# **Hertsmere Local Development Framework**

# Strategic Housing Land Availability Assessment













Main Report

September 2010



# HERTSMERE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

#### **EXECUTIVE SUMMARY**

#### Background

- A Strategic Housing Land Availability Assessment (or SHLAA) is a technical study which forms part of the supporting evidence for the Council's Local Development Framework. The SHLAA includes 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.
- The study will be used to inform the council's planning policies on delivering housing and choices on specific allocations of land for development in future planning documents. It will also be a valuable tool in assisting the council to plan for future infrastructure needs and hold discussions with service providers. However, the SHLAA has no formal status in allocating land for development or on the decisions the council make on individual planning applications.
- National planning guidance on housing in PPS3 continues to require that Local Planning Authorities (LPAs) should maintain a five-year supply of deliverable housing sites and prepare development plans to enable a continuous delivery of housing for at least 15 years from the date of adoption of the Core Strategy.
- Estimates of housing potential which could meet this requirement have been made for five different sources of housing land supply. These are:
  - Commitments (sites with permission) and sites allocated in the development plan;
  - Specific sites considered deliverable/developable under the existing policy context;
  - o Specific sites in the Green Belt;
  - Unidentified sites in Broad urban locations; and
  - Regeneration in the Elstree Way Corridor.
- The SHLAA also assesses the timing of supply distinguishing between deliverable sites which could realistically come forward within 5 years of plan adoption (2011-16) and developable sites, capable of delivery in years 6-10 and 11-15 from adoption.

#### **Results of the Assessment**

 As at 1<sup>st</sup> April 2010, development sites underway, allocated or with consent are estimated to provide 968 dwellings (including an allowance for nonimplementation). SHLAA sites which could come forward under the existing policy context would provide an additional 996 dwellings. By settlement, Borehamwood has the largest number of sites followed by Potters Bar and Bushey.

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- Including an estimate for long term supply (11 yrs+) in 'broad locations', the total urban supply is estimated to be 3,212 dwellings or 214 dwellings per annum over the next 15 years. A further 92 dwellings are identified where the timing is not certain. If these can be brought forward through proactive policies in the next 15 years, the net supply could rise to 3,300 dwellings or 220 dwellings per annum over 15 years.
- SHLAA sites in the Green Belt considered deliverable and developable over 15 years are estimated to have a potential of at least 1,830 dwellings or 122 dwellings per annum over the next 15 years. This would be in addition to urban sites
- The housing trajectory in Appendix 1 illustrates how the various sources of supply could come forward over time. It is not the role of the SHLAA to indicate which sites should make up supply but based on the results of the study, there are sufficient sites and locations to provide options to take forward through the Local Development Framework.
- The SHLAA does not include a general estimate for 'windfall' development. However, windfall has been a significant source of housing supply in the past and is likely to continue.
- The identified sites in the SHLAA can be expected to make a significant contribution to the delivery of affordable housing in the Borough.

#### Methodology

- The list of SHLAA sites is based on sites known to the Council and land specifically promoted for development. 114 specific sites were assessed in this study of which 62 were considered deliverable or developable. 52 sites were discounted from the housing supply on the basis of availability, sustainability or deliverability. Further details are given in the site assessments included in Part 2.
- The SHLAA has a base date of 1<sup>st</sup> April 2010 which takes account of the Council's most recent monitoring of completions and commitments.
- In preparing the SHLAA, the Council have followed the approach to these studies set out in best practice guidance. The methodology and draft findings have been subject to consultation with a broad stakeholder group. Site Assessments have also been tested through a smaller stakeholder panel.

#### **Next Steps**

- The SHLAA will be kept under review to maintain an up to date understanding about where development potential may exist in the Borough that may contribute towards the creation of sustainable mixed communities.
- Potential housing sites will be subject to more rigorous testing and consultation through the plan-making process.

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- **3f** Accessibility Ratings
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Net contribution from allocated/unallocated sites.

Copies of this report can be downloaded from the Hertsmere Council website or van be inspected at the Council offices

### **IMPORTANT INFORMATION – Please Read**

- The Strategic Housing Land Availability Assessment (or SHLAA) is a technical study prepared to inform and the Council's Local Development Framework. The identification of sites has no status in formally allocating land for future development or on the decisions the council make on individual planning applications.
- The purpose of the SHLAA is to quantify the future supply of housing land. It does this though 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 (DPD) 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 or mean that the Council will 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 in consultation with the SHLAA Stakeholder Group. Circumstances or assumptions may change which 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, which the Council does not take liability for. Therefore, users of the study 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/were not foreseen at the time of the assessment.
- 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, or 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.

#### STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

#### 1.0 INTRODUCTION

#### Introduction

- 1.1 National Planning guidance on housing in PPS3 continues to require that Local Planning Authorities (LPAs) should maintain a five-year supply of deliverable housing sites and prepare development plans to enable a continuous delivery of housing for at least 15 years from the date of adoption of the Core Strategy.
- 1.2 The Strategic Housing Land Availability Assessment (or SHLAA) is a technical study which forms part of the supporting evidence for the Council's Local Development Framework. The SHLAA includes an assessment of potential sites and locations for housing in the Borough over the next 15 years. Together with an analysis of past trends, the SHLAA provides a picture of the quantity and phasing of future housing supply.
- 1.3 On the 27th May 2010, the new coalition government announced that the framework of regional plans and housing targets would be abolished and replaced with locally set housing numbers. Policies in the regional plan for the East of England were revoked on 6th July 2010. Local planning authorities are now responsible for setting and justifying house building requirements in their plans. The findings of the SHLAA will be an important consideration in reviewing these requirements.
- 1.4 In preparing the SHLAA, the Council has followed the approach set out in best practice guidance<sup>1</sup>. The guidance is intended to help SHLAAs follow a structured path and ensure they are credible documents when tested to support planning policies. The SHLAA has been led by the Policy and Transport Manager and the policy team to ensure that a consistent approach to the identification of sites and their assessment has been undertaken in accordance within the good practice.
- 1.5 Data on planning applications and completions have been updated in the study to 1st April 2010. These will be finalised in the Council's Annual Monitoring Report which will be produced by the end of 2010.

#### The need for a strategic housing land assessment.

1.6 The Council submitted a core strategy in December 2008 prepared in consultation with the Government Office for the East of England. The evidence on housing supply was based on an urban capacity study published in 2007. Following submission, issues were raised by the Planning Inspector about whether the capacity study could provide a sufficiently robust assessment of long-term housing supply. The examination was adjourned to allow for additional studies to be progressed including a SHLAA and it was subsequently decided to withdraw the core strategy to enable changes to be made to the document.

<sup>&</sup>lt;sup>1</sup> Strategic Housing land Availability Assessment: Practice Guidance, CLG 23<sup>rd</sup> July 2007.

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- 1.7 While both a SHLAA and urban capacity study involve a review of possible housing sites, the SHLAA includes an assessment of greenfield land and places much more emphasis on the actual prospects for development, timing and delivery. Windfall sites are given much less importance and cannot be included in the first ten years of supply without additional justification. The SHLAA is therefore an essential requirement to allow the Council to take forward the Core Strategy.
- 1.8 While some aspects of planning legislation are under review, there are a number of other reasons why the preparation of a SHLAA is important to the planning of the Borough:
  - By assessing the amount of brownfield land and short and medium term supply, the SHLAA will help the Council resist speculative applications for development in inappropriate locations.
  - National planning guidance on the need to maintain a short term housing supply and test long-term supply has not been changed;
  - The SHLAA will be a valuable input to assisting the council to plan for future community and infrastructure needs and form a basis for discussions with service providers; and
  - The availability of land will be an important factor in reviewing the housing requirements and phasing of future development in the core strategy.

#### **Stakeholder Engagement**

- 1.9 The government's Practice Guidance on SHLAA's provides practical advice on how to carry out an assessment to identify land for housing and assess the deliverability of sites. Central to the SHLAA process is a partnership approach with key stakeholders such as housebuilders, social landlords, local property agents, local communities and other agencies. Engagement with the development sector is critical is demonstrating that the SHLAA is based on sound assumptions. As the SHLAA is a technical study it is not required to be subject to wider public consultation. This is more appropriate once the council have developed options for site allocations.
- 1.10 In June 2009, the Council compiled a list of key stakeholders and a draft methodology. A copy of the methodology can be found in Part 3 section 1. The list of stakeholders was based on known housebuilders, planning agents, RSLs, landowners, community groups and other agencies active in Hertsmere's housing market. The list of stakeholders in shown in table 1. These stakeholders were invited to comment on the study methodology and to submit information on available and developable housing sites.
- 1.11 The consultation on the study methodology was sent to the key stakeholders in the last week of June and comment was invited for a three-week period, expiring

