

St Albans

City & District



HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT

2021

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Annexes – Site Book

Explanatory note: Annex 1 to 16 contain all sites submitted by parish area. Annex 17 and 18 highlight employment and other uses.

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IMPORTANT INFORMATION – PLEASE READ

The Housing and Economic Land Availability Assessment (HELAA) is a technical study prepared to inform the Council's new Local Plan. The assessment and identification of sites has no status in formally allocating land for future development and does not guide any decision that the Council makes on individual planning applications. The purpose of the HELAA is to consider a wide range of potential options for the future supply of housing and employment land. It does this through assessing sites with future development potential. It is not a statement of policy and does not allocate sites to be developed. This is the role of the Local Plan.

Far more sites with the potential for housing are identified than will be needed for the Local Plan. Identification through the HELAA as having potential for housing does not mean that housing should come forward on these sites, as in many instances there will be strong planning reasons why they should not. The identification of potential development sites within the HELAA as deliverable does not oblige or mean that the Council will grant planning permission for development. All planning applications will continue to be considered against the appropriate policies in St Albans City and District Council Local Plan and the National Planning Policy Framework (NPPF) and any other material considerations. The inclusion of potential housing sites within the study does not preclude them from being developed for other purposes.

Phasing

The phasing, constraints, and capacity of sites are based on the Council's views at the time of the study and an assessment of deliverability, having regards to the NPPF and Planning Practice Guidance (PPG). Circumstances or assumptions may change. This may mean that sites come forward sooner or later than originally envisaged. Delivery rates are based on evidence in 2020 Lichfields' Start to Finish Report as this is the best available data. However, from a review of previous development delivery in the District may be quicker and further work is being undertaken on local delivery rates. Finally, through the process of developing the Local Plan, developers may provide evidence that sites can be delivered in different timescales to the ones estimated in the HELAA and officers will take this into account when such evidence becomes available. HELAA does not prevent planning applications from being submitted on any sites identified or excluded within it at any time.

The information published as part of the HELAA is based on information available at the time of the study, much of which is supplied by landowners or their representatives. As such, there may be some omissions and/or factual inaccuracies, for which the Council does not take liability. Therefore, users of the study's findings will need to appreciate that there may be additional constraints on some sites that were not identified at the time of the survey and that planning applications will continue to be treated on their merits at the time of the planning application, rather than on the information contained within the HELAA. Likewise, some of the identified constraints may have changed since the information was compiled. Issues may arise during the course of a detailed planning application that could not be or were not foreseen at the time of the assessment.

Generally, the housing capacity of a site in the study either relates to the number of dwellings granted in an unimplemented planning permission (where applicable) or is an estimate based on the methodology contained within the HELAA. However, the site capacities in the study do not preclude densities being increased or decreased on sites, nor does it mean that the densities envisaged within the assessment would necessarily be appropriate. Appropriate densities would need to be assessed through the planning processes when a planning application is submitted. Further technical work to be undertaken as part of the preparation of the Local Plan may also indicate that sites, or parts of sites, are not suitable for development.

Mapping of sites

Each site is individual mapped on the Council's internal GIS system primarily based on the information submitted by the landowner/ developer or agent. Boundaries may require further refinement due to different GIS base mapping, or from officers having to refine boundaries to be more precise to reflect more accurately exact boundaries e.g. road boundaries, field boundaries as the HELAA work progresses. Any accuracy issues will be resolved as best as possible before final publication.

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1 Introduction

1.1 The Housing and Economic Land Availability Assessment (HELAA) is a technical study that provides an overview of St Albans City and District Council housing and economic potential land supply to meet the District's future development needs.

1.2 In previous years 2009 -2018, the assessment has been called the Strategic Housing Land Availability Assessment (SHLAA). National planning policy and guidance has since changed, and the approach now includes Economic Land. Sites submitted before 2016 are not included as they are no longer deemed to be deliverable and no evidence has been provided to state that they can be delivered.

1.3 The assessment includes:

- All sites submitted via the 'Call for Sites' held between 25 January - 8 March 2021. 200 sites were promoted for either housing, employment, or other forms of development;
- The assessment assesses sites previously promoted from 2016 onwards. These account for 182 sites;
- The Council has undertaken an objective assessment of urban capacity within the District to understand how much non-urban land will need to be identified to meet the development needs. 215 sites were found through the process (see Appendix B).

1.4 The primary aim of the assessment is to:

- Set out the potential urban capacity of the District (see Appendix B);
- Consider the suitability, availability, and achievability of sites submitted from 2016 onwards (in line with PPG paragraph 001 Reference ID: 3-001-20190722);
- Identify potential 5 year land supply of housing land;
- Set out the estimated development potential of those sites and if it will meet the needs of the new Local Plan 2020 to 2038.

1.5 As the PPG states in paragraph 001 Reference ID: 3-001-20190722:

"...the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites that are available to meet the local authority's (or, where relevant, elected Mayor or combined authority) requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements."

- 1.6 Decisions on which sites will be taken forward as proposed site allocations or broad locations in the new Local Plan will be informed by the Site Selection process. This takes forward the result of the HELAA to consider other strands of evidence, including the outputs of the Sustainability Appraisal, Green Belt Review, and infrastructure requirements from the Infrastructure Delivery Plan.
- 1.7 It is also important to note that this is a high-level assessment and whilst multiple issues have been considered, the HELAA does not go to the level of detail that would be expected within a planning application. It is nevertheless, sufficient to identify whether there are any in principle reasons as to why a site would not be considered suitable to take forward to site selection, or to identify any matters which may limit the estimated development potential of a site in some way (e.g. the extent of a developable area, the capacity of a site or the timing of delivery).

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2 National Planning Policy and Guidance

2.1 National planning policy and guidance is comprised of:

- National Planning Policy Framework 2021
- National Planning Policy Guidance (updated online)
- National Planning Policy for Traveller Sites (PPTS) August 2015

2.2 All set out considerations for the assessment.

National Planning Policy Framework 2021

2.3 NPPF paragraph 68 sets out that the council should undertake an assessment of available land looking over a 15 year period, emphasising that larger sites should be planned to come forward in years 6-15.

"68. Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability, and likely economic viability. Planning policies should identify a supply of:

specific, deliverable sites for years one to five of the plan period; and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."

2.4 It provides further guidance on broad locations for growth at paragraph 73 where it states:

"73. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential, and the scope for net environmental gains;

b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;

c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;

d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and

e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.”

2.5 NPPF paragraph 69 emphasises the importance that smaller and medium size sites can make and how the Council will need to consider them in its assessment of developable land for housing:

“69. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;

c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”

2.6 NPPF 71 paragraph provides guidance on housing windfall allowance:

“71. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

National Planning Policy Guidance

2.7 The PPG states in paragraph: 001 Reference ID: 3-001-20190722 that HELAA should:

- *“identify sites and broad locations with potential for development;*
- *assess their development potential; and*
- *assess their suitability for development and the likelihood of development coming forward (the availability and achievability).”*

2.8 Paragraph: 002 Reference ID: 3-002-20190722 sets out how constraints such as the Green Belt should be taken into account as part of the assessment process:

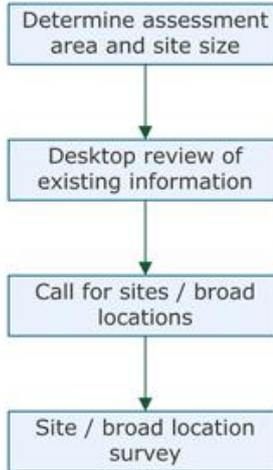
“Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the National Planning Policy Framework, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas).”

2.9 Paragraph: 008 Reference ID: 3-008-20190722 of the PPG sets out that the HELAA should provide a complete audit of all available land:

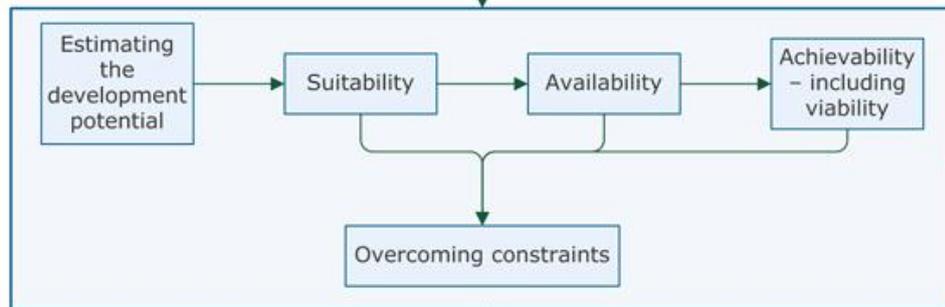
“The assessment needs to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land. The process of the assessment will, however, provide the information to enable an identification of sites and locations that are most suitable for the level of development required.”

