

Strategic Housing Land Availability Assessment (SHLAA) 2009

St Albans City and District Council is required to carry out a Strategic Housing Land Availability Assessment (SHLAA) as a key part of the evidence base for its Local Development Framework. This assessment provides a comprehensive review of potential housing sites across the District and will help the Council to make important decisions over the delivery of sufficient land for housing to meet the District's future needs. In particular, it will inform the preparation of the Council's Core Strategy, Site Allocations and Development Policies Development Plan Documents (DPDs).

Government guidance explains that, although the SHLAA is an important evidence source to inform plan making, **it does not**, in itself, determine whether a site should be allocated for housing development. Such decisions will therefore need to be taken by the Council as part of work on its Development Plan Documents (DPDs). The date at which this SHLAA was base-lined was 31st March 2009.

There have been significant changes in circumstances since 31.3.09, which will be reflected in the SHLAA 2010 update. The changes include:

the publication of and responses to the Emerging Core Strategy; an advisory visit to the Council by David Vickery of the Planning Inspectorate in November 2009; SADC Cabinet decisions, including that of 21st January, that "... existing Areas of Housing Search in the Green Belt be withdrawn from the current Local Development Framework Core Strategy Document"; data in regard to dwellings built and permissions granted from April 1st 2009 – 31st March 2010 and the latest information regarding individual sites, including additional deliverable and developable capacity gained through the District Vision work. **It should be emphasised again that the 2009 SHLAA is a "snapshot in time" at 31st March 2009 only.**

The draft SHLAA document was published on the Council's website for public consultation on 4th September 2009. Councillors, key stakeholders and all 23 respondents to the draft SHLAA Methodology were also made aware of its publication. There were 73 responses from Landowners/Agents, 5 from Organisations and 2 from individuals. This feedback and further information was taken into consideration prior to producing this final SHLAA.

For clarification, the term "suitable" is used throughout the SHLAA as being in accordance with the definitions used in PPS3 and in the SHLAA Guidance:

"A site is suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities".

This definition of "suitable" was helpfully expanded upon in the Planning Advisory Service document *Strategic Housing Land Availability Assessment - Frequently Asked Questions* at question 16:

"What does "suitable" mean in relation to deliverability/developability?"

The answer depends on context...Where there are a large number of possible sites, it may be of necessary to think in terms of sites being potentially suitable for housing, on the understanding that decisions about strategy may rule out sites in some locations in favour of others"

The considerations throughout this SHLAA have therefore taken the most appropriate interpretation, given the very large number of possible sites in this District. Suitability is therefore regarded as meaning "potentially suitable", with strategic decisions subsequently to be made as part of DPD creation, selecting some locations in favour of others.

Please note that, where sites are identified in this study, this does not necessarily mean that planning permission for residential development will be granted nor that they will be allocated for housing in future development plans. Conversely, the non-inclusion of a site does not necessarily mean it would not be considered for allocation in future plans or receive planning permission for residential development.

The 2010 SHLAA update will be able to be produced far more quickly than the 2009 document and should be published in summer 2010.

For clarity and to avoid double counting, individual sites within the parts of the district analysed as Areas Of Search have been included in the main SHLAA document only in the context of the Area Of Search within which they fall.

**ST ALBANS CITY AND DISTRICT
STRATEGIC HOUSING LAND AVAILABILITY
ASSESSMENT (SHLAA)**

Historic St Albans district, a premier community

SHLAA - 2009

(Base-line date 31st March 2009)

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Executive Summary

St Albans City and District Council is required to carry out a Strategic Housing Land Availability Assessment (SHLAA) as a key part of the evidence base for its Local Development Framework. This assessment provides a comprehensive review of potential housing sites across the District and will help the Council to make important decisions over the delivery of sufficient land for housing to meet the District's future needs. In particular, it will inform the preparation of the Council's Core Strategy, Site Allocations and Development Policies Development Plan Documents (DPDs).

Government guidance explains that, although the SHLAA is an important evidence source to inform plan making, **it does not**, in itself, determine whether a site should be allocated for housing development. Such decisions will therefore need to be taken by the Council as part of work on its Development Plan Documents (DPDs). The date at which this SHLAA was base-lined was 31st March 2009.

There have been significant changes in circumstances since 31.3.09, which will be reflected in the SHLAA 2010 update. The changes include: the publication of and responses to the Emerging Core Strategy; an advisory visit to the Council by David Vickery of the Planning Inspectorate in November 2009; SADC Cabinet decisions, including that of 21st January, that "... existing Areas of Housing Search in the Green Belt be withdrawn from the current Local Development Framework Core Strategy Document"; data in regard to dwellings built and permissions granted from April 1st 2009 – 31st March 2010 and the latest information regarding individual sites, including additional deliverable and developable capacity gained through the District Vision work. **It should be emphasised again that the 2009 SHLAA is a "snapshot in time" at 31st March 2009 only.**

The primary role of the SHLAA is to:

- identify sites with potential for housing development;
- assess the deliverability and developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed for housing. Sites should be placed into phasing periods (i.e. 5, 10 or 15 year housing supply); and
- assess the housing potential (i.e. housing capacity) on each identified site.

Policy H1 of the Regional Spatial Strategy (RSS) sets out the minimum dwelling provision (i.e. net increase) requirements per District between 2001 and 2021. For St Albans District, the figure is 7,200 dwellings and the RSS makes it clear that the figure is a minimum target to be achieved, rather than a ceiling which should not be exceeded. Provision must also be made for the delivery of an additional 1,800 dwellings between 2021 and 2026 (assuming that the Core Strategy DPD is adopted in 2011 and that the RSS requirement of 360 dwellings per annum is continued).

As of 31st March 2009, 2,903 dwellings had already been built (since 2001), with 398 built in 2008-9, at an average rate over the plan period from 2001-2009 of 363 dwellings per annum, above the minimum required rate of 360 dwellings per annum.

The capacity figures totalling 1,890 are based on delivery of housing on those sites where such development could be achieved within the scope of existing national, regional and local plan policy (i.e. without requiring any revisions to extant planning policies). This figure is significantly short of the 6,097 dwellings required to 2026. However, when additional categories of sites are included, such as those currently

contrary to policy but potentially suitable, i.e. all the potentially deliverable or developable sites are considered, the total capacity is 12,248 dwellings, well above the required level.

Whilst it is clear that more than sufficient deliverable or developable housing land can be found in the District to meet PPS3 and RSS requirements to 2026, it is also clear that not all of these options will be acceptable to the Council and will consequently not be identified as appropriate to provide for future housing growth. It is likely that a combination of approaches, using potential dwelling capacity from several of the different areas identified below as a comprehensive package, will present the most appropriate way of tackling the challenge of meeting the potential deficit in dwelling provision.

Introduction – The Purpose of the SHLAA

- i. St Albans City and District Council is required to carry out a Strategic Housing Land Availability Assessment (SHLAA) as a key part of the evidence base for its Local Development Framework. This assessment provides a comprehensive review of potential housing sites across the District and will help the Council to make important decisions over the delivery of sufficient land for housing to meet the District's future needs. In particular, it will inform the preparation of the Council's Core Strategy, Site Allocations and Development Policies Development Plan Documents (DPDs).
- ii. Central Government's Planning Policy Statement (PPS3) Housing (November 2006) seeks to ensure a more responsive approach to housing land supply at the local level.
- iii. In July 2007, Government produced good practice guidance to accompany PPS3, entitled Strategic Housing Land Availability Assessment, which provides helpful step-by-step guidance to local planning authorities on how to carry out such assessments, in order to identify land for housing and to assess the deliverability and developability of sites.
- iv. The primary role of the SHLAA is to:
 - identify sites with potential for housing development;
 - assess the deliverability and developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed for housing. Sites should be placed into phasing periods (i.e. 5, 10 or 15 year housing supply); and
 - assess the housing potential (i.e. housing capacity) on each identified site.
- v. Government guidance explains that, although the SHLAA is an important evidence source to inform plan making, it does not, in itself, determine whether a site should be allocated for housing development. Such decisions will therefore need to be taken by the Council as part of work on its Development Plan Documents (DPDs).
- vi. The SHLAA differs from Urban Capacity Studies, which local planning authorities were required to carry out as part of the old Local Plan process. The key difference is that additional sites with potential for housing which did not need to be investigated in Urban Capacity Studies must now be identified. These include: rural settlements; brownfield sites outside settlement boundaries and suitable greenfield sites, as well as broad locations (where necessary). Furthermore, Government guidance requires much stronger emphasis to be placed on the collection of sufficient information to assess the deliverability and developability of specific sites.

Meeting Future Housing Needs in St Albans District

The East of England Plan

- vii. The regional context for housing delivery is Regional Spatial Strategy (RSS), also known as the 'East of England Plan', which was adopted in May 2008.
- viii. Policy H1 of the RSS sets out the minimum dwelling provision (i.e. net increase) requirements per District between 2001 and 2021. For St Albans District, the figure is 7,200 dwellings and the RSS makes it clear that the figure is a minimum target to be achieved, rather than a ceiling which should not be exceeded. Indeed paragraph 5.5 of the RSS reinforces the view that the housing allocations should be regarded as

minimum targets, given that the total requirement for the region falls significantly short of what is needed based on evidence regarding housing pressure, affordability and household projections. In addition to the 2001 - 2021 housing requirement, Policy H1 also requires local planning authorities to plan for the delivery of housing for at least 15 years from the date of adoption of the relevant DPD. In doing so, the policy says that authorities should assume that the average rate of provision after 2021 will be the same as the rates in this Policy H1 for 2006-2021 or 2001-2021, whichever is the higher. For this District, it means that provision must be made for the delivery of an additional 1800 dwellings between 2021 and 2026 (assuming that the Core Strategy DPD is adopted in 2011 and that the RSS requirement of 360 dwellings per annum is continued).

