



STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

METHODOLOGY STATEMENT

MARCH 2008

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1. Introduction

- 1.1 As a key part of the evidence base for its Local Development Framework, St Albans City and District Council is required to carry out a Strategic Housing Land Availability Assessment (SHLAA). This assessment 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 Control Policies Development Plan Documents (DPDS).
- 1.2 Planning Policy Statement (PPS3) Housing (Nov 2006) requires all local planning authorities to prepare SHLAAs. In July 2007, Central Government produced good practice guidance to accompany PPS3, entitled 'Strategic Housing Land Availability Assessments', 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.
- 1.3 This document sets out the methodology that St Albans City and District Council proposes to adopt to undertake its SHLAA. The methodology has been drafted in line with Central Government's good practice guidance, unless stated otherwise and has also taken on board the advice provided in the Planning Advisory Service (January 2008) document '*Strategic Housing Land Availability Assessment and Development Plan Document Preparation*'.
- 1.4 This methodology statement was published for consultation during February 2008 and has been amended, as appropriate, following comments raised by stakeholders.

2. Characteristics of the District

- 2.1 St Albans City and District is situated in Central Hertfordshire within the Metropolitan Green Belt. It lies 20 miles north of London and falls within the London Arc sub-region as defined in the East of England Plan (RSS14). The District covers some 163 square kilometres and has a population of 131,300 (mid 2006 estimates).
- 2.2 There is a fairly even geographical distribution of settlements across the District, of which St Albans is the largest (with a population of just over 64,000). The commuter town of Harpenden has a population of almost 30,000 and is the District's second largest settlement. Also lying within the District and excluded from the Green Belt are the settlements of Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street/Frogmore, Redbourn and Wheathampstead. There are also a number of smaller settlements lying entirely within the Green Belt including: Annables (Kinsbourne Green), Colney Heath, Folly Fields, Gustard Wood, Lea Valley Estate, Radlett Road (Frogmore), Sandridge, Sleepshyde and Smallford.
- 2.3 St Albans District is an area of very high house prices and high demand for housing. Consequently, the Core Strategy DPD, is faced with the difficulty of

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meeting the future development needs of the District's residents, whilst also seek to protect (and where appropriate, enhance) the District's high quality built and natural environment (including the Green Belt).

3. Planning Policy Background

3.1 The SHLAA for St Albans City and District will take account of the following national, regional and local planning policy context:

3.2 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. It requires local planning authorities to:

- identify specific, *deliverable* sites for the first five years of a plan that are ready for development and to keep this topped up over time in response to market information;
- identify specific, developable sites for years 6–10, and ideally years 11–15, in plans to enable the five year supply to be topped up;
- where it is not possible to identify specific sites for years 11–15 of the plan, indicate broad locations for future growth; and
- not include an allowance for windfalls in the first 10 years of the plan unless there are justifiable local circumstances that prevent specific sites being identified.

3.3 The regional context for housing delivery is Regional Spatial Strategy (RSS14) or the 'East of England Plan'. Proposed Changes to RSS14 were published in December 2006, with Policy H1 setting a requirement for an additional 7,200 homes in the St Albans District between 2001 and 2021. It should be noted that Policy H1 describes the District allocations as minimum targets to be achieved rather than ceilings that should not be exceeded.

3.4 Notwithstanding the RSS14 requirement, the District Council must also ensure that provision is made for a 15 year housing supply from the date of adoption of Local Development Documents, in line with PPS3. The Council's Local Development Scheme is under review, but it is expected that the 15 year housing requirement will need to look as far as 2026.

3.5 Policy LA1 in the RSS14 Proposed Changes document includes St Albans District within the London Arc (Herts) sub-region, characterised by towns and urban areas that have been strongly influenced by London, are closely located, with complex movements between one another for shopping, employment and education. Policy LA1 sets out the future role of the towns within the sub-region, focusing on the retention of long standing Green Belt restraint and the promotion of greater sustainability within built up areas.

3.6 RSS14 proposes substantial growth at Hemel Hempstead and Welwyn Garden City/Hatfield, which are identified as 'Key Centres for Development

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and Change'. If major expansion of these areas is confirmed in the final RSS14, it is likely that some of the development (including housing) associated with this expansion will need to be located in St Albans District. It should, however, be noted that any housing as part of these expansions will be over and above the 7,200 homes for St Albans District.

