 years but given the amount of dwellings the delivery extends to 10/15 years+.
3.4.20. For developable sites – those coming forward from year 6 onwards, there needs to be evidence that there is a reasonable prospect of availability at the point envisaged.

3.4.21. The assessment distinguishes between sites that are unavailable and unsuitable and deemed not to be relied upon to deliver over the plan period with sites that are considered to be suitable and achievable but where availability is not confirmed. The latter are sites where analysis suggests the availability constraint is likely to be/can be overcome through local authority intervention. Assessing when sites are likely to occur is a judgement taking into account the extent of constraints that affect the site including the ease or difficulties faced in overcoming the availability constraint.

**Assessing the achievability of sites for housing**

3.4.22. A site is considered to be achievable for housing development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of a developer to complete and let or sell the development over a certain period.

3.4.23. A total of 73 sites that hadn’t already attained consent as at 1st April 2016 were identified in the assessment as being suitable and available/developable that could progress through to the achievability test.

3.4.24. The three Joint Local Plan authorities commissioned consultants Peter Brett Associates to carry out the high level viability assessment for both SHLAA’s.

3.4.25. The development of the viability assessment involved a joint SHLAA/stakeholder panel to ascertain the appropriate assumptions required to assess viability.

3.4.26. The SHLAA panel consisted of representatives from the following organisations who either attended one or both SHLAA panels or liaised with PBA directly via e-mail:
   - Barratt David Wilson Homes
   - Barratt Homes
   - Spectrum Housing Group
   - Persimmon Homes
   - McCarthy and Stone
   - Cavanna Homes
Plymouth City Council SHLAA February 2017

- Linden Homes
- Atwell Martin
- March & Petit
- RIBA
- Bailey Partnership
- William Lean Commercial & Property Development
- Wainhomes
- Peter Brett Associated
- MAZE
- CPRE Devon
- EFJP Planning
- Ashfords
- Architects Design Group
- Plymouth City Council
- South Hams District Council
- West Devon Borough Council

3.4.27. PBA’s full viability assessment explaining the process and methodology undertaken can be found in appendix 1. The overview extract is provided below.

3.4.28. The viability results for each of the 73 sites tested at the full policy requirements is shown below in table 3.5.

