Strategic Housing Land Availability Assessment Methodology Paper

West of England
Spatial Development Strategy
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Spatial Development Strategy Evidence summary sheet

Document name

Strategic Housing Land Availability Assessment (SHLAA) Methodology Paper

Why is this document required?

The SHLAA methodology paper sets out how the SHLAA for the West of England Combined Authority area is being undertaken.

A Strategic Housing Land Availability Assessment (SHLAA) is used to help identify suitable and deliverable sites for future housing development, to meet the requirements of national policy. This understanding of what is known as 'housing capacity' is a key part of the plan-making process for both Local Plans and the Spatial Development Strategy (SDS) as it will inform thinking about different ways in which new housing could be distributed.

What is the purpose of the document?

The purpose of this document is to show how key inputs to the spatial strategy development process (potential housing numbers in different geographical areas) are derived on a careful, fair and consistent basis across the Combined Authority area. The SHLAA methodology paper also explains what happens next with this information.

As the SDS is a high-level plan, it explains how we manage a range of information including detailed information about specific sites in a way that means the plan has a good chance of being delivered but that still allows for more detailed Local Plan work to refine this.

The SHLAA methodology paper is set out in two parts, demonstrating the two distinct phases of the methodology.

How will it be used?

The SHLAA methodology will be used by the authorities to understand where new housing could be delivered and the potential issues that would need to be addressed in doing so (for instance, to avoid damaging the environment). This is then used to help develop different possible ways of distributing housing growth ('spatial strategy scenarios') which we will assess to help us identify the best way of doing so. Once the spatial strategy is agreed, the Local Plan teams will refine the SHLAA work through further steps of the method, to enable them to set out the strategy in more detail.

Who was this document produced by?

The document has been prepared by the West of England Combined Authority and the Unitary Authorities of Bath and North East Somerset, Bristol City and South Gloucestershire.

Engagement and consultation

The document is for information only because the main aspects of the method are set by the Government. However, the issues considered as part of the method have been informed by the engagement that was undertaken in late 2020 on the Future of the Region. This included things to prioritise and issues to be considered in distributing growth. The method has also been developed in close consultation with officers from North Somerset Council who are preparing similar information to inform their Local Plan. The SHLAA outputs relevant to the SDS will be published in high level summary form as part of the consultation on the draft SDS in Spring 2022.

Strategic Housing Land Availability Assessment (SHLAA) Methodology

Phase 1: to inform the spatial strategy development process

Contents

Part 1: Stage 1 and 2a

1. Introduction

1.1 The preparation of a Strategic Housing Land Availability Assessment (SHLAA) is required by the National Planning Policy Framework (NPPF) (para 67). The Government's Planning Practice Guidance (PPG) supports the preparation of housing and economic land availability assessments as part of the same exercise, however practically, this has been managed as two separate but interrelated workstreams, drawing on distinctive expertise and capacity.

The SHLAA in its final form will identify a future potential supply of land which is suitable, available and achievable for housing development over the plan period. This will provide information to assist spatial strategy development, and more detailed site consideration. The PPG makes it clear that the assessment is an important source of evidence to inform plan-making and decision-taking, and the identification of a 5-year supply of housing land.

The preparation of the SHLAA accords with the most up to date guidance available in the Government's Planning Practice Guidance, (NPPG) which notes that such assessments should:

- Identify sites and broad locations with potential for development
- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability)

1.2 The SHLAA, together with the Employment Land and Spatial Needs Assessment (ELSNA) will provide key information to underpin a deliverable distribution of growth, taking account of trade-offs between these uses, and interdependencies with infrastructure investment.

