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Planning. Design. Economics.

**Guernsey SHLAA**

**Methodology Peer Review**

States of Guernsey Environment  
Department

December 2013

13762/MS/MT

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## 1.0 Introduction

- 1.1 Nathaniel Lichfield & Partners (NLP) was appointed by the States of Guernsey Environment Department in November 2013 to undertake a peer review of the draft Strategic Housing Land Availability Assessment (SHLAA) methodology. This report sets out the findings and recommendations from that review.

## Background and Context

- 1.2 The Environment Department is in the process of writing a new Island Development Plan to comply with the spatial planning strategy within the Strategic Land Use Plan (SLUP) approved by approved by the States in November 2011 and the other States of Guernsey objectives set out in the States Strategic Plan.
- 1.3 This comprehensive review of the Development Plan will replace the two existing Development Plans the Urban Area Plan and the Rural Area Plan and in light of the SLUP a new comprehensive approach to identifying land for housing development is being proposed. This is the first time a Strategic Housing Land Availability Assessment (SHLAA) has been prepared for Guernsey. Whilst there is no formal obligation on the Environment Department to prepare a SHLAA, apply any specific approach to assessing housing land availability and supply, or to comply with UK planning legislation, the Department is nevertheless seeking to follow current best practice in this area, insofar as it is appropriate to the planning framework for Guernsey.
- 1.4 In this respect, public consultation on a draft SHLAA methodology was undertaken between July to September 2013, with a small number of responses from consultants, individuals, housing providers and other States Departments received. In this context, the purpose of this peer review is to help satisfy the Environment Department that the approach and methodology for the SHLAA is robust, reliable, proportionate and appropriate so that the SHLAA can effectively inform future policies for the management of housing development on the Island.

## Approach to Peer Review

- 1.5 The approach to this peer review has been two-stage. First a desk-based review and appraisal of the relevant background and methodology to the SHLAA was undertaken. This included reviewing and considering the following documents:
- The draft SHLAA methodology (2013);
  - The Key Messages, Issues and Options consultation responses on the draft SHLAA methodology (September 2013); and
  - The draft criteria produced by the Environment Department for the assessment of housing and employment land sites.

- 1.6 Secondly, an in depth discussion and review was held between NLP and officers from the States' Environment Department to consider the approach to the SHLAA and how in practice the methodology will be implemented and the study undertaken.
- 1.7 Together, the above two stages has allowed NLP to thoroughly review the approach and, drawing upon NLP's extensive experience of producing and reviewing SHLAAs within the UK, draw conclusions and make recommendations.

## 2.0 **Best Practice in Assessing Housing Land**

2.1 The SHLAA seeks to follow best practice in assessing housing land availability. However, in doing so, it must be recognised that:

- a this is the first SHLAA to be undertaken for Guernsey, meaning that there is no previous SHLAA structure or assessment upon which to build; and
- b best practice must be considered within the unique context of the Guernsey plan system.

2.2 Notwithstanding, the draft SHLAA methodology has sought to draw influence from best practice elsewhere, and therefore it is useful to compare and consider the methodology for the Guernsey SHLAA against such best practice and guidance. The main sources of best practice are outlined as follows.

