

Three Rivers District Council

Strategic Housing and Employment Land Availability Assessment

September 2020

Contents

1 Introduction.....	2
2 Policy Context.....	2
3 Methodology.....	4
Stage 1: Site/broad location identification.....	5
Stage 2: Site/broad location assessment.....	7
Stage 3: Windfall assessment.....	12
Stage 4: Assessment review.....	12
Stage 5: Final evidence base.....	13
4 Summary of results.....	13

Appendices

- Appendix 1 - Sites with planning permission and prior approval (on 31 March 2020)
- Appendix 2 – Call for Sites submission form (2017)
- Appendix 3 – Site assessment pro-forma
- Appendix 4 – Settlement Hierarchy (Core Strategy, 2011)
- Appendix 5 – List of all sites considered
- Appendix 6 – Maps of all sites considered
- Appendix 7 – Detailed site assessments
 - Appendix 7a – Call for Sites Detailed Assessments
 - Appendix 7b – Additional Call for Sites Detailed Assessments
 - Appendix 7c – Potential Sites Call for Sites Detailed Assessments
 - Appendix 7d – Previously Considered Sites Detailed Assessments

- Appendix 7e – Other Sites Put Forward Detailed Assessments
- Appendix 7f – Urban Capacity Sites Detailed Assessments
- Appendix 7g – Refused and Withdrawn Application Sites Detailed Assessments
- Appendix 7h – Edge of Settlement Sites Detailed Assessments
- Appendix 7i – Existing Allocation Sites Detailed Assessments
- Appendix 7j – Brownfield Register Sites Detailed Assessments
- Appendix 8 – Summary of detailed assessments for all sites
- Appendix 9 – List of deliverable/developable sites
- Appendix 10 – Indicative trajectory

1 Introduction

- 1.1 The Strategic Housing and Economic Land Availability Assessment (SHELAA) is a study to quantify the future supply of housing and employment land in line with the National Planning Practice Guidance on the MHCLG website:

<https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

It does this through:

- Identifying sites and broad locations with potential for development
 - Assessing their development potential
 - Assessing their suitability for development, and their availability and achievability (the likelihood of development coming forward)
- 1.2 The SHELAA provides an up-to-date assessment of land supply in the District, helps to ensure that sufficient land is identified for new housing and employment uses for the period up to 2037 and will inform decisions on allocations in the new Local Plan.
- 1.3 The SHELAA is a key component of the evidence base for the Local Plan but is not a statement of policy and does not allocate sites for development. This is the role of the Three Rivers Local Plan.
- 1.4 The identification of potential development sites within the SHELAA as deliverable does not mean that the Council will grant planning permission for development. All planning applications will continue to be considered against the appropriate policies in the Local Plan and any other material considerations.

2 Policy Context

- 2.1 The National Planning Policy Framework (NPPF) (2019) requires Local Planning Authorities to prepare a SHELAA to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.
- 2.2 The suitability, availability and achievability of a potential site will inform whether the site is considered deliverable/developable. The glossary to the NPPF defines deliverable and developable as the following:

Deliverable: To be considered deliverable, sites for housing 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.

Developable: 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.