- ix. Following the judgement of the High Court in May 2009, Policies including LA2 and LA3 of the East of England Plan (expansion of Hemel Hempstead into the Green Belt, including land in St Albans District) and (expansion of Hatfield into the Green Belt, including possible use of land in St Albans District) have been remitted back to the Secretary of State for Communities and Local Government. Accordingly this document does not refer to or consider these matters.
- x. As of 31st March 2009, 2,903 dwellings had already been built, with 398 built in 2008-9, at an average rate over the plan period from 2001-2009 of 363 dwellings per annum, above the minimum required rate of 360 dwellings per annum.

The Local Policy Context

- xi. The District Local Plan Review was adopted in 1994. Some of its policies have since been superseded by more recent Government planning guidance. Nevertheless, in September 2007, the Secretary of State agreed that the majority of the Council's adopted local plan policies could continue to be used (i.e. 'saved') until such time as they were superseded by new policies in the Development Plan Documents that the Council has now begun to prepare. This list of 'saved' policies includes Policy 4 (New Housing in Towns) and Policy 5 (New Housing Development in Specified Settlements). Both of these policies include housing allocations, a small number of which have not yet been implemented/fully implemented.
- xii. It is currently envisaged that the Core Strategy DPD for St Albans District will be adopted in 2011. It must ensure that there is a sufficient supply of housing land to 2021 to meet the District's housing requirement of 7,200 dwellings, together with the additional 1800 dwellings between 2021 and 2026, as set out in the RSS.
- xiii. There have been significant changes in circumstances since 31.3.09, which will be reflected in the SHLAA 2010 update. The changes include:
the publication of and responses to the Emerging Core Strategy; an advisory visit to the Council by David Vickery of the Planning Inspectorate in November 2009; SADC Cabinet decisions, including that of 21st January, that "... existing Areas of Housing Search in the Green Belt be withdrawn from the current Local Development Framework Core Strategy Document"; data in regard to dwellings built and permissions granted from April 1st 2009 – 31st March 2010 and the latest information regarding individual sites, including additional deliverable and developable capacity gained through the District Vision work. **It should be emphasised again that the 2009 SHLAA is a "snapshot in time" at 31st March 2009 only.**

PART 1: ADOPTED METHODOLOGY

- 1.1 In early 2008, the District Council produced a draft methodology statement, which set out its intended approach to carrying out the SHLAA. The methodology was drafted in line with Central Government's good practice guidance and also took on board the advice provided in the Planning Advisory Service document *Strategic Housing Land Availability Assessment - Frequently Asked Questions* (Jan 2008).
- 1.2 The draft methodology statement was published for consultation during February 2008. Copies of the draft were sent to interested parties seeking their comments. These parties included statutory consultees; local developers/ housebuilders/ landowners; registered social landlords; education and healthcare establishments; major national and regional housebuilders/ developers; and those who had previously identified potential housing sites to the District Council. Letters were also sent to agents who had submitted recent planning applications for housing development and members of the established Agents' Forum. The draft document was available to view on the Council's website.
- 1.3 The Council also sent a site identification form to the above stakeholders and this was available to download from the Council's website (see Appendix 1). A covering letter explained the purpose of the SHLAA and invited stakeholders to identify any sites that may become available in the period to 2026 and which may have the potential for housing development, by filling in a site identification form.
- 1.4 The Council received 23 responses to the draft methodology document, which was subsequently amended in light of the comments received. A summary table of all the comments from stakeholders, together with the Council's response to each can be found at Appendix 2. The adopted SHLAA methodology statement is Appendix 3. The clarifications and explanations contained within the later Planning Advisory Service document *Strategic Housing Land Availability Assessment and Development Plan Document Preparation* (July 2008) were also taken into account at various stages in the process.

A Partnership Approach

- 1.5 Work on the SHLAA was carried out by officers from the Council; primarily the Planning Policy team, although help was also sought from Officers in the Council's Estates, Conservation & Design, Landscape, Housing and Development Control departments and others, at specific stages in the project.
- 1.6 Government guidance expects SHLAAs to be carried out in consultation and with full involvement from key stakeholders and local communities. The District Council recognised the benefits of working in partnership with others on its SHLAA and received a positive response from stakeholders who were keen to have further involvement in its SHLAA process.
- 1.7 The Council contacted all interested parties (together with the Environment Agency, Hertfordshire Highways and Hertfordshire County Council) to seek their views on best practice with regard to carrying out SHLAAs. Comments were also sought on drafts of the two assessment forms for Urban and Green Belt sites (see paragraphs 1.18 to 1.20 for further details).
- 1.8 All stakeholders were asked whether they would like to participate in a SHLAA Panel. Of the 48 individuals/organisations that expressed an interest, the Council sent invitation

letters to a selection of people who it felt would be able to give a broad perspective on all aspects of the SHLAA.

- 1.9 The chosen Panel comprised representatives from: Hightown Praetorian & Churches Housing Association; the Council for the Protection of Rural England; the Home Builders Federation; a local planning consultant/agent (Shire Consulting) and the District Council's Housing, Estates, Development Control, Conservation & Design and Landscape teams. The Terms of Reference for the Panel can be found at Appendix 4.
- 1.10 The primary purpose of the Panel was to discuss all the sites that had been put forward for consideration as part of the SHLAA and to guide the Council's decisions on shortlisting those sites which are considered 'potentially suitable' for housing development and worthy of further consideration. Paragraphs 1.25 to 1.26 of this document provide more details regarding the shortlisting process.
- 1.11 The draft SHLAA document was published on 4th September 2009 on the Council's website, for public consultation. Key stakeholders and all 23 respondents to the draft Methodology were also contacted directly to ask for their opinions. There were 73 responses from Landowners/Agents, 5 from Organisations and 2 from individuals. This feedback was taken into consideration prior to producing the final SHLAA.

Scope of the Assessment

- 1.12 For this SHLAA, the Council has chosen the District's administrative boundary as the extent of its study area. The six local authorities in west and central Hertfordshire are working together in the preparation of a Strategic Housing Market Assessment (consultants have been appointed on a collective basis to carry out work and will report on a sub-regional and district by district basis). In theory, it would have been logical to carry out the SHLAAs on the same sub-regional basis. However, in practice, undertaking a joint study was not possible, primarily because each authority was at a different stage of Core Strategy production and all of the other authorities in the sub-regional housing market area had already commenced their SHLAAs.
- 1.13 The Council considered that the SHLAA covering St Albans City and District needed to be as comprehensive as possible (i.e. it needed to identify as many sites with housing potential in and around as many settlements as possible within the defined study area) because:
 - Housing provision targets in the study area are challenging;
 - Housing market conditions have signalled worsening affordability; and
 - A significant proportion of housing is expected to be delivered on small sites.
- 1.14 As already mentioned, the SHLAA needed to go beyond assessing just urban capacity and also included the assessment of housing potential in rural settlements; on brownfield sites within the Green Belt; and on suitable greenfield sites (both in the urban area and within the Green Belt).
- 1.15 The SHLAA methodology document for St Albans City and District was drawn up in consultation with Officers from Dacorum and Welwyn Hatfield Councils, to ensure a consistent approach had been adopted.

Sources of Sites with Potential for Housing to be Included in the Assessment

- 1.16 The list below indicates the sources of sites with potential for housing that are covered by this SHLAA *[NB: It is slightly different to that set out in the methodology statement, as it was considered clearer to include a separate category for ‘Sites in the Green Belt which are wholly or mainly Previously Developed Land (and net area primarily covered by built development)']*.

Previously Developed Sites (in settlements excluded from the Green Belt)

- a) Land already used for housing (to include redevelopment of residential sites; building on garden land; remodelling of existing housing estates)
- b) Employment sites (i.e. land or buildings in or previously used for employment purposes within the B1, B2 and B8 use classes)
- c) Other commercial uses (e.g. car showrooms, public houses, cinemas etc)
- d) Garage courts
- e) Education sites (including schools, colleges, university sites)
- f) Healthcare sites (including existing and former hospitals, GP surgeries)
- g) Vacant/disused land and buildings (i.e. previously developed sites which have been vacant for a considerable period of time)
- h) Other urban uses (i.e. sites not included under any other category e.g. railway land, fire stations etc)

Greenfield Sites within settlements excluded from the Green Belt

- i) Open space (public and private sites)
- j) Unused land (i.e. greenfield sites with no identified purpose)
- k) Agricultural land (excluded from the Green Belt)

Sites within the Green Belt

- l) Rural Exception Sites
- m) Sites in the Green Belt which are wholly or mainly Previously Developed Land (and net area primarily covered by built development)
- n) Green Belt Sites wholly or mainly green and open (sites predominantly consisting of non-built form)

Identifying Sites with Potential for Housing

- 1.17 Paragraphs 7.16 to 7.22 of the methodology statement provide a detailed explanation of the Council's approach to identifying sites with potential for housing across the District. This can be summarised below:

- a) Collecting information on sites already in the planning process:

- Sites with unimplemented/outstanding planning permission for housing;
 - Sites covered by Council planning briefs (where schemes include residential development);
 - Sites with planning permission for housing, currently under construction.
- b) Carrying out a review of the housing and non-housing allocations covered by policies in the District Local Plan Review (1994).
- c) Collecting information on sites currently in the planning process, but without planning permission for housing:
- Sites where planning permission for housing had been refused or planning appeals dismissed, but where the principle of housing development had been accepted;
 - Sites where planning applications for residential development are currently pending a decision.
- d) Identifying new sites (i.e. those not currently in the planning process. This includes sites where pre-application discussions have occurred and also those where a previous application has been withdrawn)

Assessing when and whether sites are likely to be developed

Stage 1 - Assessing the Suitability of New Sites:

- 1.18 All sites (other than those with extant planning permission) were categorised as either:
- Urban or
 - Green Belt
 - Areas Of Search 1-8 (Broad Locations)
- 1.19 Separate assessment forms were developed for each (see Appendix 5) and were used to collect information such as: details of landowner, area in hectares (ha), current and surrounding land uses, overall character of the site, access and planning history. The forms also included standard criteria, against which the Council was able to assess the *suitability* of a particular site for housing. These detailed criteria were split under the following two headings for the first two categories:
- Physical constraints (e.g. poor access; area of flood risk; Sites of Special Scientific Interest (SSSI); Site of Archaeological Importance; Local Nature Reserve; Public Right of Way; Historic Park or Garden; Ancient Woodland etc.)
 - Policy constraints (e.g. designated employment area; site with social or community value etc). As noted by some respondents to the draft SHLAA, some of the constraint sub-categories could arguably have been placed in the other category – e.g. Conservation Area is essentially a Policy, rather than a Physical constraint. However, the assessment itself has not been affected, so the locations of the sub-categories have been left unchanged at present.
- 1.20 For Green Belt sites, specific criteria were also included in relation to the purposes of including land in the Green Belt, as set out in PPG2 (i.e. whether development would result in unrestricted sprawl of large built-up areas; would result in neighbouring towns

merging into one another; would encroach into the countryside; would harm the setting and special character of historic towns; or would assist in urban regeneration by encouraging the recycling of derelict and other urban land).

