

Three Rivers District Council

Local Development Framework

Three Rivers Strategic Housing Land
Availability Assessment Update

April 2010

Contents

	Page
1) Introduction	1
2) Background to the SHLAA Update	3
2.1) Planning Policy Statement 3: Housing	3
2.2) Regional Spatial Strategy	4
2.3) Urban Capacity Study	4
2.4) Strategic Housing Land Availability Assessment	5
2.5) Consultation on Housing Sites	6
3) Methodology	7
3.1) Planning the Assessment	7
3.2) Determining which Sources of Sites will be Included in the Assessment	7
3.3) Desk-Top Review of Existing Information	8
3.4) Determining Which Sites and Areas will be Surveyed	8
3.5) Carrying Out the Survey	9
3.6) Estimating the Housing Potential of Each Site	9
3.7) Assessing When and Whether Sites are Likely to be Developed	10
3.8) Review of the Assessment	12
3.9) Identifying and Assessing the Housing Potential of Broad Locations (Where Necessary)	12
3.10) Determining the Housing Potential of Windfalls (Where Justified)	12
4) Housing Land Availability in Three Rivers – Site Schedules See also separate Chapter 4 Document	14
5) Housing Land Availability in Three Rivers – Site Mapping See also separate Chapter 4 Document	15
6) Review of the Assessment of Housing Capacity	16
6.1) Overcoming Constraints	20
6.2) Allowance for Non-Delivery	20
6.3) Requirement for Windfalls	21
7) Conclusions	24

1) Introduction

Planning Policy Statement 3: Housing (PPS3) requires Local Authorities to undertake a Strategic Housing Land Availability Assessment (SHLAA) to support the identification of sufficient land for housing to meet the need for more homes. The SHLAA forms a key part of the evidence base for the Local Development Framework by providing information on land availability for housing over a 20 year period. The SHLAA assesses the deliverability and developability of sites for housing and is the main source of evidence to support local authorities in identifying at least a 15 year supply of land for housing as required by PPS3.

Practical guidance on carrying out a SHLAA is provided by CLG (2007)¹, and this guidance was used in the production of the South West Hertfordshire SHLAA (October 2008)² by consultants Tribal Urban Studio (TUS) for Dacorum, Three Rivers and Watford Councils.

By definition, the SHLAA is a snapshot in time, and it is therefore essential that the findings and assumptions underlying the assessment should be monitored over time; tracking the progress of sites and number of completions, as well as any possible new additions to housing sites.

The SHLAA Guidance advises that the main information to record when updating the SHLAA is whether:

- Sites under-construction have now been developed, or individual stages have been developed;
- Sites with planning permission are now under-construction and what progress has been made;
- Planning applications have been submitted or approved on sites and broad locations identified by the SHLAA;
- Progress has been made in removing constraints on development and whether a site is now considered to be deliverable or developable;
- Unforeseen constraints have emerged which now mean a site is no longer deliverable or developable, and how these could be addressed; and
- The windfall allowance (where justified) is coming forward as expected, or may need to be adjusted.

The monitoring of housing supply is undertaken at least annually through the Three Rivers Annual Monitoring Report which sets out the results of monitoring data on housing completions and supply through the housing trajectory.

Following feedback to Watford and Dacorum Borough Councils on their Local Development Frameworks, including on the SHLAA, the three authorities are undertaking a review of the SHLAA with stakeholder involvement. This Review report³ assesses and updates the methodology, assumptions and conclusions of the SHLAA and makes recommendations as

¹ CLG (2007) *Strategic Housing Land Availability Assessments Practice Guidance*.

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/399267.pdf>

² South West Hertfordshire Strategic Housing Land Availability Assessment (October 2008)

<http://www.threerivers.gov.uk/Default.aspx/Web/EvidenceBase>

³ The report is currently being finalised between the three authorities, but will be available at <http://www.threerivers.gov.uk/Default.aspx/Web/EvidenceBase> once published

to how the SHLAA should be taken forward, both through updates and through the Local Development Framework process.

This Update report therefore provides a more formal update of the SHLAA information than is set out through the Annual Monitoring Report process, and it also incorporates the conclusions of the SHLAA Review report for the Three Rivers area. It will be necessary to update this report in future years to take account of future monitoring and other evidence.

It is important to note that the SHLAA and subsequent update reports are not a statement of Council policy. They are technical documents for consideration, assisting in the production of Local Development Framework documents. The SHLAA and update reports do not determine whether a site should be allocated for housing. They merely identify land and buildings where the potential may exist for new housing development to come forward in the future.

This report focuses on housing requirements and potential supply in the District. It does not cover housing markets, quality and affordability of housing, or land requirements for other uses including for employment and Gypsy and Traveller accommodation or specific site allocations. Instead these issues are dealt with by other parts of the evidence base (for example the Strategic Housing Market Assessment and Development Economics Study) and by further work on the Core Strategy and Site Allocations Development Plan Documents.

This update report should be read in conjunction with the South West Hertfordshire Strategic Housing Land Availability Assessment (October 2008).

2) Background to the SHLAA Update

2.1) Planning Policy Statement 3: Housing⁴

A principal aim of Planning Policy Statement 3: Housing (PPS3) is to underpin the Government's response to the Barker Review of Housing Supply and the necessary step-change in housing delivery through a new, more responsive approach to land supply at the local level.