### **English Department for Communities and Local Government SHLAA Practice Guidance (2007)**

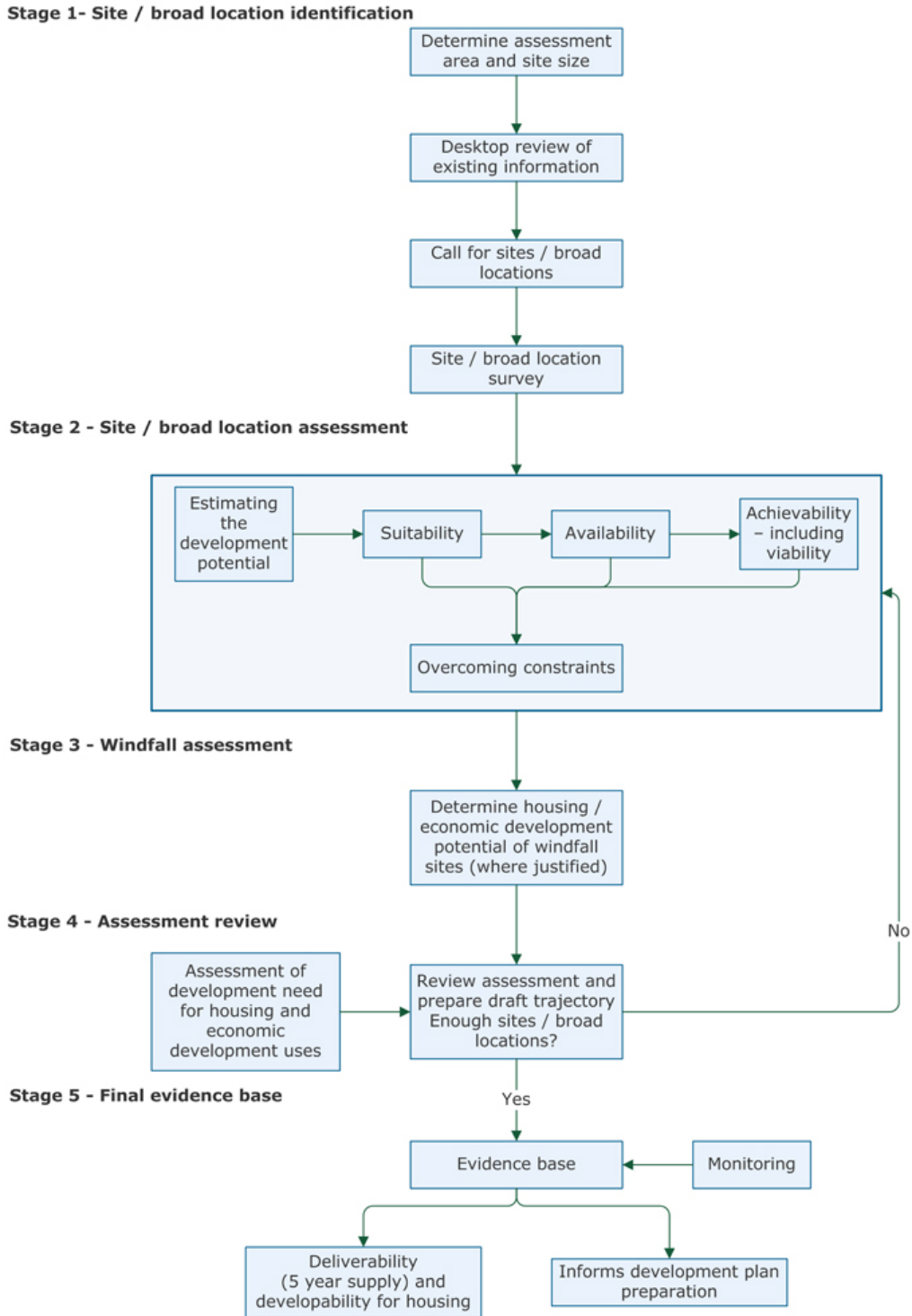
2.3 The English SHLAA Practice Guidance (2007) sets out a ten stage approach to undertaking SHLAAs from planning the assessment to finalising the assessment. It provides “*practical guidance on how to carry out an assessment to identify land for housing and assess the deliverability and developability of sites.*” The draft Guernsey SHLAA methodology identifies (para 3.1.1) that it is intended that the Environment Department will broadly follow the principles set out within this practice guidance.

2.4 The practice guidance has been applied and validated throughout the development and examination of many English Council’s Core Strategies and Local Plans. NLP consider it is a reasonable and rational starting point for developing a methodology for assessing housing land availability.

### **English draft National Planning Practice Guidance (August 2013)**

2.5 Notwithstanding the above, the SHLAA Practice Guidance is due to be replaced by a new National Planning Practice Guidance (NPPG) reflecting the newer National Planning Policy Framework for England adopted in 2012. This provides further guidance on assessing land availability. Specifically, it condenses the previous guidance into five main stages (as set out in Figure 2.1 below), but essentially retains the same steps of the ten stage approach.