Table 3.5 Viability Results

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Site name</th>
<th>Value area</th>
<th>Dwellings No.</th>
<th>Net Area (ha)</th>
<th>Viable?</th>
</tr>
</thead>
<tbody>
<tr>
<td>0001</td>
<td>Civic Centre</td>
<td>City of Plymouth - East</td>
<td>248</td>
<td>1.12</td>
<td>Yes</td>
</tr>
<tr>
<td>0003</td>
<td>Colin Campbell Court</td>
<td>City of Plymouth - East</td>
<td>300</td>
<td>1.90</td>
<td>Yes</td>
</tr>
<tr>
<td>0071</td>
<td>Land at St. Levan Gate</td>
<td>City of Plymouth - West</td>
<td>43</td>
<td>0.71</td>
<td>Yes</td>
</tr>
<tr>
<td>0090</td>
<td>Weston Mill sports pitches and car park</td>
<td>City of Plymouth - West</td>
<td>28</td>
<td>3.81</td>
<td>No</td>
</tr>
<tr>
<td>Site ID</td>
<td>Site name</td>
<td>Value area</td>
<td>Dwellings No.</td>
<td>Net Area (ha)</td>
<td>Viable?</td>
</tr>
<tr>
<td>--------</td>
<td>----------------------------------------------------------</td>
<td>--------------------------------</td>
<td>---------------</td>
<td>---------------</td>
<td>---------</td>
</tr>
<tr>
<td>0100</td>
<td>Former Woodlands School Site Whitleigh</td>
<td>City of Plymouth - West</td>
<td>72</td>
<td>1.57</td>
<td>Yes</td>
</tr>
<tr>
<td>0118</td>
<td>Mount Gould Hospital</td>
<td>City of Plymouth - East</td>
<td>28</td>
<td>2.58</td>
<td>No</td>
</tr>
<tr>
<td>0138</td>
<td>Former Western National site, Laira Bridge</td>
<td>City of Plymouth - East</td>
<td>50</td>
<td>1.80</td>
<td>Marginal</td>
</tr>
<tr>
<td>0161</td>
<td>Plymouth Railway Station and Intercity House and land adjacent</td>
<td>City of Plymouth - East</td>
<td>16</td>
<td>1.69</td>
<td>No</td>
</tr>
<tr>
<td>0186</td>
<td>Land either side of Clittaford Road</td>
<td>City of Plymouth - East</td>
<td>108</td>
<td>3.12</td>
<td>Yes</td>
</tr>
<tr>
<td>0186f</td>
<td>Clittaford Road, Southway</td>
<td>City of Plymouth - East</td>
<td>21</td>
<td>0.51</td>
<td>Yes</td>
</tr>
<tr>
<td>0202</td>
<td>Land at Tamerton Foliot Road</td>
<td>City of Plymouth - East</td>
<td>18</td>
<td>1.19</td>
<td>No</td>
</tr>
<tr>
<td>0232</td>
<td>Pomphlett Industrial Estate</td>
<td>City of Plymouth - East</td>
<td>44</td>
<td>1.10</td>
<td>Yes</td>
</tr>
<tr>
<td>0242</td>
<td>Former nursery Haye Road</td>
<td>City of Plymouth - East</td>
<td>9</td>
<td>0.84</td>
<td>No</td>
</tr>
<tr>
<td>0264</td>
<td>Coombe Way &amp; Kings Tamerton Road</td>
<td>City of Plymouth - West</td>
<td>40</td>
<td>2.80</td>
<td>No</td>
</tr>
<tr>
<td>0273</td>
<td>Land at Redwood Drive, Chaddlewood</td>
<td>City of Plymouth - East</td>
<td>190</td>
<td>3.47</td>
<td>Yes</td>
</tr>
<tr>
<td>0274</td>
<td>Land between Undercliff Road and Barton Road, Turnchapel</td>
<td>City of Plymouth - East</td>
<td>7</td>
<td>0.24</td>
<td>Yes</td>
</tr>
<tr>
<td>0297</td>
<td>Tamar Valley School Barne Barton</td>
<td>City of Plymouth - West</td>
<td>44</td>
<td>1.10</td>
<td>Yes</td>
</tr>
<tr>
<td>0303c</td>
<td>North Prospect redevelopment phase 4</td>
<td>City of Plymouth - West</td>
<td>190</td>
<td>2.80</td>
<td>Yes</td>
</tr>
<tr>
<td>0303d</td>
<td>North Prospect redevelopment</td>
<td>City of Plymouth -</td>
<td>133</td>
<td>2.15</td>
<td>Yes</td>
</tr>
<tr>
<td>Site ID</td>
<td>Site name</td>
<td>Value area</td>
<td>Dwellings No.</td>
<td>Net Area (ha)</td>
<td>Viable?</td>
</tr>
<tr>
<td>--------</td>
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</tr>
<tr>
<td></td>
<td>phase 5</td>
<td>West</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0310</td>
<td>Douglass House, Efford</td>
<td>City of Plymouth - East</td>
<td>5</td>
<td>0.57</td>
<td>No</td>
</tr>
<tr>
<td>0325</td>
<td>Foot Anstey Offices, Derrys Cross</td>
<td>City of Plymouth - East</td>
<td>120</td>
<td>0.60</td>
<td>Yes</td>
</tr>
<tr>
<td>0327</td>
<td>Windsor Road</td>
<td>City of Plymouth - East</td>
<td>26</td>
<td>0.66</td>
<td>Yes</td>
</tr>
<tr>
<td>0344</td>
<td>Plymouth Fruit Sales, Sutton Road</td>
<td>City of Plymouth - East</td>
<td>200</td>
<td>0.63</td>
<td>Yes</td>
</tr>
<tr>
<td>0371</td>
<td>Chaucer Way Primary School</td>
<td>City of Plymouth - West</td>
<td>137</td>
<td>3.05</td>
<td>Yes</td>
