

Hertsmere Borough Council

Strategic Housing Land Availability Assessment

Update November 2011



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IMPORTANT INFORMATION – PLEASE READ

The Strategic Housing Land Availability Assessment (SHLAA) is a technical study prepared to inform the Council’s Local Development Framework. The assessment and identification of sites has no status in formally allocating land for future development and will not be a material consideration in any future decision that the Council makes on individual planning applications.

The purpose of the SHLAA is to quantify the future supply of housing land. It does this through assessing sites with future development potential. It is not a statement of policy and does not allocate sites to be developed. This is the role of a Site Allocations Development Plan Document, which will be published for consultation after the Core Strategy is submitted.

The identification of potential housing sites within the SHLAA as deliverable does not oblige the Council to grant planning permission for residential development. All planning applications incorporating residential development will continue to be considered against the appropriate policies in the Hertsmere Local Plan (Adopted 2003) and emerging Core Strategy and with regard to any other material considerations. The inclusion of potential housing sites within the study does not preclude them from being developed for other purposes.

Phasing

The phasing of sites is based on the Council’s views at the time of the study. Circumstances or assumptions may change. This may mean that sites could come forward sooner or later than originally envisaged. The SHLAA does not prevent planning applications being submitted on any sites identified or excluded within it at any time.

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

Generally, the housing capacity of a site in the study either relates to the number of dwellings granted in an unimplemented planning permission (where applicable) or is an estimate based on the methodology contained within the SHLAA. However, the site capacities in the study do not preclude densities being increased or decreased on sites, nor does it mean that the densities envisaged within the assessment would be appropriate. Appropriate densities would need to be assessed through the planning processes when a planning application is submitted.

1.0 Introduction

- 1.1 This report and its appendices update the Council's Strategic Housing Land Availability Assessment (SHLAA) for 2010/11. The methodology and processes for this update remain largely unaltered from those of the original SHLAA and it is expected that it should be read alongside the Main Report published in September 2010 and Methodology published in June 2009.
- 1.2 The SHLAA is a technical study that forms part of the evidence base for the Core Strategy and Site Allocations Development Plan Documents (DPDs). It provides an assessment of potential sites and locations for housing in the Borough and provides a picture of the quantity and timing of future housing supply over the next 15 years. It will be used to inform the Council's planning policies in respect of the delivery of housing and any choices relating to the allocation of land for future housing development.
- 1.3 National government, in Planning Policy Statement 3: Housing (PPS3), continues to require that Local Planning Authorities (LPAs) maintain an up-to-date five-year supply of deliverable housing sites and prepare a Development Plan that will enable a continuous supply of housing for at least 15 years from the adoption of a Core Strategy DPD. It is not anticipated that emerging national policy in the National Planning Policy Framework (NPPF) will lessen these requirements.
- 1.4 This update will therefore provide an important picture of housing land supply over the next 15 years in light of the Council's intention to submit its Core Strategy DPD for examination in early 2012. It will also show that the Council continues to have an up-to-date supply of deliverable housing sites for the next five years and beyond.

2.0 Development context

- 2.1 During the year 2010/11 a net total of 156 new homes were added to the existing housing stock. It is estimated that a further 185 new homes will be added from sites with planning permission in 2011/12, the current year. Previously developed land remains the main source of sites for new housing in the Borough and continues to come forward from a variety of sources.
- 2.2 In terms of significant sites that are likely to be delivered in the short-term, a number of the large housing-led developments are in the pipeline. The International University (where some development has been completed) and Blackwell House sites have both been granted planning permission and are expected to yield a significant number of new homes over the next five years. Oaklands College and Studio Plaza, both significant brownfield sites on Elstree Way in Borehamwood, were granted planning permission in 2010/11 and development has recently commenced on these sites.
- 2.3 In the medium-term it is still expected that a significant level of housing will be delivered in Borehamwood through the redevelopment of Elstree Way and potential sites such as the BBC Elstree site. It is also likely that a more flexible approach will be taken towards proposals for the redevelopment of certain designated employment sites for housing, in light of existing and emerging government policy. The Council has already been made aware that several

sites in the Borough's Employment Areas are available for housing development through the SHLAA process.