- 2.3 In accordance with the NPPF local planning authorities can make an allowance for windfall sites in the SHELAA if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. However, any allowance should be realistic having regard to historic windfall delivery rates and expected future trends, and should not include residential gardens (paragraph 70).
- 2.4 The Government updated the National Planning Practice Guidance (NPPG) on the 'Housing and Economic Land Availability Assessment' in July 2019.
- 2.5 The NPPG sets out the methodology for assessing housing land availability in the context of guidance contained in the NPPF centred on five stages:
- Stage 1 Sites/broad locations identification
 - Stage 2 Sites/broad location assessments
 - Stage 3 Windfall assessment
 - Stage 4 Assessment review
 - Stage 5 Final evidence base
- 2.6 Consistent with the NPPF, the NPPG acknowledges the advantages of carrying out land assessments for housing and economic development as part of the same exercise so that sites may be allocated for the use that is considered to be most appropriate. The NPPG states that land availability assessment should:
- Identify sites and broad locations with potential for development;
 - Assess their development potential;
 - Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 2.7 In line with the duty to cooperate the NPPG requires local planning authorities to work with other local planning authorities within the relevant housing market area or functional economic market area when assessing availability of land. Key stakeholders should be involved from the earliest stages of preparation including, amongst others; developers, land promoters, local property agents and local communities.
- 2.8 The NPPG requires plan makers to be proactive in identifying as wide a range of sites as possible, including existing sites that could be improved, intensified or changed. Sites that have particular policy constraints should also be included. However, constraints should be clearly set out and tested, with conclusions drawn on whether constraints can be overcome.
- 2.9 The assessment of suitability of sites for development should be guided by the development plan, emerging plan policy and national policy, as well as market and industry requirements. The NPPG notes that when assessing sites against the adopted development plan, regard should be had to how up-to-date the plan policies

are. Sites in existing development plans, or with planning permission, will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability.

- 2.10 With regard to availability the NPPG states that: A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell.
- 2.11 In terms of achievability consideration should be given to the delivery record of developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions. In this regard a judgment would need to be made on whether there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. Essentially this is a judgment based on economic viability.
- 2.12 Once potential sites and broad locations have been assessed the NPPG requires information to be collected to produce an indicative housing trajectory, to enable the preparation of an overall risk assessment. To ensure consistency, accessibility and transparency across assessment the NPPG specifically requires the following:
- 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.

3 Methodology

- 3.1 The process followed for the SHELAA closely aligns with the methodology set out in the Planning Practice Guidance. The Guidance sets out five main stages to preparing a SHELAA:
- **Stage 1 Sites/broad locations identification**
 - **Stage 2 Sites/broad location assessments**
 - **Stage 3 Windfall assessment**
 - **Stage 4 Assessment review**
 - **Stage 5 Final evidence base**

Stage 1: sites/broad location identification

Geographical area covered

- 3.2 The assessment covers the whole of the Three Rivers District, which lies within the South West Hertfordshire Strategic Housing and Functional Economic Market Areas.

Other parties involved

- 3.3 In line with the duty to cooperate other local planning authorities in the South West Hertfordshire Strategic Housing and Functional Economic Market Areas were invited to comment on the methodology and have been engaged in the SHELAA process.
- 3.4 The following bodies have also been engaged in the SHELAA process:
- Developers, land owners and promoters of land
 - Local property agents
 - Local Economic Partnership
 - Local interest groups
 - Businesses and business representative organisations
 - Neighbouring Parish Councils
 - Other public and statutory bodies

Size of site and broad locations and types of site

- 3.5 Only sites and broad locations capable of delivering five or more dwellings or 0.25ha/500 sq m of economic, retail or mixed use development have been considered for inclusion in the SHELAA.
- 3.6 The NPPF expects a minimum of 10% of the Council's housing requirement to be delivered on sites no larger than 1 hectare, unless there are strong reasons this cannot be achieved. Sites below the 1 hectare threshold have been considered through the SHELAA process as long as they are capable of delivering five or more dwellings. If an assessment of the site within the SHELAA has indicated that the site could not support five or more dwellings, the site has been assessed as unsuitable.
- 3.7 Sites that can accommodate 300 dwellings or more are considered to be strategic sites. These sites, if considered deliverable / developable, would be required to provide indicative masterplans demonstrating the infrastructure and community benefits the site would be providing. It should be noted that site size is only a consideration when weighing up harm to the Green Belt of releasing land for development. Sites have not be excluded from the assessment process based on size (providing they could support five or more dwellings).
- 3.8 In line with the guidance in the National Planning Policy Guidance, sites with policy constraints were included in the initial list of those to be considered for inclusion in the SHELAA. Only a very limited number of policy constraints lead to exclusion of sites from consideration prior to Stage 2 site/broad location assessment. However, it was concluded that detailed site assessments would be undertaken for sites falling within these areas of constraints for consistency, demonstrating that all sites had been considered fully.
- 3.9 In identifying the list of sites/locations to be considered for assessment account has been taken of the guidance in the NPPG, and where relevant sites in the following categories have been considered:

- Existing Local Plan allocations without planning permission
 - Sites on the Brownfield Register
 - Sites identified through the Site Allocations consultation process but not included in the current Local Plan
 - Sites submitted through multiple Call for Sites exercises
 - Development Briefs/Masterplans without planning permission
 - Previous planning applications and enquiries
 - Land in Local Authority ownership or subject to the plans of Hertfordshire County Council, Government, NHS, police, fire, utilities providers, statutory undertakers (as indicated through the Call for Sites)
 - Surplus public sector land
 - Vacant and derelict land and buildings
 - Additional opportunities in established uses e.g. under-used garage blocks
 - Sites in rural areas
 - Large scale redevelopment of existing residential or economic areas
 - Urban extensions
 - Free standing settlements
 - Any other sites as judged appropriate by Council officers
- 3.10 Where sites already have planning permission or Prior Approval they will be included in the SHELAA (Appendix 1) but further detailed site assessments are not considered necessary unless other information suggests this to be required.
- 3.11 The majority of the sites on the Council's Brownfield Land Register are adopted allocations in the current Local Plan or sites which have been promoted through the Council's Call for Sites exercises. In order to avoid duplication in the trajectory, existing allocations and promoted sites were included rather than the sites on the Brownfield Land Register (as often promoted/allocated areas are larger in size than the Brownfield Register boundary).
- 3.12 Brownfield Land Register sites which are the subject of a permission were included as commitments only (rather than Brownfield Land Register sites) in order to reflect a more accurate dwelling number (i.e. the number of dwellings permissioned). The exceptions to this were Northwick Day Centre (BR20), which forms part of the H29 South Oxhey allocation, but which is not permissioned. BR4, Kings Langley Employment Area, also has spare capacity aside from the existing permissions so an indication of this capacity was included in BLR section of the trajectory.

Call for Sites

- 3.13 Stakeholder input plays a key role in the delivery of a robust SHELAA evidence base. As part of the SHELAA, a Call for Sites was issued between 28 July and 8 September 2017 together with the Council's Issues and Options Consultation. An additional Call for Sites was conducted from 30 July to 20 August 2017 requesting developers and landowners to put forward sites of less than 1ha in line with the updated NPPF, however sites above this threshold were also considered. A further Call for Sites was run between 26 October and 7 December 2018 together with the Potential Sites Consultation. These were publicised on the Council's website and in press releases. Notification was sent to everyone on the Local Plan consultee database, which is made up of wide range of organisations and individuals including those identified in paragraph 3.4 above, inviting them to submit sites for assessment.

- 3.14 A Call for Sites submission form was produced for those submitting sites for consideration, requiring a site plan to be submitted together with a brief description of the site. A copy of the form used is attached at Appendix 2.
- 3.15 Government guidance states that conflict with a limited range of national policies and designations can exclude sites from further assessment, these are as follows:
- Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty and Local Nature Reserves. Locating housing or employment development on these sites could result in the loss or harm to significant protected species and habitats as well as visual amenity.
- 3.16 Sites where these designations applied were not excluded at this stage so as to provide constancy through the site assessment process. This provided the opportunity to reconsider boundaries of sites that partially included these absolute constraints. If the sites were wholly within these areas of constraint the site would ultimately have been assessed as unsuitable for development.
- 3.17 Sites and broad locations are not excluded at this stage on the grounds of being located within the Green Belt, or within Flood Zone 2 and 3. This is because;
- Green Belt: given the quantum of new development required in the next 15 years there was a need to identify sites that are currently in the Green Belt for development. The Council undertook a Green Belt Review which was used to inform the suitability of sites located within the Green Belt. Sites considered deliverable in the Green Belt will be removed from the Green Belt through the Local Plan process.
- Flooding: the SFRA has been reviewed and it is possible that there have been some adjustments to defined flood envelopes which could affect areas considered to be capable of being developed.
- 3.18 All the sites were mapped to assess the sites and eliminate duplicates.