1.21 Following guidance laid out in paragraph 26 of the Planning Advisory Service document *Strategic Housing Land Availability Assessment and Development Plan Document Preparation* (July 2008), it was known at the outset of the exercise that broad locations might be needed to meet housing targets over the longer term. Therefore, potential broad locations were identified and assessed alongside the Urban and Green Belt sites; these are Areas Of Search 1-8. The reasons why these broad locations were considered are laid out in Appendix 11, as are the individual assessments for the eight Areas Of Search. The differing potential scale of development and hence scale of positive and negative impacts of such large potential sites necessitated the different form of assessment from that undertaken for other non-strategic Green Belt sites.

1.22 For clarification, the term “suitable” is used throughout this document as being in accordance with the definitions used in PPS3 and in the SHLAA Guidance:

“A site is suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities”.

This definition of “suitable” was helpfully expanded upon in the Planning Advisory Service document *Strategic Housing Land Availability Assessment - Frequently Asked Questions* at question 16:

“What does “suitable” mean in relation to deliverability/developability?”

The answer depends on context...Where there are a large number of possible sites, it may be of necessary to think in terms of sites being potentially suitable for housing, on the understanding that decisions about strategy may rule out sites in some locations in favour of others”

The considerations throughout this SHLAA have therefore taken the most appropriate interpretation, given the very large number of possible sites in this District. Suitability is therefore regarded as meaning “potentially suitable”, with strategic decisions subsequently to be made as part of DPD creation, selecting some locations in favour of others.

1.23 Whilst the Council’s sustainability consultants have not been involved specifically in the production of the SHLAA, the criteria for assessing the suitability of sites for housing development are consistent with the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) assessment framework that has already been established for St Albans District.

1.24 Maps for each identified site (except Council owned garage courts), arranged by settlement, can be found in Appendix 6.

1.25 Once a ‘long list’ of sites had been drawn up and an initial assessment of the physical and policy constraints of each site had been undertaken, the Council came to provisional conclusions as to whether each site was ‘suitable’ (i.e. potentially suitable) for residential development and should be given further detailed consideration as a potential housing site. The Council then held two shortlisting sessions with the SHLAA Panel. The purpose of these sessions was to go through the ‘long list’ of over 300 sites

and to take account of and discuss the diverse range of different perspectives as to whether each site should be given further consideration, based on its suitability for housing development. Where the Panel agreed that a site should be provisionally removed from the list of possible housing sites, the reasons for not taking it forward were clearly recorded. Minutes of the two Panel sessions can be found at Appendix 7.

- 1.26 A very small number of additional sites have also come forward since the panel meetings, including late SHLAA submissions and recent planning refusals, which have also been included. Some of these late submitted sites have not been given a full assessment as they are considered clearly inappropriate and in terms of the SHLAA Guidance are “non-runners”, whereby it is a waste of valuable resource to extensively investigate such sites. These “non-runner” sites are listed in Appendix 15. Further discussions were then held to finalise the lists of sites to be rejected and shortlisted.

Stage 2 - Assessing Availability for housing:

- 1.27 The ‘availability’ of each shortlisted site was assessed, using information collected from the site identification forms or by contacting the landowner, developer or agent directly. This involved investigations to determine whether a site was controlled by a housing developer who had expressed an intention to develop, or whether the landowner had expressed an intention to sell. Other factors affecting availability included: multiple ownerships, ransom strips, tenancies or operational requirements of landowners.

Stage 3 - Assessing Achievability for Housing:

- 1.28 Work was also undertaken to assess whether each site was considered ‘achievable’ for development (i.e. whether there is a reasonable prospect that housing will be developed on the site at a particular point in time).
- 1.29 Judgements were taken as to whether housing development was likely to be economically viable on each site, taking into account any extraordinary development costs that may be incurred (e.g. if a site is heavily contaminated, would require demolition of existing buildings etc), the attractiveness of the locality to developers, adjacent land uses and levels of potential market demand. In general, clear evidence over a long period of time was that demand for housing land (despite the recent downturn in the housing market) was still high in this District and that standard development costs for the average site, even making allowances for Section 106 contributions, were unlikely to render a housing scheme unviable over a reasonable period of time.
- 1.30 Whilst there are various toolkits available for assessing development viability, it was decided that using such a toolkit for assessing individual sites would not be appropriate for the SHLAA. This was primarily because toolkits are better suited to the assessment of current development schemes, where ‘real’ information (e.g. costs, number of dwellings etc) can be used to fill out all the necessary fields in the template. For the SHLAA, many of the identified sites have no previous planning history and therefore it would not be possible for accurate financial information to be obtained. Perhaps more importantly, toolkits are most useful when an immediate assessment of site viability is needed. Given that the SHLAA looks to 2026 and that some sites are not anticipated to come forward until, say, 2015, any viability assessment based on today’s house prices, development costs etc would be out of date almost immediately.
- 1.31 For sites with a predicted yield of 5 or more dwellings (both newly identified and those already in the planning process or with full or outline permission), attempts were made

to contact the relevant developer/agents to discuss anticipated phasing of development, together with likely start and completion dates and whether there were any anticipated site constraints that could affect the timing and phasing of development. Responses were received for approximately two-thirds of sites.

- 1.32 Long-standing experience in St Albans shows clearly that not all small sites (including conversions and changes of use) with full planning permission for residential development will be implemented and it is therefore considered appropriate to apply a percentage discount to the total capacity figure for these sites, so that capacity is not over-estimated.
- 1.33 For small sites with full planning permission leading to a net gain of 4 or fewer dwellings, a percentage discount of 15% has been applied. This is consistent with the discount applied to small sites for monitoring purposes, as described in the Housing Monitoring Report, April 2009.
- 1.34 For small sites (again including conversions and changes of use) with outline planning permission, a percentage discount of 30% has been applied (again consistent with the Council's existing monitoring arrangements).
- 1.35 Part II of the SHLAA includes an investigation of likely capacity on sites where planning permission has been refused, but where prospective residential development is likely to be in accordance with existing policy. Not all of these sites will receive planning permission (although the SHLAA only looks at those with a reasonable prospect of being approved after resubmission and capacity estimates are based on discussions with development control officers as to what might realistically be achieved on each site) and, of those approved, not all will be implemented.
- 1.36 Consequently, a percentage discount of 30% has been applied to the total capacity on both small and large sites, whilst, again, attempts have been made to ascertain the timings and prospects of development actually taking place on sites with a net gain of 5 or more dwellings.
- 1.37 A further percentage discount has been applied to the overall capacity on sites where a planning application for residential development was pending at 31st March 2009. For both small and large sites a discount of 60% has been applied. This is because it was anticipated that there would be a relatively high number of proposals on sites which would never be acceptable for housing development (either in principle or of a scale/design that would meet the aspirations of the applicant). Furthermore, there may also be a few schemes which are approved, but never implemented.

Estimating the housing potential of each site

- 1.38 Work was carried out to estimate the likely housing capacity of all shortlisted/suitable in principle sites. There is no specific 'saved' local plan policy on housing density and the Council has only reached a relatively early stage of DPD preparation and could not, therefore, assess capacity of sites against any emerging plan policy. Consequently, in order to calculate housing potential for the SHLAA, account was taken of recent Government guidance in PPS3 on densities.
- 1.39 Capacity estimates were calculated on an individual basis for:
 - sites with planning histories (giving a strong indication of likely capacity);
 - sites with unusual characteristics;

- sites with submitted design schemes that seem likely to be developed; and
- very small sites.

1.40 As a starting point for estimating the capacity of the remaining sites, the following base density multipliers were used:

Base density multipliers used to estimate site capacity
(Net dwellings per hectare - dph)
35 dph – standard density multiplier applied to most greenfield sites, sites of previously developed land in the Green Belt and sites in suburban or village locations. Assumed to be developed with predominantly medium density family housing, two or three storeys high.
55 dph – applied to most previously developed land in locations where there is already considerable built development and a high likelihood of small apartment blocks or relatively dense terraced townhouse developments.
80-100 dph – applied to specific sites where there is a substantial likelihood of three or four storey apartment blocks, and likely to be underground or undercroft parking (which constitute relatively large apartment blocks by the standards of the District).

- 1.41 A review was carried out of new and recently permitted housing development schemes, with sample schemes selected in order to demonstrate the capacity of different sized sites in different locations (or 'zones') across the District (see table at Appendix 8).
- 1.42 Comparison with the sample schemes was then undertaken in order to assess whether it was appropriate to make any adjustments to the above base density multipliers, taking account of the most likely densities and mix of uses in particular settlements or for particular types of site (e.g. City Centre, sites close to good public transport links, rural sites etc). Using real schemes for comparative purposes allowed for a more accurate interpretation of what could reasonably be achieved on particular sites. For all sites, consideration was also given to the local market conditions, which helped to provide guidance on appropriate housing mixes.
- 1.43 All capacity estimates were further adjusted to take into account any site characteristics or known physical constraints, together with any relevant planning history, the shape of the site, adjacent uses and developer intentions (where expressed). For most sites (i.e. the smaller, urban sites) gross and net density estimates were, in practice, the same. However, for some larger sites (particularly the Areas of Search discussed in paragraphs 3.17 to 3.20), gross density estimates needed to be discounted, as net dwelling capacity was calculated by including only those parts of a site which were likely to be developed for housing and directly associated uses. Consideration was also given to whether any land would need to be set aside for any necessary infrastructure to support the development.
- 1.44 For those sites promoted by landowners or developers, the dwelling densities and totals suggested by their consultants or agents were taken into account when determining likely capacity. However, for consistency, final estimates were all based on the Council's own calculations.