2.10 The PPG sets out a method for the assessment. The following chart below demonstrates the stages. The additional PPG guidance on these stages is then set out underneath the flowchart.

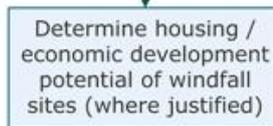
Stage 1 - Site / broad location identification



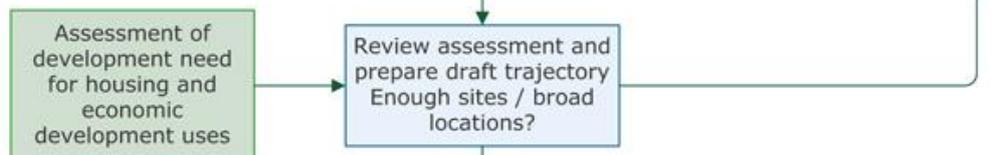
Stage 2 - Site / broad location assessment



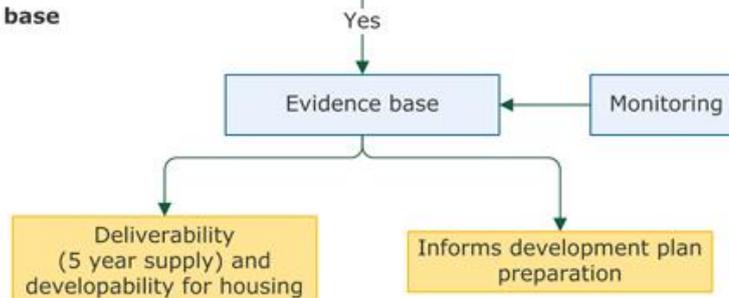
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



Stage 1: identification of sites and broad locations

2.11 PPG states that:

“The area selected for the assessment should be the plan-making area.”

2.12 In terms of size, the PPG suggests in paragraph: 009 Reference ID: 3-009-20190722:

“It may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above.”

2.13 The PPG stipulates in paragraph 012 Reference ID: 3-012-20190722 that in identifying land that the Council should undertake a ‘Call for Sites’. It states the following should be considered in undertaking the exercise:

“This needs to be aimed at as wide an audience as is practicable so that those not normally involved in property development have the opportunity to contribute. This can include notifying parish councils and neighbourhood forums, landowners, developers, businesses, and relevant local interest groups, as well as local publicity. A call for sites will need to set out the information sought from respondents, which could include:

- *site location;*
- *suggested potential type of development (eg economic development uses – retail, leisure, cultural, office, warehousing etc; residential – by different tenures, types and needs of different groups such as older people housing, private rented housing and people wishing to build or commission their own homes);*
- *the scale of development; and*
- *constraints to development.”*

Stage 2: Site/broad location assessment

2.14 The PPG states the aim of this part of the assessment as being the estimation of the development potential of each site/ broad location. It provides specific guidance on how to assess development potential:

“The estimation of the development potential of each identified site can be guided by the existing or emerging plan policy including locally determined policies on density. When assessing development potential, plan makers should seek to make the most efficient use of land in line with policies set out in the National Planning Policy Framework.

Development potential is a significant factor that affects the economic viability of a site / broad location and its suitability for a particular use. Therefore, assessing achievability (including viability) and suitability can usefully be carried out in parallel with estimating the development potential.

Paragraph: 016 Reference ID: 3-016-20190722”

2.15 The PPG states that at this stage:

“Plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period.

Paragraph: 017 Reference ID: 3-017-20190722”

2.16 PPG provides specific guidance on what needs to be considered when assessing suitability, availability and achievability of sites/ broad locations.

Suitability

2.17 Overall the PPG states in paragraph: 018 Reference ID: 3-018-20190722:

“A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.”

In the same paragraph it sets out the following may be relevant for the assessment:

- “• national policy;*
- appropriateness and likely market attractiveness for the type of development proposed;*
- contribution to regeneration priority areas;*
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.”*

2.18 Finally, it states that:

“Sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability. This can be informed by a range of factors including the suitability of the land for different uses and by market signals, which will be useful in identifying the most appropriate use.”

Paragraph: 018 Reference ID: 3-018-20190722

Revision date: 22 07 2019

Availability

2.19 The PPG states that the following factors can be considered when assessing availability:

“A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.

The existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years, further guidance to this is contained in the 5 year housing land supply guidance. Consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.

Paragraph: 019 Reference ID: 3-019-20190722”

Achievability

2.20 PPG states that the following factors can be considered when assessing achievability:

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

Paragraph: 020 Reference ID: 3-020-20190722”

2.21 The PPG provides guidance on timescales:

“Information on suitability, availability, achievability and constraints can be used to assess the timescale within which each site is capable of development. This may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year.

Paragraph: 022 Reference ID: 3-022-20190722”

2.22 If there are constraints identified as part of the assessment of suitability, availability and achievability, the PPG states at Paragraph: 021 Reference ID: 3-021-20190722 that the assessment should be focused on considering whether they can be overcome.

Stage 3: Windfall assessment

2.23 The PPG is clear in paragraph: 023 Reference ID: 3-023-20190722 that any assessment of windfall needs to be justified by compelling evidence. In particular, it draws attention to NPPF and what it states on windfall. NPPF 2021 paragraph 71 says:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

Stage 4: Assessment review

2.24 The PPG states that Stage 4 is concerned with setting out how much housing and economic development can be provided over the plan period and at what point in the future. The assessment should be set out in an indicative trajectory and accompanied by a risk assessment (see paragraph: 024 Reference ID: 3-024-20190722). If there are insufficient sites and broad locations then the process has to be revisited. If after undertaking the process again, enough land cannot be found then the PPG requires working with neighbouring authorities through the Duty to Cooperate process and setting out arrangements in a Statement of Common Ground (see Paragraph: 025 Reference ID: 3-025-20190722).

Stage 5: Final Evidence Base

2.25 PPG sets out the standard outputs that are expected in Paragraph: 026 Reference ID: 3-026-20190722:

- a list of all sites or broad locations considered, cross-referenced to their locations on maps;
- an assessment of each site or broad location, including:
- where these have been discounted, evidence justifying reasons given;
- where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
- an indicative trajectory of anticipated development based on the evidence available.

National Planning Policy for Traveller Sites (PPTS) August 2015

2.26 National Planning Policy for Travellers Sites (PPTS) states that the Council should set pitch targets for gypsies and travellers to address the likely site accommodation needs of travellers in their area, and (in summary):

- identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;
- identify a supply of specific, developable sites, or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- relate the number of pitches or plots to the circumstances of the specific size and location of the site;
- protect local amenity and environment;
- ensure that traveller sites are sustainable (economically, socially and environmentally); and
- when assessing the suitability of sites in rural or semi-rural settings, ensure that the scale of such sites does not dominate the nearest settled community.

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3 Methodology

Introduction

- 3.1 The methodology is based on the National Planning Practice Guidance (NPPG), which uses a stepped approach. The previous section sets out National Policy and Guidance on how to undertake a HELAA and should be read in conjunction with this section.