Stage 2: Site/broad location assessment

- 3.19 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* were assessed. For those sites/areas judged to be suitable, available and achievable, an assessment of their development potential enabled their contribution to meeting housing and employment land needs over the plan period to be identified.
- 3.20 Where sites already have planning permission, site assessments are not considered necessary as planning permissions provide a high degree of certainty in terms of yield. Sites will be taken as being suitable, available, and achievable unless other information suggests that they should be reassessed.
- 3.21 A site assessment pro-forma was produced. This is attached as Appendix 3. The SHELAA sites have been assessed using this pro-forma.
- 3.22 The site assessments included recording/checking the following information:
- Site size
 - Site boundaries
 - Site location

- Current land-use(s)
- Surrounding land use(s)
- Character of surrounding area
- If within an SSSI, AONB, LNR or Local Wildlife Site (LWS)
- Physical constraints (e.g. access and egress, watercourses and evidence of flooding, natural features of significance, pylons, trees)
- Potential environmental constraints
- Policy constraints (e.g. Green Belt, Heritage Assets)
- The site's position in the settlement hierarchy
- Potential for the site to deliver infrastructure (e.g. education, community facilities) based on discussions with infrastructure providers, draft master plans where it could be supported by the quantum of development
- For strategic sites (over 300 dwellings), master plans where produced by the developers / land owners
- Development progress (e.g. number of homes started and number of homes completed)
- Initial assessment of whether the site is suitable for a specific use or a mixed-use development.

3.23 As well as ensuring that up to date information had been captured the assessments assisted with:

- Confirming appropriate type/scale of development
- Confirming deliverability, any barriers and how to overcome them
- Identifying any further sites nearby with potential for development

Assessing Suitability

3.24 Suitability will be guided by:

- Existing and emerging Local Plan policy¹ and national policy. Policy restrictions may affect the amount of development that a particular site can deliver
- Where there is a clear prospect that relevant policies in the new Local Plan may change and affect the status of the site/location in policy terms e.g. where the current designation of a site no longer reflects development which has since occurred on that site, this will be taken into account.
- Problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination
- Potential impacts including the effect on landscape features, nature and heritage conservation
- Appropriateness of the type of development proposed
- Environmental impacts experienced by potential occupiers and neighbours
- Location of the site in terms of the spatial strategy / settlement hierarchy

3.25 When assessing the suitability of sites consideration was given to the site's position within the Spatial Strategy. Priority was given to brownfield sites and sites within the urban area and then to sites at the edges of higher tier settlements². The settlement

¹ This may include emerging and up-to-date evidence based documents

² Higher tier settlements are the Principal Town, Key Centres and Secondary Centres

hierarchy can be found in Appendix 4. Finally, limited development at the edge of villages inset in the Green Belt. An Edge of Settlement and New Settlement Scoping Report (2020) has been produced outside of the SHELAA process.

- 3.26 It should be noted that the 'settlement' included in the assessment form is purely for location purposes and refers to the nearest settlement rather than referring to the settlement hierarchy, and as such may not be within the boundary of the settlement itself. The 'Further Constraints/Considerations' section of the assessment form contains the site's relationship to the settlement hierarchy.
- 3.27 Bedmond is proposed to be the only inset village in the District. The overall scale of development across Bedmond should be limited due to the size of the village and given its position in the settlement hierarchy. As such, two sites combined at the edge of the village would not be considered suitable whereas this may be considered appropriate at the edge of higher tier settlements. Overdevelopment of the village through cumulative development and through sites which are disproportionate in comparison to the size of the village was therefore a consideration when assessing sites located at the edge of the proposed inset boundary of Bedmond. Within the proposed inset area of Bedmond, the scale of development will also be proportionate to the size of the village; any additional sites within the proposed inset area that are suitable, available and achievable are expected to come forward as windfall through the planning application route.
- 3.28 Sites not at the edge of higher tier settlements or within or adjacent to villages washed over by the Green Belt were not considered suitable for development. These sites will be covered by the Council's Rural Exception Site policy. This policy allows for small scale proposals delivering 100% affordable housing in perpetuity within and immediately adjacent to village core areas.

