Representor 4029 Mr Drummond Robson. Robson Planning Consultancy

Tuesday 1 May (10am)
Matter 1 – Overall Strategy and Housing Provision (RCS generally, Policies CS1, CS3, CS22)

Appendix 3

The Basis for SHLAA and SHLAA Update: Urban Capacity Studies, Strategic Housing Land Availability Assessments Practice Guidance, CLG 2007, National Planning Policy Framework.

Contents: Urban Capacity
Urban Extensions

1. PPS 3 - and PPG 3 - have been cancelled. SHLAA guidance 2007 (SG) has not been cancelled and so is a material consideration since it is referred to in NPPF but it no longer has PPG or PPS support which makes it open to wider interpretation and discretion in its use. Of particular concern is the distortion it leads to for assessed proposed housing densities and the effects these have on assessed urban provision and the impact on urban quality as set out below:.

2. SG states: "1. Strategic Housing Land Availability Assessments are a key component of the evidence base to support the delivery of sufficient land for housing to meet the community's need for more homes. These assessments are required by national planning policy, set out in Planning Policy Statement 3: Housing (PPS3). This document gives practical guidance on how to carry out an assessment to identify land for housing and assess the deliverability and developability of sites".

3. SG advocates building on Urban Capacity Studies rather than replacing them:

Urban Capacity

4. The guidance states

   "16...identify additional sites with potential for housing which 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."

5. This does not say Urban Capacity Studies should be ignored but added to. More recent SHLAA work from CD 93 onwards has not reconsidered the principles of this November 2006 study (CD/92) which it now must do in the light of the cancellation of PPG3, notably in reviewing the basis of the

weightings to future site densities, accessibility to services and accessibility to changing public transport and their cumulative multipliers. The basis for assessing site densities in the Urban Capacity Study was contained in appendix 3. This remains behind Hertsmere's current SHLAA methodology of June 2009 paragraph 35:

"Stage 6 - Estimating the housing potential of each site
35. To determine housing potential, the methodology within the UCS will be redeployed. This method used a baseline density of 30 dwellings per hectare and allowed for factored increases according to a range of indicators including a site's accessibility, surrounding density and likely dwelling types to be accommodated.
The Typical Urban Area's (TUA) provide a comprehensive mapping of prevailing densities across the Borough. Exemplar recent developments within the borough will also be identified as good examples or benchmarks of what the Council may wish to see on certain sites, in accordance with existing Local Plan and emerging Core Strategy policy."

6. (CD/92) Urban Capacity Study Extracts from section 8 Assessing unconstrained yield from the Detailed Study Areas and Appendix 3: Accessibility Ratings. (see also – oversimplified - in SHLAA report 2010 4.39-4.45).

"8.3... a base density of 30dph has been used in the calculation of potential yield from all site-specific sources, as it is not considered realistic to anticipate densities below this level on larger sites currently in non-residential uses.
8.4 From this base point, the anticipated density on each site has been determined through the use of multipliers relating to the area type, the prevailing density, accessibility and the likely housing type.
8.5 The prevailing density has been taken from the survey of TUAs detailed above while the accessibility rankings have been based upon recent joint work with Hertfordshire County Council assessing accessibility to key services across the Borough. This work will feed into policies in Hertsmere's emerging Local Development Framework. Further information on the accessibility ratings can be found in Appendix 3 to this main report.
8.6 For each of these categories, the base density was increased by up to 35%. Table 12 below details the multipliers and criteria used in the calculation of unconstrained capacity.
The anticipated capacity arising from site-specific sources has been calculated using density multipliers relating to the area type, the prevailing density, accessibility and the likely housing type.

Table 12: Density multipliers used to calculate unconstrained capacity
Base Density: 30 dwellings per hectare (dph)

Criteria	Multiplier			
	+35%	+20%	+10%	+0%
Area type	Central	Transitional	Suburban	Village or Rural
Prevailing density	Urban	Higher or Medium High	Medium	Low or Very Low
Accessibility	Very High	High	Medium	Low
Likely house type	Flats	Terraced / Town Houses / Mixed	Semi-detached	Detached

8.7 The multipliers have been applied cumulatively. For example the yield on a site in a transitional area with medium prevailing density, medium accessibility and considered likely to be most suitable for flats would be based on an anticipated density of 59 dwellings per hectare (rounded):
Base density: 30dph
Character: Transitional (+20%) = 36dph

Prevailing Density: Medium (+10%) = 40dph
Accessibility: Medium (+10%) = 44dph
Likely Type: Flats (+35%) = 59dph

8.8 Using the multipliers above provides a maximum theoretical density of 100 dwellings per hectare (net) in the most central and accessible locations. This is considered a justifiable level given the advice in PPG3. [Emphasis. DR]

Appendix 3 page 61ff (Key extracts).