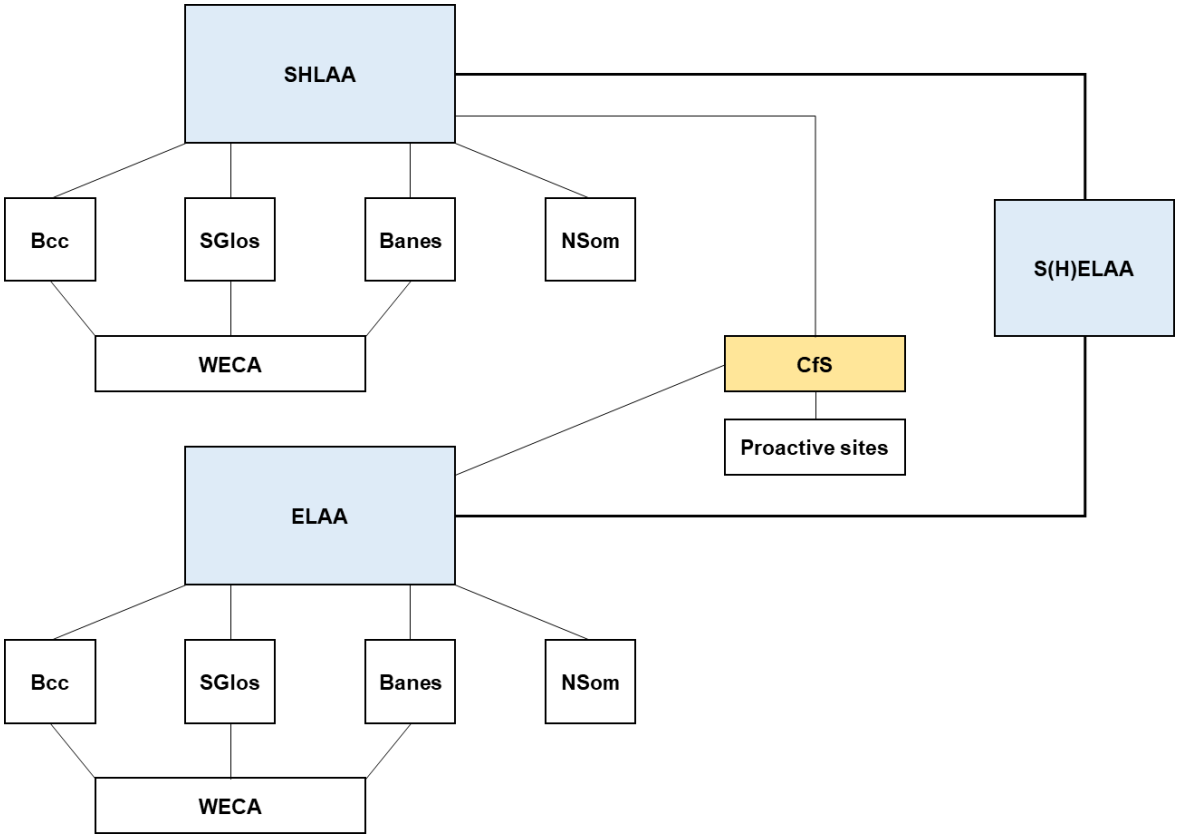
Figure 1 below illustrates the relationships and integration between the Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Spatial Needs Assessment (ELSNA) which together comprise the strategic housing and economic land availability assessment (SHELAA) for the West of England.

1.3 The initial stages of the SHLAA methodology have been developed on a West of England basis, with participation from North Somerset Council as well as the 3 constituent Combined Authority authorities: Bath and North East Somerset, Bristol City and South Gloucestershire Councils. This is to help ensure work across the area is carried out in a coordinated and consistent way to help provide robust and comparable evidence at development plan examinations. This geography mirrors that of the ELSNA.

This Methodology focuses on stage 1 and an initial stage 2 assessment which we term stage 2a. Stage 2b is SDS-specific and is set out in a separate methodology paper published in parallel. Most of the subsequent stages and the operation of the feedback loop are incorporated in the spatial strategy methodology which is [to be] covered in a separate topic paper for the SDS as well as more detailed Local Plan work which will be described and published by the individual Unitary Authority as appropriate in due course. It should be noted that as North Somerset Council is preparing its own Local Plan and not part of the SDS process, it is preparing its own SHLAA[1].