- 3.7 The District Local Plan Review was adopted in 1994. Many of its policies have since been superseded by more recent Government planning guidance. Nevertheless, in September 2007, the Secretary of State agreed that a number 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.
- 3.8 Other 'saved' Local Plan policies include: Policy 7 (Houses in Multiple Occupation); 7a (Affordable Housing in Towns and Specified Settlements); 8 (Affordable Housing in the Metropolitan Green Belt); 10 (Loss of Residential Accommodation); 11 (Residential Conversion) and 13 (Extension or Replacement of Dwellings in the Green Belt).
- 3.9 The emerging Core Strategy DPD for St Albans District is due for adoption in 2009 (although this may be reviewed in the Local Development Scheme). It must ensure that there is a sufficient supply of housing to 2021 to meet the District's housing requirement of 7,200, as set out in RSS14 (together with the additional requirements for identifying a 15 year housing supply as outlined above) and will need to determine broad locations for meeting this growth.

4. Purpose of the Strategic Housing Land Availability Assessment

- 4.1 The SHLAA will form a key component of the evidence base for the Local Development Framework covering St Albans City and District. It will provide a comprehensive review of the potential housing sites across the District and will assess the suitability of those sites, in order to guide decisions on strategic policy options and site allocations in the Council's Development Plan Documents.
- 4.2 The primary role of the SHLAA (as set out in Government's Good Practice Guidance) is to:
- identify sites with potential for housing development;
 - assess their housing potential; and
 - assess when they are likely to be developed.
- 4.3 The guidance explains that, although the Assessment is an important evidence source to inform plan making, it does not, in itself, determine whether a site should be allocated for housing development. It goes on to recommend that, when defining a study area, this should ideally coincide with

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a relevant sub-regional housing market area. However, it is acknowledged that this may be a local planning authority area, where necessary.

- 4.4 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 already working together in the preparation of Strategic Housing Market Assessments (consultants have been appointed on a collective basis to carry out work, but will report on a district by district basis). In theory, it would seem logical to carry out SHLAAs on the same sub-regional basis. However, in practice, undertaking a joint study is not possible, primarily because each authority is now at a different stage of Core Strategy production and all of the other authorities in the sub-regional housing market area have already commenced their SHLAAs.
- 4.5 Planning consultants have been appointed jointly by the neighbouring authorities of Dacorum, Three Rivers and Watford to update Urban Capacity Studies which were completed around 2/3 years ago, in order to bring them in line with current SHLAA guidance. Welwyn Hatfield Borough Council is shortly to receive a draft SHLAA document, which has been produced by the same planning consultants, whilst Hertsmere Borough Council has completed a draft SHLAA exercise in-house.
- 4.6 For the Dacorum and Welwyn Hatfield work, the consultants' remit includes looking at greenfield options for housing development in St Albans District, in relation to the proposed expansion to the east of Hemel Hempstead and west of Welwyn Garden City/Hatfield. This SHLAA methodology document for St Albans City and District has been drawn up in consultation with Officers from both Dacorum and Welwyn Hatfield Councils, to ensure a consistent approach has been adopted and to enable easy comparison/aggregation of findings, where necessary.
- 4.7 The SHLAA will aim to identify as many sites with housing potential in and around as many settlements as possible within this defined study area. As a minimum, it will seek to identify sufficient specific sites for at least the first 10 years from adoption of the Site Allocations DPD, but will ideally identify sites or broad locations for the whole 15 year plan period, which will allow the Council to consider different options for accommodating new housing within the District.
- 4.8 The Assessment 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.

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- 4.9 Once completed, the SHLAA will be updated as an integral part of the Annual Monitoring Report process. Whilst the initial SHLAA will be comprehensive, it should only be necessary to carry out a full resurvey when plans have to be reviewed and rolled forward to a longer time horizon, or some other significant change makes it necessary.

5. Adopting a Partnership Approach

- 5.1 Work on the SHLAA for St Albans City and District will be carried out by officers from the Council, primarily the Planning Policy team although help will also be sought from Officers in the Council's estates, conservation & design, landscape, housing and development control departments, at specific stages in the project.
- 5.2 Government guidance expects SHLAAs to be carried out in consultation and full involvement from key stakeholders and local communities. The District Council recognises the benefits of working in partnership with others on its SHLAA and has received a positive response from over 40 stakeholders (including landowners, house builders, land agents, the Home Builders Federation, Hertfordshire County Council), who are keen to have further involvement in its SHLAA process. The Council will shortly be contacting all interested parties to establish how best to utilise their local expertise and knowledge at key stages in the SHLAA. As a starting point, it is envisaged that these stakeholders (together with statutory bodies such as the Environment Agency, Hertfordshire Highways etc) will be sent drafts of the two assessment forms for urban and Green Belt sites (see paragraphs 7.24 to 7.29 for further details) for comment and they will be asked whether they would like to participate in a workshop style session to shortlist sites for more detailed consideration (see also paragraphs 7.39 and 7.40 of this methodology statement covering the 'sieving' process').
- 5.3 In addition to the above, the Council will ensure that full use is made of any existing forums or working groups. For example, whilst there is yet to be a formal sub-regional Housing Market Partnership established, a launch event for the Strategic Housing Market Assessment (covering the administrative areas of the six local authorities in west and central Hertfordshire) took place on 4th February 2008 and participants were asked whether they would like ongoing involvement in the SHMA and/or further dialogue with the relevant local authorities. The Council will also make use of the established Agents Forum, if there are specific issues arising from the SHLAA that would benefit from discussion with those who have an expert knowledge of the local housing market.
- 5.4 It is proposed to make full use of in-house expertise whilst carrying out the SHLAA, with anticipated involvement from development control officers and colleagues from the Council's housing, estates, conservation & design, landscape and leisure sections. There are proposals to set up a corporate working group to discuss and progress matters in relation to the Local Development Framework. If established soon, this working group could be used as a forum for discussions on the SHLAA at key stages in the process.