- 1.45 It should be emphasised that suggested capacities are not based on detailed designs for each site, so a capacity stated within the SHLAA cannot be assumed as acceptable for the purpose of development control decisions and will not prejudice any future decision that the Council may make regarding any site.

Determining whether a site is deliverable, developable or not currently developable for housing

- 1.46 Collecting information on ‘suitability’, ‘availability’ and ‘achievability’ of a site has enabled a judgement to be made as to whether a site could be considered deliverable, developable or not currently developable for housing development. Central Government advises that to be considered:

Deliverable – a site should be available now and offer a suitable location for housing and a reasonable prospect that housing will be delivered on the site within five years from the date of adoption of the Core Strategy DPD (i.e. from 2011 to 2016). As there is a two year gap between 2009 and 2011, when the Core Strategy is expected to be adopted, housing potential is also considered on the basis of whether or not it is ‘deliverable’ during this period of time as well (from 2009-2011).

Developable – a site should be in a suitable location for housing development, with a reasonable prospect that it will be available for and could be developed at a specific point in time i.e. within years 6-10 (2016 to 2021) or years 11-15 (2021 to 2026).

- 1.47 Part 2 of this document sets out the SHLAA findings and includes schedules of all the shortlisted/potentially suitable sites, indicating their estimated capacity and whether the sites are considered ‘deliverable’ or ‘developable’. Where site constraints have been identified (e.g. in terms of a site’s current availability), consideration has been given to what action would be needed to remove these constraints. If sufficient uncertainties or issues still remain, the site has been classified as: potentially suitable but ***‘not currently developable’***.
- 1.48 Our assessment of deliverability and developability has been undertaken for all sites considered ‘suitable’ for residential development, irrespective of the level of housing provision actually needed over the plan period.

PART 2 - FINDINGS OF THE SHLAA

Sites With Planning Permission (unimplemented/outstanding or under construction)

- 2.1 Appendix 9 contains a full schedule of all sites with full or outline planning permission for residential development up to 31st March 2009, which are currently unimplemented or under construction. It includes information on the dwelling capacity for each site and when development is likely to be completed.
- 2.2 The following table provides a summary of overall capacity on these sites:

	Dwelling capacity (net)	No. of dwellings deliverable 2009 - 2011	No. of dwellings deliverable 2011 - 2016	No. of dwellings developable 2016 - 2021	No. of dwellings developable 2021 - 2026
Total capacity after discount * to allow for sites that may never be implemented	1545	595	920	15	15

* Discount rates explained at 1.31 – 1.37

Sites Currently In The Planning Process, Without Planning Permission For Housing

Housing Allocations In The District Local Plan Review 1994

Deliverable or developable	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
155 (Part RW.2)	Southern part of Murphy's Chemicals Site, Codicote Road, Wheathampstead	0.83	18	0	18	0	0
207 (Part RS.18)	1 Camlet Way, St Albans	0.14	2	0	2	0	0
Total deliverable or developable			20	0	20	0	0

<u>Not currently developable</u>	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
229 (RS.13)	East Block Garages (private), Area B, off Wycombe Way, Marshalswick	0.29	9	0	0	0	0
227 (RS.46)	Jewsons Depot, Cape Road, St Albans	0.44	20	0	0	0	0
280 (RS.57)	139 London Road, St Albans	0.27	10	0	0	0	0
231	147 London Road, St Albans	0.21	12	0	0	0	0

(RS.56)							
260 (Policy 122 Site 8D)	222 London Road St Albans (former British Shipbuilders)	0.66	22	0	0	0	0
297 (Part RH.16)	Electrical showroom & adjoining building, eastern end of Amenbury Lane (opposite Leyton Green), Harpenden	0.05	4	0	0	0	0
Total NOT currently developable			77				

2.3 Appendix 10 contains a review of the housing allocations in the District Local Plan Review (November 1994). Of these allocations, the vast majority had already been completed or were no longer considered likely for residential development.

Non-Housing Allocations (or sites that were covered by specific Local Plan policies, other than Employment sites)

Not currently developable							
SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
264	West of St Peter's Street, St Albans	No specific site area (see 2.4 below)	60	0	0	0	0
275	10-28 Catherine Street (including Coupers garage) and land to rear, St Albans	0.8 (0.5 net)	30	0	0	0	0
83	St Albans Abbey Station site, Holywell Hill, St Albans	0.95	40	0	0	0	0
Total NOT currently developable			130				

2.4 There was no single Local Plan allocation for SHLAA site 264 'West of St Peter's Street' but several sites which form part of the wider area identified in the SHLAA were allocated for different uses (e.g. Drovers Way – rear of 61-67 St Peter's Street for shopping, service or B1 uses at ground floor with B1 use above; Drovers Way – rear of 25-47 St Peter's Street for shopping use; Drovers Way – rear of 61-77 St Peter's Street for shopping or service uses). The area considered includes, but potentially goes well beyond, these specific site allocations.

2.5 Similarly for SHLAA site 275, Local Plan allocations comprised: 10-28 Catherine Street for shopping or service uses at ground floor with B1 use above; and North of Catherine Street for a new public car park).

2.6 Without any emerging schemes to assess, it has proved difficult to estimate likely capacity for Sites 264, 275 and 83. However, it is clear that each of these sites, if comprehensively redeveloped, could accommodate a significant amount of residential development, in what would be sustainable and accessible urban locations. The capacity estimates in the above table have been calculated very

broadly, taking account of site opportunities and constraints, together with any intelligence regarding past schemes, recent discussions with landowners etc.

- 2.7 Notwithstanding the above, the Council's current City Vision project (which will include an element of masterplanning) may shed some light on what might be achievable within and on the edge of St Albans City Centre (e.g. on sites such as 'West of St Peter's Street'). Overall possible capacity on these sites could be significant and requires careful review, as the project progresses.

Sites Covered by Planning Briefs (including residential development)

- 2.8 None were identified, except submitted sites that are now substantially different in nature than when the relevant planning brief was prepared. These sites have been mapped and SHLAA assessments were carried out in their current guise, e.g. the Building Research Establishment, Bricket Wood, Site 153 and the Former Ariston Works, Harpenden Road, St Albans, Site 259.

Sites Where Planning Permission Has Previously Been Refused

Deliverable or developable SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
249	Private garage block, Linden Court, off Milton Road, Harpenden	0.06	2	0	2	0	0
204	10-11 Carlton Road, Harpenden	0.13	6	0	6	0	0
205	Land to r/o 17 & 19 Wood End Road, Harpenden	0.34	5	0	5	0	0
324	95 Coleswood Road, Harpenden	0.04	1	0	1	0	0
235	72 High Street, London Colney	0.15	6	0	6	0	0
241	The Swan Public House, 42 Park Street	0.12	6	0	6	0	0
211	Rear of 136 & 138 St Albans Road, St Albans	0.40	12	0	12	0	0
215	96 Victoria Street, St Albans	0.06	10	5	5	0	0
274	2 Cunningham Hill Road, St Albans	0.25	12	0	12	0	0
216	282 Hatfield Road, St Albans	0.07	7	3	4	0	0
326	59a Albert Street, St Albans	0.14	3	0	3	0	0
327	Land r/o 7 Battlefield Road, St Albans	0.07	3	0	3	0	0
328	r/o 55-63 Catherine Street, St Albans	0.02	2	0	2	0	0

Total capacity			81	11	70	0	0
Total deliverable or developable*			57	8	49	0	0

Not currently developable							
214	Clockhouse Court, 5-7 London Road, St Albans	0.06	12	0	0	0	0
238	105 St Anne's Road, London Colney	0.06	2	0	0	0	0
Total NOT currently developable			14				

* (after discount to allow for sites that may not be approved or implemented). Discount rates explained at 1.31 – 1.37

Potentially Suitable Sites Pending Decision On Current Application (As Of 31 March 2009)

(NB: These sites have not been mapped and do not have SHLAA reference numbers, as they were live applications at 31st March 2009.