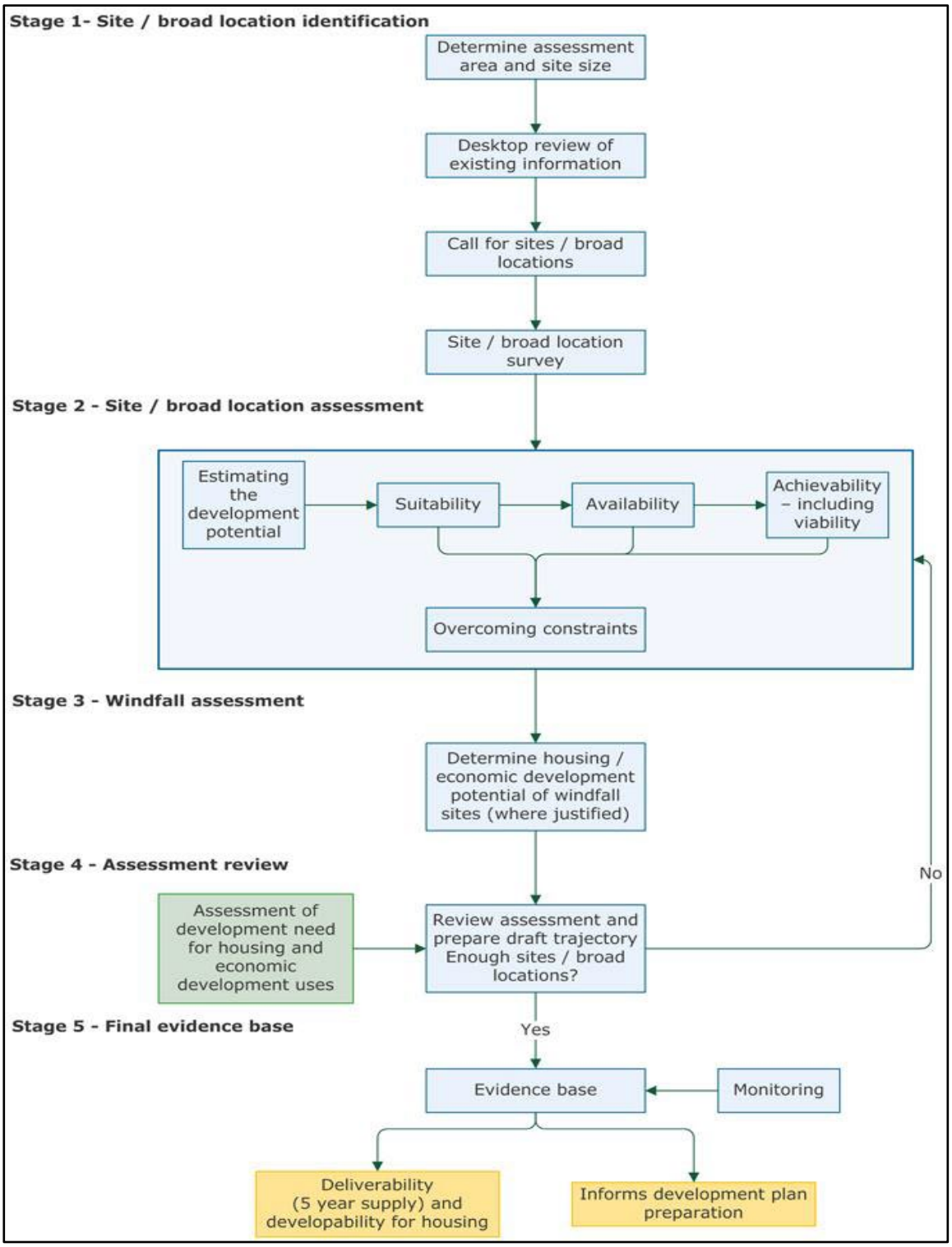
[1] The core methodology is consistent with the Part 1 method set out here, but where appropriate North Somerset will apply a different methodology (for part 2) to reflect their local plan process; this will continue to be aligned to the national methodology set out in PPG.

Figure 1: Workstreams for the common methodology



This SHLAA methodology develops that set out in the guidance contained in the NPPG. Figure 2 below outlines the stages the NPPG advises local authorities should follow in the identification and assessment of sites. There are 5 stages in the flow diagram with a number of processes within each stage. It should be noted however that there is a 'feedback loop' at Stage 4 back to Stage 2 whereby if there are not sufficient suitable, available and achievable sites identified with capacity to meet the housing need, this can be addressed by repeating Stage 2 through identifying ways of overcoming certain constraints (sites that are 'potentially suitable' if policy framework amended etc).

Figure 2: Methodology for Assessment of Sites, NPPG



(Para: 005 Reference ID: 3-005-20190722)

Note: The Assessment is not part of the Development Plan and does not in itself allocate sites. It is an evidence source providing an overall assessment of housing potential including detailed appraisal of specific sites and broad locations. The identification of particular sites and broad locations does not imply that there is a presumption in favour of any development proposal or that planning permission will be granted or refused should an application be submitted. The status of a site may change over time. In all cases the Council will exercise its statutory duties in relation to the consideration and determination of planning applications. *'The Assessment is an important evidence source to inform plan-making but does not in itself determine whether a site should be allocated for development'* (National Planning Practice Guidance).