To support this aim, PPS3 requires Local Authorities to set out in Local Development Documents policies and strategies for delivering the level of housing provision required to meet regional targets set out in the Regional Spatial Strategy, including identification of broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.

PPS3 expects Local Authorities to draw on information from the SHLAA and or other relevant evidence to identify specific **deliverable** sites to deliver housing in the first five years. To be considered deliverable, sites should:

- Be **available**- the site is available now.
- Be **suitable**- the site offers a suitable location for development now, and would contribute to the creation of sustainable, mixed communities.
- Be **achievable**- there is a reasonable prospect that housing will be delivered on the site within five years.

In addition, Local Authorities should:

- Identify a further supply of specific, **developable** sites for years 6-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated.
- Linked to the above, identify those strategic sites which are critical to the delivery of the housing strategy over the plan period.
- Illustrate the expected rate of housing delivery through a housing trajectory for the plan period.

To be considered **developable**, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available for, and could be developed at the point envisaged.

PPS3 advises that allowances for windfalls⁵ should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. In these circumstances, an allowance should be included but should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends.

⁴ Planning Policy Statement 3: Housing (2006)

<http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/pps3/>

⁵ Windfalls are sites that have not been specifically identified as available in the local plan process.

They comprise previously-developed sites that have unexpectedly become available. These could include, for example, large sites resulting from, for example, a factory closure or small sites such as a residential conversion or a new flat over a shop.

In order to maintain a flexible, responsive supply of land, and ensure a continuous five year supply of deliverable sites available for housing, PPS3 requires Local Planning Authorities to monitor the supply of deliverable sites on an annual basis, linked to the Annual Monitoring Report review process, including:

- Setting out in Local Development Documents the approach by which allocated sites will be advanced into the five year supply of deliverable sites.
- Monitoring how many sites from the five year supply of deliverable sites have been delivered annually.
- Drawing upon allocated sites, as necessary, to update the five years supply of deliverable sites, setting out in the Annual Monitoring Report the revised list of specific deliverable sites.
- Considering whether it is necessary to update the housing market and land availability evidence bases and initiate a review of relevant Local Development Documents in order to be able to continue to maintain an up-to-date five year supply of deliverable sites.

2.2) Regional Spatial Strategy⁶

The East of England Plan sets out the Regional Spatial Strategy for the East of England (including Three Rivers District). It requires Three Rivers to provide 4,000 new dwellings between 2001-2021, an average of 200 dwellings per year. 60% of these new dwellings are to be provided on previously developed land.

The East of England Regional Assembly (EERA) are now looking at a review of the East of England Plan to look to 2031, and consultation on possible housing growth took place in September-November 2009. EERA anticipate that the draft revised Plan will be submitted to the Government in 2010.

Until housing numbers to 2031 have been confirmed, Policy H1 of the East of England Plan states that in planning for delivery of housing for at least 15 years from adoption, Local Authorities should assume that the average annual rate of provision after 2021 will be the same as the rates for 2006-2021 or 2001-2021, whichever is higher. For Three Rivers, this means a continuation of the 200 dwellings per year target.

2.3) Urban Capacity Study⁷

In January 2005, Llewelyn Davies produced an Urban Capacity Study on behalf of Dacorum, Three Rivers and Watford Councils in line with Government guidance for housing as set out in Planning Policy Guidance Note 3 (PPG3). This study assessed the potential for providing new homes in the built up areas of the three authorities, and identified potential for 3,725 dwellings in Three Rivers 2001-2021.

⁶ East of England Plan (2008) http://www.gos.gov.uk/goeast/planning/regional_planning/

⁷ Urban Capacity Study (2005) <http://www.threerivers.gov.uk/Default.aspx/Web/EvidenceBase>

2.4) Strategic Housing Land Availability Assessment⁸

To meet the requirements of PPS3 and inform Local Development Framework Documents the South West Hertfordshire SHLAA was prepared by Tribal Urban Studio for Dacorum, Three Rivers and Watford Councils and published in October 2008. The SHLAA covers a 20-year timeframe from 2010 broken down into 5-year periods.

While the Urban Capacity Study formed the basis for the assessment, the requirements of a SHLAA required additional work to be undertaken, in particular to:

- Determine whether sites identified in Urban Capacity Studies are still available and review assumptions on housing potential;
- Identify additional sites with potential for housing that were not required to be investigated by Urban Capacity Studies, such as sites in rural settlements, brownfield sites outside settlement boundaries and suitable greenfield sites as well as broad locations where necessary;
- Carry out further survey work within settlements to identify additional brownfield sites that have come forward since the Urban Capacity Study was carried out; and
- Assess the deliverability/ developability of all sites.

The SHLAA followed the ten step methodology set out in the SHLAA Practice Guidance:

- Planning the assessment
- Determining which sources of sites will be included in the assessment
- Desk top review of existing information
- Determining which sites and areas will be surveyed
- Carrying out the survey
- Estimating the housing potential of each site
- Assessing when and whether sites are likely to be developed
- Review of the assessment
- Identifying and assessing the housing potential of broad locations (where necessary)
- Determining the housing potential of windfalls (where justified).