3.0 Policy context

- 3.1 The policy context has remained relatively static since the publication of the SHLAA.

Regional Spatial Strategies

- 3.2 The most significant change to the Council's policy framework in the time that has elapsed between the publication of the SHLAA and this update is that a series of court rulings have made clear that the East of England Plan (RSS14) is part of Hertsmere's Development Plan. Notwithstanding the intention of the government to revoke Regional Spatial Strategies (RSS) through the Localism Bill, the judgment in respect of Cala Homes (South) Limited v Secretary of State for Communities & Local Government (No. 3) stated that to be sound DPDs must be in general conformity with the RSS.
- 3.3 RSS14 policy H14 sets a target of 5,000 net additional homes in Hertsmere between 2001 and 2021, or 250 new homes a year during this period. Therefore, to be found sound, the Council's Core Strategy DPD must plan for the provision of a level of new homes that enables general conformity with RSS14.

Core Strategy

- 3.4 Policy CS1 of the Council's Revised Core Strategy DPD For Submission to the Secretary of State (November 2011) states that the Council will make provision for 3,550 new homes in the Borough between 2012 and 2027. This equates to a net addition of 237 homes a year and is considered to be a target that enables the Core Strategy DPD to be in general conformity with the RSS.
- 3.5 Policy CS4 of the Core Strategy DPD requires that Affordable Housing be provided in relation to all developments of 10 or more residential units (gross). The proportion of Affordable Housing, however, remains at 35%, as it was in the 2008 Submission version.
- 3.6 Also of note is that the government has recently published a draft National Planning Policy Framework, which it intends will eventually replace all existing Planning Policy Guidance notes / Statements (PPG/Ss). Planning Policy Statement 1: Delivering Sustainable Development and PPS3 are relevant to the production of a SHLAA, and PPS3 sets out requirements for LPAs to be able to demonstrate five- and 15-year housing supplies.

National Planning Policy Framework

- 3.7 It is clear that the government's emerging policy proposals will not alter the requirement for LPAs to produce a SHLAA or demonstrate supply for 15 years of housing growth. The main relevant change proposed is that Council's should not only be able to 'identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements', but that this supply also include an additional

allowance of at least 20%. This would effectively result in the requirement for a six-year supply.

4.0 Update methodology

- 4.1 The methodology for this update to the SHLAA does not significantly vary from that previously followed unless stated in this report.

Extra care accommodation

- 4.2 A modest change from the original SHLAA methodology has been that sites with planning permission or potential for C2 extra care housing were taken as a source of potential housing supply. It is considered that this is reasonable as Hertsmere has an increasingly large population of elderly residents and it is thought that extra care housing units are increasingly likely to form an important element of the overall housing supply.
- 4.3 Careful consideration has been given to whether extra care housing units constitute a C2 or C3 use, and it is recognised that this is an issue that must be decided on a case-by-case basis. However any assessment of housing need should consider the entire community and it is probable that the assessment undertaken to inform the RSS would have taken into account household formation that takes place through elderly people moving into extra care accommodation. Indeed, it is quite reasonable to assume that the occupation of an extra care unit will result in a more traditional C3 house or flat elsewhere becoming available for separate occupation.
- 4.4 Unlike some other C2 uses, extra care accommodation is physically similar to other types of C3 residential complex and normally constitutes self-contained housing units, with individual, secure front doors. Moreover, it is noted that such housing attracts its own Council Tax charge and forms the principle residence for the occupiers of this type of housing. Therefore, it is considered that C2 extra care accommodation can be included for the purposes of identifying housing supply.

Sources of sites and information

- 4.5 Aside from this the identification of new sites has been carried out using the same sources as identified in the original methodology. A systematic search of these sources, including the Council's own monitoring data, was undertaken. A new call-for-sites also took place and letters were sent to all major landowners and agents requesting that the Council be notified about any new sites with the potential for residential development through the submission of a site questionnaire.
- 4.6 The housing commitments data was supplemented with new planning permissions and commencements and updated to reflect any relevant changes, such as lapsed permissions, that had taken place since the publication of the SHLAA. It should be noted that the SHLAA is a snapshot of housing supply and that the commitments data presented in this update is correct as of 31 March 2011.