"By working in conjunction with Hertfordshire County Council (HCC), the relative accessibility of areas within the Borough have been calculated. Accessibility maps were provided by HCC showing access to the following services across the Borough: primary school, secondary school, hospital, supermarket, food shop, GP surgery, station, pharmacy, significant retail centre (Town Centres, Local Town Centres and District Centres as defined in the Hertsmere Local Plan).

"For each of the above services, accessibility on foot and accessibility by bus was mapped, with the exception of supermarkets and hospitals for which accessibility by bus only was mapped. Areas were given a score between 0 (no access) and 30 (very high accessibility) depending on their accessibility to each service and mode.
Points were then plotted every 100 metres north to south and east to west across the Borough, creating a grid of approximately 10,000 points. Each point on the grid was assigned an accessibility score for each category and mode based on the HCC Maps detailed above.
The score for each service and mode was then weighted to reflect the relative importance of each service, and the relative ease of access. [Emphasis. DR]
Table 3a below summarises the weightings and the subsequent maximum score achievable for each service and mode. This provided a theoretical maximum accessibility score of 2,220 points.

Table 3a: Accessibility score weightings

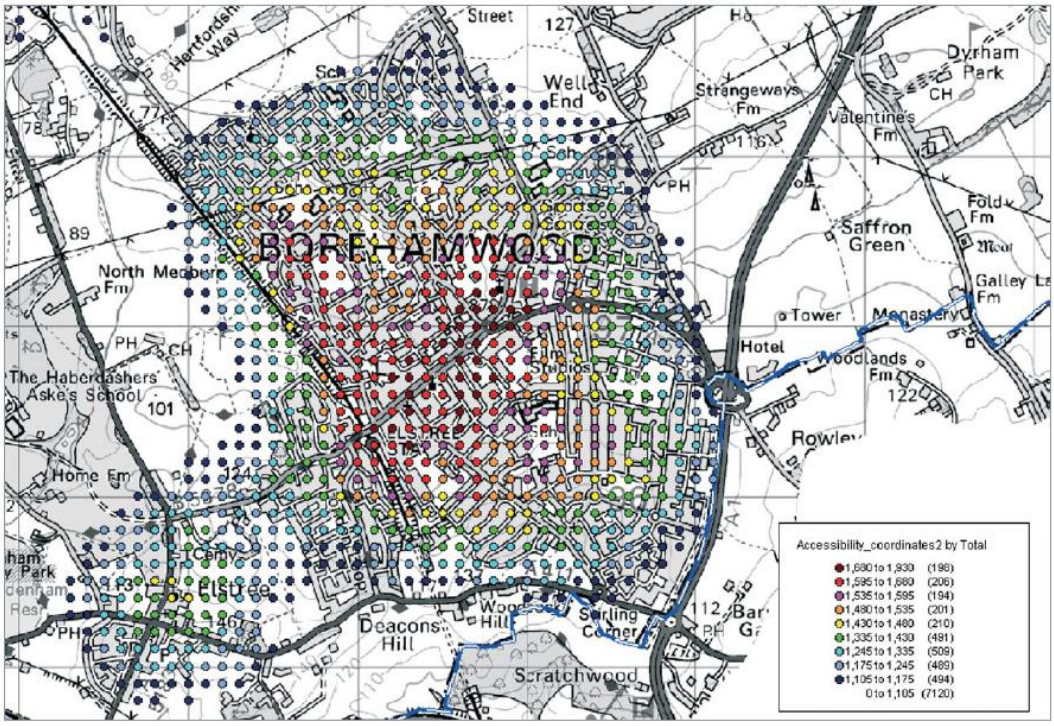
Service	Walking		Bus	
	Weighting	Max Score	Weighting	Max Score
Primary School	9	270	3	90
Secondary School	6	180	4	120
Hospital	-	-	3	90
Supermarket	-	-	2	60
Food Shop	8	240	3	90
GPs	6	180	4	120
Station	10	300	6	180
Pharmacy	2	60	1	30
Retail Centre	4	20	3	90