Assessing Availability

- 3.29 An available site is one where on the best information available there is confidence that there are no legal or ownership problems e.g. multiple ownerships, ransom strips, tenancies or operational requirements of landowners. 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. Where problems are identified an assessment has been made as to how and when they can realistically be overcome. The delivery record of the developer or landowner concerned, and planning history of the site may also be taken into account in assessing availability.

Assessing Achievability

- 3.30 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 capacity to complete or let or sell the development quickly

Constraints

- 3.31 Where constraints are identified, and not considered to be a barrier to overall delivery of the site, the action needed to remove them was also assessed. This enabled a realistic assessment to be made of the potential type and quantity of development that could be delivered on each site/broad location and in what timescale.

- 3.32 Actions needed to enable sites to be delivered were considered. These included:
- Consolidating ownerships
 - Investment in infrastructure
 - Environmental improvement
 - Changes to emerging local plan policies
 - Removal of land from the Green Belt
 - Revising site boundaries to remove constraints from site area
- 3.33 The vast majority of potential sites are located in the Green Belt and as such would not be considered suitable for development under existing policy. The Council contacted its neighbouring authorities to ascertain whether they could take any of Three Rivers' housing need. All of the authorities responded negatively. It is therefore necessary for development to take place within the Green Belt for objectively assessed need to be met. The Council considers the exceptional circumstances for Green Belt removal through the Local Plan process to have been met.
- 3.34 The Council's Green Belt Review produced harm ratings for removing parcels of land from the Green Belt. The potential sites within the Green Belt were located within different levels of harm. The Council considered all sites up to a harm rating of moderate-high potentially suitable, in Green Belt terms, for development. In areas of high harm, strategic sites (over 300 dwellings) could potentially be found suitable if located in a sustainable location and if it could be demonstrated that the site could deliver infrastructure and community benefits. In areas of high harm, sites with capacity for under 300 dwellings were also considered to be potentially suitable if located on brownfield land and if in sustainable locations and/or in close proximity to public transport.
- 3.35 Priority was given to sites at the edge of settlements, with more limited development being considered at the edge of inset villages. Sites in and around villages washed over by the Green Belt (i.e. not located at the edge of higher-tier settlements/inset villages) were not considered suitable due to Green Belt policy remaining in place.
- 3.36 The Stage 2 Green Belt Review considered the extent to which the release of different areas of land at the edge of inset settlements³ affects the contribution to the Green Belt purposes, through both the loss of openness of the released land and the resulting impact that this could have on the adjacent Green Belt. This process involved an assessment of the harm to Green Belt purposes of releasing land for development to facilitate the expansion of inset settlements (whether within, or close to the District) or of the village of Bedmond (which was identified in the Stage 1 Study as having potential to be inset into the Green Belt). It assessed 152 parcels of land.

³ And the village of Bedmond as it was recommended as having potential for inseting

Green Belt removal harm rating and approach to assessing suitability

Harm Rating*	
Very High	Not considered acceptable for residential development
High	Development considered acceptable if it: 1) is strategic in scale (normally 300+ dwellings), in a sustainable location and will deliver infrastructure and community benefits, or 2) on brownfield land and in close proximity to public transport/sustainable locations
Moderate-High	All sites considered (if located at the edge of a higher tier settlement or inset village)
Moderate	All sites considered (if located at the edge of a higher tier settlement or inset village)
Low-Moderate	All sites considered (if located at the edge of a higher tier settlement or inset village)
Low	All sites considered (if located at the edge of a higher tier settlement or inset village)

Timescale – Deliverable/Developable

3.37 The following information was used to estimate the timescale within which each site/location is likely to be developed:

- Suitability, availability, achievability and constraints
- Lead-in times for development proposed
- Build-out rates for development proposed

3.38 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 5 years and in particular that development of the site is viable. (NPPF Glossary)

3.39 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).