Site surveys and assessments

- 4.7 New SHLAA sites were surveyed in line with the previous methodology, though it should be noted that a new simplified pro-forma was developed and is attached as Appendix 1. This was done to avoid excessive repetition in site assessments.
- 4.8 When estimating the number of units likely to come forward on a given site, submitted planning applications were sometimes taken as the basis for assessing how many units could be acceptably accommodated. This was only done where officer opinion was that that a scheme would most likely be found acceptable in relation to the Council’s planning policies, taking into account any other relevant considerations.
- 4.9 With regard to assessing availability, it should be noted many sites that were subject to planning applications for residential development that had been withdrawn or refused since 1 April 2010 were assumed to be available. This was provided that the applicant had signed certificate of ownership A on the planning application form and that no other information indicated that the site was no longer in their ownership.

Lapse rate

- 4.10 As stated previously in the SHLAA, it is not thought reasonable to assume that all schemes granted permission will be developed. Some planning permissions lapse without being implemented and the final housing yield, then, was discounted to take this into account.
- 4.11 A similar methodology to that in the SHLAA was used to recalculate a lapse rate that could be applied to commitments that had not been commenced, SHLAA sites and other long-term sources of supply. This was previously based on an analysis of the number of planning permissions that had not been implemented and subsequently lapsed over the period starting 1 April 2001 and ending 31 March 2006. The period analysed was lengthened from five years to seven, to take into account data up until 31 March 2008. Additionally sites that had been subject to a planning permission for residential development that had later been superseded by a new permission for non-residential development were removed from the data set.

TABLE 1: Lapse rate 2001/02 – 2007/08

Year	Number of units granted	Number of units lapsed	Percentage lapsed
2001/02	400	2	1%
2002/03	450	0	0%
2003/04	140	4	3%
2004/05	374	30	8%
2005/06	263	6	2%
2006/07	426	47	11%
2007/08	512	67	13%
Total / Average	2565	156	6%

- 4.12 During the period analysed planning permission was granted for 2,565 homes. Of these permissions 156 were not implemented. This equates to a lapse rate of 6% – up on the 4% rate applied previously in the SHLAA; this has been applied to the gross housing yield, where appropriate, to produce a net figure. See table 1 above for further analysis.

Phasing

- 4.13 An estimate-led approach to projecting when new homes are likely to be completed has been retained. The only change to the projected phasing of development has been that the homes to be delivered from commitments have been spread evenly over a period of six to seven years, rather than five to six years. The exceptions to this are those homes currently under construction, which have been phased to take into account the individual circumstances of each development.
- 4.14 It should be noted that this update records an increase in the number of committed homes in comparison to the number that were recorded as committed by the SHLAA. This demonstrates that developments are taking longer to come through the pipeline and be completed. For this reason, it is thought reasonable to extend the projected period for committed homes coming forward.

Housing land supply period

- 4.15 It should also be noted that this update to the SHLAA treats the current year (2011/12) as year zero. As such, it does not include units that it estimates will be completed within the current year as contributing towards the required 5- or 15-year housing land supply figures.
- 4.16 For the purposes of providing a complete housing trajectory, the number of units that are likely to be completed in the current year has been estimated. Details of the likely yield from 2011/12 are included within this report and some of the tables reflect this through setting out data over a 16-year, rather than a 15-year, period.

5.0 SHLAA site assessment reviews

- 5.1 All existing SHLAA site assessments were reviewed to ensure that these are still relevant and that the housing yield figure remains robust. In cases where new site specific information has come forward since the publication of the SHLAA, individual updates are given in Appendix 2. Where any change is material a recommendation has been made in respect of whether there should be alterations to the final assessment of the site's deliverability or developability and capacity. Some SHLAA sites have also been granted planning permission. Associated changes to the net capacity of sites for housing have been carried through into the final housing yield figure.
- 5.2 Some of the updates were informed by revised site questionnaires submitted by landowners or agents. These were received as a result of the Council's new call-for-sites.
- 5.3 A review was also carried out of the designations and spatial information used to rule out certain sites from the SHLAA. Although changes had been made to

Wildlife Site designations and several local bus routes, none of these meant that sites which were previously excluded from the housing land supply should have been included or that any of the sites included should have been excluded.