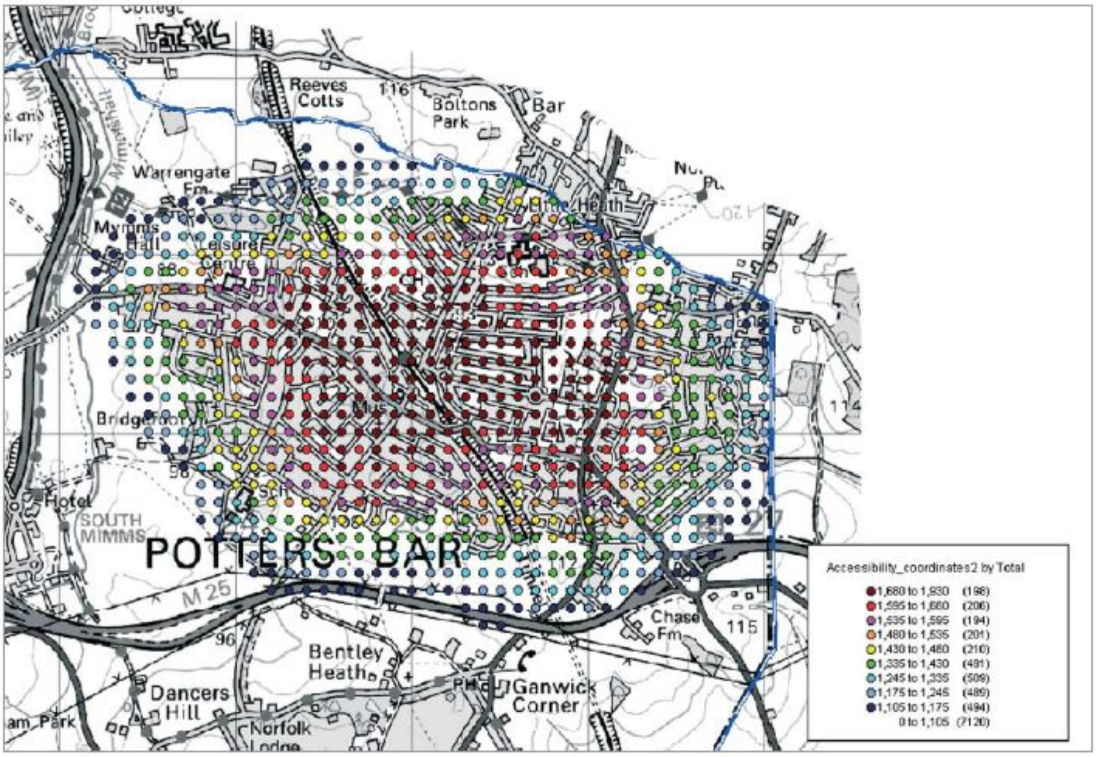
"The score for each point was then summed to give the total accessibility score for each point on the grid, with the most accessible point in the Borough obtaining a score of 1,930 points. The maps on the following pages detail the accessibility scores for the Borough's main settlements. The table below details how these scores were translated into density multipliers."