Figure 2.1 English Draft NPPG - Assessment of Land Availability methodology



Source: CLG draft National Planning Practice Guidance

2.6

The main substantive difference between 2007 SHLAA Practice Guidance and the draft National Planning Practice Guidance, is that the latter indicates that assessments should be made across both housing and economic land uses (e.g. employment) rather than narrowly focusing on housing. Crucially the draft NPPG specifically states that:



*“This guidance indicates what inputs and processes should lead to a robust assessment of land availability. Plan makers should have regard to the guidance in preparing their assessments. Where they depart from the guidance, plan makers will have to set out reasons for doing so. The assessment should be thorough but proportionate, building where possible on existing information sources outlined within the guidance.”*

- 2.7 Even in the context of the NPPF and the English Plan-led system, the best practice guidance acknowledges that any assessment must be thorough, but ultimately proportionate, but can be tailored to individual circumstances.

## **NLP Experience**

- 2.8 Nathaniel Lichfield & Partners has the necessary experience and qualification to undertake this peer review. NLP is one of the UK’s largest and longest established independent planning consultancies, and is currently RTPI Planning Consultancy of the Year. NLP also has a significant track record of undertaking housing land availability assessments and development capacity work from a variety of different perspectives. This has included experience across England preparing SHLAAs for Local Planning Authorities, including Lewes, Gateshead, the Greater Norwich Development Partnership (Norwich, Broadland and South Norfolk) and Epping Forest. Prior to the requirement to produce SHLAAs, it was common practice to produce ‘urban capacity studies’ and NLP produced a number of these for local authorities, including the City of Edinburgh. NLP has produced economic viability evidence for SHLAAs and has also previously provided advice and monitoring services on SHLAAs to the Home Builders Federation.
- 2.9 Through the above, NLP has developed an excellent understanding of the methodological and practical issues which arise in undertaking housing land assessments and are therefore well placed to provide peer review support to the States of Guernsey.

## 3.0 Peer Review

### Guernsey SHLAA Methodology 2013 Draft

#### Consultation

- 3.1 The Guernsey SHLAA methodology was produced in draft in 2013. The methodology was consulted upon as part of the Guernsey Plan Review 2<sup>nd</sup> Stage Public Consultation from July to September 2013. A total of 7 consultation responses were received on this document. The 'Second Stage Consultation for the Island Development Plan - Summary of Public Responses' document (November 2013) summarises that:

*“Respondents supported the proposed SHLAA process and acknowledged that it is an identification and site assessment tool and, in accordance with the “Draft Strategic Housing Land Availability Assessment Methodology 2013”, should not be extended to select the preferred allocated sites to be included within the Island Development Plan. This could compromise the independence, integrity and impartiality of the SHLAA. Support was voiced for selection of preferred sites through a separate assessment, ranking and consideration against comparative advantages and disadvantages of alternative sites with an explanation of weighting for transparency. It was thought that the SHLAA should be regularly updated for future use.”*

- 3.2 Notwithstanding, a small number of concerns were raised by stakeholders, including the degree to which the SHLAA introduced too many stages and was potentially disproportionate in scale. One response also queried the approach to windfalls and whether the 20% allowance is achievable, whilst a further response queried the adoption of density assumptions for sites.

- 3.3 Alongside this consultation, a 'call for sites' was undertaken. This process invited landowners to submit sites for development (either housing, leisure or commercial) with the housing sites required to meet the strategic criteria of being:

- a within or around the Main and Local Centres to ensure conformity with the SLUP which explicitly sets out a spatial strategy that concentrates development within those areas; and
- b exceeding 0.25 acres or accommodating 5 or more dwellings to ensure the number of potential sites identified are manageable in the subsequent assessment.