6.0 Long-term sources of supply

- 6.1 It is considered that the assessment of housing supply in the Borough should include similar long-term sources as those accounted for in the SHLAA.
- 6.2 For this update, a lapse rate has not been applied to estimated yields from either Broad Urban or Rural Locations, as these estimates are derived from completions data. A number of planning permissions granted by the Council that should have been completed during the nine years covered by this data would have lapsed. As such, it is considered that the estimated trend-based figures already reflect the assumption that some granted planning permissions will not result in any new homes being built.

Broad Urban Area Locations

- 6.3 Broad Urban Area Locations have again been included in the supply pipeline for 500 new homes in the years 11-15. The justification for doing so remains as the Borough continues to have high house and land prices, which has resulted in development on brownfield sites in urban areas being considered viable by developers. Also, the Core Strategy DPD retains the Borough's tightly drawn Green Belt boundaries and thus promotes the development of urban areas.

TABLE 2: Proportion of net housing completions on unallocated urban and rural sites 2002/03 – 2010/11

Year	Net completions unplanned in urban area	Net completions unplanned in rural area
2002/03	70	7
2003/04	125	1
2004/05	170	4
2005/06	190	64
2006/07	78	40
2007/08	251	19
2008/09	75	33
2009/10	185	28
2010/11	147	3
Average	143	22
Percentage of total completions	67%	8%

- 6.4 An updated analysis of housing completions on unallocated urban sites has also been undertaken (see appendix 3). This shows that the past trend showing a high level of completions on such sites has continued into 2010/11. Between the beginning of April 2002 and the end of March 2011 an average of 143 new homes per annum have come forward on these sites, constituting 67% of total completions during this period. Therefore an estimate of 100

homes per year over the final five years of the 15-year supply is considered conservative. See table 2 above for further analysis.

Elstree Way Corridor

- 6.5 A total of 800 new homes to be delivered as part of the redevelopment of the Elstree Way Corridor remain included in the supply pipeline for years 6-10 and 11-15. The Council has recently committed to producing an Area Action Plan DPD for the Elstree Way Corridor, following the completion of a feasibility study commissioned by the key partners and landowners along Elstree Way. This will provide clear guidance and certainty for developers and landowners, and, as such, will help bring forward development.

Broad (PDL / Settlement) Rural Area Locations

- 6.6 Broad (PDL / Settlement) Rural Area Locations are now included in the housing supply pipeline. Although it is not intended that the Core Strategy DPD promote significant new housing in rural locations, it is noted that the areas outside of Borough's main settlements have consistently yielded a modest number of new homes over the past nine years. New housing can sometimes be appropriate in rural locations within the Green Belt. In particular, this can be the case where, for example, development takes place on land that either constitutes previously developed land (PDL) or is on an infill site within an existing village; it is noted that Policy CS2 of the Council's Revised Core Strategy DPD (November 2011) supports some limited infilling in Elstree, Shenley and South Mimms. Generally the areas within the Borough outside of its main settlements have high house and land prices, and are generally within easy commuting distance of key employment centres. This has resulted in the development of new homes in these locations being considered viable by developers, and it is considered reasonable to assume that a small number of new homes will continue to come forward on appropriate sites from these locations.
- 6.7 An analysis of completions on rural sites between 2002/03 and 2010/11 is included as part of Appendix 3. This analysis uses the same methodology as that used for analysing completions on urban sites, and shows that between the beginning of April 2002 and the end of March 2011 an average of 22 new homes per annum have come forward. This makes up 8% of total completions during this period. Therefore an estimate of 15 homes per year over the final five years of the 15-year supply is considered conservative. See table 2 above for further analysis.

7.0 Assessment of supply

- 7.1 The SHLAA update 2011 provides a review of future housing supply in Hertsmere from 2011 until 2027.

Commitments

- 7.2 Commitments are development sites in the planning process where there is a good degree of certainty that they will come forward. These include land allocated for development in the adopted Hertsmere Local Plan (2003), schemes that have been commenced, proposals with detailed or outline planning permission, and proposals that have been approved subject to a

legal agreement. It is considered that committed sites are developable within five years (or six years in the case of sites with outline planning permission or an outstanding legal agreement).