Stage 1: Site / Broad Location identification

a. Geographical Area Covered

- 3.2 The assessment covers the whole of St Albans City and District Council area. The District lies within the South West Hertfordshire strategic housing and function economic market areas.

b. Site of sites and broad locations

- 3.3 Sites and broad locations capable of delivering 5 or more dwellings or 0.25ha/500 sqm of economic development were considered for inclusion in the HELAA. Sites have been identified without reference to the amount of land for development needed. Where sites are substantially or wholly covered by these constraints, then they will be excluded.

c. Types of site

- 3.4 A wide range of sites were considered. In line with the guidance in paragraph: 010 Reference ID: 3-010-20190722 of the NPPG, sites with policy constraints were included in the initial list of those to be considered for inclusion in the HELAA. Where sites are substantially or wholly covered by these constraints, then they will be excluded.
- 3.5 In identifying the list of sites/locations to be considered for assessment account has been taken of the guidance in paragraph 011 Reference ID: 3-011-20190722 of the NPPG, and where relevant, sites in the following categories are being included:
- Existing Local Plan allocations without planning permission;
 - Sites submitted through the 'Call for Sites' 2021;
 - Sites from previous SHLAA from 2016 onwards.
- 3.6 Where sites already have planning permission or have been subject to prior notification/approval they are included in the HELAA as windfall. They have not undergone a further detailed site assessment as this is not considered necessary unless other information suggests this to be required.
- 3.7 An additional exercise has been undertaken to understand urban capacity within the District, this is set out in the Urban Capacity Study (see Appendix B).

d. 'Call for Sites'

- 3.8 Stakeholder input plays a key role in the delivery of a robust HELAA. As part of the preparation of the HELAA, a 'Call for Sites' was issued from 25 January to 8 March 2021. The 'Call for Sites' was publicised on the Council's website and sent out to the Local Plan stakeholder database the Council holds. The database consists of those who choose to be involved.
- 3.9 A HELAA questionnaire/ proforma was prepared. It was made available on the website and those submitting sites for consideration were required to complete it and provide a site plan with the site boundaries clearly indicated. A copy of the questionnaire/ proforma is attached in Appendix A.

Stage 2: Site/ broad location assessment

- 3.10 To enable a preliminary judgement to be made about whether a site or broad location can be considered deliverable or developable over the plan period, its suitability, availability and achievability was assessed via a desk based assessment. Each site is individual mapped on the Council's internal GIS system primarily based on the information submitted by the landowner/ developer or agent. Boundaries may require further refinement due to different GIS base mapping, or from officers having to refine boundaries to be more precise to reflect more accurately exact boundaries e.g. road boundaries, field boundaries as the HELAA work progresses. Any accuracy issues will be resolved as best as possible before final publication.
- 3.11 For those sites/areas judged to be suitable, available and achievable, an assessment of their development potential enabled their potential contribution to meeting housing and employment land needs over the plan period to be identified.
- 3.12 Sites assessed in the previous SHLAA were reviewed. Where the same site had been submitted in 'Call for Sites' 2021, if the boundary was different to previous submissions, it has been included for transparency. It has been treated as a separate site, as it was considered the circumstances of the site had changed. However, the total housing figure shown above includes only the most recently submitted proposal for each site to avoid double counting.
- 3.13 Sites were taken as being available as they had been submitted. They were also considered deliverable and achievable unless other information suggested that they should be reassessed. A more detailed assessment of deliverability and achievability will be undertaken through the site selection process.

a. Site and broad location survey

- 3.14 A desk based assessment of the potential contribution to housing and economic land supply of each site/broad location was also carried out.
- 3.15 The desktop survey included recording/checking the following information:
- Site size
 - Site boundaries

- Site location
- Current land-use(s)
- Planning history
- Character of site and surrounding area

b. Assessment

3.16 Sites were assessed for their suitability, availability and achievability, in line with paragraph: 017 Reference ID: 3-017-20190722 of the NPPG.

c. Assessing Suitability

3.17 A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. A stepped approach was undertaken which is detailed below.

Step 1: Assessment of Constraints

3.18 Step 1 focused on sifting out those sites which are entirely covered by an absolute constraint and therefore unable to deliver development. This will ensure that sites are not excluded in their entirety in Step 1 where alterations to a site boundary could be made to remove absolute constraints or where areas of absolute constraint could be considered for other uses i.e. open space. Sites where this was possible were kept in and still considered suitable.

3.19 Absolute Constraints are considered to be the following:

- Ancient Woodlands
- Air Quality Management Areas
- Flood Zone 3B
- Local Nature Reserves
- Registered Parks and Gardens
- Scheduled Monuments
- Site of Special Scientific Interest

Step 2: Assessment of Constraints which can be mitigated

3.20 Step 2 included an assessment of constraints (absolute and non-absolute) which could potentially be mitigated but may affect estimations of development capacity. These constraints were based on the absolute constraints set out in Step 1 where sites are in, but not entirely covered by an absolute constraint, as well as the following non-absolute constraints:

- Listed Buildings
- Locally Listed Buildings

- Conservation Areas
- Archaeological Sites where planning permission may be subject to recording conditions
- Archaeological Sites subject to local preservation
- Metropolitan Green Belt
- Tree Preservation Orders
- Public Open Space
- Local Wildlife Sites
- Landscape Character Areas
- Minerals Safeguarding Areas (Brick)
- Minerals Safeguarding Areas (Sand and Gravel)
- Flood Zone 2
- Flood Zone 3
- Source Protection inner zone (SPZ 1)
- Source Protection outer zone (SPZ 2)
- Source Protection total catchment zone (SPZ 3)
- Existing Section 41 NERC Habitat Act 2006 (CAT 1)
- Existing habitat area not qualifying under Section 41 NERC Habitat Act 2006 (CAT 2)
- High priority for habitat creation (CAT 3A)
- Medium priority for habitat creation (CAT 3B)
- Low priority for habitat creation (CAT 3C)
- Regionally Important Geological and Geomorphological Sites

3.21 Sites and broad locations are not excluded at this stage on the grounds of being located within the Green Belt (as identified in the current 1994 Local Plan). Given the quantum of new development that is likely to be required in the next 15 years there is likely to be a need to identify sites that are currently in the Green Belt for development.

3.22 It is acknowledged that footnote 7 of the NPPF (2021) includes both Green Belt and other designations including SSSIs. The NPPF does, however, in paragraphs 140 -141 set out where Green Belt boundaries may exceptionally be altered and only where this is fully evidenced and justified. A Green Belt Review is being undertaken by Arup in 2021-2022. Sites have been assessed against the outcomes of this review in order to identify their contribution to Green Belt purposes. The outcomes of this will be considered as part of the Site Selection process which follows the HELAA.

Step 3: Review of relevant planning history

3.23 Relevant planning history for each site was reviewed with the aim of identifying any other issues which may prevent a site from being considered suitable. This assessment provides an initial understanding of whether a site is likely to be considered suitable for development, Sites are then taken forward to assess availability.

d. Assessing Availability

3.24 An available site is one where on the best information existing there is confidence that there are no legal or ownership problems (e.g. multiple ownerships, ransom strips, tenancies or operational requirements of landowners) that will prevent development from coming forward. This will often mean that the land is owned by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell.

3.25 Where any problems were identified by those putting forward the site or known to the Council, an assessment has been made as to how and when they might realistically be overcome. Factors could include the delivery record of the developer or landowner concerned and the planning history of the site. The current use of the site may also affect its availability during the Plan period – e.g. a quarry with 10 years' worth of resources still to be extracted may not be developable until years 11-15 at the earliest, and possibly much later. Such issues have been considered.

e. Assessing Achievability

3.26 An achievable site is one where there is a reasonable prospect that the type of development proposed will be developed at a particular point in time. This means that:

- it should be economically viable, and
- the developer has the capacity to complete and let or sell the development over a certain period.

3.27 The viability of a site will depend on a range of factors including the quantum of development which can be accommodated and the cumulative development costs (including any planning obligations) while ensuring an appropriate site value for the land owner and an appropriate return for the developer. Demand for housing in St Albans City and District Council remains very high with a buoyant housing market reflected in average property prices. Therefore, for the purposes of the HELAA, where land has been actively promoted for development or it has planning permission or is allocated in an existing plan, there is an overall assumption that a site is capable of being viable. Detailed viability testing will be carried out in due course, where required, for the sites that the Council chooses to allocate for the plan.

f. Estimating development potential

3.28 For those sites considered to be suitable, available and achievable within the Local Plan period, an estimate of the site's capacity /development potential has been made. Different approaches have been undertaken for housing, economic development and other uses.

Estimating Development Potential of Housing Sites

3.29 In any identified site, the land it contains might not be wholly developable. Each site has constraints and requirements for infrastructure which need to be accommodated when estimating the site's capacity. Gross to net ratios are used to estimate the developable area of each site.

3.30 Housing sites will use the 40 dwellings per hectare (dph), in accordance with the Council's previous Residential Density Report 2014¹. It is considered that 40dph is a relatively 'safe', robust assumption which can be readily achieved in suburban location housing developments in the District.