Deliverable or developable SHLAA Ref	Site Address	Application Ref	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
	Oaklands College, Smallford Campus, Hatfield Road, St Albans	5/08/0620 (minded to approve, but subject to Secretary of State call-in inquiry)	0	62	0	0
	Former Oaklands College, Highfield Campus, St Albans	5/08/0801 (minded to approve, but subject to Secretary of State call-in inquiry) also 5/08/2429	0	38 (or 34)	0	0
	Youth & Community Office, Alma Road, St Albans	5/08/0750	0	12	0	0
	11 London Road, St Albans	5/2008/2492	0	6	0	0
	220 Watford Road, Chiswell Green	5/2009/0160	0	1	0	0
	30 Roundwood Park, Harpenden	5/2009/0056	0	1	0	0
	Land to the rear of 95 Sandpit Lane, St Albans	5/2009/0215	0	1	0	0
	Land r/o 178 Park Street Lane, Park Street	5/2009/0140	0	1	0	0
	Napsbury Church, Goldring Way, London Colney	5/2008/2813	0	4 (net, above existing permission)	0	0

	Land adj 3 Garrard Way, Wheathampstead	5/2008/2442	0	1	0	0
	Land adj 27 Rothamsted Avenue, Harpenden	5/2009/0291	0	1	0	0
	36 Verulam Road, St Albans	5/2009/0312	0	1	0	0
	Capps Lodge, House Lane, Sandridge	5/2009/0565	0	1	0	0
Total Capacity		129	0	129	0	0
Total deliverable or developable*		52	0	52	0	0

* After discount to allow for sites that will may not be approved or implemented. Discount rates explained at 1.31 – 1.37

Newly Identified Sites

Previously Developed Sites (by category)

Land Already In Residential Use							
Deliverable or developable							
SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (Net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
170	Moat Cottage, Off High Street, Wheathampstead	0.07	2	0	2	0	0
70	Land between 132 & 142 Fishpool Street, St Albans	0.14	2	0	2	0	0
258	James Marshall House, Leyton Road, Harpenden	0.38	14	0	14	0	0
202	Land r/o 39-43 Crabtree Lane, Harpenden	0.48	12	0	12	0	0
Total deliverable or developable			30	0	30	0	
Not currently developable							
147	Rear of 37 and 39 Hilltop, Redbourn	0.09	2	0	0	0	0
65	Land at Luton Road/Farm Avenue, Harpenden	0.46	18	0	0	0	0
71a	Land r/o 1-43 Francis Avenue & 2 to 54 Batchwood Drive, St Albans	0.78 (0.6 net)	20	0	0	0	0
71b	Land r/o 45 to 83 Francis Avenue and 56 to 96 Batchwood Drive, St Albans	1.47 (1.0 net)	25	0	0	0	0
71c	Land to r/o 38 to 72 Francis Avenue and fronting Repton Green & Birchmead Close, St Albans	0.4 (0.3 net)	8	0	0	0	0

75	18 Langley Crescent & gardens r/o 2-16 Langley Crescent, St Albans	0.34 (0.25 net)	6	0	0	0	0
276	Land r/o 29 to 43 White Horse Lane, London Colney	0.5	12	0	0	0	0
224	270 London Road, St Albans	0.19	6	0	0	0	0
225	272 London Road, St Albans	0.31	10	0	0	0	0
Total NOT currently developable			107				0

- 2.09 In November and December 2008, the Council Cabinet received a report that highlighted the need to improve the range and flexibility of the accommodation and care that the Council could offer the elderly in the St Albans District. As part of the Council's review of sheltered housing provision, Cabinet agreed there was an over-provision of such accommodation locally and that some schemes were no longer needed in their present form as sheltered housing.
- 2.10 The redevelopment programme is expected to take place between 2010 and 2014. Despite the scope for redevelopment on some sites, it is likely that there will be no net gain (and more likely a small net loss) in net dwelling provision on these sites. As discussions progress with developers/Housing Associations with regard to the form in which these redevelopments will take, it will become clearer whether any further dwelling capacity can be identified or indeed if any net loss needs to be taken account of. Any such capacity/loss will be included as part of the SHLAA annual update.
- 2.11 In 2008, the Council agreed that the SHLAA should not investigate housing potential of any sites that would require the demolition of one or more Council houses or development of garden land belonging to Council properties. Members did, however, agree that it might be appropriate to reconsider the possibility of redeveloping any identified areas of defective Council housing stock as part of future SHLAA reviews.

Land in Employment Use (Allocated Employment Sites)

Deliverable or developable SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
54	Batford Mill Industrial Estate, Lower Luton Road, Harpenden (EMP 2)	0.95	45	0	45	0	0
69	Southdown Industrial Estate, Harpenden (EMP 3)	2.38	95	0	50	45	0
145	T W Russell site, Guildford Road, St Albans (Part of EMP 12)	0.17	10	0	10	0	0
226	Apex House, 81 Camp Road (former Mascoprint site), St Albans (Part of EMP 14)	0.16	22	0	22	0	0
80	Sphere Industrial Estate, Campfield Road, St Albans (Part of EMP 14)	1.36	120	0	60	60	0
34	Wellington Road, London Colney (Part of EMP16)	0.79	40	0	20	20	0

165	63 High Street, Harpenden (Policy 128 – B1 uses)	0.21	8	0	8	0	0
332	Land at Cherry Tree Lane, near Hemel Hempstead (Policy 26 – Land for Employment Development at North East Hemel Hempstead)	5.4 (4.0 net)	120	0	60	60	0
Total deliverable or developable			460	0	275	185	

Not currently developable							
281	Ziggurat Car Park, Grosvenor/ London Road, St Albans (Policy 122)	0.44 (0.2 net)	12	0	0	0	0
310	Hertfordshire Business Centre, Alexandra Road, London Colney (EMP 17)	0.91	45	0	0	0	0
256	Employment Area EMP9 (northern part), St Albans Road, St Albans	2.4 (2.0 net)	100	0	0	0	0
323	Commercial Garage Court, Adelaide Street, St Albans (Policy 115 – Allocated for B1 uses)	0.05	6	0	0	0	0
Total NOT currently developable			163				

Land in Employment Use (Unallocated Employment Sites)

Deliverable or developable	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
58b	Builders' Yard, Westfield Road, Harpenden	0.46	15	0	15	0	0
85	Beaumont Works, Sutton Road, St Albans	0.56 (0.25 net)	10	0	10	0	0
300	James Marshall Commercial Centre, Leyton Road/ Amenbury Lane, Harpenden	0.3	16	0	0	16	0
Total deliverable or developable			41	0	25	16	

Not currently developable							
250	Former Eversheds printing works and associated land, Alma Road and London Road, St Albans	1.84 (1.5 net) See para 2.14 below	100	0	0	0	0
298	Pan Autos and adjacent uses, Dark Lane/Grove Road, Harpenden	0.35	12	0	0	0	0
299	Jewsons, Dark Lane, Harpenden	0.34	18	0	0	0	0
330	104 High Street, London Colney	0.25	10	0	0	0	0
315	84 Park Street, Park Street	0.22	12	0	0	0	0
317	John Hill & Son, 28-32 Fish Street, Redbourn	0.11	6	0	0	0	0

Total NOT currently developable			158				0
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- 2.12 Site 250 (Former Eversheds Printing Works and associated land) was the application site for a proposed Tesco superstore. Planning application no. 5/08/0370 was refused in June 2008. It is not yet known whether the applicant will submit a new planning application or sell the site on. However, if a supermarket use did not transpire and the whole of the site as now assembled (except the locally listed buildings) was developed for housing, it is estimated that around 100 dwellings could potentially be built. This would be at a similar density to the residential scheme that was approved on part of this site in 2000, subject to a Section 106 agreement that was never signed. The overall site area for the 2000 scheme was, however, smaller with a yield of 65 dwellings.
- 2.13 The Interim Central Hertfordshire Employment Land Review 2006 assessed all employment sites of a significant size against a set of criteria and categorised each as 'poor', 'average' or 'good' for B Class employment use. It recommended that all 'poor' sites could go out of employment use, whilst all 'average' sites needed further consideration and all 'good' sites should remain in employment use. In light of this advice, the Council looked at all the sites assessed as 'poor' or 'average' (in addition to any employment sites submitted for consideration in the SHLAA), in order to establish whether there was scope for any to be reclassified as housing sites.
- 2.14 The tables above split the employment sites assessed as part of the SHLAA into two separate categories: (1) Sites that are allocated for employment uses in the District Local Plan Review, 1994 (or where Policies indicate new development should be for Employment purposes) and (2) Unallocated employment sites. The redesignation of allocated employment sites for housing development would be contrary to current saved Local Plan policy.

Sites in Other Commercial Use							
Not currently developable							
SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
84	Kwik Fit and Total Filling Station site, Verulam Road, St Albans	0.2	12	0	0	0	0
81	Morrison's Supermarket Car Park, Hatfield Road, St Albans	1.65	76	0	0	0	0
Total NOT currently developable			88				

Council Owned Garage Courts (excluding those in the Green Belt)							
Deliverable or developable							
SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable	No. of dwellings deliverable	No. of dwellings developable	No. of dwellings developable

				2009 to 2011	2011 to 2016	2016 to 2021	2021 to 2026
DC5	Adj 40 Beech Crescent, Wheathampstead	0.05 including amenity land	3	0	3	0	0
DC41	Housden Close, Wheathampstead	0.05	6	0	6	0	0
DC94	Adjoining 25 Allen Close Wheathampstead	0.04 including garages & amenity land	3	0	3	0	0
Total deliverable or developable			12	0	12	0	0

Not currently developable							
Total NOT currently developable	Individual site assessment forms at Appendix 13		377				

2.15 A few privately owned garage courts have been identified with potential for housing as part of the SHLAA, but these are categorised as 'sites already within the planning process' rather than as new sites. All the garage courts in the above table are in Council ownership. Only three sites were actively being pursued for redevelopment as residential (affordable) housing sites at 31.3.09 –

- Site DC5 (Adjacent 40 Beech Crescent, Wheathampstead)
- Site DC41 (Housden Close, Wheathampstead)
- Site DC94 (Adj 25 Allen Close, Wheathampstead)

2.16 Capacity on these three sites is currently estimated as 12 dwellings (although dwelling numbers may change as discussions progress with the relevant Housing Associations). In addition, the Flint Way garage site in St Albans has planning permission for redevelopment to provide 9 special needs dwellings. The remainder of the Council's garage courts have been categorised as 'not currently developable'.

2.17 Since 2003, four Council owned garage courts have been redeveloped for housing (resulting in a total of 14 dwellings). As the table shows, a substantial number of dwellings could be achieved on all the above sites if they were put forward for development. However, this is not realistic in practice, primarily due to the loss of off street parking provision this would create. Furthermore, most of these sites are very small and are unlikely to prove attractive to developers, unless adjoining land is also acquired. Nevertheless, the Council is currently looking at whether any other garage court sites should come forward for development as part of its Garages Review. To give at least some indication of what might be possible over the long term, if 25% of the 'suitable' garage courts in urban areas were redeveloped for housing, they could yield in the region of 90 dwellings.