The SHLAA considered a variety of sources of land for housing including existing UCS sites that were as yet unimplemented, and also revisited sites that were previously rejected to test whether they could be suitable for inclusion. Sources of land included in the assessment were:

- Sites within the planning process;
- Vacant and derelict land and buildings;
- Surplus public sector land;
- Land in non-residential use e.g. commercial buildings, car parks;
- Additional housing opportunities in established residential areas, such as under used garage blocks and backland development;
- Urban extension sites; and
- Other greenfield land.

⁸ South West Hertfordshire Strategic Housing Land Availability Assessment (2008)
<http://www.threerivers.gov.uk/Default.aspx/Web/EvidenceBase>

The SHLAA identified 532 sites for consideration in Three Rivers. 109 sites were considered suitable for further assessment in terms of policy restrictions, physical or environmental limitations and it was estimated that there is potential to deliver 3,661 new homes from these sites in Three Rivers (1,236 from within urban areas and 2,425 on greenfield land).

The SHLAA provides a pool of potential housing sites to meet needs in Three Rivers, however it is a technical document, and is one of a number of different evidence base studies which together with other work will inform the allocation of sites for housing through the Local Development Framework process.

2.5) Consultation on Housing Sites

Since publication of the South West Hertfordshire SHLAA in October 2008, Three Rivers District Council has carried out two rounds of public consultation on potential housing sites in the District as part of consultation on the Core Strategy Preferred Options (February 2009) and Further Preferred Options (November 2009) documents.

As well as informing the allocation of land for housing, the responses received to the consultation provide a useful source of information on housing supply, both on the deliverability and developability of sites, and on new housing sites which may be deliverable/developable.

3) Methodology

The methodology underlying this Update report is based on the methodology set out in Volume 1 of the South West Hertfordshire SHLAA (2008)⁹ and used to complete that assessment, as well as incorporating recommendations from the SHLAA monitoring framework. However, the methodology has also been updated to take account of the recommendations of the SHLAA Review Report (2010) which has been produced with stakeholder involvement.

This update revisits all sites identified in the SHLAA and uses the latest information available to determine whether the deliverability and phasing information for each site is still considered accurate, particularly in the context of the changing economic circumstances. Where SHLAA information is no longer considered accurate, revisions to the deliverability and phasing information are provided.

The latest information available for housing completions and commitments is 1st April 2009, while information on other identified sites, for example through consultation responses may have been received up to April 2010.

In addition to revisiting sites identified in the SHLAA, since completion of the study, a number of new sites have come forward for consideration. This update therefore also assesses these new sites on the same basis as the SHLAA assessed the original sites to determine their potential contribution to housing in the District including their deliverability and suggested phasing.

The steps of the methodology employed in the South West Hertfordshire SHLAA (2008) and how these have been employed or amended for this Update are set out below.

3.1) Planning the Assessment

The 2008 report developed and refined the outline methodology in discussion with the Councils and through stakeholder consultation. The overall methodology employed was also supported by stakeholders involved in the SHLAA Review (2010), while some refinements were also suggested.

3.2) Determining which Sources of Sites will be Included in the Assessment

The 2008 SHLAA included the following sources of land in the assessment:

- Vacant and derelict land and buildings
- Surplus public sector land
- Land in non-residential use e.g. commercial buildings, car parks
- Additional housing opportunities in established residential areas, such as under used garage blocks and backland development
- Urban extension sites
- Other greenfield land
- Local Plan allocations

⁹ South West Hertfordshire Strategic Housing Land Availability Assessment (2008)
<http://www.threerivers.gov.uk/Default.aspx/Web/EvidenceBase>

- Sites with development briefs
- Sites with planning permission (unimplemented and sites under construction).

The site sources were drawn from Figure 4 of the practice guidance¹⁰ which also includes the example sources of 'sites in rural settlements and rural exception sites', large scale redevelopment and re-design of existing residential areas' and 'new free standing settlements'. For the study area, it was not considered that 'sites in rural exceptions and rural exception sites' needed to be dealt with under a separate category as they would be picked up through the other sources. The East of England Plan did not identify the need for any new free standing settlements within the study area, and this source was therefore not considered further through the SHLAA. It was also considered that there was little potential for large scale redevelopment and redesign of existing residential areas within the study area and this source was therefore not considered further through the SHLAA.

The sources of sites considered through the 2008 SHLAA are also included in this update, and in addition 'large scale redevelopment and re-design of existing residential areas' has also been included to take account of emerging information on the potential for redevelopment and regeneration of the South Oxhey area. This is the only area within Three Rivers considered to have realistic potential for large scale redevelopment and re-design. Where the SHLAA update includes cross-boundary sites, the assessment of these takes into account information from adjacent authorities on these sites.

3.3) Desk-Top Review of Existing Information

The 2008 assessment used a variety of sources to identify sites with the potential for housing in Three Rivers. Sources used were: the Urban Capacity Study (2005), the Three Rivers Local Plan, sites with planning permission and applications for planning permission (including refusals), monitoring data on dwelling starts and completions, development briefs, NLUD information, consultation responses and mapping data was used to sites in the urban area such as gap sites and backland areas.

This update reviews all of the 2008 sites, and in addition includes new sites that have been suggested through Local Development Framework consultations or through planning applications and permissions since the 2008 study.