2. Methodology

2.1 Stage 1 - Identification of sites and broad locations

2.1.1 Assessment area and site size

The assessment area was agreed to be the whole plan area but managed on a Planning Authority basis. It was agreed not to apply a site threshold at this stage until further analysis had been undertaken of the distribution of site sizes and windfalls.

2.1.2 Developing a list of sites

In developing a comprehensive list of sites, three processes can be utilised (broadly aligning with the 3 remaining 'stage 1' boxes set out in the NPPG): a desktop review exercise, a call for sites, and a proactive search These explore the different potential sources or components of capacity set out in the PPG as indicated in the table in Appendix1.

a. Desktop review of existing information
NPPG states it is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area (including those existing sites that could be improved, intensified or changed).

The authorities already have a considerable body of work, including reviews of existing designations and allocations, and where appropriate this has been brought into the SHLAA processes. In most cases however, this is more relevant to urban capacity work which is the subject of a related but separate [forthcoming] methodology statement and topic paper. It should also be noted that 'commitments' set out in the authorities' housing trajectories are counted as part of the housing capacity for the area unless their policy basis is to be re-visited through the new plan; as such, unless this is the case, they are not re-assessed through the SHLAA.

b. Call for Sites/broad locations
A Call for Sites (CfS) process was undertaken by each authority in Summer and early Autumn 2020. This was 'open' for all sites with consistent publicity through the authorities' websites and relevant plan-making stakeholder databases.
This is in line with NPPG advice, which states if the process to identify land is to be transparent, and identify as many potential opportunities as possible, it is important to issue a call for sites and broad locations for development. This needs to be aimed at as wide an audience as is practicable so that those not normally involved in property development have the opportunity to contribute.

c. Proactive search

Another potential source of assessment sites and locations is a set of proactive search processes. Proactive search is particularly important in the urban context, and as stated above, this is the subject of a related but separate [forthcoming] methodology statement and topic paper. Other proactive search processes include applying an 'area of search' approach that applies certain locational principles, settlement buffers etc and more detailed strategic masterplanning assessments of infrastructure related opportunity and the potential for managed change in places to realise new forms of capacity (e.g. new forms of mixed-use development).

Given recent experience of the volume of call for sites submissions, it was agreed, in order to make this a manageable process and avoid duplication of effort, in the 'beyond urban' context this would be undertaken within the parameters of the agreed spatial strategy methodology for the relevant plan (i.e. Spatial Development Strategy (SDS) or Local Plan) at a later stage. That is, once suitability criteria had been established and 'call for sites' submissions had been subject to an initial suitability assessment, any further comparable opportunity would be sought out, primarily through a GIS (geographical information systems) based exercise.

It is noted that in parallel with development plan preparation, strategic infrastructure-led master planning/ capacity work (e.g. Northern Fringe, SW Bristol, and A4 Corridor work) is underway, exploring the potential for infrastructure-related opportunity to inform an understanding of capacity. These areas are those where there are significant infrastructure challenges including those that are best addressed on a cross-boundary basis; apparent (but not necessarily tested) potential to investigate new development capacity by opening up new areas of development or enabling intensification; and places which could benefit from corridor-targeted investment as described in the JLTP4. Where these studies identify any new opportunities, these will be drawn into the main analysis of the SHLAA, where appropriate to do so, otherwise this work is likely to inform analysis of constraints and capacity and deliverability of existing sites or urban windfall potential, so is unlikely to be published separately on a granular basis. Equally SHLAA site information may also feed this work where appropriate to do so.

Other masterplanning type studies are also underway as part of the region's response to town centre change and Covid recovery. These are primarily relevant to urban capacity work and dealt with in separate [forthcoming] methodology and topic paper.

2.1.3 Site Survey - Collation of key information

NPPG suggests the following list of information is compiled for each site on the comprehensive list and this is :

- site size, boundaries, and location;
- current land use and character; [urban/rural/greenfield/brownfield]
- land uses and character of surrounding area; [as above]
- physical constraints (eg access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities); [where mapped]
- potential environmental constraints; [where mapped]
- consistency with the development plan's policies; (i.e. notably does it fall within any designations)
- proximity to services and other infrastructure, such as public transport; [where mapped]
- where relevant, development progress (eg. ground works completed, number of units started, number of units completed); and
- initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development; [i.e. is development potential housing or employment or mixed use]

In this methodology, the 'site survey' or collation of key information stage is a process driven by GIS mapping and analysis of site constraints and attributes which enables the compilation of consistent information about the sites and broad locations derived from all sources.