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5.5 A draft SHLAA document will be presented to the Council's Planning Policy Advisory Panel for Members' input in September 2008, prior to being finalised. The Council will then consult key stakeholders on the SHLAA document during the Autumn of 2008.

5.6 It is considered that the proposed consultation arrangements meet the requirements of the Council's adopted Statement of Community Involvement (SCI).

6. Core Outputs from the SHLAA

6.1 The completed assessment will comprise the following core outputs:

SHLAA Core Outputs
A list of sites, cross-referenced to maps, showing locations and boundaries of specific sites (and broad locations, where necessary) with the potential for housing development.
Assessment of 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 that are identified to come forward will be placed into phasing periods (i.e. 5, 10 or 15 year housing supply).
Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified).
Constraints on the delivery of identified sites.
Recommendations on how these constraints could be overcome and when.

7. Proposed Methodology for Undertaking the Strategic Housing Land Availability Assessment

Stage 1 - Planning the Assessment

7.1 The Council has prepared a detailed work programme for completion of the SHLAA and considers that there should be sufficient resources available to complete the work by early autumn 2008.

7.2 A four week community and stakeholder consultation period on the draft methodology document began on Monday 4th February 2008. Copies of the draft were sent to interested parties including: statutory consultees; local developers/housebuilders/landowners; registered social landlords; education and healthcare establishments; major national and regional housebuilders/developers; and those who have already identified potential housing sites to the District Council) seeking their comments. Letters were also be 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.

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- 7.3 The Council also sent a site identification form to the above stakeholders and this was available to download from the Council's website. 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 (i.e. by filling in a site identification form).
- 7.4 The Council received 23 responses to the draft SHLAA methodology consultation document and this final version has been produced taking on board the comments received. A summary table of all the comments from stakeholders, together with the Council's response to each will be included as an Appendix to the SHLAA document.

Stage 2 - Scope of the Assessment

- 7.5 Government guidance requires local planning authorities to give careful thought to how comprehensive their SHLAA should be. The Council considers that the Assessment covering St Albans City and District needs to be as comprehensive as possible 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.
- 7.6 As mentioned above, the SHLAA needs to go beyond assessing just urban capacity and must also include the assessment of housing potential in rural settlements; on brownfield sites within the Green Belt; on suitable greenfield sites (both in the urban area and within the Green Belt); and in broad locations (where necessary).
- 7.7 It should be reiterated that the SHLAAs for the neighbouring authorities of Welwyn Hatfield and Dacorum will be examining the potential to accommodate future housing growth as part of their respective growth areas (as identified in RSS14) partly within St Albans City and District. However, such sites will not count towards meeting the 15 year land supply for housing in the St Albans District.

Stage 3 - Sources of Sites with Potential for Housing to be Included in the Assessment

- 7.8 The lists below indicate the sources of sites with potential for housing that will be covered by the SHLAA for St Albans City and District. These sources correspond with the same categories of sites, which are currently used to collect information on housing land supply as part of the Council's annual monitoring requirements. However, unlike the monitoring information, it is not proposed to include conversions as a separate category. Instead, conversions will be placed within their existing land use category (e.g. a converted office building would come under 'employment uses').

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Group 1 - Previously Developed Sites

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

Group 2 - Greenfield Sites (within settlements excluded from the Green Belt)

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

Group 3 - Sites and/or Broad Locations within the Green Belt

- New category, not previously monitored, that includes sites and broad locations in the Green Belt on the edge of existing settlements (but excludes previously developed sites in the Green Belt, which would be classified under the appropriate category under Group 1 - e.g. Harperbury Hospital would be categorised as 'healthcare').

[Paragraphs 7.11 to 7.16 below, provide more detail about the identification of '*broad locations*' within the Green Belt.]