Education Sites							
Deliverable or developable							
SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026

279	University of Hertfordshire Law Faculty, Hatfield Road, St Albans	0.51	22	0	22	0	0
Total deliverable or developable			22	0	22	0	0

Healthcare Sites

Deliverable or developable SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
288	The Cedars, Part of the St Albans City Hospital site, Normandy Road, St Albans	0.22	12	0	12	0	0
Total deliverable or developable			12	0	12	0	0

Not currently developable							
331	The Red House/ Harpenden Memorial Hospital, Carlton Road, Harpenden	1.62	55	0	0	0	0
Total NOT currently developable			55				

Vacant/Disused Land and Buildings

No sites identified.

Sites in Other Urban Uses

Deliverable or developable SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
131	Harpenden Library and Youth Club, Vaughan Road, Harpenden	0.19	12	0	12	0	0
134	London Colney Recreation Centre, London Colney	0.8	32	0	32	0	0
259	Former Ariston Works site, Harpenden Road, St Albans	2.6 (1.8 net)	55	0	28	27	0
Total deliverable or developable			99	0	72	27	0

Not currently developable							
130	Land to r/o Harpenden Fire Station, Leyton Road, Harpenden	0.21	4	0	0	0	0
167	Elliswick Tennis Club, Elliswick Road, Harpenden	0.6	20	0	0	0	0

140	Redbourn Library, Lamb Lane, Redbourn (including re-provision of library)	0.11	2	0	0	0	0
161	Cunningham Library, Cell Barnes Lane, St Albans	0.04	2	0	0	0	0
210	Former Gas Works, Griffiths Way, St Albans	No specific site area	100	0	0	0	0
283	Haseldine Road Car Park, London Colney (Council owned)	0.29 (0.14 net)	9 (more if adjoining garage court site DC6 was included)	0	0	0	0
Total NOT currently developable			137				

Greenfield Sites Within Settlements Excluded From The Green Belt

Open Space (Non-District Council owned)							
Deliverable or developable							
SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
149	Glebe Allotments, land r/o Richardson Close, London Colney	0.65	21	0	21	0	0
57	Westfield Allotments, Westfield Road, Harpenden	0.58	25	0	25	0	0
128	King Harry Lane Playing Fields (southern area), St Albans	4.8	150	0	150	0	0
Total deliverable or developable			196	0	196	0	0
Not currently developable							
213	St Albans High School for Girls Detached Playing Fields, east of Townsend Drive	2.2 (1.5 net)	35	0	0	0	0
159	Aboyne Lodge School Detached Playing Field, Normandy Road, St Albans	0.55	18	0	0	0	0
125	Ariston Playing Field, Harpenden Road, St Albans	2.45 (2.0 net)	70	0	0	0	0
Total NOT currently developable			123				

2.18 The Council has taken on board the findings and recommendations of its draft Green Spaces Strategy (GSS), with regard to the suitability of the above open space sites (and others that come under different categories of site) for residential development.

2.19 The above table does not include any Council owned green space sites, due to a Council resolution not to dispose of any of its green spaces for development purposes. Nevertheless, some such sites may no longer serve any real green space purpose and may prove

suitable options for development, especially as an alternative to building in the Green Belt or on other, more highly valued, green spaces. Future SHLAA updates will monitor any change of policy regarding this potential source of sites.

Unused Land (i.e. Greenfield sites with no identified purpose)

Deliverable or developable SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
4	Land to the east of East Lane Public Car Park, Wheathampstead (Council owned)	0.13	3	0	3	0	0
33	Land to the east of Morris Recreation Ground, adjacent to the A1081 London Colney Bypass and White Horse Lane, London Colney	1.32	48	0	48	0	0
36	Land at Watersplash Court and Thamesdale, London Colney	0.17	10	0	10	0	0
Total deliverable or developable			61	0	61	0	0

Agricultural Land (excluded from the Green Belt)

	No sites identified						
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Sites in the Green Belt

Rural Exception Sites

	No sites identified.						
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Sites in the Green Belt which are wholly or mainly Previously Developed Land (and net area substantially covered by built development)

Deliverable or developable SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
153	Building Research Establishment, Bucknalls Drive, Bricket Wood	26.0 (5 net)	150	0	75	75	0
17	Former station yard and adjacent land, Bricket Wood	0.74 (0.35 net)	12	0	12	0	0
38	Three Valleys Water site, Roestock Lane, Colney Heath	2.36 (1.0 net)	35	0	17	18	0
13	Burston Garden Centre/ Hertfordshire Fisheries & Burston Nurseries, off North Orbital Road, How Wood	15.5 (2.0 net)	70	0	35	35	0

172	The Former Nurses' Quarters, Napsbury Hospital, London Colney	1.29	30	0	30	0	0
160	Butterwick Adult Training Centre, Hixberry Lane, St Albans	0.75 (0.6 net)	20	0	20	0	0
25	Pound Farm, Sandridge	1.38 (1.1 net)	25	0	25	0	0
23	West End Farm, Nomansland, Wheathampstead	1.0	10	0	10	0	0
114	Harper Lodge Farm, Harper Lane, Radlett	4.2 (1.0 net)	30	0	15	15	0
262	37-47 Radlett Road, Frogmore	0.71	25	0	15	10	0
254	Harperbury Hospital, Harper Lane, London Colney	46.0	350	0	350	0	0
289	Grounds Maintenance depot, Verulamium Park (Westminster Lodge), St Albans	0.20	8	0	8	0	0
Total deliverable or developable			765	0	612	153	0

Not currently developable							
303	Verulam Industrial Estate, London Road, St Albans	0.74	36	0	0	0	0
138	St Lukes School, Redbourn	7.97 (2.0 net)	70	0	0	0	0
329	HSBC Training Centre, Smug Oak Lane, Bricket Wood	65.0 (4.0 net)	180	0	0	0	0
DC48	Council owned garage court, Meadway, Colney Heath	0.16	10	0	0	0	0
164	Beesonend Stables, Beesonend Lane, Childwickbury Stud, Harpenden	0.46	4	0	0	0	0
DC17	Council owned garage court adjoining No. 63 Cottonmill Lane, St Albans	0.14	6	0	0	0	0
DC61	Council owned garage court at Reynolds Crescent, Sandridge	0.05	2	0	0	0	0
DC71	Council owned garage court at St Leonards Crescent, Sandridge	0.15	6	0	0	0	0
240	49-53 Radlett Road, Frogmore	0.68	25	0	0	0	0
253	HR Owen site, Shenley Lane, London Colney	2.2 (1.1 net)	28	0	0	0	0
Total NOT currently developable			367				

Green Belt Sites wholly or mainly greenfield (sites predominantly consisting of non-built form)

Deliverable or developable SHLAA Ref	Site Address	Gross site area (ha) net area in brackets	Estimated dwelling capacity (net)	No. of dwellings deliverable 2009 to 2011	No. of dwellings deliverable 2011 to 2016	No. of dwellings developable 2016 to 2021	No. of dwellings developable 2021 to 2026
43a	Land at Chiswell Green Farm, Chiswell Green Lane, Chiswell Green (Parcel A)	2.54	80	0	40	40	0

43b	Land at Chiswell Green Farm, Chiswell Green Lane, Chiswell Green (Parcel B)	5.31	185	0	85	100	0
44	Land abutting Long Fallow / Forge End, Chiswell Green	6.1	200	0	100	100	0
40	Land at Noke Side, Chiswell Green	1.04	25	0	25	0	0
96	Land west of The Croft and Cherry Hill, Chiswell Green	2.1	60	0	30	30	0
61	Land north of Beesonend Lane, Harpenden	4.12	100	0	50	50	0
60	Land adjacent to Falconer's Field, Harpenden	1.16	40	0	20	20	0
59	Land at Piggottshill Lane, Harpenden	0.94	22	0	22	0	0
193	Land south of How Wood/adjacent to Park Street Lane	2.3 (1.0 net)	30	0	30	0	0
100	Land at Orchard Drive, How Wood	1.34 (0.8 net)	30	0	30	0	0
133	Land adjacent to No. 375 High Street, London Colney	0.18	4	0	4	0	0
72	Land to the north of Boissy Close, Colney Heath Lane, St Albans	1.43	50	0	25	25	0
245	The Dak, Colney Heath Lane, St Albans	1.18	35	0	18	17	0
126	Land between Mayne Avenue and Bedmond Lane, St Albans	5.8 (3 net)	110	0	55	55	0
127	Land to the north of Verulam Golf Club, London Road, St Albans	2.2 (1.7 net)	60	0	30	30	0
319	Land to the west of Brandon Mews Mobile Home Site, Hill End Lane, St Albans	0.09	4	0	4	0	0
19	Land north of Blackhorse Lane, Redbourn	1.65	45	0	23	22	0
3	Land south of Hillydyke Road, Wheathampstead	3.54 (1.0 net)	35	0	18	17	0
16	Land r/o 45-75 Bucknalls Drive, Bricket Wood	1.51 (1.0 net)	25	0	25	0	0
185	Land at Five Acres Country Club, Bricket Wood	2.73 (1.0 net)	12	0	12	0	0
15	Park Street Baptist Church/ land between Tippendell Lane and Orchard Drive, How Wood	2.3 (1.6 net)	55	0	30	25	0
18	Land to the east of Redbourn/ west of the A5183	13.2 (3.0 net)	100	0	50	50	0
73	Land at Sandringham School, The Ridgeway, St Albans	0.62 (0.4 net)	12	0	12	0	0
198	Land at Woodcock Hill, Sandridge	1.0	35	0	18	17	0
98	Land to the west of Hatching Green and Flowton Grove, Harpenden	0.85	5	0	5	0	0
278	Bridge Nursery, Dunstable Road, Redbourn	0.3	2	0	2	0	0
106	Land at Roundwood Lane/ Brackendale Grove,	1.2	30	0	30	0	0

	Harpenden						
62	Grove Farm, Piper's Lane, Harpenden	4.5 (1.0 net)	30	0	30	0	0
12	Land at 'Alpha', 91 Mayflower Road, How Wood (adjacent to North Orbital Road)	0.4 (0.2 net)	5	0	5	0	0
Total deliverable or developable			1426	0	828	598	0