Estimate development potential (capacity)

3.40 For those sites considered to be suitable, available and achievable within the Plan period, and estimate of the site's capacity / development potential was made.

3.41 The draft Housing Density Policy sets out that new housing should be provided at a target density responding to the site, its context and the housing need with densities generally of at least 50 dwellings per hectare. In areas well served by public transport, services and facilities higher densities will be expected.

- 3.42 This policy was used to set the baseline, however there may be occasions where a lower density of development would be appropriate with regard to a site and its context. This approach was applied in estimating the development potential of sites.
- 3.43 Where the estimated development potential of a site is less than that assumed by a landowner making a submission, the viability, and hence achievability of a site may be affected and have to be re-visited. The Council's assessment of density and dwelling numbers for the site were also re-visited to ascertain whether a lower density may be more appropriate for the site.
- 3.44 For economic development sites floor space densities and other measures used to assess employment land requirements are in the South West Herts Economic Study 2019. It provides the total requirement of floor space by use class. Any relevant planning history or submissions from owners will also be used as a guide to assessing development potential.
- 3.45 Sites only capable of delivering less than five residential units were excluded and will be accounted for in the windfall allowance.
- 3.46 Some yield based on developments that have been refused planning permission may be included; this will be the case if the development was supported in principle and it is considered likely that an amended version of the proposal will be pursued and may subsequently obtain planning permission.

Stage 3: Windfall Assessment

- 3.47 An allowance for likely housing delivery from windfall sites is included. Windfall sites are those which have not been specifically identified as available through the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available. The National Planning Policy Framework (paragraph 70) and Planning Practice Guidance enables Local Planning Authorities to make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. There is evidence that windfall sites have historically formed a significant part of the housing supply in Three Rivers. However, an allowance for future windfall provision has not been included in the SHELAA for years 0-5 to avoid issues of double counting.
- 3.48 Prior to the publication of the revised NPPF in July 2018 any windfall allowance was not to include residential gardens. The updated NPPF 2018 and subsequent update in February 2019 no longer apply this restriction, however it indicates that Local 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 as stated in Paragraph 70.

Stage 4: Assessment Review

- 3.49 The capacity, availability, suitability and achievability of all sites, together with phasing details (i.e. 0-5 years, 6-10 years, 11-16 years) were collated. An overall risk assessment as to whether sites will come forward as anticipated was undertaken. An indicative housing trajectory was then produced in November 2019. A shortfall against objectively assessed need was identified and therefore there was the need to revisit the assessments and consider whether any further sites/locations could be

identified or capacities reviewed. Further work was undertaken to meet objectively assessed needs. This included an Urban Capacity Study and the identification of further sites at the edge of settlements that had not been submitted through call for sites. Land identified as being as unsuitable for development due to Green Belt policy was reconsidered following the approach set out in paragraphs 3.33 to 3.36 above. An Edge of Settlement and New Settlement Scoping Report was also produced.

Stage 5: Final Evidence Base

3.50 The outputs from the SHELAA include:

- A list of all sites or broad locations considered, cross-referenced to their locations on maps
- An assessment of each site in terms of its suitability, availability and achievability to determine whether it is realistically expected to be developed including evidence justifying reasons why any sites were discounted.
- Further detail for strategic sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons.
- The potential type and quantity of development that could be delivered on each site/location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when, and
- An indicative trajectory of anticipated development.

4 Summary of results

4.1 This section of the SHELAA report sets out summary results of the study. The results are displayed by site category⁴ and include the number of sites identified in each site category, the total housing capacity across all sites and the expected delivery timescale of the development, from adoption of the Plan. The housing potential is set out as a trajectory across the plan period.

4.2 The number of sites assessed within each category are listed below:

Site Category	No. of sites assessed
Call for Sites	99
Additional Call for Sites	21
Potential Call for Sites	28
Previously Considered Sites	34
Other Sites Put Forward	9
Urban Capacity Sites	71
Refused and Withdrawn Application Sites	14
Edge of Settlement Sites	21
Existing Allocation Sites	14
Brownfield Land Register Sites	1
Total:	312

⁴ 'Site category' refers to the source of each site i.e. if a site was sourced through the Call for Sites exercise, from the Urban Capacity or Edge of Settlement Studies, from the list of extant Existing Allocations, etc.