3.4) Determining Which Sites and Areas will be Surveyed

The 2008 study area was the entire area of Dacorum, Three Rivers and Watford councils. Areas excluded from survey were sites which were affected by the following environmental designations: Areas of Outstanding Natural Beauty, Special Areas of Conservation, Sites of Special Scientific Interest, Local Nature Reserves, Semi-Natural Ancient Woodland, Historic Parks and Gardens and Scheduled Ancient Monuments as these were the 'showstopper' constraints agreed for the area through the Sustainability Appraisal process.

This update carries forward the areas for survey of the 2008 study within Three Rivers District.

¹⁰ CLG (2007) *Strategic Housing Land Availability Assessments Practice Guidance*.
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/399267.pdf>

3.5) Carrying Out the Survey

The 2008 study used a desktop update of the surveys undertaken in the 2005 Urban Capacity Study on a street by street basis of the town centres and the 800m walking distance from the edge of the town centre in all directions. The UCS undertook a comprehensive survey covering existing housing allocations, land and buildings allocated for other uses, vacant land not previously developed, previously developed land, intensification of existing areas, redevelopment of existing areas, redevelopment of car parks.

The SHLAA 2008 survey also took account of new planning permissions, new sites for development and new sites submitted by landowners and developers. The survey and update information resulted in the recording of site characteristics and constraints and initial assessment of the suitability of the site for housing.

This update has not re-surveyed all sites, but has recorded additional information that has become available, for example on the numbers of dwellings completed or changes to the site or its surroundings.

3.6) Estimating the Housing Potential of each Site

In order to determine the housing capacities of sites, the 2008 study utilised design case studies for sites of less than 5 hectares. The case studies were those used in the Urban Capacity Study (2005). The case studies were compared to the density levels of planning permissions granted in the study area since the completion of the Urban Capacity Study and were found to provide a sample range of different types of development opportunity in a range of locations. They were therefore considered broadly accurate and appropriate to use in the SHLAA.

The design case studies provided a low- and high-density estimate of capacity, and a mid-point between these ranges was taken. The SHLAA argues that using the mid-point figure would balance out the density of sites coming forward above and below the mid-point.

On larger sites of over 5 hectares, the design led approach was considered to become less accurate, therefore lower densities were applied reflecting the need to provide associated infrastructure. Densities were established using research by Tribal Urban Studio into the density of large-scale sustainable neighbourhoods which are normally residential led mixed use but large enough to accommodate land for community facilities such as open space, schools, hospitals, local shops. For sites of between 5 and 10 hectares, a scenario A density of 25dph and scenario B density of 35dph was applied. For sites of over 10 hectares, a scenario A density of 20dph and scenario B density of 30dph were applied.

The update has used the same approach to assessing capacity, with the exception of some sites where additional information is now available (for example from planning applications or technical work), which suggests revised assessments of capacity according to this information.

Further details of the design case studies are set out in Volume 2 of the 2008 SHLAA report.

3.7) Assessing When and Whether Sites are Likely to be Developed

In order to determine when and whether sites are likely to be developed, the 2008 SHLAA considered the suitability, availability and achievability of housing on sites, after excluding some sites, for example those which were carried forward from the Urban Capacity Study and have already been developed.

To assess the suitability of sites for housing, the 2008 SHLAA carried out a sieving process to assess whether sites were suitable according to whether the site offered a suitable location for development and would contribute to the creation of sustainable, mixed communities.

Factors considered in determining suitability were national and regional policy restrictions and the need to conform to the principles of sustainable development, physical constraints such as topography, access and infrastructure, environmental conditions, and potential impacts on the area. Local policy justifications for considering a site unsuitable for housing included retention of land for employment purposes, retention of open space particularly in areas of open space deficiency, protection of locations where further residential development would be detrimental to the existing character and form of the settlement and retention of land and buildings performing a community function. A specific set of additional criteria were used to determine the suitability of green belt/ greenfield sites taking into account whether sites in Three Rivers abut designated settlement boundaries, maintain the settlement hierarchy and would provide modest growth in relation to the settlement size and function.

The 2008 SHLAA assessed the availability of sites based on any information available on ownership and land owners' intentions to develop to determine expected legal or ownership problems such as multiple ownerships that would prevent the site coming forward.

The 2008 SHLAA assessed the achievability of sites based on a judgement of the economic viability of the site according to market factors (the location and surroundings of sites, transportation and site specific factors), cost factors (site uses, ownership and site specific factors) and delivery factors according to the principles set out in Table 3.1.

Table 3.1: Principles for Assessing Achievability of Housing Development

<p>Market Assessment (optimum outcome is high values)</p> <p>Location and surroundings</p> <ul style="list-style-type: none">• Higher values were generally given in areas where there was a significant amount of new development which has improved the residential nature of the area• Higher values were also given if sites had a good outlook and were in close proximity to good quality recreational space (both formal and informal, such as edge of green belt locations)• Lower values were generally applied in areas where there was a significant amount of local authority housing <p>Transportation</p> <ul style="list-style-type: none">• Sites close to public transportation links were generally given a higher value rating than the likely values generated by existing property due to the potential for higher
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density developments

Site specific factors

- Where there was evidence of the potential for relatively high-density development, either through evidence from adjacent sites or from the site itself, again the value rating was generally increased
- Sites with overhead power cables were not generally given a high rating due to the limiting effect on development height and the blighting effect on residential sale values of living under overhead wires
- Lower values were generally given if sites adjoined particularly noise-generating land uses, such as adjacent to a railway line