Not currently developable							
222	Land at Nicholas Breakspear School, Colney Heath Lane, St Albans	8.4 (4.5 net)	150	0	0	0	0
68	Plot 6, land adjacent to High Ridge, Spring Road, Kinsbourne Green Harpenden	0.12	1	0	0	0	0
56	Rosalia Cottage, Spring Road, Kinsbourne Green, Harpenden	0.14	1	0	0	0	0
53	Pennypond, Annables Lane, Kinsbourne Green	0.35	1	0	0	0	0
291	Beesonend Orchard, Beesonend Lane, Harpenden	1.98	45	0	0	0	0
180	Sewage Works and adjoining Council owned land, Piggottshill Lane, Harpenden	6.11 (4.5 net)	150	0	0	0	0
117	Land to the east of Shenley Lane, adjoining the HR Owen site, London Colney	0.32	5	0	0	0	0
192	Car park and land to the south west of the Old Red Lion Public House, Watling Street, Frogmore	0.27 (0.15 net)	8	0	0	0	0
286	Land r/o 1-7 Moor Mill Lane and 110-126 Radlett Road, Frogmore	0.58	10	0	0	0	0
277	Fire Station, south of Scout Farm, Dunstable Road, Redbourn	0.27	10	0	0	0	0
266	'Stoneleigh' and 'Hillbury', Blackhorse Lane, Redbourn	0.68	10	0	0	0	0
184	Land r/o Corder Close and Jerome Drive, St Albans	0.85 (0.5 net)	12	0	0	0	0
8	Land at Meads Lane, Wheathampstead	0.19	4	0	0	0	0
92	Land r/o 257 & 259 Lower Luton Road (off Cherry Tree Lane), Wheathampstead	0.43	4	0	0	0	0
333	Land to the north east of Sparrowswick Ride and Townsend School, St Albans.	13.0 (5.0 net)	175	0	0	0	0
Total NOT currently developable			586				

2.20 Individual site assessments for the 8 Areas Of Search (Broad Locations) are detailed in Appendix 11.

Areas Of Search	Dwelling capacity (Mid-estimate)
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	figures)
No. 1 (South West of St Albans)	1,100
No. 2 (South East of St Albans)	950
No. 3 (West of London Colney & south of Napsbury site)	900
No. 4 (South of London Colney)	0
No. 5 (East of St Albans)	1,050
No. 6 (Smallford)	750
No. 7 (North of St Albans)	800
No. 8 (North of Harpenden)	700
Total	6,250

2.21 As with the allocated employment sites, residential development on any Greenfield sites within the Green Belt would be contrary to extant national and local plan policy.

PART 3 – REVIEW OF THE ASSESSMENT

Deliverable and developable net dwelling gain	Dwelling capacity (net)	No. of dwellings deliverable 2009 - 2011	No. of dwellings deliverable 2011 - 2016	No. of dwellings developable 2016 - 2021	No. of dwellings developable 2021 - 2026	Target 2009 – 2026 = 17 years @ 360 p.a. = 6,120 – 23 above target already built = 6,097
A Existing permissions - discount	1545	791	724	15	15	
B Consistent with existing policy or SADC decision	Housing allocations 20 Refusals (- discount) 57 Pending (-discount) 52 Residential 30 Unallocated employment 41 Council owned garage courts 12 Education sites 22 Healthcare sites 12 Other urban uses 99 Total 345 Total of A Plus B 1890	0 8 0 0 0 0 0 0 0 (8)	20 49 52 30 25 12 22 12 72 (294)	0 0 0 0 16 0 0 0 27 (43)	0 0 0 0 0 0 0 0 0 0	
C Urban Greenfield	Open space 196 Unused land 61 Total 257	0 0 0	196 61 (257)	0 0 0	0 0 0	
D Green Belt sites, Wholly or Mainly PDL	PDL in whole or in part 765	0	612	153	0	
E Allocated Employment Sites	Allocated employment sites 460	0	275	185	0	
F Small Site Windfall *	Small site windfall 950	0	350	350	250	
G Large Site Windfall **	Large site windfall 250	0	0	0	250	
H Green Belt Wholly Or Mainly Greenfield	Areas Of Search 6250 Greenfield (Non-AOS) 1426 Total 7661	0 0 0	4100 828 (4908)	2150 598 (2748)	0	
Total		799	7,440	3,494	515	12,248
I Urban PDL sites deemed Not Currently Developable which are under consideration within the LDF process *	25% of suitable Council-owned Garage courts 90 SHLAA 210 - Griffiths Way 60 SHLAA 264 - West of St Peters Street 60 SHLAA 275 - Coupers Garage 30 SHLAA 264 - No. 222 London Road 22 SHLAA 83 - Abbey Station 40 SHLAA 250 - Former Eversheds 100 Total 402					

* Small site windfall - 70 p.a. from 2011, declining to 50 p.a. from 2021. ** Large site windfall – 50 p.a. from 2021 (year 10 of the plan).

There is considerable capacity on urban PDL sites which for SHLAA purposes are deemed Not Currently Developable, but may be developable over a period of time and constitutes a significant potential source of dwelling gain.

Analysis of the SHLAA findings

- 3.1 The capacity figures totalling 1,890 (total of categories A plus B above) are based on delivery of housing on those sites where such development could be achieved within the scope of existing national, regional and local plan policy (i.e. without requiring any revisions to extant planning policies). This figure is significantly short of the 6,097 dwellings required between 2009 and 2026 (6,097 consisting of 17 years at 360 dwellings per annum, minus 23 dwellings above target already built).
- 3.2 Consequently, it is important to consider alternative means of identifying further housing capacity. Not doing so would have serious implications and would almost certainly render the Council's Local Development Framework unsound, as the Council would have failed to demonstrate a 15 year supply of housing land and would not be able to demonstrate its ability to meet RSS minimum housing targets to 2026 in its Core Strategy and Site Allocations DPDs.
- 3.3 When all the potentially deliverable or developable sites are considered (total of categories A to H) the 12,248 is clearly more than sufficient dwelling capacity. Further explanations of some of the options available to meet the requisite targets are outlined below.
- 3.4 *Urban Greenfield sites*
These they may or may not be developable in accordance with existing policy, depending on individual site and proposal circumstance.
- 3.5 *Green Belt sites which are wholly or mainly Previously Developed Land (and net area primarily covered by built development)*
These they may or may not be developable in accordance with existing policy, depending on individual site and proposal circumstance.
- 3.6 *Redesignating some of the existing allocated and unallocated employment sites across the District for residential development.*
Residential development proposals on allocated employment sites would currently be highly likely to be refused as contrary to existing (saved) Local Plan policy. In light of the findings of the Interim Central Hertfordshire Employment Land Review, if the Council chooses to reallocate some or all of the employment sites, up to 460 dwellings could be achieved. Given that almost no employment development land exists in the District, there is a clear need to retain appropriate provision of a range of employment types in sustainable locations. Therefore, only a relatively small proportion of these sites are likely to be chosen for residential redevelopment. Further dwelling gain on unallocated employment sites could be positively encouraged by their allocation for residential or mixed uses.
- 3.7 *Investigating whether there is justification to include a windfall allowance*
Windfall sites are defined in Footnote 21 of PPS3 as sites:

'which have not been specifically identified as available in the local plan process. They comprise previously-developed sites that have unexpectedly become available. These could include, for example, large sites resulting from, for example, a factory closure or small sites such as a residential conversion or a new flat over a shop.'
- 3.8 Additionally, PPS3 Paragraph 59 states that:

'Allowances for windfalls should not be included in the first 10 year supply unless local planning authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. In these circumstances, an allowance should be included but should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends.'

3.9 The relevant SHLAA Guidance is Paragraphs 50-52:

'PPS3 sets a clear expectation that the supply of land for housing should be based upon specific sites, and where necessary, broad locations. However, it recognises that there may be genuine local circumstances where a windfall allowance is justified. The disadvantage of a windfall allowance is that because it is not clear exactly where development is likely to occur, there is little certainty for communities or developers. By their nature, generalised windfall estimates make it more difficult to plan, for example, in terms of making sure the necessary infrastructure is in place.'

...and coming to an informed view as to:

- whether the annual rate is likely to increase or decrease;*
- whether the pattern of redevelopment is likely to remain the same, grow or decline;*
- whether current market conditions are likely to stay the same, worsen or improve in the future.*

Coming to an informed view on a windfall allowance means reflecting how comprehensive and intensive the survey has been in identifying sites and broad locations for future growth, and the extent to which the Assessment has been informed by the industry and by market intelligence.'

3.10 This SHLAA has identified a very significant potential shortfall in housing land, despite being carried out in a very comprehensive manner (i.e. by seeking to identify capacity from as many sites as possible, without setting any site size threshold and using the broadest possible range of information sources). Due to the extensive consultation undertaken and the considerable extent to which the Assessment has indeed been informed by industry and market intelligence, it is therefore considered appropriate for this SHLAA to investigate past trends in windfall development across the St Albans District, in order to help determine whether any windfall allowance could justifiably be added to the estimated capacity on identifiable sites.

3.11 The SADC Housing Monitoring Report (2009) includes information on residential completions and highlights that, between 1995 and 2008, windfall sites contributed an average dwelling increase of 228 units per annum within the District. Over the shorter timeframe of 2001-2009, an annual average of 229 dwellings was derived from windfall, almost exactly the same as the overall 1995-2009 figures. When broken down further into individual categories for small sites, conversions and large sites, the degree of consistency between the shorter and longer timeframes is again remarkable. This provides concrete evidence of the very high degree of consistency of these figures over time, even though there have been substantial peaks and troughs in both total dwelling provision and that portion derived from windfall, from year to year. Whilst the overall housing market conditions in the UK have gone from relatively steady in the mid to late 1990s, to a boom in the early and mid 2000s and worse conditions since 2007, the amount of dwellings delivered by windfall sites in St Albans has remained very similar over a substantial period of time, whatever the prevailing market conditions. Current

opinions as to the current and future market conditions for housing as a whole are varied, but the evidence clearly shows that whether the overall UK housing market conditions, St Albans District is extremely attractive to developers.