- 7.3 As at 1 April 2011, there were 107 committed sites with a total housing yield of 1,215 units. Applying a lapse rate of 6% to all commitments excluding schemes that have been commenced, this equates to a net yield of 1,182 units. See table 3 below and Appendix 4 for further analysis.

TABLE 3: Commitments as at 01/04/2011 – by location

LOCATION	UNITS (net addition to stock)				TOTAL
	Allocated	Underway	Detailed	Outline	
Borehamwood	20	242	70	40	372
Potters Bar, Ridge and South Mimms	0	20	93	0	113
Bushey, Aldenham and Patchetts Green	0	365	107	182	654
Elstree and Shenley	0	8	5	0	13
Radlett	0	13	50	0	63
Gross total	20	648	325	222	1215
Net total (less 6% lapse rate, where applicable)	19	648	306	209	1182

SHLAA sites

- 7.4 A total of 147 sites have been assessed for the SHLAA. Of these 88 are considered to be deliverable or developable and 59 have been removed from the supply. See table 4 below for further analysis. Full details of the assessments can be found in Appendices 2, 5 and 6, and Part 2 of the SHLAA.

TABLE 4: SHLAA sites assessed

LOCATION	Sites	Site area (gross)	Discounted	Deliverable / Developable
Borehamwood	40	101.3	11	29
Potters Bar, Ridge and South Mimms	37	120.2	13	24
Bushey, Aldenham and Patchetts Green	40	114.2	17	23
Elstree and Shenley	13	46.0	5	8
Radlett	17	139.7	13	4
Total	147	521.4	59	88

TABLE 5: SHLAA sites existing policy context – potential housing supply by location

LOCATION	TIMEFRAME (Years from this assessment)				TOTAL (within 15 year period)	TOTAL (all sites)
	1-5yr	6-10yr	11-15yr	16+ yr or unknown		
Borehamwood	577	352	0	0	929	929
Potters Bar, Ridge and South Mimms	159	0	0	92	159	251
Bushey, Aldenham and Patchetts Green	137	46	0	0	183	183
Elstree and Shenley	30	0	0	0	30	30
Radlett	10	0	0	0	10	10
Gross total	913	398	0	92	1311	1403
Net total (less 6% lapse rate, where applicable)	858	374	0	86	1232	1319

TABLE 6: SHLAA other Green Belt sites – potential housing supply by location

LOCATION	TIMEFRAME (Years from this assessment)				TOTAL (within 15 year period)	TOTAL (all sites)
	1-5yr	6-10yr	11-15yr	16+ yr or unknown		
Borehamwood	151	315	0	254	466	720
Potters Bar, Ridge and South Mimms	908	0	151	0	1059	1059
Bushey, Aldenham and Patchetts Green	235	0	0	0	235	235
Elstree and Shenley	52	0	0	0	52	52
Radlett	0	0	55	0	55	55
Gross total	1346	315	206	254	1867	2121
Net total (less 6% lapse rate, where applicable)	1265	296	194	239	1755	1994

7.5 The SHLAA groups assessed sites into two categories: first, those sites that can be developed under the existing policy context, which is describe in Section 3 of this report; and, second, those that are in Green Belt locations and would have to be reallocated in order to come forward for development. A total of 1,403 units are considered deliverable or developable under the

existing policy context; 1,311 of these are considered deliverable within the first 15 years of housing land supply. When the lapse rate is applied to this second figure the net total of units that are deliverable within the first 15 years is 1,232. See tables 5 and 6 above for further detailed analysis.

Distribution

7.6 Tables 3, 5 and 6 above show the distribution of housing supply across the Borough’s main settlements. It is estimated that 60% of housing supply would be in Borehamwood, 23% in Bushey, 11% in Potters Bar and 6% in Radlett and other suitable locations, such as Elstree, Shenley and other smaller villages. Please see table 7 below for further analysis.