</tr>
<tr>
<td>0387</td>
<td>Bath Street West</td>
<td>City of Plymouth - East</td>
<td>300</td>
<td>1.48</td>
<td>Yes</td>
</tr>
<tr>
<td>0406</td>
<td>BT Depot, Tamerton Foliot Road</td>
<td>City of Plymouth - East</td>
<td>87</td>
<td>2.18</td>
<td>Yes</td>
</tr>
<tr>
<td>0421</td>
<td>Downham School</td>
<td>City of Plymouth - East</td>
<td>28</td>
<td>0.49</td>
<td>Yes</td>
</tr>
<tr>
<td>0590c</td>
<td>Melville Building, Royal William Yard</td>
<td>City of Plymouth - East</td>
<td>40</td>
<td>0.54</td>
<td>Yes</td>
</tr>
<tr>
<td>0728</td>
<td>South West Water Site, Glacis Park</td>
<td>City of Plymouth - East</td>
<td>638</td>
<td>9.10</td>
<td>Yes</td>
</tr>
<tr>
<td>0729</td>
<td>Former Plympton Hospital</td>
<td>City of Plymouth - East</td>
<td>54</td>
<td>1.18</td>
<td>Yes</td>
</tr>
<tr>
<td>0744</td>
<td>Former Southway Primary School</td>
<td>City of Plymouth - East</td>
<td>95</td>
<td>2.25</td>
<td>Yes</td>
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<tr>
<td>0746</td>
<td>Former Gas Works, St Levan Road Site</td>
<td>City of Plymouth - East</td>
<td>57</td>
<td>0.81</td>
<td>Yes</td>
</tr>
<tr>
<td>0824a</td>
<td>Mount Wise, Devonport</td>
<td>City of Plymouth - East</td>
<td>75</td>
<td>0.31</td>
<td>Yes</td>
</tr>
<tr>
<td>0839</td>
<td>Registry office, Lockyer Street</td>
<td>City of Plymouth - East</td>
<td>52</td>
<td>0.27</td>
<td>No</td>
</tr>
<tr>
<td>Site ID</td>
<td>Site name</td>
<td>Value area</td>
<td>Dwellings No.</td>
<td>Net Area (ha)</td>
<td>Viable?</td>
</tr>
<tr>
<td>---------</td>
<td>---------------------------------------------------------------------------</td>
<td>------------------------------------------</td>
<td>----------------</td>
<td>---------------</td>
<td>---------</td>
</tr>
<tr>
<td>0842</td>
<td>Stirling House &amp; Honicknowle Clinic, Honicknowle Green</td>
<td>City of Plymouth - West</td>
<td>20</td>
<td>0.50</td>
<td>Yes</td>
</tr>
<tr>
<td>0858</td>
<td>Quality Hotel, land north of Cliff Road</td>
<td>City of Plymouth - East</td>
<td>80</td>
<td>0.89</td>
<td>Yes</td>
</tr>
<tr>
<td>0863</td>
<td>Land South of Langley Crescent</td>
<td>City of Plymouth - East</td>
<td>14</td>
<td>0.34</td>
<td>Yes</td>
</tr>
<tr>
<td>0864</td>
<td>Land Off Tamar Way</td>
<td>City of Plymouth - West</td>
<td>13</td>
<td>0.34</td>
<td>No</td>
</tr>
<tr>
<td>0865</td>
<td>Southway Campus, Clittaford Road</td>
<td>City of Plymouth - East</td>
<td>67</td>
<td>1.63</td>
<td>Yes</td>
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<tr>
<td>0876</td>
<td>Ham Drive, Pennycross</td>
<td>City of Plymouth - East</td>
<td>25</td>
<td>0.45</td>
<td>Yes</td>
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<tr>
<td>0899</td>
<td>Royal Parade and Old Town Street</td>
<td>City of Plymouth - East</td>
<td>90</td>
<td>0.90</td>
<td>Yes</td>
</tr>
<tr>
<td>0900</td>
<td>Royal Parade and East of Armada Way</td>
<td>City of Plymouth - East</td>
<td>78</td>
<td>0.78</td>
<td>Yes</td>
</tr>
<tr>
<td>0903</td>
<td>Charlton Crescent</td>
<td>City of Plymouth - East</td>
<td>60</td>
<td>1.73</td>
<td>Yes</td>
</tr>
<tr>
<td>0909a</td>
<td>Broadreach site, Richmond Walk</td>
<td>City of Plymouth - East</td>
<td>60</td>
<td>0.51</td>
<td>Yes</td>
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<tr>
<td>0913</td>
<td>Woodvale Nurseries, Truro Drive</td>
<td>City of Plymouth - West</td>
<td>31</td>
<td>0.78</td>
<td>Yes</td>
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<tr>
<td>0942</td>
<td>Land at Stuart Road/Victoria Park</td>
<td>City of Plymouth - East</td>
<td>46</td>
<td>0.65</td>
<td>Yes</td>
</tr>
<tr>
<td>0946</td>
<td>Errill Retail Park, Plymouth Road</td>
<td>City of Plymouth - East</td>
<td>60</td>
<td>2.53</td>
<td>No</td>
</tr>
<tr>
<td>0954</td>
<td>Fields to north of St Budeaux A38 junction</td>
<td>City of Plymouth - West</td>
<td>120</td>
<td>6.62</td>
<td>Marginal</td>
</tr>
<tr>
<td>0956</td>
<td>Land at Plympton House</td>
<td>City of</td>
<td>14</td>
<td>2.85</td>
<td>No</td>
</tr>
<tr>
<td>Site ID</td>
<td>Site name</td>
<td>Value area</td>
<td>Dwellings No.</td>
<td>Net Area (ha)</td>
<td>Viable?</td>