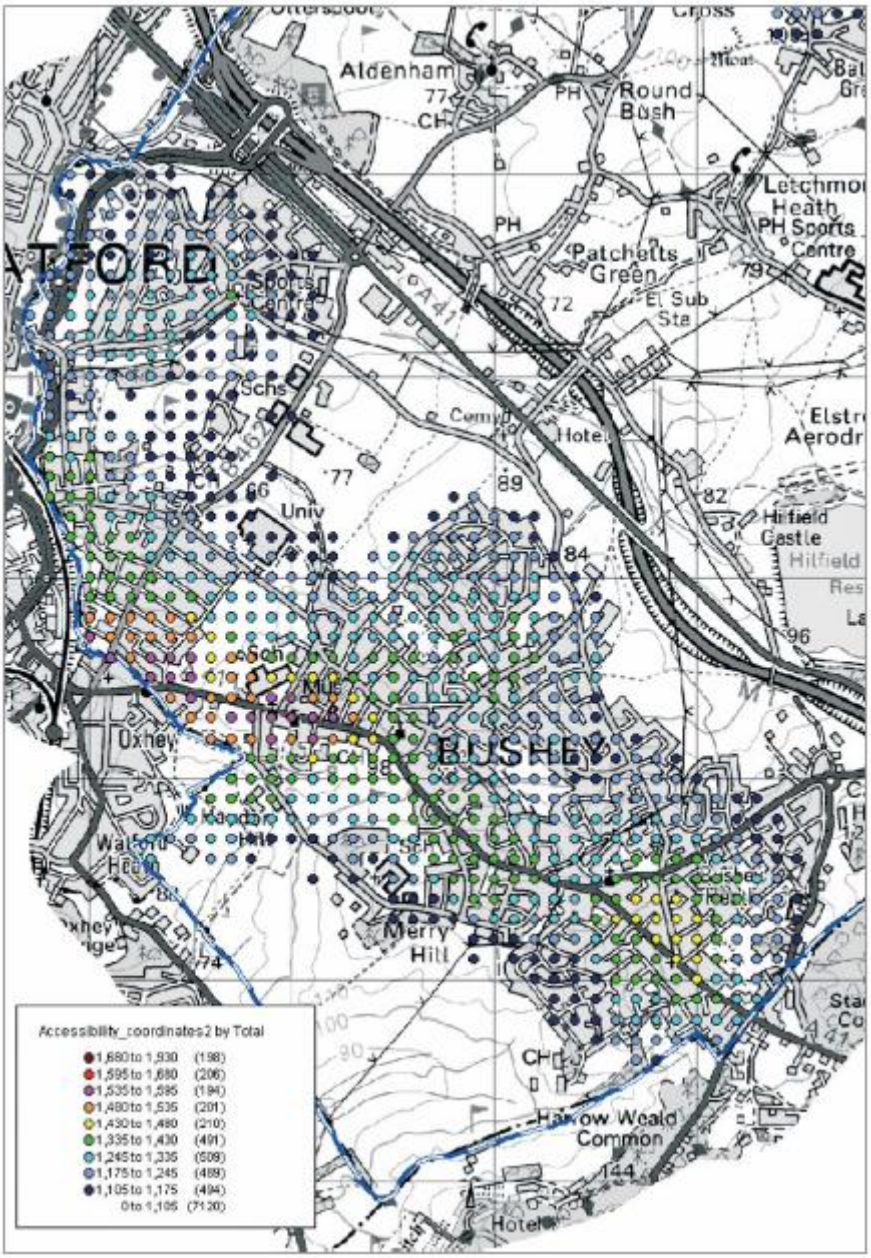
Table 3b: Accessibility based multipliers

Accessibility	Accessibility Score (range)	Multiplier
Very High	1,595 and above	+35%
High	1,480 to 1,595	+20%
Medium	1,335 to 1,480	+10%
Low	Below 1,335	+0%