Cost Assessment (optimum outcome is low costs)

Site uses

- Higher costs were generally applied where there were heavy, dirty or industrial uses on site, or where there was evidence to suggest there may have been in the past, due to the likely costs involved in remediating such sites to a residential standard
- Medium costs were generally applied to any site with evidence of fuel pumps or previous petrol station uses due to higher potential costs for cleaning the site
- Low costs were generally applied to any cleared sites, and those being used for relatively benign uses such as for car parking, open/ green spaces or allotments

Ownership

- Medium costs were generally given where there were active interests on site, which would require relocating or potentially compensating, or where there were a number of different property ownerships which would need resources to assemble. In some cases where sites identified were large this was increased to a high cost rating.
- Medium costs were applied if there were difficulties with access routes, such as being too narrow, unsurfaced or likely to be unsuitable for residential traffic in their current condition, or where they might require land or property acquisitions to improve. The same cost rating was also applied in instances where sharing of access ways might be necessary such as over existing service yards
- It was assumed sites such as garage courts and allotments are in single ownership and that they are leased to the occupants. If this is not the case, cost of developing the site may increase, as resources have to be put into land assembly

Site specific factors

- Sites with sloping profiles or uneven topography were generally given at least a medium cost rating due to the higher costs involved in either levelling or using construction equipment on uneven sites
- Sites with overhead power cabling were generally given at least a medium cost rating, if not high, due to the difficulties of using construction equipment under and around high voltage power lines
- Sites which were already under construction were given a low cost rating as the sites have already been packaged through the development process.

Using these assessments, sites were placed into time periods (0-5 years, 6-10 years, 11-15 years and 16-20 years) reflecting the factors identified affecting when they were likely to come forward.

The SHLAA update only excludes sites which have already been redeveloped from further assessment and analysis. The update has then assessed the suitability, availability and achievability of all sites on the same principles as the 2008 SHLAA (and SHLAA practice guidance). However it provides a more explicit assessment of the deliverability and developability of each site, and has been particularly informed by information received from landowners and the development industry through consultations.

In addition, the SHLAA update also identifies potential barriers to delivery of housing (these will generally have led to the site being considered un-available or un-achievable), and where relevant, potential measures to unblock these sites.

3.8) Review of the Assessment

The Council's reviewed the main SHLAA work in 2008 to assess the level of housing identified and the timescales for delivery of housing.

Chapter 6 of this update reviews the level of housing identified through the assessment through a housing trajectory and judgement as to whether sites will come forward as anticipated to establish whether there is sufficient supply of housing or whether further sites need to be found, assumptions need to be revisited, and whether there is a need to plan for a shortfall through identifying broad locations for housing growth and/ or through a windfall allowance.

3.9) Identifying and Assessing the Housing Potential of Broad Locations (Where Necessary)

The 2008 SHLAA included some sites where it was not possible to draw precise boundaries but where it was assumed that housing growth would occur during the SHLAA period after further work to identify precise areas suitable for housing. There were no sites within Three Rivers which did not have precise boundaries.

This update includes one 'broad location' (site NW44) where specific sites have not been identified. The broad location is South Oxhey Town Centre where there is intention to regenerate the town. Although some specific sites have been identified within the broad location, the capacity attributed to the broad location is in addition to these sites and reflects potential from redevelopment and re-design of some existing residential sites within this area.

Estimates of potential housing supply have been developed with regard to the nature and scale of opportunities within South Oxhey. The broad location has an estimated capacity of 100 dwellings as a result of intensification of residential uses associated with regeneration proposed within the broad location.

3.10) Determining the Housing Potential of Windfalls (Where Justified)

The 2008 SHLAA did not include an assessment of housing supply from windfalls as it was not considered to be justified.

On the basis of the evidence from this update, it has been considered that some allowance for windfalls is justified in Three Rivers. The windfall allowance is discussed in Chapter 6 of this assessment and reflects the fact that the SHLAA has not identified sufficient deliverable/developable housing capacity, and that very little urban capacity is identified in Three Rivers in years 11-15 and 16-20 which would lead to problems in meeting East of England Plan requirements for 60% of new housing completions to be on previously developed land.

4) Housing Land Availability in Three Rivers- Site Schedules

This chapter updates the site schedules provided in volume 3b of the South West Hertfordshire SHLAA (October 2008). The schedules follow the same general format as the 2008 report, but contain additional information on each site including further explanation of the deliverability of the site, barriers to delivery of housing on specific sites and where possible measures that could be taken to remove barriers and unblock the delivery of housing and when. They have also been amended to reflect best practice to improve the clarity of assessments of the deliverability and developability of each site.

The same site references have been used as in the 2008 SHLAA to allow comparison of sites, and new sites have continued the numbering sequence. Some site names/ addresses have been amended to improve clarity. It should be noted that the 2008 SHLAA included some duplicate sites. These sites have only been assessed once in the SHLAA update and there are therefore some gaps in the numbering of sites within the SHLAA update reflecting where the 2008 study included duplicates.

Site schedules are presented in the Chapter 4 document.

5) Housing Land Availability in Three Rivers- Site Mapping

This chapter updates the site mapping provided in volume 4b of the South West Hertfordshire SHLAA (October 2008). In particular, the mapping also now shows sites from the site schedules that are not considered to be deliverable/ developable for housing.