3.31 This simple 40 dph calculation makes no specific allowance for infrastructure and major open space in larger development areas. To take into account allowances for infrastructure on larger sites, the Residential Density Report sets out only 60% of the site will be considered usable for residential, with 40% would be required to provide infrastructure, main roads, open space and public facilities. However, as small sites will likely not require the level of infrastructure a range of gross to net ratios are used in the HELAA to estimate the developable area of each identified site.

3.32 The gross to net ratio is based on the size of the site. Generally, as a site's area increases so does the need for additional infrastructure and this reduces the proportion of developable area within a site. The gross to net ratios will be based on best practice guidance which presents a range of ratios to use. The table below sets out the gross to net ratios for each site size.

Table 1: Gross to net ratio

Site Area (hectares)	Gross to net ratio
Sites up to 0.4ha	100%
Sites between 0.4 to 2ha	85%
Sites greater than 2ha	60%

Source: Based on Urbed - Tapping the Potential: Best Practice in Assessing Urban Housing Capacity: 1999

¹ St Albans City & District Council SLP Background Note: Density October 2014
https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/planning-policy/examination-library/SP_Housing_SLP_BackgroundNote_ResidentialDensities_Oct2014_tcm15-45179.pdf

- 3.33 As a majority of the sites identified in the 'Call for Sites' are on Green Belt land, with no existing density, the gross to net ratio has been set as the mid-point of the range, other than sites greater than 2 hectares, preventing these large sites from exceeding the 60% developable area for residential. At this time density ranges and uplift areas have not been applied to sites within urban areas. The Urban Capacity Study (see Appendix B) has identified sites in urban areas, and applied density uplift based on residential character, and sustainability.
- 3.34 Sites capable of delivering less than five units were sifted out of the HELAA as considered unsuitable. However, the identified supply will form part of the windfall allowance. Similarly, sites promoted for less than five units were not considered.

Estimating Development Potential of Economic Development

- 3.35 For economic development, a land area has been included. Given that the end user(s) of potential employment sites are not currently known, it would be difficult to convert land area into a realistic floor space or jobs total at this stage.

Other Uses

- 3.36 As with Employment, sites that fall within other uses can be difficult to quantify into an overall capacity for the proposed use, and as such only the land area has been included.

Site Constraints

- 3.37 With sites put forward for all uses, development potential may be affected by Absolute and Non Absolute constraints affecting parts of the site, but not enough to exclude them from further consideration. In these instances the affected area has been excluded from the site area, and as such reducing housing potential. These constraints include all Absolute constraints, as well as Flood Zone 2 and 3. Listed Buildings are also identified as a constraint that can reduce capacity, but require a deeper assessment of the impact on the setting of a Listed Building.

Other Factors reducing Development Potential

- 3.38 The following other factors have been taken into account as reducing capacity;
- Other Proposed Uses
- 3.39 Sites that have indicated mixed use development including other proposed uses – e.g.employment, and have given the site area splits for each use, residential capacity will be calculated against the estimated residential area only.

- Existing implemented permissions.

3.40 A number of sites put forward include extant permissions currently under construction. The area of sites considered to come forward for new development has as such been reduced to reflect this.

g. Timescale – Deliverability/ Developable

3.41 The following information has been used to estimate the timescale within which each site/location is likely to be developed:

- Suitability, availability, achievability and constraints
- Size / scale of development
- lead-in times for development proposed
- build-out rates for development proposed

3.42 To be considered deliverable, sites should be:

“available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

(NPPF Glossary)

“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”

(NPPF Glossary)

Lead in times and build out rates

- 3.43 This subsection sets out the estimated lead in times and build out rates for housing sites included in the HELAA, over the Local Plan period. The lead in times and build out rates are based on quantitative secondary data from the Lichfields 'Start to Finish (second edition)' 2020 report², which examined historic housing delivery in England and Wales (outside London) between 1995/96 and 2017/18. Delivery rates are based on evidence in 2020 Lichfields' Start to Finish Report as this is the best available data. However, from a review of previous development delivery in the District may be quicker and further work is being undertaken on local delivery rates. Lichfield's work provides the best available data on delivery rates. Finally, through the process of developing the Local Plan, developers may provide evidence that sites can be delivered in different timescales to the ones estimated in the HELAA and officers will take this into account when such evidence becomes available.
- 3.44 The 'Start to Finish' report assessed the lead in times of housing sites, which refers to the stages in the planning and delivery process that take place before housing is completed. The first period is referred to as the 'planning approval period', defined as the period from application validation to approval of detailed planning permission. The second period is described as the 'planning to delivery period', defined as the period from detailed planning permission being granted to the completion of the first dwelling on site.
- 3.45 Following this, the report analysed the average (mean and median) annual housing delivery of a sample of 97 housing sites based on the following size categories: 50-99 dwellings; 100-499 dwellings; 500-999 dwellings; 1,000-1,499 dwellings; 1,500-1,999 dwellings and 2,000+ dwellings. It should be noted that the report did not include assessments of housing delivery for sites of 1-49 dwellings. To summarise, there is a correlation between lead in times, build out rates and the size of housing sites. Smaller housing sites have shorter lead in times and lower build out rates, whereas larger housing sites have longer lead in times and higher build out rates.
- 3.46 The table below sets out raw data from the report for lead in times and build rates of housing sites:

² ² Start to Finish (second edition), Lichfields (February 2020) <https://lichfields.uk/content/insights/start-to-finish>

Table 2 – Lichfields ‘Start to Finish’ Report, Housing Sites Average Lead in Times and Build Out Rates:

A. Size of Site (Number of Dwellings)	B. Average Planning Approval Period (Years)	C. Average Planning to Delivery Period (Years)	D. Total Average, Planning Approval to Planning to Delivery Period (Years) = B + C	E. Average (Mean) Build Out Rate (Dwellings per Year)	F. Median Build Out Rate (Dwellings per Year)	G. Total Range Period to Complete Average (Mean) Build Out Rate (Years) = A / E	H. Total Time from Average Planning Approval to Delivery Period and Period to Complete Build Out (Years) = D + G
1-9	N/A	N/A	N/A	N/A	N/A	N/A	N/A
10-49	N/A	N/A	N/A	N/A	N/A	N/A	N/A
50-99	1.4	2.0	3.3*	22	27	2.3 to 4.5	5.6 to 7.8
100-499	2.1	1.9	4.0	55	54	1.8 to 9.1	5.8 to 13.1
500-999	3.3	1.7	5.0	68	73	7.4 to 14.7	12.4 to 19.7
1,000-1,499	4.6	2.3	6.9	107	88	9.4 to 14	16.3 to 20.9
1,500-1,999	5.3	1.7	7.0	120	104	12.5 to 16.7	19.5 to 23.7
2,000+	6.1	2.3	8.4	160**	137	12.5+	20.9+

Source: Start to Finish (second edition), Lichfields (February 2020) (Figure 4, p.6; Figure 7, p.9; Figure 9, p.12) <https://lichfields.uk/content/insights/start-to-finish>

*Does not sum up due to rounding

**N.B. Average build out rates for sites over 2,000 homes: average of 160 dwellings per year (all sites), average of 155 dwellings per year (sites with 5+ years of delivery) and average of 165 dwellings per year (sites with 10+ years of delivery)

3.47 Estimated lead in times and build out rates for housing sites in the HELAA are proposed, which correspond with data from the 'Start to Finish' report above. It should be noted that data for the estimated HELAA lead in times and build out rates has been rounded to the nearest whole number or nearest five number (where applicable). For the purposes of the HELAA:

- it is estimated that for all housing sites, the lead in times in year one (specifically the planning approval period) will begin from the year that the Local Plan is adopted by the Council.
- housing sites of 1-9 dwellings, the estimated average planning approval period is 1 year, followed by an average planning to delivery period of 1 year; then a build out rate of 1-9 dwellings is estimated in year 3.
- housing sites of 10-49 dwellings, the estimated average planning approval period is 1 year, followed by an average planning to delivery period of 1 year; next an average build out rate of 15 dwellings per year is estimated in years 3 to 6.
- housing sites of 50-99 dwellings, the estimated average planning approval period is 1 year, followed by an average planning to delivery period of 2 years; then an average build out rate of 20 dwellings per year is estimated in years 4 to 8.
- housing sites of 100-499 dwellings, the estimated average planning approval period is 2 years, followed by an average planning to delivery period of 2 years; next an average build out rate of 55 dwellings per year is estimated in years 5 to 14.
- housing sites of 500-999 dwellings, the estimated average planning approval period is 3 years, followed by an average planning to delivery period of 2 years; then an average build out rate of 70 dwellings per year is estimated in years 6 to 20.
- housing sites of 1,000-1,499 dwellings, the estimated average planning approval period is 5 years, followed by an average planning to delivery period of 2 years; next an average build out rate of 110 dwellings per year is estimated in years 8 to 21.
- housing sites of 1,499-1,999 dwellings, the estimated average planning approval period is 5 years, followed by an average planning to delivery period of 2 years; then an average build out rate of 110 dwellings per year is estimated in years 8 to 24.
- housing sites of 2,000 or more dwellings, the estimated average planning approval period is 6 years, followed by an average planning to delivery period of 2 years.
- housing sites of 2,000 or more dwellings, the estimated average build out rates are 155 dwellings per year in years 9 to 17 (years 1 to 9 of housing completions) and 165 dwellings per year in year 18 onwards (year 10 onwards of housing completions).