</tr>
<tr>
<td>--------</td>
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<td>---------------------------------</td>
<td>---------------</td>
<td>---------------</td>
<td>---------</td>
</tr>
<tr>
<td>0962</td>
<td>Mayflower Street East</td>
<td>City of Plymouth - East</td>
<td>132</td>
<td>0.66</td>
<td>Yes</td>
</tr>
<tr>
<td>0964</td>
<td>New George Street West</td>
<td>City of Plymouth - East</td>
<td>30</td>
<td>0.49</td>
<td>Yes</td>
</tr>
<tr>
<td>0965</td>
<td>Bath Street East</td>
<td>City of Plymouth - East</td>
<td>323</td>
<td>2.00</td>
<td>Yes</td>
</tr>
<tr>
<td>0966</td>
<td>Prince Rock playing pitch site</td>
<td>City of Plymouth - East</td>
<td>60</td>
<td>1.00</td>
<td>No</td>
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<tr>
<td>0967a</td>
<td>Sutton Road West</td>
<td>City of Plymouth - East</td>
<td>194</td>
<td>0.89</td>
<td>Yes</td>
</tr>
<tr>
<td>0969</td>
<td>Land behind Marett Road, St Budeaux</td>
<td>City of Plymouth - West</td>
<td>37</td>
<td>0.93</td>
<td>Yes</td>
</tr>
<tr>
<td>0971</td>
<td>MDEC Central Park Avenue</td>
<td>City of Plymouth - East</td>
<td>141</td>
<td>0.75</td>
<td>Yes</td>
</tr>
<tr>
<td>0974</td>
<td>Royal Assurance site, Armada Way</td>
<td>City of Plymouth - East</td>
<td>110</td>
<td>0.49</td>
<td>Yes</td>
</tr>
<tr>
<td>0975</td>
<td>Savage Road, Barne Barton</td>
<td>City of Plymouth - West</td>
<td>230</td>
<td>3.00</td>
<td>Yes</td>
</tr>
<tr>
<td>0976</td>
<td>Bull Point Barracks</td>
<td>City of Plymouth - West</td>
<td>13</td>
<td>0.68</td>
<td>No</td>
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<tr>
<td>0977</td>
<td>Cornwall Street East</td>
<td>City of Plymouth - East</td>
<td>92</td>
<td>1.10</td>
<td>Yes</td>
</tr>
<tr>
<td>0978</td>
<td>Cornwall Street west</td>
<td>City of Plymouth - East</td>
<td>79</td>
<td>0.79</td>
<td>Yes</td>
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<tr>
<td>0979</td>
<td>Seventrees, Baring Street, Greenbank</td>
<td>City of Plymouth - East</td>
<td>80</td>
<td>0.66</td>
<td>Yes</td>
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<tr>
<td>0989</td>
<td>Land North of Clittaford Road</td>
<td>City of Plymouth - East</td>
<td>9</td>
<td>0.44</td>
<td>Marginal</td>
</tr>
<tr>
<td>Site ID</td>
<td>Site name</td>
<td>Value area</td>
<td>Dwellings No.</td>
<td>Net Area (ha)</td>
<td>Viable?</td>
</tr>
<tr>
<td>--------</td>
<td>-----------------------------------------------</td>
<td>--------------------------------</td>
<td>---------------</td>
<td>---------------</td>
<td>---------</td>
</tr>
<tr>
<td>0991</td>
<td>Derriford Commercial Centre</td>
<td>City of Plymouth - East</td>
<td>664</td>
<td>11.68</td>
<td>Yes</td>
</tr>
<tr>
<td>0993</td>
<td>Land adjacent to Plumer Road</td>
<td>City of Plymouth - East</td>
<td>20</td>
<td>0.50</td>
<td>Yes</td>
</tr>
<tr>
<td>0994</td>
<td>Land off Newnham Road, Colebrook</td>
<td>City of Plymouth - East</td>
<td>52</td>
<td>1.67</td>
<td>Yes</td>
</tr>
<tr>
<td>0995</td>
<td>Former China Clay site, Coypool</td>
<td>City of Plymouth - East</td>
<td>400</td>
<td>19.75</td>
<td>No</td>
</tr>
<tr>
<td>1002</td>
<td>Land at 60 Vinery Lane</td>
<td>City of Plymouth - East</td>
<td>5</td>
<td>0.52</td>
<td>No</td>
</tr>
<tr>
<td>1010</td>
<td>Island Farmhouse</td>
<td>City of Plymouth - East</td>
<td>11</td>
<td>0.27</td>
<td>Yes</td>
</tr>
<tr>
<td>1014</td>
<td>Land between 140 and 150 Dunraven Drive</td>
<td>City of Plymouth - East</td>
<td>11</td>
<td>0.28</td>
<td>Yes</td>
</tr>
<tr>
<td>1015</td>
<td>Millfields Trust, 278 Union Street</td>
<td>City of Plymouth - East</td>
<td>62</td>
<td>0.77</td>
<td>Yes</td>
</tr>
<tr>
<td>1030</td>
<td>Sugar House, Sutton Harbour</td>
<td>City of Plymouth - East</td>
<td>150</td>
<td>0.43</td>
<td>Yes</td>
</tr>
<tr>
<td>1041</td>
<td>Stonehouse Barracks</td>
<td>City of Plymouth - East</td>
<td>400</td>
<td>5.41</td>
<td>Yes</td>
</tr>
</tbody>
</table>
3.4.29. Figure 3.4 below summarises the viability results of the 73 SHLAA sites which were tested at full policy requirements and figure 3.5 below summarises the achievable housing number from this supply of sites.