2.2 Stage 2a – Initial Assessment of sites and broad locations

Stage 2 is the assessment process, the outcome to estimate whether there is any development potential including site capacity in terms of units, looking at sites/places in terms of their:

1. Suitability
2. Availability
3. Achievability – including viability

NPPG states a site or broad location can be considered [theoretically] suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. The interface with the spatial strategy process, is that these are then appraised against 'positive' suitability factors (locational principles) which will be ordered to construct a spatial strategy, as well as factoring in other development impacts. Accordingly, sites identified in the SHLAA will logically form a pool of opportunity for consideration through spatial strategy options or scenarios given their location, attributes and potential identified.

Suitability is the key criterion for further consideration of a site in the plan making process. Sites assessed as not having suitable potential will not be subject to assessment of availability and achievability.

2.2.1 Initial Assessment process

The main SHLAA based mechanism for sifting the sites relates to analysis of constraints. In Stage 2a the authorities agreed to consider sites against a set of Primary constraints considered to be 'showstoppers' that preclude development (see Table 1 below). These typically are backed by legislation which confers a strong protection from development. Sites subject to any of these will not be assessed in detail and will be discounted in first sieve. Where a site is partly subject to any of the primary constraints, the remaining part, not falling within the constraint is taken forward for further more detailed assessment in the SHLAA, providing it could potentially yield at least 5 dwellings.

Additional constraints of a more secondary nature, or otherwise affecting site capacity and deliverability are applied in Stage 2b (see part 2, Stage 2b methodology). These include those where there is a strong policy presumption against development e.g. Greenbelt, FZ3a, AONB etc. Where national policy requires, (in relation to flood risk and green belt) these are held separately The primary and secondary constraints have a close relationship with Footnote 6 in the NPPF which outlines certain areas where the 'presumption in favour of sustainable development' will not apply. It is noted that the paragraph to which the footnote relates reminds us that these designations and policy associated with them restrict development potential in terms of scale and form and this needs to be given due consideration. However, this methodology further nuances this point to recognise this is on a scale from strong presumption against development to development being possible in a carefully considered way through plan preparation.

Table 1 – Assessments of sites and broad locations

Primary constraints	Secondary constraints	Other site-specific constraints
Sites already developed with no prospect of intensification or redevelopment (professional judgement) Internationally protected wildlife sites Ramsar Sites Special Areas of Conservation Special Protection Areas	World Heritage site and Setting Designated Local Green space Green belt Horseshoe Bat Juvenile Sustenance Zones Area of Outstanding Natural Beauty (AONB) Flood Zone 2, 3a	Open spaces and parks Nature recovery network (NRN) Existing development Existing land uses like solar farms, cemeteries, telecommunication, allotments, woodland, existing water bodies including watercourses, large ponds

Registered Parks and Gardens Common Land Flood Zone 3b National Trust Inalienable Land National Nature Reserve Sites of Special Scientific Interest (SSSI) Ancient Woodland Scheduled Ancient monuments Registered Battlefields Health and Safety Executive (HSE) exclusion zones Open Access Land Regionally Important Geological Sites (RIGS) moved from SC Local Nature Reserves (LNR) Working mineral sites	Other policy designations precluding development (e.g. employment only designations) Local Wildlife Sites (LWS) Sites of Nature Conservation Importance (SNCI) High grade agricultural land Listed Buildings Grade 1 Critical Drainage areas Priority habitats Minerals safeguarding areas	Contaminated land/ landfill sites/ quarries Infrastructure - railways, major highways, motorways, heavy industry, hazard zones for power lines, gas/oil pipelines Road access Agricultural Land Topography/slope/views Listed Buildings Conservation Areas Drinking water quality SPZs Groundwater quality SPZs Buffers of primary sites

NB: The status of a constraint may be altered where justifiable and dependent on the project under consideration

2.2.2 Application of initial consistent capacity assumptions

The additional element of consistency that is applied at this stage is the site or location is given a density typology and size-based gross:net discount.