Site maps are presented in the Chapter 5 document.

6) Review of the Assessment of Housing Capacity

The SHLAA Update has identified a large number of sites which are considered to be suitable, available and achievable within a 20 year period. However the SHLAA is part of the evidence base to inform decisions about site allocations in the LDF process, and does not make recommendations as to which sites should be taken forward. Decisions on which sites will be developed will take into account other factors, including public consultation and other evidence and assessments, in addition to the SHLAA Update.

The SHLAA and SHLAA Update have sought to identify all possible housing sites within Three Rivers. The Council will decide which sites should go towards accommodating the housing requirement for the area, and will also monitor the database regularly to keep it up-to-date.

This SHLAA Update has considered 516 possible sites. 211 sites were considered suitable, and 135 were considered deliverable/ developable.

The detailed assessments in Chapter 4 have considered each site in detail, but a summary is shown in Table 6.1.

Table 6.1: Phasing of all Deliverable/ Developable Sites in Three Rivers

	Capacity Assessment (Dwelling Numbers)					Total
	0-5 Years	6-10 Years	11-15 Years	16-20 Years	No Phasing Period	
Abbots Langley	1	275	9	0	175	460
Ashridge	1	61	20	0	37	119
Bedmond and Primrose Hill	26	136	0	0	424	586
Carpenders Park	21	0	0	0	0	21
Chorleywood East	14	13	0	0	0	27
Chorleywood West ¹¹	27	80	0	0	9	116
Croxley Green	23	3	7	0	29	62
Croxley Green North ¹²	152	402	0	0	0	554
Croxley Green South	95	19	34	0	71	219
Moor Park and Eastbury	0	7	0	0	0	7
Hayling	21	0	0	0	0	21
Langleybury	42	115	0	0	0	157
Leavesden	148	929	0	0	0	1077
Maple Cross and Mill End	20	168	0	0	0	188
Northwick	170	116	168	50	47	501
Oxhey Hall	0	37	0	0	47	84
Penn	7	32	0	0	42	81
Rickmansworth	51	257	36	0	24	368
Rickmansworth West	26	38	9	0	0	73
Sarratt	8	0	0	0	0	8
Total	853	2,688	283	50	905	4,779

¹¹ Site CW30 covers part of CW27, therefore only the capacity of CW30 has been used in summary calculations to avoid double counting

¹² Site CGN6 is part of CGN4 therefore only the capacity of CGN4 has been used in summary calculations to avoid double counting

Of the 4,779 total dwelling capacity, 2,080 are urban sites, whilst 2,699 are greenfield. Summaries are shown in Tables 6.2 and 6.3. The assessment indicates that 3,874 dwellings are considered to be deliverable within a 20 year period. 853 dwellings have been assessed as deliverable in the first five years, 2,688 between 6-10 years, 283 between 11-15 years and 50 between 16-20 years.

Leavesden ward has the highest identified capacity (1,077), followed by Bedmond and Primrose Hill (586) and Croxley Green North (554). Moor Park and Eastbury (7) and Sarratt (8) wards have the lowest identified capacity.

Leavesden, Northwick and Croxley Green North wards have the greatest identified short term housing capacity. In the 6-10 year phasing period, Leavesden and Croxley Green North wards have the greatest capacity.

Table 6.2: Assessed Urban Capacity in Three Rivers

	0-5 Years			6-10 Years			11-15 Years			16-20 Years			No phasing			Total
	A	B	Midpoint	A	B	Midpoint	A	B	Midpoint	A	B	Midpoint	A	B	Midpoint	
Abbots Langley	1	1	1	0	0	0	5	12	9	0	0	0	21	32	27	37
Ashridge	1	1	1	0	0	0	15	25	20	0	0	0	5	9	7	28
Bedmond and Primrose Hill	4	4	4	75	114	95	0	0	0	0	0	0	239	438	339	438
Carpenders Park	15	27	21	0	0	0	0	0	0	0	0	0	0	0	0	21
Chorleywood East	14	14	14	0	0	0	0	0	0	0	0	0	0	0	0	14
Chorleywood West	23	31	27	0	0	0	0	0	0	0	0	0	6	11	9	36
Croxley Green	18	27	23	2	4	3	5	8	7	0	0	0	18	30	24	57
Croxley Green North	2	4	3	0	0	0	0	0	0	0	0	0	0	0	0	3
Croxley Green South	92	97	95	18	19	19	24	43	34	0	0	0	50	92	71	219
Moor Park and Eastbury	0	0	0	5	9	7	0	0	0	0	0	0	0	0	0	7
Hayling	12	29	21	0	0	0	0	0	0	0	0	0	0	0	0	21
Langleybury	42	42	42	17	28	23	0	0	0	0	0	0	0	0	0	65
Leavesden	28	34	31	0	0	0	0	0	0	0	0	0	0	0	0	31
Maple Cross and Mill End	17	23	20	12	18	15	0	0	0	0	0	0	0	0	0	35
Northwick	137	202	170	38	63	51	144	191	168	50	50	50	35	58	47	486
Oxhey Hall	0	0	0	24	50	37	0	0	0	0	0	0	33	60	47	84
Penn	5	9	7	23	41	32	0	0	0	0	0	0	29	54	42	81
Rickmansworth	47	54	51	161	289	225	23	48	36	0	0	0	17	31	24	336
Rickmansworth West	20	32	26	29	47	38	7	11	9	0	0	0	0	0	0	73
Sarratt	6	10	8	0	0	0	0	0	0	0	0	0	0	0	0	8
Total	484	641	565	404	682	545	173	288	283	50	50	50	453	815	637	2080