**Figure 3.4 Overview of the sites viability assessment results**

![Diagram showing viability assessment results: 55 sites (Yes), 3 sites (Marginal), 15 sites (No).]

**Figure 3.5 Overview of the housing viability assessment results**

![Diagram showing housing viability assessment results: 6,646 units (Yes), 179 units (Marginal), 761 units (No).]
3.4.30. PBA’s findings are that based on the information presented in the SHLAA, it can be expected that unless any unknown significant abnormal costs occur on any sites, then three-quarters of the suitable and available/developable Plymouth sites are achievable with the potential to deliver about 6,646 units. A further 4% of sites are considered to be on the margins of being achievable because their residual land values are either 10% above or below the benchmark land value.

3.4.31. With the addition of the marginal viable sites, whereby not all policies might be met or there is a small change in values and/or costs, this would increase the potential delivery yield to 6,825 units in the Plymouth area, which is 90% of the potential yield.

3.4.32. Of the 15 sites identified as not being viable in the assessment 5 sites are in land in PCC ownership. These sites are therefore considered to be achievable as PCC is bringing their sites forward in the knowledge that possibility exists that accepting below market land value may be required to deliver the sites.

3.5. **Stage 3 - Windfall Assessment**

3.5.1. The NPPF defines windfall sites as sites which have not been specifically identified as available in the Local Plan process. PPG states that “A windfall allowance may be justified in the 5 year supply if a local planning authority has compelling evidence as set out in paragraph 48 of the National Planning Policy Framework” The NPPF states that “evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.

3.5.2. Small sites (below 5 dwellings) have delivered a noteworthy proportion of recent housing development in Plymouth and are an important supply of housing for self-build opportunities and/or for local small developers. Table 3.6 below displays the amount of delivery that has occurred over the last 10 years from small site windfall sites.
Table 3.6 Historic delivery on small sites (Windfall)

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Completions on sites &lt;5 (inc. conversions of net change &lt;5)</th>
<th>Completions on Garden Development</th>
<th>Demolitions on sites &lt;5</th>
<th>Total=Total completions minus garden development minus demolitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006/07</td>
<td>87</td>
<td>16</td>
<td>1</td>
<td>70</td>
</tr>
<tr>
<td>2007/08</td>
<td>91</td>
<td>13</td>
<td>1</td>
<td>77</td>
</tr>
<tr>
<td>2008/09</td>
<td>74</td>
<td>4</td>
<td>0</td>
<td>70</td>
</tr>
<tr>
<td>2009/10</td>
<td>60</td>
<td>10</td>
<td>1</td>
<td>49</td>
</tr>
<tr>
<td>2010/11</td>
<td>54</td>
<td>16</td>
<td>6</td>
<td>32</td>
</tr>
<tr>
<td>2011/12</td>
<td>45</td>
<td>17</td>
<td>6</td>
<td>22</td>
</tr>
<tr>
<td>2012/13</td>
<td>37</td>
<td>15</td>
<td>0</td>
<td>22</td>
</tr>
<tr>
<td>2013/14</td>
<td>27</td>
<td>5</td>
<td>1</td>
<td>21</td>
</tr>
<tr>
<td>2014/15</td>
<td>39</td>
<td>9</td>
<td>0</td>
<td>30</td>
</tr>
<tr>
<td>2015/16</td>
<td>31</td>
<td>3</td>
<td>5</td>
<td>23</td>
</tr>
<tr>
<td>Total</td>
<td>545</td>
<td>108</td>
<td>21</td>
<td>416</td>
</tr>
</tbody>
</table>

3.5.3. An average of 42 dwellings per annum has occurred over the past 10 years and therefore a small site windfall allowance of 42 dwellings per annum will be applied to the housing supply identified in this assessment. As small site planning consents as at 1st April 2016 will already be counted in the supply to avoid double counting the allowance will commence in 2019/20 i.e. no allowance will be applied in the first 3 years.

3.5.4. It is worth noting that no allowance has been made for large site windfalls. Looking back to the SHLAA 2009 a number of sites have come forward in the 7 years since that were not identified in the 2009 assessment. Over time opportunities arise on sites that at the time of an assessment could not have been envisaged, primarily because at the time of a land availability assessment sites were likely to be in current use, not available and not being promoted.