Table 8

Dwelling Increase On Allocated And Windfall Sites

YEAR	Total Dwelling Increase	Large Sites Allocated For Housing in the Plan	Windfall Sites									
			Large Sites Not Allocated For Housing in the Plan	Small Sites	Conversions & Demolitions	Total Windfall	Greenfield Sites	Total Windfall Excluding Greenfield Sites	Large Sites not Allocated But Where the Plan Encourages Housing or Where Permission Existed in 1994	Total Windfall Excluding Columns 8 & 10	Broke Bond & Marconi Longacres Sites	Total Windfall Excluding Columns 8, 10 & 12
95-96	475	346	29	48	52	129	2	127	0	127	0	127
96-97	238	91	67	53	27	147	1	146	19	127	0	127
97-98	415	190	181	42	2	225	12	213	116	97	17	80
98-99	529	272	138	31	88	257	2	255	49	206	67	139
99-00	600	256	269	42	33	344	9	335	89	246	133	113
00-01	415	168	164	68	20	252	10	242	19	223	20	203
01-02	356	81	213	25	37	275	12	263	0	263	4	259
02-03	301	170	77	34	20	131	10	121	0	121	0	121
03-04	248	126	68	39	15	122	23	99	0	99	0	99
04-05	601	332	168	57	44	269	33	236	0	236	0	236
05-06	329	159	96	46	28	170	8	162	0	162	0	162
06-07	377	132	142	55	48	245	2	243	0	243	0	243
07-08	293	5	166	82	40	288	19	269	0	269	0	269
08-09	398	66	274	44	14	332	9	323	0	323	0	323
Totals												
95-09	5,575	2,394	2,052	666	468	3,186	152	3,034	292	2,419	241	2,178
01-09	2,903	1,071	1,204	382	246	1,832	116	1,716	0	1,716	4	1,712
Annual Average												
95-09	398	171	147	48	33	228	11	217	21	173	17	156
01-09	363	134	151	48	31	229	15	215	0	215	1	214

Source: SADC Housing Monitoring Report 2009, p22

- 3.12 Clearly, windfall sites have formed a very important element of the housing land supply in St Albans District since 1995 (constituting almost two-thirds of all net dwelling gain) and there is no reason to suggest that this general trend will not continue. However, many sites have been identified through this SHLAA and will in future become housing or mixed use allocations, so in the future fewer sites will be termed “windfall”. It is also interesting to note on a qualitative level that the pattern of windfall development appears to have changed somewhat over recent years. There have been fewer proposals for the construction of one or more dwellings on back garden land and more for the demolition of one or more existing dwellings and their replacement with two or more new dwellings.
- 3.13 The disadvantages inherent in windfall allowances, particularly the difficulty of planning for physical and social infrastructure to accompany development in locations that are currently unknown, are fully acknowledged. However, such dispersed development has been the reality in the District over a long period of time and is almost certain to continue and needs to be appropriately planned for. It is impossible to identify every site or conversion opportunity that will yield a net dwelling gain and the windfall trend information is undeniably clear - that the SHLAA would significantly under-estimate overall housing capacity if no allowance is made for windfall development.

- 3.14 Given that the SHLAA has sought to identify as many sites as possible with housing potential, the actual number of windfall sites not identified anywhere in the SHLAA will be relatively small at first. It is therefore suggested that there should be a time lag of 2 years before any allowance is included in the estimated windfall capacity. Of the windfall sites, the average contribution from small sites (i.e. less than 5 dwellings) was 48 dwellings per annum, whilst contributions from conversions and demolitions (the vast majority of which also yielded less than 5 dwellings) was 31 dwellings per annum, since 2001. It is considered that there is justification to include an allowance of 70 dwellings per annum from small sites between 2011 and 2021, which would be somewhat lower than the average recent completion rates of 79 per annum on small windfall sites (including conversion sites). Between 2021 and 2026 a lower rate of 50 dwellings per annum adopts an even more cautious approach, as there may eventually be some limitation reached concerning the numbers of additional suitable small sites coming forward.
- 3.15 It is not considered appropriate to include any windfall allowance for large sites in the early years of the SHLAA, as a large proportion of such sites are likely to have been identified elsewhere in this study and can take considerable time to reach completion. However, past experience in St Albans over many years shows very clearly that further unforeseen large sites will come forward for housing development as time progresses. It should be remembered that 'large' sites in SHLAA terms are sites providing net gain of only 5 or more dwellings, not all of which is it realistically possible to foresee or to gather information upon. Therefore, it is suggested that a further allowance of 50 dwellings per annum for large sites is introduced from year 10 of the Plan period onwards (i.e. from 2021). This figure takes a cautious approach, based on recent trend information contained in the Council's Housing Monitoring Report 2009, with an average of 151 dwellings per annum deriving from this source, reflecting the fact that many sites have been identified through this SHLAA and will in future become housing or mixed use allocations, so in the future fewer sites will be termed "windfall".
- 3.16 The location of the District wholly within the Metropolitan Green Belt (except excluded settlements) means that the purposes of PPG2 are of hugely significant importance for the District as a whole. The absence of a windfall allowance and consequent Green Belt release could significantly undermine the valid purposes of Green Belt policy.
- 3.17 Overall, the assessment has been comprehensive and intensive; it has been informed by industry and market intelligence; the future rate, pattern of development and effect of market conditions have been investigated; combined with the location of the District wholly within the Metropolitan Green Belt may jointly provide the robust and genuine local circumstances required to justify windfall provision. If chosen, any windfall allowance and its justification would be examined during the process of adoption of the Core Strategy.
- 3.18 *Green Belt sites which are wholly or mainly Greenfield (sites predominantly consisting of non-built form).*
This category includes the eight Areas of Search as well as individual Green Belt sites. Other than for the very limited circumstances described in PPG2, development here would be contrary to existing policy.
- 3.19 The nature and scale of development potentially available with the eight Areas Of Search could enable transport, school, healthcare, community facility and other infrastructure improvements of a kind not possible with smaller scales of development. On the other hand, smaller scale, dispersed, non-strategic developments may be more

appropriate. It should also be borne in mind that some of the Areas Of Search could be developed only in part, as non-strategic developments.

- 3.20 As ongoing evidence base work for the Local Development Framework, the Council have been encouraging a collaborative masterplanning approach to examining development potential on all of the Areas Of Search. It is, therefore, possible that respective landowners/agents may come up with indicative concept schemes which could yield a different number of dwellings for each site. Any such schemes will be given careful consideration by the Council and dwelling capacity estimates may consequently be amended, as appropriate.
- 3.21 *Taking steps to promote housing development on some sites which are “not currently developable”, including designating some of these areas for residential or mixed uses.*
The sites listed in column H of the schedule on page 32 above, as well as others identified elsewhere as “not currently developable”, have been assessed strictly in terms of the SHLAA criteria and significant constraints/doubts currently exist as to whether or not they will be deliverable or developable. However, several of these sites are under consideration within the overall LDF process and positive action, such as their allocation for mixed use development within the Core Strategy or Site Allocations DPD (after appropriate discussions with landowners and others) may well make some developable over a period of time.
- 3.22 *Identifying further housing potential on some Council owned sites which are deemed “not currently developable” and proactively driving their development*
As mentioned earlier, the issue of development potential on Council owned green space sites is expected to be discussed by the Council in the future and any resultant dwelling capacity will be taken into account in SHLAA updates. The Council intends to carry out more detailed work to assess the redevelopment potential of any sites currently occupied by defective Council housing stock. There may also be opportunities for additional dwellings on existing areas of Council housing, such as garden or amenity land, or the redevelopment of existing dwellings at a greater density. Considerable potential has been identified on Council owned garage court sites.
- 3.23 *Increasing Densities in Urban Areas*
It is possible that the Council could decide to revisit its density assumptions in urban parts of the District, in an attempt to increase capacity on the most sustainable and accessible sites. However, capacity estimates have given considerable attention to site specific characteristics and are considered realistic. They have also taken government guidance on density in PPS3 into account, as well as trends in development practice locally, regionally and nationally. Consequently, it is considered that there is little scope for increasing densities significantly to achieve higher dwelling numbers.

Implications of the SHLAA for the Local Development Framework

- 3.24 The combination of information from local developers, the likely timing of Core Strategy and Site Allocations DPD adoption and typical local building rates all suggest very strongly that it would be sensible for the Council to consider the formulation of a phasing policy within its Core Strategy, to facilitate completions at a more even rate across the Plan period than would otherwise be likely.
- 3.25 The SHLAA is an important piece of evidence base for the Local Development Framework, which provides key information on which the Council can base its decisions regarding the most appropriate direction of future growth across the District. However, it is not a decision making tool in its own right. In light of the shortfalls in future housing

land that is consistent with existing policy identified in this document, it is clear that the Council has some difficult choices to make as work progresses on the Core Strategy and Site Allocations DPDs.

- 3.26 Whilst it is clear that more than sufficient deliverable or developable housing land can be found in the District to meet PPS3 and RSS requirements to 2026, it is also clear that not all of these options will be acceptable to the Council and will consequently not be identified as appropriate to provide for future housing growth. It is likely that a combination of approaches, using potential dwelling capacity from several of the different areas identified above as a comprehensive package, will present the most appropriate way of tackling the challenge of meeting the potential deficit in dwelling provision.

Monitoring and Review of the SHLAA

- 3.27 The SHLAA will be updated as an integral part of the Annual Monitoring Report process and is also linked to the annual Housing Monitoring Report. As this initial SHLAA is as comprehensive as practicably possible, it should only be necessary to carry out a full resurvey when the Council's DPDs have to be reviewed and rolled forward to a longer time horizon, or some other significant change makes it necessary. Nevertheless, the Council will undertake a regular review of new and previously identified sites, particularly those classified as 'not currently developable,' in order to determine whether any of the known constraints can be addressed at a given point in time, so that likelihood of delivery can be increased.