Each site will have an estimated development potential. Unless design-led capacity work on a site has been undertaken by or on behalf of the relevant authority, a theoretical approach is used as set out below using the site area free of primary constraints. This involves firstly, calculating a net developable area for housing that accounts for infrastructure and other calls on land (e.g. landscaping, response to constraints, mixed use) as follows[2]:

- Site under 2 hectares proposed for 100% residential: (90% of the site) x (Up to 2 hectares)x (dwellings per hectare) .
- Sites between 2 – 10 hectares proposed for 100% residential: (75% of the site) x (hectares of the site) x (dwellings per hectare).
- Sites above 10 hectares with an assumption for mixed use: (50% of the site) x (hectares of the site) x (dwellings per hectare).

In turn a set of density typologies are applied. Table 2 below outlines the initial dwellings per hectare (dph) assumptions based on the broad location of the site. This is in line with the National Planning Policy Framework (NPPF) to ensure an efficient use of land when considering development with higher densities expected in more central and accessible locations. However, where a range is specified, the lower end is currently applied due to the early stage of the assessment in order to be suitably cautious regarding constraints and context.

Table 2: Location type density assumptions

Location type	**Initial dph assumption[3]**
Central (Bristol City Centre)	200dph
Inner city (Bristol City)	100dph to 120dph
Central and Inner Bath	100dph
Suburban centres (high streets and transport hubs) and market town centres	70dph – 85dph
Suburban (including urban extensions)	50dph to 65dph
Market towns (outside centres including urban extensions)	50dph
New settlements	50dph to 65dph
Rural/villages	40dph

[2] The method has been developed using Tapping The Potential best practice study:

[3] Where a dph range has been used the initial theoretical capacity will be calculated on the lower end of the range. This is to ensure a reasonable assumption before specific site constraints/opportunities are fully understood and investigated.

It should be noted that at this stage these are considered realistic though in some cases an uplift on those typically achieved at present, as well as in line with national policy expectations, but may be not necessarily be aligned with ultimate policy expectations as these will be subject to separate testing. As the SHLAA progresses to its final stages a final 'assessed capacity' will be found that reflects the individual site.

Following the initial assessment process, all sites are either discounted or potentially suitable to be considered further in plan preparation. This potential can be aggregated to place or broad location level which is helpful in considering spatial strategy options.

Strategic Housing Land Availability Assessment (SHLAA) Methodology

Phase 1: to inform the spatial strategy development process

Part 2: Stage 2b

1. Introduction

1.1 This is the second part of the methodology for the early stages of the Strategic Housing Land Availability Assessment (SHLAA) being prepared across the West of England. Part 2 is specific to the Spatial Development Strategy (SDS) so will be different from the approach normally taken for Local Plans which proceed to make site allocations. The SDS is required to have a good understanding of potential capacity to inform the preparation of the spatial strategy and housing requirements for the area, but on a proportionate basis. Rather than site allocations, it will be working with Broad Locations for Growth and non site/place specific non strategic growth.

1.2 The approach taken therefore is intended to reflect that Local Plans will undertake more detailed site by site testing to determine which sites will ultimately be allocated, whilst still giving a good understanding of relative capacity. This requires that sites includes in different spatial strategy scenarios are given appropriately discounted capacities that reflect that some may come forward for development through local plans or acceptable windfalls, but some may not, and some may ultimately deliver higher capacities, but others may deliver lower capacities. As such at this stage these theoretical capacities will be most accurate at the planning authority scale at which they are most likely to 'average out'. They will be less accurate, but still reasonably so at a Broad Location for Growth (place) scale, but are not accurate at a site level[1].

2. Methodology

2.1 Given the objective to help ensure a realistic understanding of capacity in the SDS area that reflects the strategic objectives of the plan, this stage of the methodology has to start to consider deliverability (a combination of achievability and availability) as well as constraints which are more relevant to suitability (though can also affect achievability). Accordingly, 3 sets of discounts[2] have been generated to be applied to the initial theoretical capacity calculated at the end of stage 2a (see Phase 1 Part 1 methodology).