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23 812 completions have occurred on large site windfalls in the period 2009/2016. Approx. 112 dwellings per annum.
4. **Assessment Findings and Review (Stage 4 & 5)**

4.1. **Introduction**

4.1.1. The findings of the study are discussed in the following sections and summarised in table 4.1 (see section 4.18). They demonstrate the level of housing which may be considered to come forward from each source of sites, depending on a categorisation which is drawn from the 2014 SHLAA but has been amended to reflect current circumstances.

4.2. **Format of findings**

4.2.1. Each site has been given a unique reference number for the purposes of the assessment. Appendix 5 contains the list of sites that were rejected at stage 1. These sites are presented by Plymouth Plan Area. 270 sites were rejected at stage 1.

4.2.2. The findings for each site assessed are presented by Plymouth Plan area in Appendix 6. Within the appendix there is a map for each of the Plymouth Plan areas supported by a summary table of findings for each site within that area. The mapping is colour coded to reflect the different status of sites and indicates the unique site reference number for each site. The reference number is used in the summary tables to identify the site.

4.2.3. The levels of housing delivery from each source are drawn together to provide the figures in the following sections and are summarised in Table 4.1 (see section 4.18)

4.3. **Completions 2014 to 2016**

4.3.1. In order to provide a complete record on delivery of dwellings for the plan period 2014-34, the SHLAA includes figures for the delivery of housing from all sources for the period from 01/04/2014 to 31/03/16.
4.3.2. The figures are drawn from the Authorities Monitoring Report and show a net total of housing delivery of 1,696 dwellings

4.4. **Sites under construction as at April 1st 2016**

4.4.1. Sites where development is already underway provide the most immediate source of future housing supply. Generally sites, once commenced, will be completed within relatively short periods of time, determined by the size of the site and market conditions.

4.4.2. Therefore it is considered that on these sites, delivery of housing is likely to be completed within 5 years except on very large sites where schemes are phased to deliver over a longer timeframe.

4.4.3. There are a total of 3,060 dwellings on sites under construction of which 644 dwellings are under construction. A total of 1,686 of the dwellings on these sites are anticipated to be delivered in the next 5 years to 2021.

4.5. **Sites with planning permission as at 1st April 2016**

4.5.1. Sites with planning consent provide the most significant source of short-term housing supply. Dwellings with consent are likely to be delivered within the next 5 years except on very large sites where schemes are phased to deliver over a longer timeframe. This is an accepted proposition particularly given that the permissions generally have a permission maximum of three years to be commenced.

4.5.2. There are a total of 2,216 dwellings on sites with planning permission yet to commence, however it is acknowledged that not all permissions will be implemented and some consents will lapse for a variety of reasons.

4.5.3. Therefore a lapse rate of 10% (222 dwellings in total) has been applied on sites with planning consent that are yet to be implemented, reflecting the same rate that has been applied in the 2009 and 2014 SHLAA’s.
4.5.4. The assessed level of delivery from this source is 1,994 dwellings with 1,437 dwellings anticipated to be delivered in the first 5 years to 2021.

4.6. Deliverable sites, unconstrained by policy

4.6.1. The SHLAA process has identified a total of 47 sites which are considered to be Available now, Suitable for development and Achievable (viable). These are therefore considered to be deliverable sites and can be relied upon in considering the future delivery of housing.

4.6.2. The sites in combination are anticipated to provide a total of 5,514 dwellings over the remainder of the JLP plan period (2016-2034)

4.6.3. A potential yield for each of these sites was identified\(^{24}\) and analysis of each of these is provided within the relevant Plymouth Plan Area summaries. (See appendix 6). For each site the constraints affecting these sites are identified and the anticipated delivery timeframe is presented in accordance with the methodology set out in section 3 regarding delivery rates and lead in times.

4.6.4. 1,511 dwellings are anticipated to be delivered in the first 5 years to 2021.

4.7. Deliverable sites, with Local Authority intervention – ownership

4.7.1. The assessment of sites within the SHLAA has included a high level viability appraisal of all sites, the results of which are discussed in section 3 (Assessing the Achievability of sites for housing, and appendix 1).

4.7.2. The viability appraisal includes all sites which were identified as being available/developable for development through the SHLAA process. This includes a number of sites where it is known that PCC is centrally involved in the delivery of those sites, notably as the land owner.

\(^{24}\) Some sites in this category have a larger unconstrained yield i.e. it is deemed that the constraints present on the site reduce the potential supply. The unconstrained yield total for these sites would be 6088 dwellings
4.7.3. There are a total of 5 sites in this category that when put through the viability assessment are shown not to be viable and generally would be discounted from being included in the SHLAA summary of deliverable supply. However given the Council’s role in these sites it is considered that they can be relied upon for housing delivery given the council’s programme of releasing its land for housing development where delivery is occurring on similar sites.

4.7.4. A total of 164 dwellings\(^{25}\) are therefore included in the deliverable supply over the remainder of the plan period to 2021. A total of 58 dwellings are anticipated to deliver in the first 5 years to 2021.