3.48 Table 3 outlines the estimated lead in times and build out rates of housing sites in the HELAA; Figure 1 illustrates the estimated HELAA housing site's lead in times and build out rates in a Gantt chart.

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Table 3 – HELAA Housing Sites Estimated Lead in Times and Build Out Rates:

A. Size of Site (Number of Dwellings)	B. Average Planning Approval Period (Years) <i>Rounded to nearest whole number</i>	C. Average Planning to Delivery Period (Years) <i>Rounded to nearest whole number</i>	D. Total Average, Planning Approval to Planning to Delivery Period (Years) <i>= B + C Rounded to nearest whole number</i>	E. Average (Mean) Build Out Rate (Dwellings per Year) <i>Rounded to nearest five number (where applicable)</i>	F. Total Period to Complete Average (Mean) Build Out Rate (Years) <i>= A / E Rounded to nearest whole number</i>	H. Total Time from Average Planning Approval to Delivery Period and Period to Complete Build Out (Years) <i>= D + F Rounded to nearest whole number</i>
1-9 *	1	1	2	1-9	1	3
10-49 **	1	1	2	15	1 to 4	3 to 6
50-99	1	2	3	20	3 to 5	6 to 8
100-499	2	2	4	55	2 to 9	6 to 13
500-999	3	2	5	70	7 to 14	12 to 19
1,000-1,499	5	2	7	110	9 to 14	16 to 21
1,500-1,999	5	2	7	120	13 to 17	20 to 24
2,000+	6	2	8	155 or 165 ***	13+	21+

*N.B. Build out rates for sites of 1-9 dwellings not included in Lichfields report. Estimated average planning approval period of 1 year, followed by average planning to delivery period of 1 year. This is followed by a build out rate of 1-9 dwellings in year 3.

**N.B. Build out rates for sites of 10-49 dwellings not included in Lichfields report. Estimated average planning approval period of 1 year, followed by average planning to delivery period of 1 year. This is followed by an average build out rate of 15 dwellings per year from year 3 onwards.

***N.B. For sites of 2,000+ dwellings, average annual build out rate of 155 dwellings per year for years 1-9 of housing completions and average annual build out rate of 165 dwellings per year for years 10+ of housing completions.

Figure 1 – Gantt Chart of HELAA Housing Sites Estimated Lead in Times and Build Out Rates, by year:

Size of site (Number of Dwellings)	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Yr 12	Yr 13	Yr 14	Yr 15	Yr 16	Yr 17	Yr 18	Yr 19	Yr 20	Yr 21	Yr 22	Yr 23	Yr 24
1-9 *			1-9																					
10-49 **			15	15	15	4																		
50-99				20	20	20	20	19																
100-499					55	55	55	55	55	55	55	55	55	4										
500-999						70	70	70	70	70	70	70	70	70	70	70	70	70	70	19				
1,000-1,499									110	110	110	110	110	110	110	110	110	110	110	110	69			
1,500-1,999									120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	41
2,000+ ***									155	155	155	155	155	155	155	155	155	155	165	165	165	165	165	165

Key	Colour
B. Average Planning Approval Period (Years) <i>Rounded to nearest whole number</i>	
C. Average Planning to Delivery Period (Years) <i>Rounded to nearest whole number</i>	
G. Total Range Period to Complete Average (Mean) Build Out Rate (Years) <i>Rounded to nearest whole number</i>	Average (mean) build out rate (dwellings per year)

*N.B. Build out rates for sites of 1-9 dwellings not included in Lichfields report. Estimated average planning approval period of 1 year, followed by average planning to delivery period of 1 year. This is followed by a build out rate of 1-9 dwellings in year 3.

**N.B. Build out rates for sites of 10-49 dwellings not included in Lichfields report. Estimated average planning approval period of 1 year, followed by average planning to delivery period of 1 year. This is followed by an average build out rate of 15 dwellings per year from year 3 onwards.

***N.B. For sites of 2,000+ dwellings, average annual build out rate of 155 dwellings per year for years 1-9 of housing completions and average annual build out rate of 165 dwellings per year for years 10+ of housing completions.

3.49 Lichfield's work provides the best available data on delivery rates. Further work is being undertaken on local delivery rates to see how they compare. Finally, through the process of developing the Local Plan, developers may provide evidence that sites can be delivered in different timescales to the ones estimated in the HELAA and officers will take this into account when such evidence becomes available.

Stage 3: Windfall

3.50 Windfall refers to sites that come forward unexpectedly. They arise for a number of reasons, e.g.

- Changes in circumstances may result in sites which were never previously considered for development coming forward over time (particularly in St Albans, due to the age of the current 1994 Local Plan);
- Landowners may not have been aware of the Local Plan process or known that they could promote their sites as part of it;
- Landowners who knew about the Local Plan process may not have considered it timely, necessary or worthwhile to promote their site; and
- Sites may not be allocated, for example because they are too small, but nevertheless could be developed at some point over the plan period.

3.51 The NPPF Glossary (page 73) defines windfall as: "sites not specifically identified in the development plan".

3.52 The NPPF in paragraph 71 sets out:

"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply."

3.53 It goes on further to state in paragraph 71 that:

"Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area."

3.54 It should be noted that this approach has been updated since the 2012 NPPF. In paragraph 48 of the NPPF 2012 it explicitly stated that windfall allowances "should not include residential gardens". It is clear from the above that the NPPF sets out that an allowance can be made for windfall sites as part of anticipated supply where there is compelling evidence that they will provide a reliable source of supply. In St Albans City and District Council, windfall sites have, for many years, made an important contribution to housing supply in the District, and given the continued high level of demand for housing, this is expected to continue.

3.55 The methodology is based upon an analysis of windfall delivery rates for years 2010/11 to 2019/20 for which the council has detailed records. The methodology is based upon a multi-stepped approach as follows:

- I. Provides a record of total housing completions and categorises windfalls based on the number of dwellings delivered during a whole economic cycle;
- II. Examines the results over the study period 2010-2020;
- III. Analyses the historic trends and whether there is sufficient evidence for the inclusion of a windfall allowance in the supply; and
- IV. finally based on the evidence provides a figure for anticipated housing delivery from windfall sites which takes into account future market trends, policy changes and assessment of whether there is likely to be an increase or decrease in windfall completions.

3.56 The Windfall assessment figures reflect net completions on sites, including sites identified in the SHLAAs (last updated in 2018). Windfall figures do not include:

- Allocations made in the adopted and saved 1994 District Local Plan Review which have largely been delivered;
- Completions in the Metropolitan Green Belt. The district is over 81% Green Belt and any Green Belt Green Field (GBGF) sites likely to be granted planning permission in the Green Belt would need to demonstrate very special circumstances which would outweigh harm to the openness of the Green Belt and any other harm. Windfalls resulting from this source have therefore been excluded as it cannot be assumed to be a reliable future contribution. These are sites that potentially would have been allocated in an up-to-date local plan following Green Belt release. Previously Developed Land (PDL) in the Green Belt has been included in the windfall calculations because the evidence demonstrates it consistently makes up part of annual completions in the District.

3.57 NPPF (2021) in paragraph 71 no longer makes reference to windfall sites being on previously developed land or considers exclusions should be made to development in residential gardens. Therefore, the windfall will consider all development that was not expected. Development in large residential gardens have therefore been included in the assessment. They have provided a consistently reliable source of delivery across the district over the years.