- Rural Exception Sites (NB: Such sites can only be identified if Parish surveys have been undertaken recently, which have identified a clear local need for affordable housing).

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Identifying Possible Broad Locations for Housing Development

- 7.9 Central Government's good practice guidance on SHLAAs addresses the need to identify and assess the housing potential of 'broad locations' (i.e. areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified). The guidance recommends that this be undertaken as a separate stage of the SHLAA (i.e. Stage 9) if, following the initial assessment of sites, there are still insufficient sites identified to meet housing requirements.
- 7.10 Notwithstanding this advice, St Albans City and District Council proposes to identify and assess the housing potential of broad locations, as an integral part of its Assessment, rather than as a separate stage towards the end of the process. This is because there are early indications of a shortfall in housing land to meet the District's housing requirements set out in RSS14 and consequently it is likely that one or more broad locations (and/or minor adjustments to the Green Belt) will need to be considered for possible housing development to meet this shortfall.
- 7.11 The advantage of identifying broad locations is that it allows the community to be clearer about where future development will be directed and offers greater certainty for developers about where development may be encouraged.
- 7.12 Government guidance categorises broad locations as either:
- **Within and adjoining settlements** – e.g. areas where housing development is or could be encouraged and small extensions to settlements; or
 - **Outside settlements** – e.g. major urban extensions, growth points, growth areas, new free-standing settlements and eco-towns.
- 7.13 Guidance says that broad locations 'outside settlements' should be identified through the respective Regional Spatial Strategy. RSS14 does not specifically identify any such locations. However, the RSS14 Proposed Changes document does identify 'Key Centres for Development and Change' within the adjoining local authority areas of Dacorum (i.e. Hemel Hempstead only) and Welwyn Hatfield. Each of these Councils has already commissioned consultants to assess the housing potential of sites within its own growth area, some of which are likely to be located in St Albans District. The findings will be taken into account in the St Albans Core Strategy Development Plan Document (DPD).
- 7.14 The St Albans Core Strategy DPD Issues and Options consultation document (July 2007) identified eight possible broad locations adjoining settlements, with the potential for further housing (and/or employment) development. These were as follows:
- Area of Search 1: South West of St Albans
 - Area of Search 2: South East of St Albans

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- Area of Search 3: West of London Colney
- Area of Search 4: South of London Colney
- Area of Search 5: East of St Albans
- Area of Search 6: Smallford
- Area of Search 7: North of St Albans
- Area of Search 8: North of Harpenden

Sites to be excluded from the SHLAA

7.15 Whilst the scope of the Assessment is intentionally very broad to allow for as many sites as possible to be identified, the Council does not consider it appropriate for the SHLAA to include any of the following:

- Protected areas of recognised importance for wildlife/habitat (e.g. Sites of Special Scientific Importance (SSSIs); Local Nature Reserves)
- Scheduled Ancient Monuments
- Historic Parks and Gardens
- Ancient Woodland
- Any green spaces identified for protection in the Council's Green Spaces Strategy (scheduled for completion in May 2008)
- Those employment sites categorised as 'good' quality in the Interim Central Hertfordshire Employment Land Review (subject to the Council's further assessment of whether there are any specific sites/ or parts of sites that need to be treated differently).
- Empty homes - There are no significant areas of the District where empty homes are considered to be a major problem. Including this category as a source of supply would not provide justification for providing less land in other categories for housing. Furthermore, empty homes are not net additions to the overall dwelling stock and have already been counted as dwellings when originally constructed. Consequently, there would be double counting if they were included in SHLAA supply calculations. There are also practical and definition problems associated with empty homes (e.g. how long does a home have to be empty; how many times could the same dwelling be counted; how are new dwellings that have been unoccupied for long periods handled; how is 'empty' defined?)
- Floodplain (only in relation to greenfield and Green Belt sites)

Stage 4 - Identifying Sites with Potential for Housing

7.16 In order to help identify sites with potential for housing across the District, the Council proposes to adopt the methodology set out overleaf.

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Sites already in the Planning Process

- 7.17 Firstly, the Council will compile a list of all the sites under each category (as listed in paragraph 7.8 above), which are already in the planning process. Using current housing monitoring information and recent development control/building control data, it will be possible to establish all sites with:
- unimplemented /outstanding planning permissions for housing;
 - planning briefs prepared by the Council (where schemes include residential development);
 - planning permission for housing, which are currently under construction.
- 7.18 The Council will also carry out a review of the housing allocations covered by 'saved' policies in the District Local Plan Review (1994), to determine whether there are any sites which still need to be taken forward as part of the SHLAA. These allocations will only be retained if it can be satisfactorily demonstrated that they are deliverable.
- 7.19 In addition to the above, there are other sites currently in the planning process (but without planning permission for housing) that will be given further consideration. Some examples include:
- Sites categorised as '*other proposed large sites*' or '*other possible large sites*' in the Council's Interim Urban Capacity Study (2005), where there are still uncertainties that need to be addressed;
 - Sites where planning permission for housing has been refused; where planning applications have been withdrawn; or where planning appeals have been dismissed.