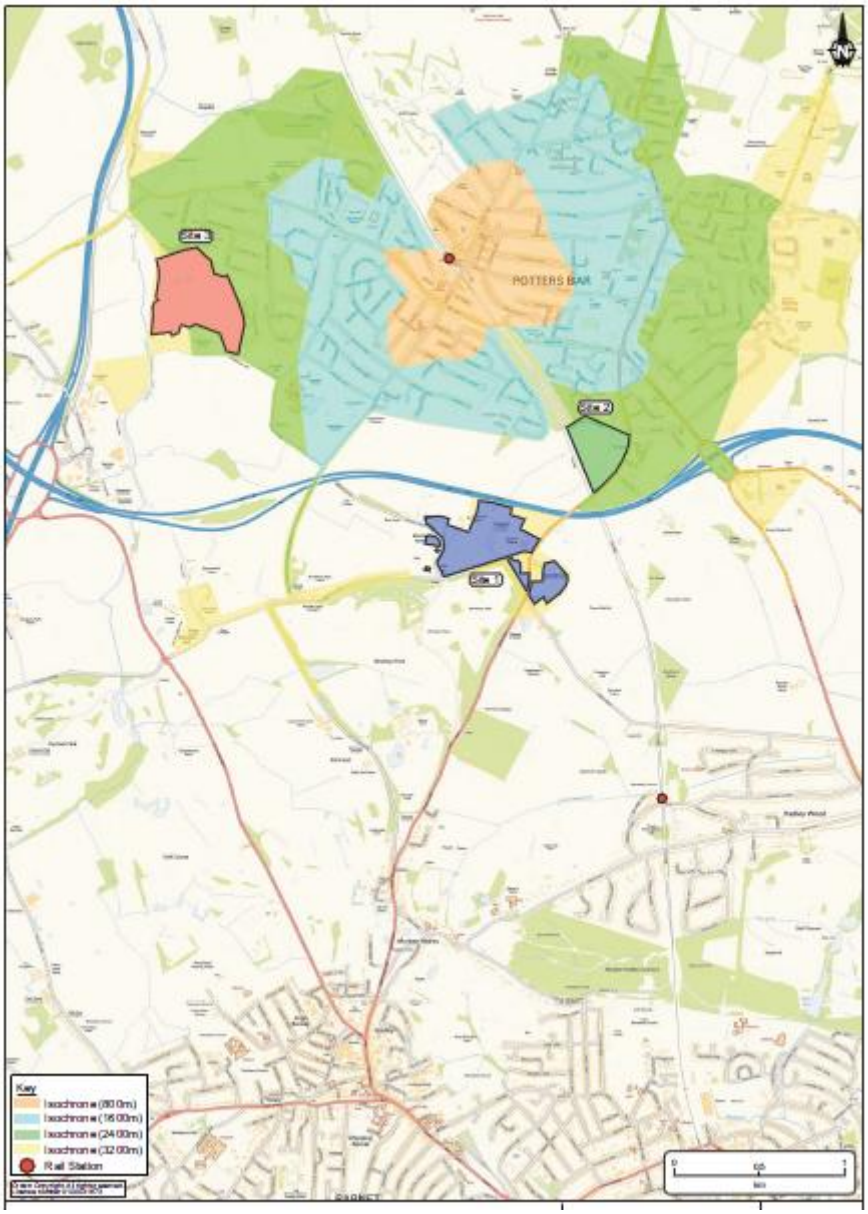
Accessibility Ratings Maps



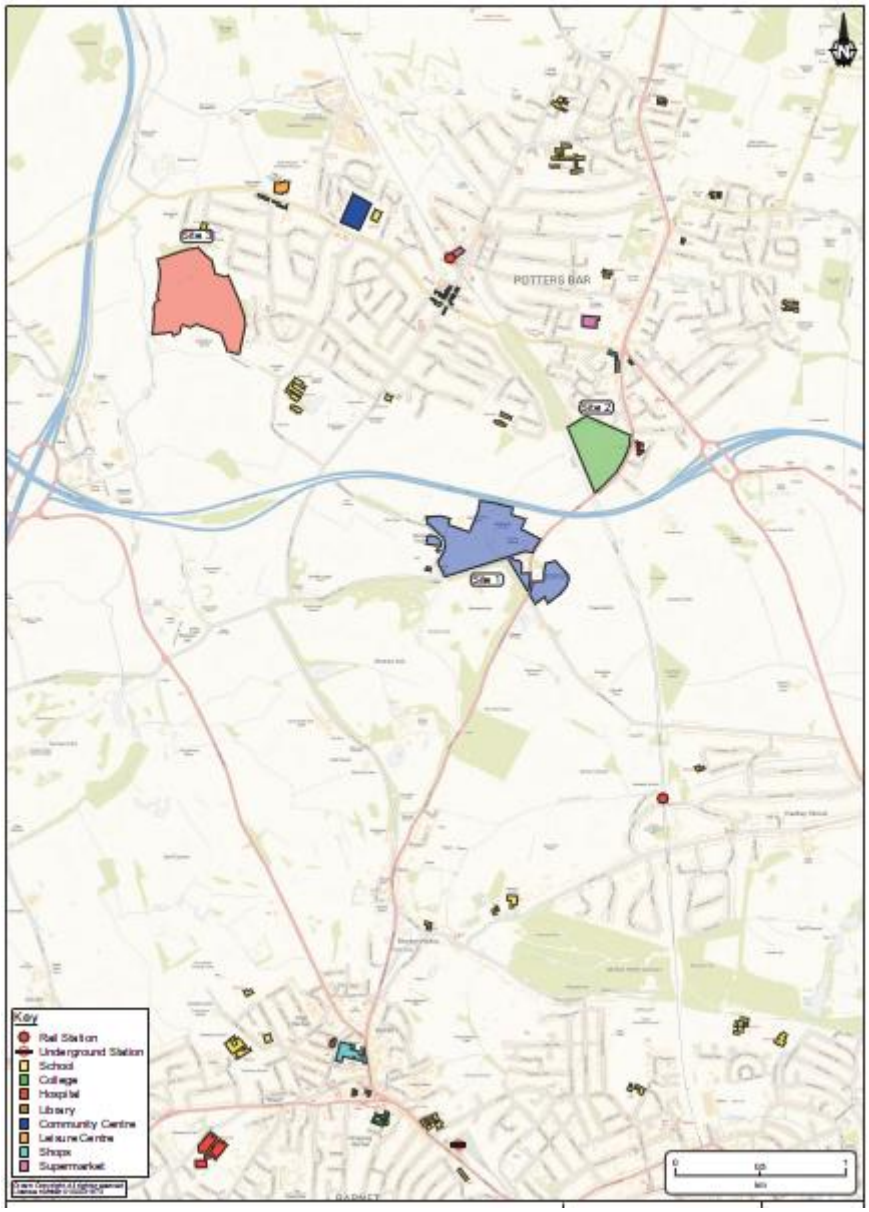

Reeves Cotts
Boltons Park
Bar
Warrengate Fm
Mymms Hall
Leisure Centre
Little Heath
Bridgefoot
Hotel
SOUTH MIMMS
POTTERS BAR
M 25
Chase Fm
Bentley Heath
Dancers Hill
Ganwick Corner
Norfolk Lodge
Accessibility_coordinates2 by Total
1,680 to 1,930 (198)
1,595 to 1,680 (206)
1,535 to 1,595 (194)
1,480 to 1,535 (201)
1,430 to 1,480 (210)
1,335 to 1,430 (491)
1,245 to 1,335 (509)
1,175 to 1,245 (489)
1,105 to 1,175 (494)
0 to 1,105 (7120)