Table 6.3: Assessed Greenfield Capacity in Three Rivers

	0-5 Years			6-10 Years			11-15 Years			16-20 Years			No phasing			Total
	A	B	Midpoint	A	B	Midpoint	A	B	Midpoint	A	B	Midpoint	A	B	Midpoint	
Abbots Langley	0	0	0	214	335	275	0	0	0	0	0	0	110	186	148	423
Ashridge	0	0	0	49	73	61	0	0	0	0	0	0	23	37	30	91
Bedmond and Primrose Hill	22	22	22	39	42	41	0	0	0	0	0	0	72	98	85	148
Carpenders Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Chorleywood East	0	0	0	12	13	13	0	0	0	0	0	0	0	0	0	13
Chorleywood West	0	0	0	61	99	80	0	0	0	0	0	0	0	0	0	80
Croxley Green	0	0	0	0	0	0	0	0	0	0	0	0	5	5	5	5
Croxley Green North	149	149	149	331	474	402	0	0	0	0	0	0	0	0	0	551
Croxley Green South	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Moor Park and Eastbury	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hayling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Langleybury	0	0	0	74	109	92	0	0	0	0	0	0	0	0	0	92
Leavesden	93	141	117	753	1105	929	0	0	0	0	0	0	0	0	0	1046
Maple Cross and Mill End	0	0	0	117	188	153	0	0	0	0	0	0	0	0	0	153
Northwick	0	0	0	50	79	65	0	0	0	0	0	0	0	0	0	65
Oxhey Hall	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Penn	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rickmansworth	0	0	0	31	33	32	0	0	0	0	0	0	0	0	0	32
Rickmansworth West	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sarratt	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	264	312	288	1828	2653	2143	0	0	0	0	0	0	210	326	268	2699

6.1) Overcoming Constraints

The site schedules (chapter 4) have identified constraints to the delivery of some sites, and recommended measures that could be implemented to remove these constraints to delivery have also been identified where appropriate.

6.2) Allowance for Non-Delivery

The decisions of landowners and developers are likely to affect how housing sites come forward, and PPS3 recommends some flexibility in housing supply given the overall scale of housing necessary, the period of time covered, and fluctuations in market conditions, such as the current economic downturn.

It is difficult to predict the effects of the economic downturn on housing supply, though it might be expected that rates of delivery will slow rather than sites being abandoned as land values and house prices in the area remain relatively high. Information from the SHLAA Panel as part of the SHLAA Review suggested that the downturn may particularly affect the delivery of flatted development and this has been reflected in the update in adjustments to the phasing of high density developments. The economic downturn may also lead to a need to resolve barriers to the delivery of some sites according to the constraints on delivery identified in the site schedules. The need to resolve barriers may be highlighted by future monitoring and SHLAA updates.

There is greater confidence that sites phased in the first five years are deliverable as anticipated as a result of more detailed information on the sites, particularly from the development industry.

The longer timescales involved mean that there is some uncertainty over whether sites beyond the first five years will come forward as anticipated. Sites which are otherwise considered developable but where there is no information on landowner intentions have not been allocated to a phasing period. However, in order to take account of changes to owners' intentions and/ or circumstances, an allowance for non-delivery of sites can be applied to sites after the first five years of supply.

The allowance is based on monitoring information of past rates of non-implementation. This information suggests that in Three Rivers, non-implementation rates have been low at an average of 2.5% between 2001-2009. Applying a 2.5% non-implementation rate to the capacity assessment set out in table 6.1 suggests a capacity of 3,799 dwellings deliverable between 0-20 years, as shown in Table 6.4.

Table 6.4: Revised Capacity Assessments Taking Account of Non-Implementation

	Capacity Assessment (Dwelling Numbers)					
	0-5 Years	6-10 Years	11-15 Years	16-20 Years	No Phasing Period	Total
Total Capacity	853	2,688	283	50	905	4,779
2.5% Non Implementation Rate	-	67	7	1	23	98
Revised Total Capacity	853	2,621	276	49	882	4,681

Non implementation rates will be kept under review through future monitoring and updates which will highlight any problems of non-delivery.

6.3) Requirement for Windfalls

The SHLAA Update identifies 3,799 dwellings as deliverable within 0-20 years, which is slightly below the RSS requirement for 4,000 dwellings. It also identifies much lower capacity beyond the first 10 years, and in particular very little urban capacity within Three Rivers in years 11-15 and 16-20. This lack of urban capacity would also lead to problems in meeting requirements for 60% of new housing completions to be on previously developed land and reflects:

- The difficulty in identifying longer term opportunities for the re-use of previously developed land;
- The difficulty in identifying longer term opportunities for the development of small sites; and
- The approach of the SHLAA to testing sites for deliverability which was not part of Urban Capacity Studies.

The assessments of site capacity in the SHLAA Update are based on the best information available and reflect design case studies which have been assessed against actual delivery of housing in the District. Therefore it is not considered appropriate to adjust capacities to increase supply. A broad location within South Oxhey has been identified where it is considered that housing could be delivered. Currently there are no other broad locations in the District where housing development is considered feasible and will be encouraged. It is therefore considered that a windfall allowance should be included to ensure sufficient capacity.