- 3.4 NLP consider that the scale and scope of consultation undertaken in respect of the SHLAA is appropriate and commensurate to the material being consulted upon. Whilst there is no legal requirement or obligation within Guernsey to undertake a SHLAA, or indeed therefore consult on a methodology for one, the fact that the methodology has been consulted upon and that a 'call for sites' process has been undertaken can give the Environment Department comfort

that it has given itself the best possible basis for undertaking the SHLAA. In particular, the call for sites will have provided the Environment Department with a useful and comprehensive basis for assessing land. This accords with best practice.

### **Overall approach**

- 3.5 As set out previously, the overall approach of the draft SHLAA methodology has been developed to broadly follow the principles set out within the extant English Department for Communities and Local Government SHLAA Practice Guidance (2007). This approach is well developed and can be considered a robust starting point. Notwithstanding, there are a number of areas where the Environment Department depart from guidance set out in response to the specific issues and form of policy within Guernsey. Some of these particular elements are explored below.

### **Source of Sites**

- 3.6 The CLG SHLAA Practice Guidance states that (para 21) *“Except for more clear-cut designations... the scope of the Assessment should not be narrowed down by existing policies designed to constrain development”*. This is further reiterated as best practice by the draft NPPG which states: *“When carrying out a desk top review, plan makers should be proactive in identifying as wide a range as possible of sites and broad locations for development... Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness...”*
- 3.7 The draft SHLAA methodology sets out the above strategic criteria (a and b) within Table 2 of the methodology. This narrows the sites which will be considered for assessment based upon an application of policy constraints. Whilst this may not accord with best practice from the English planning system, it is clear that such an approach is entirely appropriate for Guernsey. The Island Development Plan, which the SHLAA will inform, has to conform with the SLUP which sets out a spatial strategy concentrating housing development to areas within and around the Main Centres and, to a lesser extent, the Local Centres, and therefore the SHLAA methodology has been tailored to reflect this.
- 3.8 In other regards of assessing the suitability of a site, the Environment Department will not seek to unduly constrain the assessment or the sites to be considered by existing or emerging policies from the Island Development Plan (as set out in para 4.11.4 of the draft methodology). This appears a reasonable and justified approach in the context of the Guernsey plan system, and will avoid unnecessarily considering sites beyond the strategy set out in the SLUP.

### **Assessing Suitability, Availability and Achievability**

- 3.9 The draft SHLAA methodology sets out the proposed approach to assessing suitability, availability and achievability, identifying which factors will be

considered when assessing such sites. The overarching approach set out appears sensible and proportionate to the issues which need to be covered. However, the draft SHLAA methodology does not set out the specific criteria against which sites will be assessed. This is a deficiency of the draft methodology as it currently stands, albeit the Environment Department have provided NLP with a set of draft criteria, reviewed below. Once formalised, it may be appropriate for these to be appended to the methodology.

- 3.10 In terms of assessing suitability, it was discussed with the Environment Department how the information collated is going to be utilised in informing the Island Development Plan. NLP understand from this discussion that the intention is for the SHLAA to only consider the absolute suitability of the site (i.e. whether it is suitable or not suitable). The SHLAA is not going to be used to indicate relative suitability or otherwise rank sites against one another at the current time. Such factors will be deferred to preparation of the Island Development Plan, where a far wider range of factors will be taken into account. Although many SHLAAs in England do seek to provide judgements on the degree of suitability of the site, the approach proposed by the Environment Department reflects well the process of developing the Island Development Plan. Furthermore, the consultation revealed support for an approach whereby any selection (or narrowing down) of preferred sites was undertaken in a wholly separate exercise. In this regard the SHLAA seeks to only capture factual information, rather than ascribing any judgement to whether that information would make one SHLAA site preferable to another.
- 3.11 In terms of assessing availability, the draft methodology (para 4.12.4) proposes to focus on sites where an active interest in development has been demonstrated, with evidence put forward through the call for sites process or through planning applications used as the basis for a judgement on availability. Placing the onus on landowners and site promoters to evidence availability is a reasonable approach. However, where sites or locations may be identified for inclusion within the SHLAA but information on availability is currently incomplete or unavailable the Environment Department may wish to consider whether land registry searches (or equivalent), combined with further consultation, may provide the necessary information to make a judgement on availability.
- 3.12 Assessing achievability is essentially making a judgement on the economic viability of development on the site. The Environment Department set out that in arriving at a judgement on achievability they will consider market factors, cost factors and delivery factors, in line with best practice guidance. There is already some evidence on viability contained within the independent report 'The Use of Planning Covenants in the Delivery of Affordable Housing in Guernsey, 2012' which may be used as the basis for considering the starting point on viability. Ultimately, however, the assessment of achievability will need to be one of professional judgement based upon evidence from the market. In this respect the Environment Department will know through the suitability assessment whether there are any constraints which will present particular cost factors for development, however, considering market and delivery factors is much more contextual to what is happening in the market. It was discussed