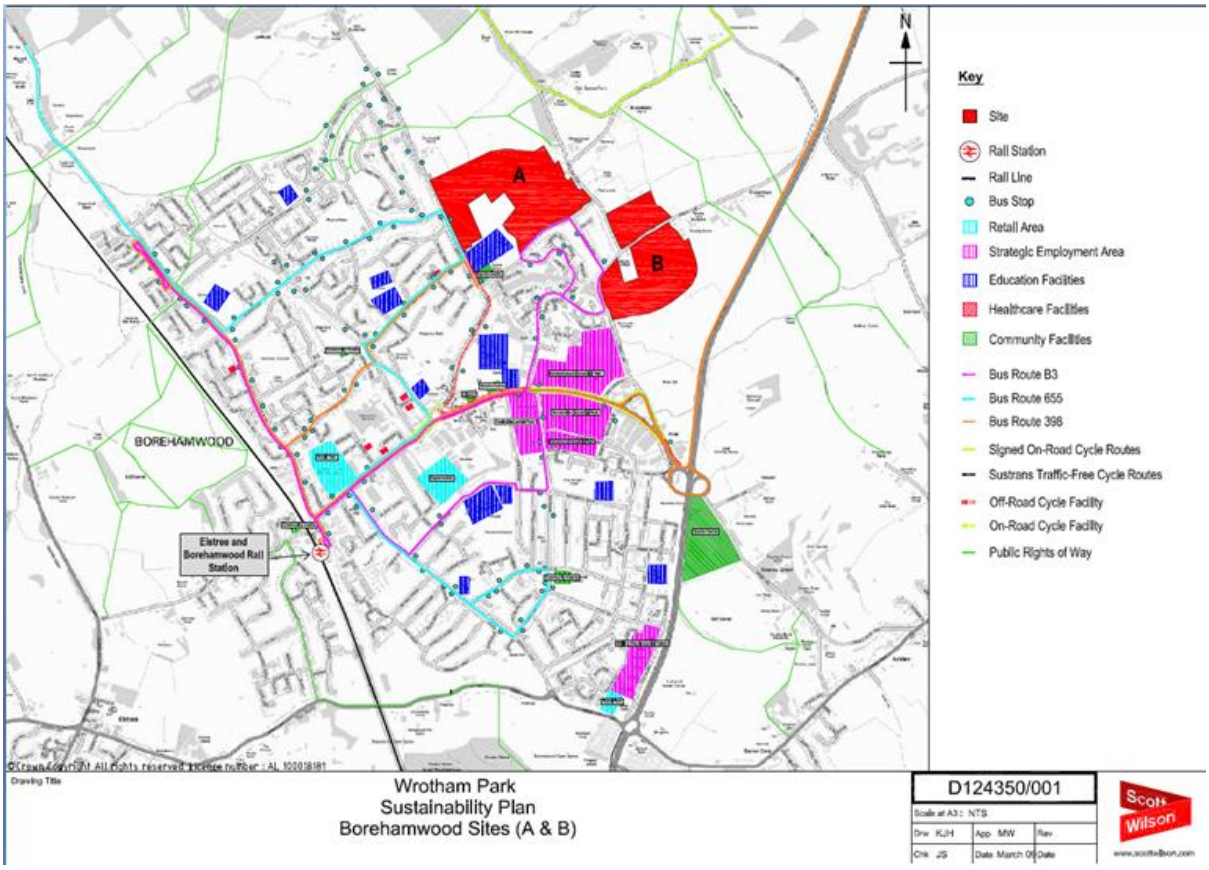
7. These multipliers (which try to add apples and pears) to result in future housing densities rather obscure the important concern of how far places are from transport hubs and services nodes for ease of sustainable travel as well as the existing shape of the town and actual travel distances within it. They could benefit from being replaced by more simply understandable isochrone data and service location data on the lines of the following for Potters Bar undertaken by Scott Wilson:



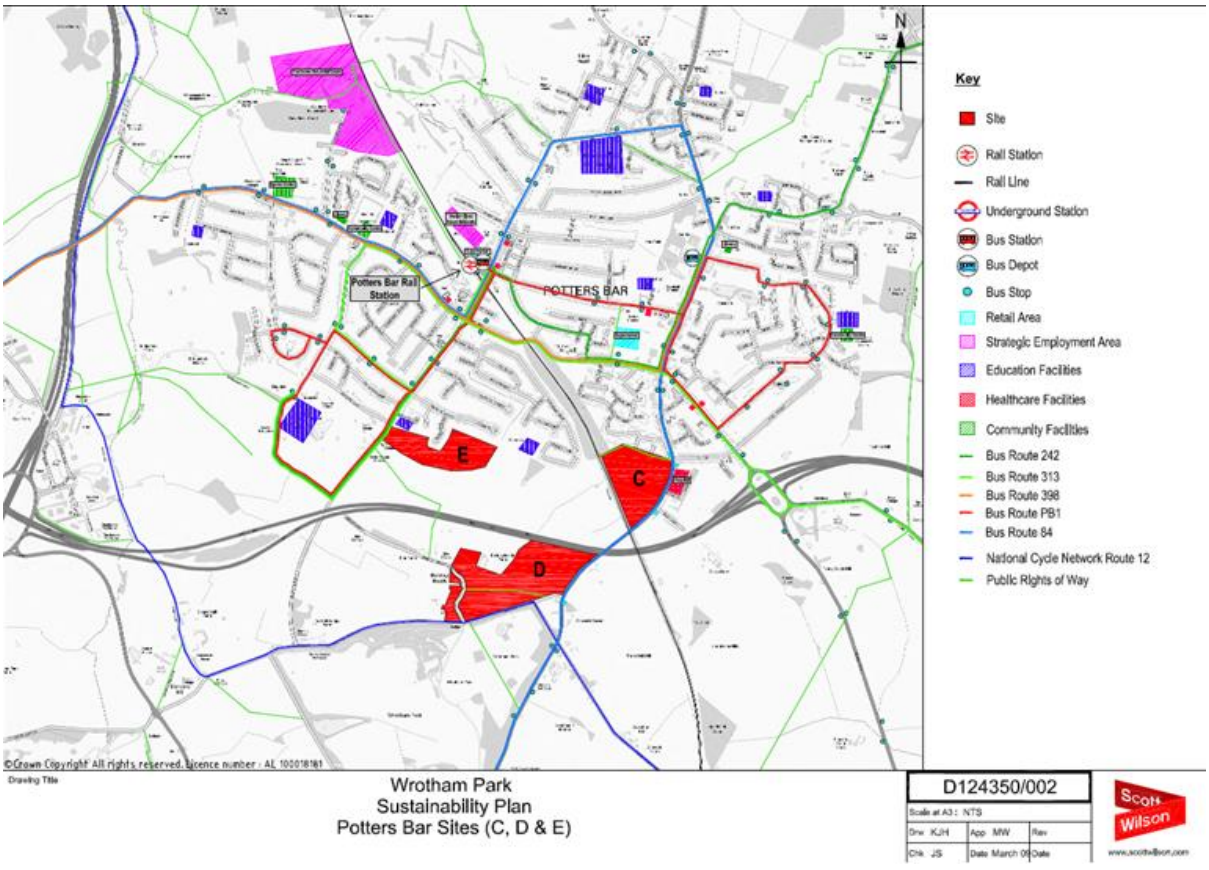
Cycle Isochrones from Potters Bar Station: Scott Wilson 2006