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4 Assessment of Supply

Introduction

4.1 This section sets out the assessment of supply for housing, economic land and other uses put forward through the 'Call for Sites' process and previous SHLAA process from 2016-2019.

Assessment of Supply – Housing

4.2 For the purposes of this study, housing supply has been separated into the following categories:

- Developments with planning permission or prior notification/approval under permitted development rights.

4.3 This category includes schemes that have commenced (but have not yet been completed) as well as those that have not yet commenced.

- Identified sites.

4.4 This category includes sites identified through the 'Call for Sites' and previous SHLAA process from 2016-2019. A large number of sites have been submitted multiple times. Where the site boundaries are identical, only the most recent submission has been included. Where there are multiple versions of the same site with different boundaries, all have been included for transparency. However, the total housing figure shown above includes only the most recently submitted proposal for each site to avoid double counting.

- Windfall yield

4.5 The NPPF classifies windfall as:

“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.”

4.6 Table 4 sets out the 15 year land supply based on the above.

Table 4: 15 year land supply (all sources of land)

15 year land supply (01/04/2021 baseline)		
Planning permission, prior notification process	Schemes not yet commenced	1,350 net dwellings
	Schemes under construction	618 net dwellings
Housing allocations	Harpenden Neighbourhood Plan 2019 (remaining allocated housing sites)	57 net dwellings
Identified sites	Urban Capacity Study (subject to availability check)	2,174 net dwellings
	'Call for Sites' 2021	31,015 net dwellings
	SHLAA 2016-2018	14,710 net dwellings
Windfall	Windfall allowance (182 net dwellings per year from 2023/24 onwards)	2,184 net dwellings
	Total net yield	52,108 net dwellings

Development with planning permission

4.7 As at the baseline date of 1 April 2021 planning permission and prior approvals have been issued for 2,484 homes. These are broken down into commitments (planning permissions which have not started on site) and completions (developments which have been built out). As at the baseline date of 1 April 2021 there are:

- Commitments - 1,968 net dwellings
- Completions - 516 net dwellings in 2020/21

4.8 All the commitments are all considered to be deliverable under the definition set out in the NPPF and PPG.

Identified Sites

4.9 The HELAA assesses sites under a potential alternative policy context, where some existing constraints have been removed. This is primarily because the Council acknowledges it will not be possible to accommodate the entirety of local housing need on previously developed sites within existing built up areas.

4.10 As an authority with over 81% of its area designated as Green Belt, exceptional circumstances may exist to review the Green Belt boundary in some locations in order to accommodate growth. Whether exceptional circumstances can depend on:

- The acuteness/intensity of the objectively assessed housing need

- The inherent constraints on supply/availability of land suitable for sustainable development
- The consequent difficulties in achieving sustainable development without impinging on the Green Belt
- The nature and extent of the harm to those parts of the Green Belt which may be removed via a boundary review, and
- The extent to which impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practical extent

4.11 The HELAA therefore considers an alternative policy context whereby existing Green Belt restrictions are not applied to an assessment of theoretical site capacity. It must be emphasised that it is not the role of the HELAA to determine if and where Green Belt boundary changes should be made but for the purposes of assessing how much developable housing land is potentially available for development, the HELAA includes an alternative policy context.

Sites Not Progressed To Site Selection

4.12 A total of 112 sites were not taken forward to site selection (33 sites from the HELAA were not taken forward to site selection and 79 sites from the Urban Capacity Study were not taken forward to site selection). These sites were excluded from being taken forward to the Site Selection process due to either being unsuitable, unachievable, or unavailable. Sites which were identified through the 'call for sites' and have been excluded are detailed in Table 5.

Table 5: Sites Sifted Out (Housing)

Site Reference	Site Address	Reason Not Progressed
CH-08-16	Station Road Smallford	The site has not been put forward by landowner, agent or developer
CH-19-21	Land at 82 Oaklands Lane	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
CH-32-17	Land between 106 and 116 Tollgate Road Colney Heath	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
CH-34-16	Station Road Smallford	No. The site has not been put forward by landowner, agent or developer.
HR-03-18	Land at Turner's Hall Farm, west of Harpenden	This site is not suitable. A majority of the site located within Flood Zone 3B and there is no realistic prospect of development outside this constraint.

Site Reference	Site Address	Reason Not Progressed
HR-06-21	Land to the south of Annables Lane	No. The site has not been put forward by landowner, agent or developer.
HT-08-18	Land at Ambrose Lane	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
HT-09-21	Grove Road Garage Site	The site is not suitable because it is of insufficient size to be assessed further.
HT-14-21-1	Land adjacent to Batford Mill, Lower Luton Road	This site is not suitable. A majority of the site located within Flood Zone 3B and there is no realistic prospect of development outside this constraint.
HT-16-16	Land at 8 Rothamstead Avenue and 2 Salisbury Avenue, Harpenden	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
HT-17-21-1	Land on junction of Lower Luton Road & Bower Heath Lane	The site is not suitable. The site is located entirely within Flood Zone 2.
HT-29-16	Former Harpenden House Hotel	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
LC-05-18	Land adjacent 4 South Farm Cottages, London Colney	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
LC-06-21	Land North of Napsbury Park off The Drive	The site is not suitable. The site is located entirely within a Registered Park and Garden.
LC-07-18	Land to the rear of North Cottages, Napsbury, London Colney	The site is not suitable. The site is located entirely within a Registered Park and Garden.
LC-08-21	Rural Estate land north of Napsbury	The site is not suitable. The site is located entirely within a Registered Park and Garden.
R-29-17	Redbourn Library, Lamb Lane	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
SA-01-21	Plot 19, Ragged Hall Lane	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
SA-04-18	Plot 16, Ragged Hall Lane, Chiswell Green	The site is not suitable. The site is of insufficient size to

Site Reference	Site Address	Reason Not Progressed
		provide a capacity for five or more dwellings.
SA-06-21	Salisbury Tennis Club	No. The site is not available. The landowner has not indicated that the site is available.
SA-11-21	1 Watford Road, St Albans	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
SA-13-21	Gombards Car Park	No. The site has not been put forward by landowner, agent or developer.
SA-15-18	Land South of Orchard Close, St Albans	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
STS-09-18	Land adjacent to No 2 Radlett Road, Frogmore	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
STS-26-21	Land at Brinsmead, Frogmore	This site is not suitable. A majority of the site located within Flood Zone 3B and there is no realistic prospect of development outside this constraint.
STS-39-18	Moor Mill South, Bricket Wood	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
STS-45-21	Bricket Wood Scout Hut HQ	No. The site is not available as indicated by the landowner.
STS-52-16	South of Burydell Lane, west of River Ver, Park Street	The site is not suitable. The site is located entirely within Flood Zone 3B. The site is of insufficient size to provide a capacity for five or more dwellings.
STS-59-21	Hanstead Park, Smug Oak Lane	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
WH-31-18	Plots 123 and 124 to land R/O Manor Road	The site is not suitable. The site is of insufficient size to provide a capacity for five or more dwellings.
WH-39-18	Folly Meadow, Off Lower Luton Road	This site is not suitable. A majority of the site located within Flood Zone 3B and there is no realistic prospect

Site Reference	Site Address	Reason Not Progressed
		of development outside this constraint.

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Table 6: Overall Summary of Potential Housing Yield from ‘call for sites’ only

HELAA sites - Potential housing supply by location					
LOCATION	TIMEFRAME (Years from this assessment)				Total (within 15 years)
	1-5yr	6-10yr	11-15yr	16+	
Colney Heath	1,045	2,845	2,015	1,590	5,905
Harpenden Rural	235	470	775	2,680	1,480
Harpenden Town	720	1,085	635	150	2,440
Harpenden Town / Wheathampstead	0	330	550	150	880
London Colney	470	1,620	790	125	2,880
Redbourn	840	2,270	980	120	4,090
Redbourn / Harpenden Rural	0	360	600	605	960
Sandridge	790	3,550	1,740	590	6,080
St Albans (unparished)	720	1,855	915	515	3,490
St Michael	215	205	0	0	420
St Michael / St Albans (unparished)	0	710	950	795	1,660
St Michael/ Redbourn	0	310	775	2,965	1,085
St Stephen	1,585	5,805	3,215	1,605	10,605
Wheathampstead	1,235	1,955	560	560	3,750
Total	7,855	23,370	14,500	12,450	45,725

Table 7: Potential Housing Supply Urban / Green Belt Land from ‘call for sites’ only

HELAA sites - Potential housing supply Urban / Green Belt Land					
Green Belt / Urban Land	TIMEFRAME (Years from this assessment)				Total (within 15 years)
	1-5yr	6-10yr	11-15yr	16+ or unknown	
Urban Land	430	125	0	0	555
Green Belt	7,425	23,245	14,500	12,450	45,170
Net total	7,855	23,370	14,500	12,450	45,725

Windfall

4.13 See previous section on windfall for approach to calculation. Windfall allowance 182 net dwellings per year from 2023/24 onwards which totals 2,184 net dwellings over 15 years.