Identifying New Sites or Broad Locations (i.e. those not currently in the Planning Process)

- 7.20 Identifying new sites or broad locations with potential for housing is a more complex exercise and Government guidance offers a series of possible sources of information for carrying out this task.
- 7.21 For the St Albans SHLAA, it is proposed that the following general methods of site identification will be used (these methods will be appropriate for all of the possible site categories):
- Assessment of sites or broad locations put forward by stakeholders as part of the SHLAA process (provided these are reasonable candidates for housing development);
 - Discussions with colleagues in the Council's planning policy, development control, estates, housing and leisure sections to identify any possible sites (e.g. where officers have already had pre-application discussions, approaches from landowners or where there is considered to be housing potential on any pieces of Council owned land);

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- Review of OS maps and aerial photography to identify likely areas with housing potential (particularly development hotspots such as town and district centres, principal public transport corridors etc);
- Assessment of those sites and broad locations that have already been put forward for housing development by landowners or developers during stakeholder and community consultation on Issues and Options documents in May 2006 and July 2007 as part of the Local Development Framework. (This will include revisiting the 8 Areas of Search that the Council identified as possible broad locations for accommodating housing and/or employment growth in the Core Strategy Issues & Options consultation document – see paragraph 7.16 above). Approximately 100 sites were also considered by the Council as part of its Green Belt Boundary Study (2003), which formed part of evidence gathering for the superseded District Local Plan Second Review. The preliminary findings of this study will need to be revisited.
- Review of non-housing allocations covered by ‘saved’ policies in the District Local Plan Review (1994), to assess possible capacity for housing development.

7.22 In addition to the above general methods, the Council proposes to utilise other possible sources of information, in relation to specific categories of site.

For example:

Land Already Used for Housing

The Council’s Conservation and Design team carried out research with regard to the possible remodelling of some of the Council housing estates across the District several years ago (further information on each of the Council Estates is held by the Housing section).

The Housing section will be consulted on any further housing potential within the pre-fabricated and mobile home sites in the District.

The Council notes the advice on page 5 of the Planning Advisory Service (PAS) guidance document, that the SHLAA could identify ‘broad locations in existing residential areas within settlements’, where emerging DPD policy actively encourages additional housing (e.g. through infilling and redevelopment), but where the nature of such areas means that it is not possible to identify individual sites. This would allow an assessment of the potential supply of housing sites within existing residential areas to be made, with reference to past levels of development and an assessment of future potential. The PAS guidance states that:

‘...since it is based upon proactive policy, the likely supply from such a broad location is not windfall in terms of PPS3

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policy, and can therefore be included in the SHLAA from the outset.'

Notwithstanding the above, the Council has sought further advice from PAS on the interpretation of this guidance and has concluded that, as none of the 'saved' policies from the St Albans District Local Plan Review relate to a delineated area where housing infill and/or conversion is actively encouraged, the Council cannot seek to apply the concept of broad locations at this time. We may, however, be able to bring this forward in a future DPD.

Furthermore, it is understood that the Department for Communities and Local Government has now clarified that the yield from broad locations can only normally be taken into account for the 11 to 15 year period of a plan, and not before. This will require a correction to the PAS advice note.

Employment Sites

The Interim Central Hertfordshire Employment Land Review has assessed all employment sites of a reasonable size against a set of criteria and then categorised each as 'poor', 'average' or 'good'. It then recommends that all 'poor' sites could go out of employment use, whilst all 'average' sites need further consideration and 'good' sites should remain in employment use. The Council proposes to look at all the sites assessed as 'poor' or 'average' in the Employment Land Review, in order to establish whether there is scope for any to be reclassified as housing sites.

This category will also include an assessment of the potential for conversion of office uses to housing.

In addition to using the general methodology, the Council will use other information sources (e.g. local commercial property registers/databases or the National Land Use and Valuation Office databases) to try and identify possible employment sites with housing potential.

Garage Courts

The Housing section has recently begun work on the assessment of Council owned garage courts in the District, with regard to their future housing potential. It is proposed that this detailed assessment will be completed as part of the SHLAA.

As part of a housing capacity study in 2002 for the Structure Plan, Hertfordshire County Council has also carried out a broad assessment at district level into how much land and how many sites were in garage court use. An assumption was then made as to what proportion might be redeveloped for housing.