Through the annual monitoring process, windfalls that do occur in the first 10 years of supply will be incorporated into assessments of housing supply as they are given planning permission and are completed. These windfalls will reduce future requirements so that fewer sites are needed to meet the housing target for the District.

No windfall allowance was made within the 2008 SHLAA as TUS did not consider that there were genuine local circumstances justifying their inclusion. However the SHLAA acknowledged that windfalls may be included in future assessments or monitoring updates.

PPS3 states that allowances for windfalls should not be included in the first 10 years of land supply unless robust evidence can be provided of genuine local circumstances that prevent specific sites being identified. In these circumstances, an allowance should be included but should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends.

Where a windfall allowance can be justified, the SHLAA guidance states that this should be based on an estimate of the amount of housing that could be delivered on land that has not been identified in the list of deliverable/ developable sites, or as part of broad locations for housing development. One approach suggested to determine a realistic allowance is to estimate housing potential from each likely source of land for housing as the rates will be different between them. Potential from each source may be estimated by calculating average

annual completion rates from the source, taking care to avoid double counting and coming to a view as to:

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

In the past, larger windfall sites have come forward for development in the District, for example the Ovaltine site in Kings Langley which delivered 367 dwellings. However, while larger site windfalls may occur in future, these are much more difficult to predict, and therefore it is not proposed to include any windfall allowance for larger sites.

The sources of windfalls that are expected to contribute to supply are redevelopment of between one and four dwellings to flats or houses, and newbuild, or conversion or redevelopment from non-residential uses to between one and four dwellings.

Monitoring information on dwelling completions (Table 6.5) shows that since 2001, redevelopment of between one and four dwellings has contributed an average of 19 units a year, and newbuild or conversion of one or two dwellings has contributed an average of 19 units a year.

Table 6.5: Past Contribution of Windfall Sources to Housing Supply

	Net Windfall Completions from Redevelopment of 1-4 dwellings to flats or houses	Net Windfall Completions from Newbuild, or Conversion or Redevelopment from non-residential uses to 1-4 dwellings	Total Windfalls	Net Total Completions
2001/02	34	16	50	365
2002/03	28	26	54	233
2003/04	16	13	29	138
2004/05	10	15	25	73
2005/06	12	24	36	197
2006/07	17	15	32	335
2007/08	2	20	22	254
2008/09	31	26	57	331
Average	18.75	19.38	38.13	240.75

Completions from both windfall sources have fluctuated over the years. Given the very high house prices in the district which are expected to remain strong given the District's location on the edge of London and the constraint of the Green Belt, and the pattern of development and character of the District, it is anticipated that patterns and rates of development from these sources will continue at approximately the same rate with an average of 38 dwellings a year from windfalls.

A windfall allowance of 38 dwellings per year is therefore considered to be reasonable and has been included beyond the first ten years of supply. This is equivalent to 380 dwellings and means that the RSS target of 200 dwellings per year would be exceeded.

The windfall allowance reflects that it has not been possible for the SHLAA Update to determine which houses or small pieces of land within the District will be deliverable for housing within the Plan period as this is dependent on owners' intentions. It was also not realistic to contact all owners in the District to establish whether they would consider making their land/ property available for development and to establish for each possibility whether housing would be deliverable here.

As monitoring data shows that housing supply from windfalls in Three Rivers has come from across the whole District (rather than concentrated in certain areas), it was not possible for the SHLAA Update to identify broad locations where this source is likely to contribute, further than 'within the existing urban area'.

The windfall allowance will be monitored annually and revised as appropriate through the Annual Monitoring Report and housing trajectory updates.

7) Conclusions

The SHLAA update has been undertaken on the basis of the SHLAA review which used stakeholder involvement to assess the robustness of the 2008 SHLAA and make recommendations for improvements which have been incorporated into this update. As well as influencing the SHLAA Update methodology as a result of the SHLAA Review process, stakeholder involvement through consultations has also informed the SHLAA update.

On the basis of the SHLAA Update, a summary trajectory (Table 6.1) has been produced showing the overall assessment of housing capacity in the District. It shows that 4,179 dwellings have been assessed as deliverable/ developable within the District over the 20 year period. While this summary trajectory provides an assessment of when housing has been assessed as being deliverable or developable, more detailed trajectories will be included in the Annual Monitoring Report and Core Strategy documents reflecting the results of stakeholder consultation, including on specific housing sites, and decisions about which sites will be taken forward to meet housing targets.

Table 6.1: Summary Trajectory

	0-5 years	6-10 years	11-15 years	16-20 years	No phasing	Total
Assessed Urban Capacity	565	545	283	50	637	2080
Assessed Greenfield Capacity	288	2143	0	0	268	2699
Total Assessed Capacity	853	2688	283	50	905	4779
2.5% Non-Implementation Allowance	0	67	7	1	23	98
Windfall Allowance	0	0	190	190	0	380
Total	853	2621	466	239	882	5061

Future SHLAA updates will reconsider all sites in this assessment, including those currently considered unsuitable against the latest available information. Stakeholders will continue to be involved in future SHLAA updates/ reviews and LDF work including on housing supply.