- 4.3 294 housing sites and 18 employment⁵ sites were assessed as part of the SHELAA (Appendix 5 and Appendix 6). A detailed set of results for each site, which includes the evidence on site suitability, availability and achievability which informed the site assessments is set out in Appendix 7. A summary of the detailed assessments is set out in Appendix 8.
- 4.4 From all sites assessed, 74 sites housing sites and 6 employment⁶ sites were found to be deliverable or developable, equating to a total of 80 sites.
- 4.5 A list of the deliverable/developable sites is shown in Appendix 9; to avoid double counting this list excludes smaller sites located within larger sites which may also have been assessed as deliverable/developable.
- 4.6 The total housing capacity⁷ of these sites is estimated to be between 9,091 and 10,697 dwellings over the 15 year period following adoption of the Local Plan. The total employment land⁸ to be provided is estimated to be 47.7 ha. This includes 8.2ha of land for a secondary school and 27.7 ha for expansion of Leavesden Studios on top of the 11.8 ha employment land⁹.
- 4.7 The breakdown of the employment sites is as follows:

	Site Ref.	Site Name	Main Proposed Use	Size (ha)
All Site Categories	CFS11	Carpenders Park Farm, Oxhey Lane	Education	8.2
	CFS28	Land at Gypsy Lane, Hunton Bridge	Leavesden Studios	7.7
	CFS32a	Land at Lynsters Farm (Revised Boundary)	Employment	10.7
	CFS70a	Croxley Business Park - Employment	Employment	0.4
	CFS70b	Croxley Business Park - Open Space	Employment	0.7
	OSPF6	Land west of Leavesden Aerodrome	Leavesden Studios	20

- 4.8 There is evidence that windfall sites have historically formed a significant part of the housing supply in Three Rivers. However, an allowance for future windfall provision has not been included in the SHELAA for years 0-5 to avoid issues of double counting. The amount of housing that is expected to be delivered annually through windfall is 39 dwellings; therefore the total over the following 10 year period would be 390 dwellings.

⁵ Sites proposed for other uses including education, motorway services, retail and for Leavesden Studios are included in the number stated for employment sites. Employment sites may also be proposed for residential use but have been counted in the figure for 'employment sites' in order to avoid double-counting in paragraph 4.3. Proposed uses per site are stated in Appendices 6 and 7.

⁶ Education site and sites for expansion of Leavesden Studios are included as employment land

⁷ Total housing capacity includes existing site allocations

⁸ Total employment land includes the 6 additional employment sites, but excludes the existing Local Plan allocations.

⁹ Including ancillary open space.

- 4.9 Sites with planning permission and under construction will bring forward a further 948¹⁰ dwellings in the 0-5 year period (Appendix 1).
- 4.10 The total potential housing capacity for the 15 years following adoption¹¹, including an allowance for windfall and including sites with planning permission and under construction is therefore between 10,429 and 12,035 dwellings. An indicative trajectory of anticipated development has been prepared based on the evidence available (Appendix 10).
- 4.11 The appendices to the SHEELA include the following:
- Sites with planning permission and prior approval (Appendix 1)
 - Call for Sites submission form (2017) (Appendix 2)
 - Site assessment proforma (Appendix 3)
 - Settlement Hierarchy (Appendix 4)
 - List of all sites considered (Appendix 5)
 - Maps of all sites considered (Appendix 6)
 - Detailed site assessments (Appendix 7)
 - Summary of detailed assessments (Appendix 8)
 - List of deliverable / developable sites (Appendix 9)
 - Indicative trajectory (Appendix 10)

¹⁰ As of 31 March 2020

¹¹ The total potential housing capacity will also need to meet any under-delivery from the 2016 Local Plan start date through to the Plan adoption date.