with the Environment Department that one way of potentially providing useful evidence to support the assessment in this regard may be to canvas views on deliverability from across the market, with local developers and/or local property agents likely to be able to provide useful stakeholder views without unduly adding to the work associated with undertaking the SHLAA.

### **Sieve Approach**

- 3.13 The draft SHLAA methodology sets out a sieve approach to undertaking site assessments (para 4.15.4). This essentially takes each test of suitability, availability and achievability in sequence, and if the site fails one of the tests, it is not then assessed for the subsequent tests. This sieve approach is further complemented by the initial site filter which seeks to rule out site beyond the scope of the SLUP strategy and those sites of special significance. This is considered to be a pragmatic approach to take which will reduce any time spent gathering information which will ultimately be irrelevant to the overall assessment of the site.

### **Broad Locations**

- 3.14 In order to meet the 6-10 year housing requirement the draft SHLAA methodology sets out that 'broad areas of search' will be identified. This is in line with best practice guidance and will ensure all potential areas and sources of supply are adequately considered. Notwithstanding, the draft SHLAA methodology does not identify how such broad locations will be identified beyond stating that they will be on the edge of the two Main Centres. The approach to broad locations was discussed with the Environment Department, and NLP understand the intention is that the broad locations will be defined through a review of potential areas of opportunity for growth. This could include mapping constraints and then identifying those areas adjacent to the two main centres which fall outside of those constraints and represent logical locations for expansion.
- 3.15 Broad locations are by their very definition ones that will not necessarily be related to a definitive boundary, or line, on a map. Therefore, the Environment Department will need to give consideration to how these will be firstly identified and secondly defined. Options discussed with the Environment Department included either potential broad areas (e.g. 'shading' on a map) or potential directions of growth (e.g. arrows on a map), from which specific sites could be identified at a later date. Either way, it was discussed and agreed that defining sites within the broad areas of search at the SHLAA stage would be inappropriate as it would not allow sufficient flexibility in the scale of the broad locations so that they can meet whatever residual development is required to meet the housing delivery set out in the plan.

### **Windfalls**

- 3.16 The draft methodology sets out that 20% of the Island's need will be met through windfall sites (i.e. those not allocated through the plan). This was

queried in stakeholder responses to the draft SHLAA methodology consultation, with the view that it was not clear why provision should be made and that even then 20% is too high and unachievable.

3.17 The purpose of including an allowance for windfalls is to allow for sources of supply that would either not be explicitly identified and tested through the SHLAA or may not be allocated for any reason. In particular relation to the SHLAA this would include sites below the identified site size threshold. It may also practically include other sources of housing supply which may not be related to site allocations, such as sub-division of units. On this basis, best practice guidance sets out that the SHLAA can identify windfalls as a source of supply, but indicates that it should be based upon sound evidence. In this regard, the assumption on windfalls identified in the draft SHLAA methodology has been backed up by an analysis of past trends.

3.18 As part of discussions, the Environment Department presented NLP with the analysis that had been undertaken on windfalls, which provides evidence as to the scale of windfalls that can be assumed going forward, estimated at c.100 each year. On this basis, it appeared reasonable to assume that 20% of supply against the Island's current States target (300 per annum) or even against the upper range identified in the most recent housing needs survey (indicating housing need from c.450 households per annum) is achievable. Indeed it would be conservative based on past trends. It would be appropriate to include this analysis as part of the SHLAA to robustly justify the 20% figure.