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Education Sites

The Council proposes to contact Hertfordshire County Council (Children, Schools and Families) to establish whether there are any plans to redevelop, expand or relocate any of the existing educational facilities in the District. Similarly, contact will be made with Oaklands College, University of Hertfordshire and all the private schools in the District.

Healthcare Sites

The Council will make contact with interested parties (including the Primary Care Trust, the relevant health authority and the main GP practices), in order to establish their future development plans.

Vacant/disused land and buildings

There has been almost no development under this category over recent years and it is possible that no potential new sites will be identified. Nevertheless, the Council will use its general methodology, together with any other information sources (e.g. the knowledge of local agents) to try and identify possible housing sites.

Open space (including public and private sites)

The Council will need to take on board the findings and recommendations of its Green Spaces Strategy (currently due for completion in May 2008), particularly with regard to any sites that are identified as surplus to requirement.

Green Belt sites and broad locations

As mentioned in paragraph 7.22 above, the Council already holds a significant amount of information on possible housing potential in the Green Belt (both in terms of minor adjustments to Green Belt boundaries and broad locations for future housing and/or other development), which has been collected as part of consultation on the District Local Plan Second Review and the emerging Development Plan Documents. The Council will use its general methodology to identify any further Green Belt sites or broad locations for inclusion in the SHLAA.

Stage 5 - Collecting Information and Assessing the Suitability of Identified Sites and Broad Locations

- 7.23 For committed sites (i.e. those with planning permission for housing), there is little additional site information that needs to be collected, except information on construction start and completion dates and any site constraints that could affect the timing and phasing of development.

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- 7.24 All other identified sites and/or broad locations will be categorised as either:
- Urban or
 - Green Belt
- 7.25 The Council has developed separate assessment forms for each of the above categories, which will be circulated for comment as described in paragraph 5.2 above. These will be used to collect key information such as: details of landowner, area (ha), current and surrounding land uses, overall character of the site/broad location, access and planning history.
- 7.26 The forms will also include standard criteria, against which the Council will be able to assess the **suitability** of a particular site/broad location for housing. Government guidance states that 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.
- 7.27 Allocated sites in the St Albans District Plan Review (November 1994) and sites with planning permission for housing will generally be suitable, although it may be necessary to assess whether circumstances have changed, which would alter their suitability (NB: The Council envisages that there will be very few sites covered by 'saved' policies in 1994 Plan that still need to be taken forward as part of the SHLAA).
- 7.28 For other sites and broad locations, detailed criteria for examining suitability for housing (now or in future) are included under the following two headings in the draft assessment forms:
- **Physical constraints** including: Conservation Area, poor access, County Wildlife Sites, ground contamination, area of flood risk, SSSIs, public rights of way, steep slopes.
 - **Policy constraints** including: designated employment areas; Green spaces identified for protection in the Green Spaces Strategy; greenfield sites; sites with social or community value.
- 7.29 For Green Belt sites, specific criteria have also been included in relation to the purposes of including land in the Green Belt as set out in PPG2 (e.g. 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).
- 7.30 Each identified site or broad location will be mapped on a 1:1250 map base.

Stage 6 - The Sieving Process

- 7.31 Once a 'long list' of sites has been drawn up and an initial assessment of the physical and policy constraints of each site has been undertaken, Officers will

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come to provisional conclusions as to whether each site should be given further detailed consideration as a potential housing site.

- 7.32 The Council then proposes to hold a 'sieving workshop', with representatives from statutory bodies such as the Environment Agency, Hertfordshire Highways; Officers from the District Council's Planning Policy, Housing, Estates, Development Control, Conservation & Design and Landscape teams; and selected stakeholders who have expressed an interest in ongoing involvement in the SHLAA.
- 7.32 The purpose of this workshop will be to go through the 'long list' of sites and to reach agreement collectively as to whether each site should be given further consideration, based on any physical and policy constraints that have been identified and whether there is any likelihood of such constraints being overcome.
- 7.33 Where sites have been removed from the list of possible housing sites, the reasons for not taking them forward for more detailed consideration will need to be clearly recorded.

Stage 7 - On-Site Survey Work

- 7.34 It is proposed that those new sites or broad locations to emerge during the identification process (including those put forward by stakeholders), which are considered to be reasonable candidates for housing development, will be visited as part of the survey. It is not proposed to re-visit those sites identified as 'within the planning process'. This is because the Council already undertakes site visits to such sites as part of its housing monitoring on an annual basis. There may also be other sites that have already undergone a rigorous assessment of housing potential and do not need to be revisited.