4.8. Sites unavailable at present – developable

4.8.1. Sites identified in this category are sites that are considered unavailable at present but have been deemed suitable for housing in the assessment and where it is considered that there is a reasonable prospect that potential exists to overcome availability within the plan period.

4.8.2. A total of 11 sites were identified in this category accounting for 1,094 dwellings\(^{26}\) that are included in the deliverable supply over the remainder of the plan period. As the sites are not available now no dwellings can be considered deliverable in the first 5 years.

4.9. Small site windfall allowance

4.9.1. The SHLAA specifically excludes any search for sites less than 0.25Ha which might accommodate less than 5 dwellings. This therefore necessarily undercounts the potential housing delivery over the plan period. This is discussed in section 3.5 (windfall assessment). The allowance identified is 42 dwellings per annum commencing in 2019/20 i.e. no allowance is made in the first 3 years to avoid double counting.

\(^{25}\) Some sites in this category have a larger unconstrained yield i.e. it is deemed that the constraints present on the site reduce the potential supply. The unconstrained yield total for these sites would be 261 dwellings

\(^{26}\) Some sites in this category have a larger unconstrained yield i.e. it is deemed that the constraints present on the site reduce the potential supply. The unconstrained yield total for these sites would be 1,414 dwellings
4.9.2. A total of 630 dwellings from this source are included in the deliverable supply over the remainder of the plan period. A total of 84 dwellings are included in the first 5 years to 2021.

4.10. Demolitions

4.10.1. A total of 621 demolitions are anticipated to occur over the plan period relating to the regeneration of North Prospect and with regard to a site in Barne Barton (Site reference 0975).

4.11. Student accommodation release

4.11.1. As a result of the delivery of purpose built student accommodation which includes developments currently under construction and with planning consent as at 1st April 2016 PCC consider that there is sufficient, robust information about this supply and its effect on releasing student accommodation to the market to include a forecast of potential releases in the deliverable supply.

4.11.2. Appendix 9 provides the evidence with regard to the methodology for deriving the forecast of release of housing from student accommodation. This approach is consistent with NPPG is based on robust analysis of council tax data, takes account of recent and future student numbers, so double counting is avoided.

4.11.3. A forecast supply of 225 dwellings is therefore included in the deliverable supply over the remainder of the plan period. A total of 224 dwellings are included in the first 5 years of the supply to 2021 as 2 significant purpose built student accommodation developments are currently under construction.

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27 Housing and Economic Land Availability Assessment, Paragraph 038 reference ID:3-038-20140306
4.12. **Total deliverable supply**

4.12.1. Table 4.1 (see section 4.18) summarises the figures for the delivery of dwellings within the PCC administrative area. It demonstrates a total net figure of 12,060 dwellings anticipated to come forward from deliverable sources over the remaining plan period 2016 to 2034.

4.12.2. A further 1,696 dwellings (net) have been delivered in the period 2014-2016, which brings the net deliverable supply total identified over the plan period to 13,756 dwellings.

4.13. **Sites that are available and suitable but unviable**

4.13.1. The high level viability assessment has identified a total of 5 sites which are available and suitable, but that in current market do not appear to be viable.

4.13.2. These 5 sites represent a possible total of 503 dwellings which could come forward if the circumstance of the site were to be considered in detail. It may be that the particular market product could be amended to enable delivery, or simply a rise in market values might make the site viable. Alternatively the council could consider supporting delivery through negotiations in the planning application process.

4.13.3. Although these sites have been considered unviable in the high level testing it does not mean they are unviable for the respective landowners. For SHLAA purposes however they cannot immediately be relied upon to deliver dwellings, however with further review and potentially intervention, the sites could be made deliverable.

4.14. **Sites constrained by policy (unsuitable)**

4.14.1. The assessment has identified sites that are considered available but are constrained by current/emerging development planning policy. If policy constraints were to be amended or removed through the development plan process sites in this category could conceivably be developed. This provides the
council with an identified stock of sites which may be considered as part of plan making if there is a need to identify further dwellings to meet housing requirements.

4.14.2. There are a total of 40 sites in this category which have been assessed as contrary to current or emerging policy protection. These are generally either sites in employment locations where there is policy to protect land for employment uses or land that is identified as high quality strategic/local greenspace. Other reasons include unsustainable location, environmentally sensitive location, loss of playing pitches, impact on heritage assets and amenity.

4.14.3. The assessment identifies a supply of 6,334 dwellings from the 40 sites in this category. These sites cannot be relied upon to come forward, but if there is a need to identify additional housing land a decision could be taken to amend the policy framework through the development plan process.

4.15. **Unconstrained Supply Total**

4.15.1. The total unconstrained supply\(^\text{28}\) from the assessment over the plan period 2014-34 equals 21,584 dwellings.