2.2 These comprise those relating to:

a) **Policy - desire to protect sites/assets -** those relating to strategic objectives/national policy that articulates the importance of protecting

[1] Therefore the results of the assessment will be published in due course in a summarised form alongside the Draft Plan

[2] This has drawn on the well established GLA SHLAA methodology but adapted to relate it to a mixed urban/rural context with specific West of England constraints.

particular assets, so the discount reflects either the need to avoid assuming development over them or the need to incorporate them into the development in some way thereby reducing developable land, or a general sequential preference that should affect the reliance on that type of land for development.

b) Environmental Impact (including landscape and heritage) – essentially vulnerabilities that there is a strong strategic imperative (in many cases including national policy) to address by reducing density or developable area to allow for buffering and other mitigation, which the discounts reflect.

c) **Deliverability** –technical or assembly issues that need to be resolved prior to start or completion making it likely that delivery will be delayed/cannot wholly be relied on.

2.3 Before the discounts (as set out in Appendix 2) are applied, an analysis of significance is undertaken. This requires assessment of the extent of overlap between the assessment site and the constraints/assets referenced in the methodology. Given that Stage 2a of the methodology has already applied a net: gross discount (linked to size) that in part accounts for constraints affecting developable area, a further discount is only applied if it covers more than the area netted off in Stage 2a. That is:

- If a site is over 10ha in size, the constraint/asset would need to cover more than 50% of the site to be considered significant
- If a site is 2-10ha in size, the constraint/asset would need to cover more than 25% of the site to be considered significant
- If a site is less than 2ha in size, it would need to cover > 10% of the site

2.4 If the constraint is significant in relation to a particular site, it becomes relevant for additional discounting purposes. Discounts are applied in two steps: firstly the highest of the relevant discounts arising from categories a and b is applied. Secondly, any relevant deliverability discount (category c) is applied. In addition, sites significantly affected by flood risk (zone 2/3a) and/or green belt are categorised separately so that they can be held separately in spatial strategy scenario development for sequential testing purposes.

2.5 The methodology is primarily applied through a Geographical Information System (GIS) and spreadsheet-based process to sites submitted as part of 'calls for sites'; however it can also be applied to those sites derived from proactive search methods, including in the urban context (Para: 010 Reference ID: 3-010-20190722). This ensures that all sites are treated consistently, and broad locations for growth/capacity numbers that are contributed as inputs to the development of the spatial strategy already account for constraints and a range of strategic objectives.

2.6 Where more detailed design-led testing of site capacity is available at this stage, (e.g. through place-based masterplanning using comparable density assumptions) and it produces a lower figure than from this methodology, that figure will be substituted.

2.7 Further processing of these sites and numbers occurs through spatial strategy scenario appraisal which will help to identify if additional discounts should be applied (or existing discounts amended) as more information arises concerning impacts and deliverability. This is particularly relevant for secondary and other constraints listed in Table 2 that are not readily mappable.

2.8 It will also be expected that in more detailed analysis, Local Plans may further refine and consider some of these discounts, especially those that result in significant capacity reductions, and re-appraise sites and capacity in some areas where it is compatible with the overall spatial strategy to do so.

Appendix 1

To assist the local authorities in considering all types of sites the NPPG provides a table (below) which lists the different types of sites and potential data sources. The agreed consistent approach in relation to each type of site is set out below.

PPG Types of site and potential data source

Type of Site	Potential data source	Proposed West of England approach
i. Existing housing [and economic development]allocations and site development briefs not yet with planning permission	Local and neighbour plans Planning applications records Development Briefs	Core Strategy and other allocations plans (include unimplemented allocations) Principle of development accepted
ii. Planning Permissions for housing [and economic development] that are unimplemented or under construction	Planning application records Development starts and completions record	Sites with planning permission are considered to form part of the existing commitments so are not assessed as part of the SHLAA/ HELAA process
iii. Planning applications that have been refused or withdrawn	Planning application records	Not to include [typically where there is active developer interest these are promoted through the Call for Sites process]
iv. Land in the local authority's ownership	Local authority records	Factored into Call for Sites engagement through existing asset management discussions (e.g. One Public Estate) and urban capacity work.
v. Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, central government, National Health Service, police, fire services, utilities services, statutory undertakers	
vi. Sites with permission in principle and identified brownfield land	Brownfield land registers (parts 1 and 2) National Land Use Database Valuation Office database Active engagement with sector	Covered by urban capacity and ELSNA studies referenced below. The empty homes figures will be factored into non-site specific/ windfall analysis, along with number expected to arise from