### **Appropriateness of overall approach**

3.19 Overall the draft SHLAA methodology appears to be a reasonable approach to assessing housing land to inform the development of the Island Development Plan. The draft methodology clearly draws upon best practice guidance and will provide a comprehensive but proportionate approach to collating information on land with potential for housing development. However, the methodology has also been refined in several areas, providing a bespoke approach in the context of the planning system in Guernsey and the Strategic Land Use Plan that is already in place.

### **Draft Criteria for the Assessment of Housing and Employment Land Sites**

3.20 As set out above, the draft SHLAA methodology does not currently set out any criteria for the assessment of the housing sites. The Environment Department has provided NLP with a draft set of criteria, which relate to the range of suitability factors which the assessment will look at. The intention is that this set of criteria provides a prompt within the assessment and ensures that the right information is captured for both housing and employment land sites. NLP consider it is particularly important that similar and standardised information across both housing and employment sites is captured, to ensure these sites

are considered in the round and as part of an integrated approach to assessing land. The approach to using criteria is therefore appropriate.

- 3.21 The criteria currently drafted solely relate to 'suitability' factors. The criteria identified appear to be sufficiently all encompassing to identify the extent to which there may be any 'showstopper' constraints for any given assessment site. The only criteria which may be insufficiently covered, which may present a constraint on development, is the ability to gain adequate access to the site (e.g. where there are particular traffic or visibility issues). This was one criterion that was suggested in the consultation responses on the draft SHLAA methodology and is one that would usefully need to be assessed before a site could be concluded as suitable.
- 3.22 Whilst the criteria are generally comprehensive as currently drafted, they are not exhaustive. Some additional information on a sites location, such as neighbouring uses and any amenity issues (e.g. noise, bad neighbours etc.) could similarly be captured. Furthermore, the criteria may also usefully set out prompts for the physical information that will need to be collated, including site size, current use, topography and shape (or any other physical factors which may influence the developability of the site). It is understood that many of the criteria, particularly around access to, and distance from facilities and services have been set up to enable analysis and assessment through GIS. This will create a useful set of parameters that can be logically applied, whilst also automating the analysis of certain elements of the assessment.
- 3.23 One part of the criteria relates to what definition is used for 'within or around the edges' of the main centres and local centres comprises. NLP understand that as yet the spatial extent of the main centres and local centres have not been defined, but that their general locations were identified as part of the call for sites exercise. The Environment Department have indicated that defining the extent of the centres will be an iterative process and that one key aspect for assessment sites will be considering relationship with the settlement pattern of the centre. For the purpose of this first SHLAA, and until the spatial extent of the centres are defined, this approach appears to be reasonable. Notwithstanding, the approach taken to whether a site is within, on the edge of, or beyond a centre should be logically applied and the rationale clearly set out within the final SHLAA and/or within the allocations of the Island Development Plan.
- 3.24 It was also discussed with the Environment Department that a similar criteria approach could be adopted for a site's 'availability'. Such criteria could prompt the identification of factors such as multiple ownership issues, ransom strips and landowner intentions and timescales.

## **Implementation of the SHLAA**

- 3.25 Whilst the SHLAA methodology and the assessment criteria will set out the overarching approach to assessing potential sites, the other consideration in undertaking a SHLAA for the first time is how it will be implemented in practice.

Although not set out explicitly within the draft SHLAA methodology, the practicalities of implementing the SHLAA are important for its future updating and presentation of the outputs. Therefore, it is useful to consider how the SHLAA will capture and present information.