Potters Bar and Barnet. Local Services: Scott Wilson 2006



Wrotham Park
Sustainability Plan
Borehamwood Sites (A & B)



Wrotham Park
Sustainability Plan
Potters Bar Sites (C, D & E)

Urban Extensions

8. SG Figure 4 assumes new urban extensions normally to have been identified by RSS a set out in table 4 (which should now carry less weight) and is of little help if there is inadequate space in towns. The density multiplier shows this clearly to be the case if the quality of life of Hertsmere's residents is to be maintained and improved for this and future generations. The SHLAA site assessments demonstrate this with densities of up to 100 dwellings per hectare.

Figure 4: Sources of sites with potential for housing

Sites in the planning process
• land allocated (or with permission) for employment or other land uses which are no longer required for those uses • existing housing allocations and site development briefs • unimplemented/outstanding planning permissions for housing • planning permissions for housing that are under construction
Sites not currently in the planning process
Examples: • vacant and derelict land and buildings • surplus public sector land • land in non-residential use which may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of mixed-use development • additional housing opportunities in established residential areas, such as under-used garage blocks • large scale redevelopment and re-design of existing residential areas • sites in rural settlements and rural exception sites[13] • urban extensions[14] • new free standing settlements[14]

14 The broad location for which will normally have been identified by the Regional Spatial Strategy.

9. SG paragraph 26 places less weight on SHMA as being only "helpful" by contrast to "necessary" in NPPF 159. This gives more emphasis to it and its derivation from demographic pressures. Market demand is severely discounted without a proper review of green belt boundaries at the CS stage to assess its growth potential.

10. In 2005 the strategy of the Local Plan(CD 24) was:

Policy K2: Development Strategy
The overall development needs of Hertsmere will be planned in accordance with the settlement hierarchy set out in paragraph 5.9. Initiatives such as Comprehensive Settlement Appraisals or Village Appraisals will be developed in association with the local community and other relevant parties for individual settlements to assist the process of monitoring and reviewing the policies in this Plan.
5.9 The following hierarchy of settlements within the Borough will be used, subject to the policies set out in this Plan, to guide development to appropriate locations:

- the majority of the Borough's development needs will be steered towards the towns of Borehamwood, Bushey, and Potters Bar. [further paragraphs cover the smaller settlements]

11. It is unclear how this has led to far greater emphasis on Borehamwood's growth alone since.

SG "Stage 6: Estimating the housing potential of each site
30. The estimation of the housing potential of each identified site should be guided by the existing or emerging plan policy, particularly the approach to housing densities at the local level."

- deliverable – a site is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within five years from the date of adoption of the plan;

12. This position, derived from PPS3 is now modified in NPPF 47 footnote 11 to emphasis viability and change to market demand or phased over a long period. The Council will need to review the viability of the sites it puts forward. This will undoubtedly erode further the case for urban containment.

"11 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 and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans."

13. The SG definition of developable remains unchanged.

- developable – a site should be in a suitable location for housing development, and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time[24].

14. The basis for windfalls has been altered to allow also for expected future trends and to exclude use of gardens. The broad urban locations will require review of SRC 3.8.

SG 28 _Windfall sites are those which have not been specifically identified as available in the local plan process. They comprise previously-developed sites that have unexpectedly become available. These could include, for example, large sites resulting from, for example, a factory closure or small sites such as a residential conversion or a new flat over a shop.

NPPF 48. Local planning authorities may make an allowance for windfall sites in the five-year supply 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. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.