Stage 8 - Estimating the housing potential of each site

- 7.35 Central Government suggests that drawing up sketch schemes for identified sites is a good way of estimating their housing potential. However, this approach is extremely resource intensive. A second approach suggested in the Government guidance is to compare each of the identified sites against a 'sample' sketch scheme, which represents a form of development considered acceptable/desirable in a particular area.
- 7.36 In light of the considerable resource implications associated with drawing sketch schemes for individual sites, the Council will consider whether to take this approach only for the larger sites identified during the SHLAA process.
- 7.37 There is no specific 'saved' local plan policy on housing density and the Council has only reached a very early stage of DPD preparation and cannot, therefore, assess capacity of sites against any emerging plan policy. Consequently, in order to calculate housing potential for the majority of the smaller sites, account will need to be taken of recent Government guidance in PPS3 on densities and the Council will seek the in-house expertise of its

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Development Control, Conservation & Design and Landscape Officers to assess recent housing development schemes that have been approved/built across the District. This will enable assumptions to be made about the optimum 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), which can then be used to estimate likely capacity on each identified site. For all sites, consideration will also be given to the local market conditions, as identified in the Strategic Housing Market Assessment, which should help to provide guidance on appropriate housing mixes in particular locations.

- 7.38 For most sites (i.e. the smaller, urban sites) gross and net density estimates will, in practice, be the same. However, for some larger sites and broad locations, gross density estimates will need to be discounted, as net dwelling capacity will be calculated by including only those parts of a site which will be developed for housing and directly associated uses such as access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided. Consideration will be given to any specific site constraints identified during the site survey and Officers will take account of any land that needs to be set aside for necessary infrastructure to support the proposed development.
- 7.39 Where broad locations have been identified, estimates of potential housing supply will be developed having regard to the nature and scale of potential opportunities in the area (including what other land uses e.g. employment, leisure etc and what additional infrastructure may be required). In some cases, a decision may need to be taken as to how far the notional boundaries of a broad location ought to extend.
- 7.40 Notwithstanding the Council's above approach to estimating housing capacity, those landowners, developers or agents who are submitting possible sites as part of the SHLAA, will also be encouraged to provide their own sketch schemes for consideration during Stage 8.

Stage 9 - Assessing when and whether sites are likely to be developed

- 7.41 Assessing the '*suitability*', '*availability*' and '*achievability*' of a site will provide information on which a judgement can be made as to whether a site can 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 plan (i.e. by 2016); and
 - **Developable** – a site should be in a suitable location for housing development and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time.

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- 7.42 The assessment of deliverability and developability will be made for all sites considered in the SHLAA that have survived the 'sieving process', irrespective of the level of housing provision that is actually needed over the plan period.

Assessing Availability for housing

- 7.43 A site is considered *available* for development when, on the best information available, there is confidence that there are no legal or ownership problems such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This means that the site is controlled by a housing developer who has expressed an intention to develop, or the landowner has expressed an intention to sell. There may also be organisational issues affecting potential redevelopment of a site (e.g. availability of alternative sites for a business to relocate; retirement of owner etc).
- 7.44 Where problems are identified, the Assessment will need to consider how and when problems can realistically be overcome.

Assessing Achievability for Housing

- 7.45 A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement regarding the economic viability of the site and the capacity of the developer to complete and sell the housing over a certain period.
- 7.46 It might be affected by:
- **Market factors** – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values; attractiveness of the locality; level of potential market demand; and projected rate of sales (particularly important for larger sites)
 - **Cost factors** – including site preparation costs relating to any physical constraints such as ground contamination; land assembly; relocation requirements; ransom potential; any exceptional works necessary; the Council's own policy requirements (e.g. affordable housing, green space, leisure provision etc), meeting levels of the Code for Sustainable Homes, planning obligation requirements; prospect of funding or investment to address constraints, assist development or meet identified infrastructure requirements.
 - **Delivery factors** – including the developer's own phasing; the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates); whether there is a single developer or several developers offering different housing products; and the size and capacity of the developer

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- 7.47 The assessment of the availability and achievability of sites and broad locations for housing will be carried out by the Council's Planning Policy Officers, in consultation with Housing and Estates Officers, together with other key stakeholders such as the Home Builders Federation, local developers, housebuilders and agents to utilise their expertise and ensure the assessment is realistic and reflects current market conditions.
- 7.48 As mentioned in paragraph 5.3 above, the Strategic Housing Market Assessment (covering the administrative areas of the six local authorities in west and central Hertfordshire) has now commenced and it is hoped that the SHMA will provide information on issues such as: wider housing market influences and drivers, housing market values, supply and demand factors and housing stock. There is also the possibility of consultants being commissioned to undertake a Development Economics Study, which would look at whether local affordable housing targets would make developments unviable.
- 7.49 The Council will consult Hertfordshire County Council, Hertfordshire Highways and perhaps other statutory undertakers such Thames Water etc, in order to establish whether there are infrastructure needs/constraints associated with any of the identified sites or broad locations. The Hertfordshire Investment and Infrastructure Strategy is not due for completion until September 2008, however, consultants are due to begin work in March, so may be able to provide some initial information on sites and/or broad locations (for example, where it is considered that likely infrastructure costs could make potential housing schemes in a particular broad location unviable).
- 7.50 The assessment forms will be used for collecting further information on estimated capacity, deliverability and developability for each identified site/broad location.