## Database and recording information

- 3.26 NLP understand that the preferred method for recording information is an Excel based database linked to GIS based mapping layers. This is preferred over an Access database, a solely GIS based solution or another bespoke solution due to its balance between functionality, accessibility for all potential users and ability to update simply. In NLP's experience Excel combined with GIS provides sufficient functionality to collate the necessary information on a range of sites and undertake the requisite analysis of them to arrive at useful outputs.
- 3.27 In this respect, and as part of this Peer Review process, NLP has provided the Environment Department with a number of example Excel database structures that have been utilised in previous SHLAAs. Core facets of these which the Environment Department may wish to implement include:
- a version control functionality, to capture when information is updated or changes are made;
  - b a site referencing protocol which can link to both GIS and be used as a unique site identifier in any written outputs (e.g. in reporting, site proformas on maps);
  - c protocols and/or approaches to capturing information on the status of the site for use in monitoring and review (i.e. where it is in the planning process, progress on deliver, how many completions there have been etc.);
  - d data validation functionality to ensure the applicable information is entered in the correct format under each field;
  - e fields for site promoter and/or land owner information, which can be combined with Word to produce mail merges; and
  - f auto-filter functionality to enable summaries of sites with particular factors, or with particular assessment outcomes to be easily identified.
- 3.28 The database will need to be designed with future monitoring and review in mind, and as such there must be in-built flexibility for future outcomes.

## Final reporting and presentation

- 3.29 It is understood that the final SHLAA report will present the headline outputs from the assessment alongside a summary of the assessment undertaken for each site presenting the key information in respect of the sites features as well as its suitability, availability and achievability as assessed in line with the methodology. NLP understand this will be accompanied by appropriate maps showing the location of the sites and broad areas of search locations. It would be impractical for the SHLAA to present the full amount of information collated



for each site, however, it is important that the final reporting output clearly identifies any key constraints or issues with a site's deliverability. This will ensure an appropriate balance between providing a depth of information and managing the resource and legibility implications of providing lengthy outputs.

### **Monitoring and Review**

3.30

Monitoring and review of the SHLAA should be undertaken periodically in order to ensure the information is up to date. As the SHLAA study will be published together with the Draft Island Development Plan anticipated for Spring 2014, it may be appropriate to revisit any particular information which comes to light after this (e.g. if landowners submit further information following publication of the SHLAA). It is only likely to be necessary to carry out a full re-survey of the sites either when there are changes to the policy context for the SHLAA or when there are significant changes necessary to keep the assessment fully updated.

4.0

## Conclusions and Recommendations

### Conclusions on Approach

4.1

NLP has reviewed the Environment Department's Draft SHLAA Methodology, and has discussed in depth the approach and practicalities of implementing the SHLAA. This report has sought to critically review the approach, identify areas where improvements could be made and highlight practical advice for undertaking the assessment. Overall, NLP considers the approach set out is robust and proportionate to developing the evidence necessary to underpin the Island Development Plan. The broad approach follows the best practice guidance developed under the English planning system, but has crucially been modified in certain areas to respond to the specific context of Guernsey as well as the practical information and resource constraints which the Environment Department will have to work within. The approach therefore represents a pragmatic approach, particularly as no SHLAA (or equivalent) has previously been produced for Guernsey.

### Recommendations

4.2

Although the overall approach is considered robust, there are a number of practical recommendations which NLP consider may usefully improve the process and outcomes of the SHLAA. These main recommendations are set out as follows:

- 1 Incorporate the SHLAA assessment criteria within a finalised methodology, to provide a reference point for what factors will specifically be captured by the assessment;
- 2 Where information on availability (e.g. ownership and site intentions) is not available or is insufficient to make a judgement, the Environment Department should consider whether land registry searches and/or further consultation with land owners may provide useful information;
- 3 Use discussions and consultation with local developers and agents to inform the assessment of achievability. This will provide useful contextual information on the markets ability to deliver development viably;
- 4 Consider the methodology for how broad areas of search will be practically identified and defined within the SHLAA;
- 5 Include evidence justifying the 20% windfall allowance as part of the final SHLAA report;
- 6 In implementing the SHLAA, a database and form of presentation should be developed and adopted that allows for appropriate monitoring and review in the future.

4.3

In implementing the SHLAA, the Environment Department should remain flexible, pragmatic and open to adjusting the approach to respond to any

specific issues or obstacles which may arise when undertaking the site assessments.



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