TABLE 7: Summary of housing distribution

Settlement	Allocations and Commitments	SHLAA Sites	Broad Urban and Rural (PDL/ Settlement) Locations	Total 0-15 yr	Net Total 0-15 yr	Percentage
Borehamwood	371	1729	250	2350	2239	60%
Bushey	649	180	50	879	851	23%
Potters Bar	113	159	150	422	407	11%
Radlett and other suitable locations	82	43	125	250	243	6%
Gross Yield	1215	2111	575	3901		
Net Yield	1181	1984	575	3740		

TABLE 8: Summary of housing potential within the urban area

SITE SOURCE	TIMEFRAME (Years from this assessment)					TOTAL (All sites)
	Current yr	1-5 yr	6-10 yr	11-15 yr	16+ yr or unknown	
Existing Allocated Site	0	16	4	0	0	20
Sites with Planning Permission	53	457	37	0	0	547
Sites under construction	132	516	0	0	0	648
Sites Considered Deliverable or Developable Within the Existing Policy Context	0	913	398	0	92	1403
Broad Urban Locations	0	0	0	500	0	500
Broad (PDL/Settlement) Rural Locations	0	0	0	75	0	75
Elstree Way	0	0	400	400	0	800
Gross Yield	185	1902	839	975	92	3993
Net Yield						3827

TABLE 9: Summary of 15 year housing supply within the urban area

SITE SOURCE	TIMEFRAME (Years from this Assessment)			TOTAL (Within 15 Year Period)
	1-5 yr	6-10 yr	11-15 yr	
Existing Allocated Site	16	4	0	20
Sites with Planning Permission	457	37	0	494
Sites under construction	516	0	0	516
Sites Considered Deliverable or Developable Within the Existing Policy Context	913	398	0	1311
Broad Urban Locations	0	0	500	500
Broad (PDL/Settlement) Rural Locations	0	0	75	75
Elstree Way	0	400	400	800
Gross Yield	1902	839	975	3716
Net Yield				3559

Housing supply within urban areas

- 7.7 Estimates of housing supply from the Elstree Way Corridor and Broad Urban Locations in addition to commitments and homes on urban sites that are deliverable, demonstrate that there is sufficient housing land supply for 3,716 new homes over the next 15 years. When the lapse rate is applied to appropriate sources of new housing there is a net yield of 3,559 new homes over the next 15 years. This equates to an annual supply of approximately 237 new homes. See tables 8 and 9 above for further analysis.

Affordable Housing

- 7.8 It is expected that the sites identified as part of the Council's housing supply over the next 15 years will make a significant contribution towards Affordable Housing in the Borough. Revised Core Strategy DPD For Submission to the Secretary of State 2011 Policy CS4 requires that on sites of 10 residential units or more (gross) 35% be delivered as affordable. An estimate has been made of the likely level of Affordable Housing that would come forward.
- 7.9 This estimate has been calculated on the basis that 35% of homes from the assessed sources would be delivered as Affordable Housing. These sources are as follows:
- SHLAA sites that would yield 10 or more new homes;
 - The 800 homes likely to be delivered as part of the Elstree Way Corridor development; and

- Based on past trends of the proportion of schemes of 10 or more homes, approximately four fifths of the units likely to come forward in Broad Urban and Rural Locations

It also estimates the level of Affordable Housing likely to come forward as a result of commitments, through an assessment of these sites against the Council’s previous policy positions in relation to Affordable Housing.

TABLE 10: Summary of estimated Affordable Housing supply from urban commitments and SHLAA sites during the 15 year period

Source	Gross Supply	Net Supply	Affordable Housing Element
Commitments under construction (pre-Core Strategy)	294	294	74
Commitments under construction (post-Core Strategy)	183	183	64
Other Commitments (pre-Core Strategy)	40	38	10
Other Commitments (post-Core Strategy)	209	196	69
SHLAA Sites	1156	1087	380
Broad Urban Locations	500	390	137
Broad Rural Locations	75	60	21
Elstree Way	800	752	263
Total	3257	3000	996

7.10 This estimate shows that 996 homes would be delivered as affordable from a total yield of 3,257 homes from eligible schemes. These 996 units equal 28% of the 3,559 estimated homes from urban sites in the 15 year housing supply. See table 10 above for further analysis.

Housing trajectory

7.11 The housing trajectory, attached as Appendix 7, gives an illustration of how the various sources of housing supply might be delivered over the next 15 years.

8.0 Monitoring and updating

8.1 The Council will continue to monitor housing supply in the Borough and will update the SHLAA as appropriate.