vii. Vacant and derelict land buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes eg. offices to residential	Local authority empty property register English Housing Survey National Land Use Database Commercial property databases (eg. estate agents and property agents) Valuation Office database Active engagement with sector Brownfield land registers	PDR (permitted development rights).
viii. Additional opportunities for un-established uses (eg. Making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys	
ix. Business requirements and aspirations	Enquiries received by local planning authority; Active engagement with sector	To be covered by the ELSNA engagement
x. Sites in rural locations	Local and neighbourhood plans Ordnance Survey maps Aerial photography Planning applications Site surveys Call for Sites	See call for sites and proactive approach above
xi. Large scale redevelopment and redesign of existing residential or economic areas		
xii. Sites in adjoining villages and rural exceptions sites		
xiii. Potential urban extensions and new free-standing settlements		

Appendix 2

Category (a) discounts: Policy – desire to protect sites/assets

Constraint	Action	Rationale/notes
Public Open space/Local Green Space	Discount by extent as a proportion of gross site area (i.e. could be 100%) unless loss is strategy-led	In line with greening objectives – need to protect such sites
Local wildlife site/SINC/core priority habitat	Discount by extent as a proportion of gross site area (i.e. could be 100%)	In line with greening objectives which provide a strong presumption of protection
Existing employment use designated of strategic significance	Discount by extent as a proportion of gross site area (i.e. could be 100%) unless de-designation being plan led and actively managed in which case design led figure to be used	In line with ELSNA recommendations and expected policy position.
Existing employment use local/non strategic designation	Discount by 75% unless de-designation/city centre change being actively managed in which case design led figure to be used	Assumes more efficient land can be achieved whilst still protecting economic interests in line with ELSNA and expected policy position
Existing employment use inc retail (non designated)	Discount by 50%	Assumes more efficient use of land can be achieved whilst still protecting economic interests in line with ELSNA and expected policy position
Best and Most Versatile Agricultural land	Discount by 15%	National policy suggests should account for importance of and seek to use other land first. In line with sustainable resource use considerations. Percentage of rural SHLAA call for sites affected by this is approx. 84% so suggests a crude probability of 84% that have to resort to these.
Minerals safeguarding	Discount by 10%	National policy requires must prevent sterilisation. Does not assume whole area will be needed for extraction or create any presumption of extraction. In much of the region in practice reflects risk (of historic workings etc) that would need to be addressed in any development rather than a presumption against development.

Category (b) discounts - Environmental Impact – requiring mitigation/buffering likely to impact on developable area or densities

Constraint	Action	Rationale/notes
Bat Sustenance Zone	Discount by extent as a proportion of gross site area (i.e. could be 100%)	Draft SPD and HRA methodology suggests not compatible with development and hence greening objectives
World Heritage Setting	Discount by 90%	Very few locations are compatible so effectively becomes low probability.
Landscape designation (AONB)	Discount by 50%	Enhanced landscape mitigation required
Greenbelt openness/separation	Discount by 50%	To retain openness
Ancient Monument or other asset setting/listed building curtilage - 400m buffer (rural/open)	Discount by 30%	To retain openness of setting
Nature Recovery Network (wider strategic network area not priority habitat)	Discount by 15%	To ensure 10% net gain plus expected additional strategic significance factor in biodiversity net gain metric.
Conservation Area or Listed building curtilage (urban) or World Heritage Site	Discount by 10%	Already reflected in density typology to some extent; reduce further to account for potential additional step down
Flood Risk Zone 3a (not benefitting from defence) or Critical Drainage Area	Discount by 10% (5% if benefitting from defence)	Reflecting possible land take for mitigation. [Aligned with GLA SHLAA methodology.]
HSE zones/pylons	Discount by 10% for pylon/pipeline Middle HSE zone discount by 10%	Reflecting buffering etc public safety and access considerations

Category c discounts – Deliverability - Technical or assembly issues to be resolved prior to start or completion making it likely that delivery will be delayed/cannot wholly be relied on

Constraint	**Action**	**Rationale/notes**
More than average secondary constraints	Discount by 10%	Reflects overall complexity
Ownership complexity/no active promotion – not CfS/active occupier	Discount by 10-30%	[Aligned with GLA discounting]
Contamination/unusual costs	Discount by 10%	[Aligned with GLA discounting.]
GB	Discount by 20%	As have to get through local plan examination first, likely to cause delay
Infrastructure dependency for access/sustainability and not yet a commitment being actively worked on	Discount by 10-20%	[Aligned with GLA discounting]