Assessment of Supply – Economic Land

- 4.14 The South West Herts Economic Study Update was published in September 2019. This set a total need of 188,000 sq.m of office and 481,500 sq.m of industrial (E(g)(iii), B2 and B8) floor space across the South West Hertfordshire Local Authorities (SWHLAs). When distributed, this set out a need for 39,500 sq.m of office and 75,900 sq.m of industrial floor space (E(g)(iii), B2 and B8) in the District, for the period between 2018-2036.
- 4.15 Floor-space needs in the District is presented as a guide and final figures are recommended to be agreed through Duty-to-Cooperate discussions between SWHLAs. Notwithstanding this, the sites included in the HELAA indicate that St Albans can meet both needs. St Albans City and District Council Economic Development and Employment Land Evidence Technical Report was prepared in 2016. This estimated a total gain of 125,000 sq.m of Office and 456,665 sq.m of industrial floor-space. This gain in floor-space was to be provided by the approved Strategic Rail Freight Interchange (SRFI) and potential employment site at Hemel Garden Communities. This would have resulted in an overprovisioning of industrial floor-space to help meet South West Hertfordshire needs, however, the report noted that Office provision at East Hemel alone would fall short of South West Hertfordshire office needs.
- 4.16 The HELAA has identified 24 employment sites, of which two sites have been discounted. Therefore, 22 sites will be taken forward to site selection and have the potential to deliver 192.51 hectares of mainly employment uses.

Table 8: Sites Sifted Out (Employment)

Site Reference	Site Address	Reason Not Progressed
HT-14-21-2	Land adjacent to Batford Mill, Lower Luton Road	This site is not suitable. A majority of the site located within Flood Zone 3B and there is no realistic prospect of development outside this constraint.
HT-17-21-2	Land on junction of Lower Luton Road & Bower Heath Lane	The site is not suitable. The site is located entirely within Flood Zone 2.

- 4.17 Following the outcome of the ‘Call for Sites’ 2021, a number of sites that were employment led were put forward. These are set out in Table 9.

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Table 9: Employment uses identified in the HELAA

Site Reference	Site Name	Employment area (in Hectares)	Employment Floor-space (in square metres)	Types of Proposed Employment Uses
CH-03-21	Land adjacent to A1M and North Orbital Road, Roehyde	10.65	37,161	Commercial, Logistics
CH-04-21	Land at Roehyde	4.29	Not specified	Light Industrial, General Industrial, Storage and Distribution
CH-06a-21	Land at Tyttenhanger, Tarmac Tyttenhanger Sand and Gravel Quarry	4.66	Not specified	Not specified
CH-06b-21-2	Land at Tyttenhanger, Tarmac Tyttenhanger Sand and Gravel Quarry	7.33	Not specified	Not specified
CH-14-21	Land at Colney Heath (Tarmac)	3.70	Not specified	Not specified
CH-26-21	Roehyde Farm, Roestock Lane, Bullens Green	Not specified	Not specified	Science Park
HT-05-21-2	Harpenden Sewage Treatment Works, Piggottshill Lane	4.10 *See paragraph 4.20	Not specified	Not specified
HT-10-21	Rothamsted Research, Harpenden Campus	13.62 *See paragraph 4.20	Not specified	Science and Enterprise Park
HT-14-21-2	Land adjacent to Batford Mill,	0.28	Not specified	Not specified

Site Reference	Site Name	Employment area (in Hectares)	Employment Floor-space (in square metres)	Types of Proposed Employment Uses
	Lower Luton Road			
LC-12-21-2	Land South West of London Colney Allotments	0.66	Not specified	Not specified
R-09-21	Land North East of Redbourn	Not specified	Not specified	Not specified
R-12-21	Land at Redbourn Farm, West of Dunstable Road	Not specified	Not specified	Not specified
R-22-21	Land North of Redbourn Road	Not specified	Not specified	Not specified
R-30-21	Spencers Park (Phase 2)	0.65	Not specified	Offices, Light Industrial, General Industrial, Storage and Distribution, Research
RF-01a-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 1)	33.17	331,665	Strategic Railfreight Interchange, Ancillary Offices, General Industrial, Storage and Distribution
SA-10-21	Land at North St Albans	Not specified	Not specified	Offices
SA-14-21-2	Units 1 - 10 Campfield Road	Not specified	Not specified	Not specified
SA-14-21-3	Units 1 - 10 Campfield Road	Not specified	Not specified	Not specified
SMR-01-21	Land at East Hemel	55.00	Not specified	Enterprise Zone

Site Reference	Site Name	Employment area (in Hectares)	Employment Floor-space (in square metres)	Types of Proposed Employment Uses
STS-04-21	Land at Burston Nurseries	Not specified	Not specified	Offices
STS-19-21	Land at Noke Lane, south of Chiswell Green	52.78	Not specified	Not specified
WH-07-21-2	Harpenden Sewage Treatment Works, Piggottshill Lane	1.62 *See paragraph 4.20	Not specified	Not specified
Total		192.51	368,826	

N.B – sites which have not specified the proposed area for employment uses are not included in the calculations.

- 4.18 The HELAA sets out a total of 192.51 hectares of available employment land. Out of the available employment land, there is a total estimated floor-space capacity of 368,826 sq.m of additional (E(g)(iii), B2 and B8) industrial floor-space as indicated within the sites proformas. Not all site proformas indicated employment land floor-space, or employment land hectarage therefore the total floor-space and hectarage is likely to be greater than presented.
- 4.19 Based on the floor-space capacity alone, this results in an estimated additional 292,926 sq.m of Industrial floor-space above the needs for the District as set out in the economic land needs identified in the 2019 South West Hertfordshire study.
- 4.20 It should be noted that the following sites, Harpenden Sewage Treatment Works, Piggottshill Lane and Rothamsted Research, Harpenden Campus may not contribute to the overall employment provision. These proposals involve primarily redeveloping existing employment uses on the site.

Assessment of supply – other identified uses

- 4.21 Following the outcome of the 'Call for Sites' 2021, a number of sites came forward for other uses. Other uses either form part of sites that have been promoted for Employment or Residential uses or have been put forward for a single other use.

4.22 An estimation of the use area is included when this information has been provided by the agent/landowner. There are also some larger sites where there are non-specific proposals that include 'other uses' where the use area has not been specified. For example solar farms, community uses, and green spaces have been identified as a potential use in a significant number of sites submissions as part of large residential led mixed use sites.

4.23 Other uses are set out in Table 10.

Table 10: Other Uses identified in the HELAA taken forward for Site Selection Process

Site Reference	Site Name	Other Uses: area (in hectares)	Types of Proposed Uses
CH-06a-21	Land at Tyttenhanger, Tarmac Tyttenhanger Sand and Gravel Quarry	13.31	Open Space, Wetland Park, Woodlands
CH-06b-21-1	Land at Tyttenhanger, Tarmac Tyttenhanger Sand and Gravel Quarry	5.75	Open Space, Wetland Park, Woodlands
CH-14-21	Land at Colney Heath (Tarmac)	33.00	Country Park
CH-15-18	Land Adjacent The Barley Mow Caravan Site, Barley Mow Lane, Smallford	0.94	Gypsy & Travellers
CH-16-18	Land Adjacent The Barley Mow Caravan Site, Barley Mow Lane, Smallford	1.16	Gypsy & Travellers
CH-25-21	Smallford Farm	Not specified	Solar Farm
HT-07-21	Land at North West Harpenden	2.5	Education: 2FE Primary School, Biodiversity Improvement, Green Belt Compensatory Land, Tree Planting
LC-01-21	Land South of London Colney	13.96	Education: 2FE Primary School, Local Centre, Public Open Space, Green Space
LC-02-21	Land West of London Colney	35.09	Education: 6-8 FE Secondary School, 2FE Primary School, Public Open Space, Country Park