4.16. **Undeliverable Sites**

4.16.1. A total of 19 sites were identified during the course of the assessment that are deemed physically constrained sites not capable of delivering housing.

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\(^{28}\) This includes dwellings already delivered, under construction, with planning consent, programmed demolitions, windfall allowance and forecast of student accommodation release. This total excludes sites categorised as unavailable at present and undeliverable.
4.17. **Sites unavailable at present – undeliverable**

4.17.1. The sites identified in this category are considered unavailable at present which cannot be relied upon to come forward during the plan period. Some sites in this category may also be considered unsuitable i.e. constrained by current/emerging development plan policy.

4.17.2. A total of 74 sites were identified in this category with a capacity of 6,938 dwellings.

4.17.3. As discussed in paragraphs 3.3.17 to 3.3.19 the council has not merely relied upon call for sites exercises and endeavoured to make contact with landowners to establish availability. The sites in this category therefore represent sites where availability cannot be established in accordance with the NPPG definition.

4.17.4. Within this group of sites is the former Plymouth Airport. The site is owned by the City Council but has a long lease to Sutton Harbour Company. The airport is no longer operational as an airport. However, the City Council as the freehold owner has not confirmed its availability and therefore cannot be considered to be available and cannot be relied upon.

4.17.5. If, at a point in time in the future, the airport site were to become available a future revision of the SHLAA would be in a position to assess the site and it could be considered to be a sustainable location for development.

4.18. **Summary of findings**

4.18.1. Table 4.1 below presents the summary of findings from all sources identified above.
Table 4.1 SHLAA summary of findings

<table>
<thead>
<tr>
<th>Source</th>
<th>Number of Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2014-2016</td>
</tr>
<tr>
<td><strong>Deliverable Supply</strong></td>
<td></td>
</tr>
<tr>
<td>Completions 2014 to 2016</td>
<td>1,696</td>
</tr>
<tr>
<td>Dwellings on sites under construction as at April 1st 2016</td>
<td>1,686</td>
</tr>
<tr>
<td>Dwellings on sites with planning permission as at 1st April 2016 (assuming 10% lapse rate)</td>
<td>1,437</td>
</tr>
<tr>
<td>Deliverable sites, unconstrained by policy</td>
<td>1,511</td>
</tr>
<tr>
<td>Deliverable sites, with Local Authority intervention – ownership</td>
<td>58</td>
</tr>
<tr>
<td>Sites unavailable at present – developable</td>
<td>0</td>
</tr>
<tr>
<td>Small site windfall allowance</td>
<td>84</td>
</tr>
<tr>
<td>Student accommodation release</td>
<td>224</td>
</tr>
<tr>
<td>Demolitions</td>
<td>-481</td>
</tr>
<tr>
<td><strong>Total dwelling Yield for PCC</strong></td>
<td>1,696</td>
</tr>
<tr>
<td><strong>Average delivery per annum</strong></td>
<td>848</td>
</tr>
<tr>
<td><strong>Unconstrained Supply</strong></td>
<td></td>
</tr>
<tr>
<td>Deliverable sites, unconstrained by policy (extra capacity if constraints not applied to reduce capacity)</td>
<td>21</td>
</tr>
<tr>
<td>Deliverable sites, with Local Authority intervention – ownership (extra capacity if constraints not applied to reduce capacity)</td>
<td>78</td>
</tr>
<tr>
<td>Sites unavailable at present – developable (extra capacity of constraints not applied to reduce capacity)</td>
<td>0</td>
</tr>
<tr>
<td>Sites that are available and suitable but unviable</td>
<td>19</td>
</tr>
<tr>
<td>Sites constrained by policy (unsuitable)</td>
<td>404</td>
</tr>
<tr>
<td><strong>Total number of dwellings (deliverable supply + unconstrained supply)</strong></td>
<td>1,696</td>
</tr>
<tr>
<td><strong>Average delivery per annum</strong></td>
<td>848</td>
</tr>
<tr>
<td>Sites unavailable at present – undeliverable</td>
<td>0</td>
</tr>
</tbody>
</table>
4.18.2. The findings of Plymouth’s SHLAA together with the findings of the South Hams/West Devon SHLAA have been brought together to establish whether there is sufficient deliverable supply within the Plymouth Housing Market Area to meet the housing need identified.

4.18.3. The Plymouth and South West Devon Joint Local Plan, Housing Topic Paper (Provision and supply), February 2017\textsuperscript{29} concludes that sufficient supply has been identified to meet the housing needs of the Plymouth Housing Market Area over the JLP plan period 2014-34, and therefore a review of the Plymouth SHLAA is not warranted at this time.

\textsuperscript{29} http://web.plymouth.gov.uk/homepage/environmentandplanning/planning/planningpolicy/plymouthplan/pevidencebase.htm