Stage 10 - Overcoming Constraints

- 7.51 Where site constraints have been identified, the SHLAA will consider what action would be needed to remove them (e.g. provision of new infrastructure, dealing with fragmented ownership, environmental improvements, amending planning policy etc).
- 7.52 It is suggested that a brainstorming session is held, where attendees from the Council (and possibly other key stakeholders or landowners/developers) can discuss possible solutions for overcoming these constraints.

Stage 11 - Estimating Windfall Allowances

- 7.53 PPS3 states that no allowance should be made for windfall sites (i.e. sites which have not been specifically identified as available in the LDF process, but are previously developed sites that have unexpectedly become available) in the first 10 years of land supply unless local authorities can provide robust evidence as to why such sites cannot be identified.

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- 7.54 The Housing Monitoring Report (2007) includes information on residential completions and highlights that windfall sites are currently contributing a dwelling increase of about 200 units per annum within the District.
- 7.55 It is possible that, following the identification of as many sites and broad locations as practicably possible during Stage 4 of the SHLAA, the Council may still need to devise specific windfall allowances for certain categories of site likely to contribute to housing supply for the full 15 years following adoption of the Site Allocations DPD (i.e. from 2011 to 2026) rather than just from year 10 onwards.
- 7.56 Any windfall allowances will be estimated by calculating the average annual completion rates from each source (taking care to avoid double counting of sites and broad locations which have already been included in the Assessment) and then taking account of the following trend information:
- Whether annual rates of windfall development within the District are likely to increase or decrease;
 - Whether the patterns of windfall development are likely to remain the same, grow or decline; and
 - Whether current market conditions are likely to stay the same, worsen or improve in the future.

Stage 12 - Review of the Assessment

- 7.57 A draft SHLAA document will be produced which summarises the process undertaken and presents an overall assessment of the deliverability and developability of each site (and broad location, where appropriate).
- 7.58 On the basis of all the information collected during the Assessment, the Council proposes to place each site into a potential phasing period, in line with any identified constraints. It will then be possible to outline the housing potential across the District in the form of an indicative housing trajectory (i.e. a graph showing how much housing can be provided and at what point in the future).
- 7.59 At this stage, the Council will need to assess whether sufficient sites (and broad locations) have been identified to meet the District's housing requirements as set out in RSS14 and, if not, further sites or broad locations may need to be sought, or assumptions regarding the housing potential of particular sites may need to be revisited.
- 7.60 The key outputs at Stage 12 will include: a draft SHLAA document (which will be presented to the Planning Policy Advisory Panel in September 2008); a series of completed site/broad location assessment forms; and GIS maps for each site/broad location.
- 7.61 Following consideration by the Planning Policy Advisory Panel, the Council will seek further comments on the SHLAA document from all those stakeholders, landowners etc who have been involved in the process. It is

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anticipated that this further consultation will take place during the Autumn of 2008.

8. Sustainability Appraisal and Strategic Environmental Assessment

- 8.1 Whilst it is not expected that the Council's sustainability consultants will be involved specifically in the production of the SHLAA, the criteria for assessing the suitability of sites and broad locations for housing development will need to be consistent with the SA/SEA assessment framework that has already been established for St Albans District. Furthermore, the final SHLAA document will identify a number of sites (and broad locations), which will need to be fully assessed against the SA/SEA framework, in order to determine which should be taken forward as the Council's Preferred Options for inclusion in the Core Strategy and Site Allocations DPDs.

9. Proposed Timetable for Carrying Out the SHLAA

- 9.1 The total length of time to complete the Assessment will be approximately eight months, with the following key project milestones:

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| • Consultation on Methodology | Feb 08 |
| • Desk Research, Mapping, Data collation | March 08 |
| • On-site Survey work | April 08 |
| • Assessment of Housing Potential on Identified Sites | May 08 |
| • Collation of Initial Findings | August 08 |
| • Presentation to the Planning Policy Advisory Panel | Sept 08 |
| • Further consultation with stakeholders on SHLAA | Sept 08 |