Site Reference	Site Name	Other Uses: area (in hectares)	Types of Proposed Uses
R-04-21	Land east of Holtsmere End Lane, North East Hemel Hempstead	Not specified	Biodiversity Improvement; Tree Planting
R-09-21	Land North East of Redbourn	20.30	Education, Local Services, Public Open Space
R-18-21	Land south of Harpenden Lane	Not specified	Gypsy & Traveller, Biodiversity Improvement
R-22-21	Land North of Redbourn Road	Not specified	Education
R-30-21	Spencers Park (Phase 2)	0.27	Education: Primary School; Local Centre; Open Space
RF-01a-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 1)	119.56	Visitor Information Centre, Managed Grassland
RF-01b-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 8)	27.38	Wildlife Habitat Enhancement, Managed Grassland
RF-01c-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 8)	4.20	Wildlife Habitat Enhancement, Managed Grassland
RF-01d-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 7)	27.09	Wildlife Habitat Enhancement, Managed Grassland
RF-01e-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 6)	5.43	Wildlife Habitat Enhancement, Managed Grassland
RF-01f-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 6)	9.38	Wildlife Habitat Enhancement, Managed Grassland
RF-01g-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 5)	14.87	Wildlife Habitat Enhancement, Managed Grassland, Recreation Space

Site Reference	Site Name	Other Uses: area (in hectares)	Types of Proposed Uses
RF-01h-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 5)	77.20	Wildlife Habitat Enhancement, Managed Grassland, Recreation Space
RF-01i-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 4)	3.22	Wildlife Habitat Enhancement, Managed Grassland
RF-01j-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 4)	15.28	Wildlife Habitat Enhancement, Managed Grassland
RF-01k-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 4)	33.69	Wildlife Habitat Enhancement, Managed Grassland
RF-01l-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 3)	22.62	Wildlife Habitat Enhancement, Managed Grassland, Biodiversity Enhancement, Watercourse Vegetation
RF-01m-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 2)	26.07	Wildlife Habitat Enhancement, Managed Grassland
SA-03-21	Former Ariston Works, Harpenden Road	2.45	Primary School
SA-10-21	Land at North St Albans	Not specified	Education: Primary School; Neighbourhood Centre
SA-16-21	Land West of Batchwood	4.8	Education: 2FE Primary School; Biodiversity Improvement, Green Belt Compensatory land, Tree Planting
SA-17-21	Verulam Industrial Estate	0.12	Commercial
SA-24-21	St Albans Abbey Theatre	0.32	Theatre

Site Reference	Site Name	Other Uses: area (in hectares)	Types of Proposed Uses
SA-25-21	Land at London Road	Not specified	Cemetery, Biodiversity Improvement
SAN-05a-21	Cheapside Farm (Parcel A)	Not specified	Education: Primary School, Commercial, Leisure
SAN-05c-21	Cheapside Farm (Parcel B)	12.8	Playing Pitches
SAN-06-21	East St Albans	Not specified	Education: 2FE Primary School, Public Open Space, Neighbourhood Centre, Commercial, Recreation
SAN-07-18	Land north of St Albans Road, Sandridge	Not specified	Community Centre
SM-09-21	Land North of Ragged Hall Lane	Not specified	Public Open Space
SMR-01-21	Land at East Hemel	Not specified	Education: Secondary School, 2x Primary Schools, Nursery; Commercial, Community Facility and Health
SMSA-02-21	Land at Windridge Farm parcel B	Not specified	Education: Primary School, Community Facilities, Open Space
STS-04-21	Land at Burston Nurseries	Not specified	Leisure Facilities: Hotel, Gym, Pool, Retail, Biodiversity Offsetting, Green Belt Compensatory, Tree Planting
STS-14-21	Park Street Triangle	Not specified	Gypsy & Traveller, Education,

Site Reference	Site Name	Other Uses: area (in hectares)	Types of Proposed Uses
			Healthcare, Retail, Local Centre
STS-23-21	Greenwood United Reformed Church	Not specified	Church, Community Facilities
STS-30-21	Land North of 5 Acres and South of the M25	3.07	Road user Services, Hotel and Community Uses
STS-31-21	Land to the N Bricket Wood, bounded by the M25 and A405 North Orbital	5.85	Community Use
STS-34-21	Land at Harperbury Hospital, Harper Lane	Not specified	Primary School; Local Centre, Medical Centre
STS-53-21	Land north of Chiswell Green Lane and east of The Croft, Chiswell Green	Not specified	Community Facilities, Biodiversity Improvements
WH-05-21	Land at Blackbridge off Codicote Road	57.93	Visitors Centre, Leisure, Sports Facilities, Playing Pitches, Open Space, Woodland, Bike Trails
WH-17-21-2	Land at Cherry Tree Lane	4.31	Agricultural Practicing
WH-25-21	Land west of Lamer Lane	4.2	Biodiversity Improvements, Green Belt Compensatory Land, Tree Planting, Open Space
WH-29-21	Land Adj Waterend House, Waterend Lane	1.61	Solar Farm
WH-30-21	Aldwickbury Park Golf Club	Not specified	Neighbourhood Centre, Leisure Facilities: Gym, Pool; Public Open Space
Total		609.73	

4.24 Other uses in Table 10 have been coded against the categories set out in the HELAA proforma (see Appendix A) in Table 11 below.

Table 11: Other Uses being taken forward to Site Selection Process (based on the HELAA Proforma)

Other Proposed Uses (based on the HELAA Proforma)	Total area (in hectares)
Biodiversity Improvement/Offsetting	405.05
Green Belt Compensatory Land	0
Gypsy & Travellers	2.10
Land for Tree Planting	0
Mixed Use (e.g. Education, Local Centres, Neighbourhood Centres, Sports Facilities, Leisure Facilities and Healthcare)	139.05
Other (e.g. Theatres, Community Centres, Places of Worship)	61.92
Renewable and Low Carbon Energy and Heat	1.61
Total	609.73

N.B – sites which have not specified the proposed area for other uses are not included in the calculations.

5 Conclusion

- 5.1 The HELAA assessment has been carried out in line with the NPPG to understand the total land capacity. The purpose of the HELAA is to consider a wide range of potential options for the future supply of housing and employment land. In line with the NPPG, the development needs are set out in the South West Herts Local Housing Need Assessment and the South West Herts Economic Study.
- 5.2 A 'call for sites', was undertaken from 24 January to 8 March 2021. The 'call for sites' asked anyone to suggest suitable land for development in the District to the Council. Sites were asked to be put forward for housing, economic uses and other uses. 200 sites were submitted by land owners, agents, developers and local residents. These 200 sites have been assessed alongside previously submitted sites dating back to 2016. In total this 384 sites. The same process has been undertaken for the Urban Capacity Study, which identified an additional 294 sites. However, as the Urban Capacity Study sites have been identified by officers as being potentially suitable, rather than submitted by land owners or developers. Each site has been assessed for its suitability, availability and achievability. Sites that are not considered to be suitable, available or achievable are not taken forward to site selection.
- 5.3 In total, the HELAA process has identified 678 sites (including the Urban Capacity Study). Of these, 112 sites were not taken forward to site selection. 566 sites will be taken forward to site selection. A combination of these sites, with the existing planning permissions and identified windfall allowance there is the potential to deliver approximately 63,000 homes. Over 15 years this equates to approximately 52,000 net dwellings homes. 46,000 of these homes have been identified through the 'call for sites' process from 2016 to 2021.
- 5.4 The HELAA has identified 24 employment sites, of which five sites have been discounted. Therefore, 22 sites will be taken forward to site selection and have the potential to deliver 192.51 hectares of mainly employment uses, 191.20 hectares of which are within the Green Belt.
- 5.5 A total of 609.73 hectares of land has been identified for other uses (including mitigation associated with the permitted Strategic Rail Freight Interchange on the former Radlett Aerodrome site).
- 5.6 The current calculation for Standard Methodology for Housing Need identifies that the new Local Plan will need to accommodate approximately 15,000 homes over a 15 year period. The HELAA has identified more than enough land supply to meet the District's housing need, which will enable choices to be made. There will in many instances be strong planning reasons not to take forward certain sites, which will be considered as part of the site selection work, in due course.