- 27 July 2009<sup>2</sup>. The methodology, summary of comments received and the Council's response can be found in Part 3. The summary and response to these concerns were sent to stakeholders on 1 September 2009.
- 1.12 A site questionnaire (see Part 3c) was designed to provide basic information to the Council on the deliverability and developability of sites. 47 questionnaires, out of a total of 78, were returned to the Council. All of these sites were featured in the SHLAA assessment.
- 1.13 In addition to working with key stakeholders, the Council also set up a Key Stakeholder Panel ("the Panel") to provide expert advice on potential housing sites. A workshop was held with the Panel on 3 September 2009. At this workshop, the sites identified by the Council were discussed and consensus generally reached on their deliverability and developability. A list of panel members and minutes from this workshop can be found in Part 3e. The final site assessments take into account feedback from the panel.
- 1.14 In January 2010, an initial draft SHLAA was circulated amongst all key stakeholders for comment, for a period of four weeks. 21 responses were received. A summary of issues raised and the council's response can be found in Appendix 4. Most of the comments are site specific although a few raise issues concerning the broader methodology. The Council has incorporated changes to the site assessments in this final report.

#### **Scope for Joint Working**

- 1.15 Practice guidance encourages LPAs to work together to prepare joint assessments based on Sub Regional Housing Market Areas. Hertsmere is part of the London Commuter Belt (West) market area. However, a joint study in partnership with other LPA's was not considered to be a practical option for this study. This SHLAA was commissioned in response to issues raised to the Council's submission core strategy. This dictated a tight timeframe for undertaking the study which would have been difficult to programme with neighbouring authorities.
- 1.16 The Council is in the process of completing a Strategic Housing Market Assessment (SHMA) with five other Hertfordshire authorities. Although yet to be finalised as a whole, some parts, such as those identifying Housing Sub-markets in London Commuter Belt West, have been completed to the satisfaction of the partner authorities. As a housing sub-market area, the SHMA identifies that Hertsmere has weak links to Watford Borough via Bushey Heath. As a SHLAA was recently completed for Watford, this precludes going into partnership with that authority<sup>3</sup>.

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<sup>&</sup>lt;sup>2</sup> It should be noted that, although the letter accompanying the site questionnaires specified a deadline of 20 July 2009, paragraph 16 of the methodology set out a one month period (i.e. to 27 July 2009) from the date material was sent out. For clarity, this later deadline was used.

<sup>&</sup>lt;sup>3</sup> The South West Hertfordshire Strategic Housing Land Availability Assessment was completed in October 2008. This covers the areas administered by Dacorum, Three Rivers and Watford Borough Councils.

1.17 The SHMA also notes that the larger settlements of Borehamwood and Potters Bar are linked more closely to the North London housing market due to the good connectivity afforded by frequent train services and the location of employment. However, all London boroughs and the GLA are undertaking a joint SHLAA. This is on the basis that London is a unique housing market area in its own right<sup>4</sup>. This working arrangement therefore precludes inclusion of Hertsmere.

#### Report contents

- 1.18 The SHLAA report is divided into three parts to make it easier to update in future. Part 1 contains the main report covering the council's approach to the study and summary of findings. Part 2 of the SHLAA includes the assessments and maps for individual sites. Part 3 of the SHLAA contains two groups of supporting appendices. The first relates to metholodology and stakeholder engagement. The second contains supporting information linked to figures and tables in the main report.
- 1.19 The Council will need to review parts of the SHLAA on a regular basis to keep it up to date as a source of evidence for the Local Development Framework. This is likely to be through supplementary reports to the SHLAA and the Council's Annual Monitoring Report. Key areas for monitoring will include the annual update on housing completions and commitments and a record of new sites not included in this SHLAA.

#### **Changes since the Stakeholder Draft**

- 1.20 There have been a number of revisions to this report from the draft circulated to stakeholders in January 2010. These include:
  - re-assessment of sites in the light of information received from the stakeholder consultation;
  - updates to the planning policy context including references to withdrawal of the core strategy, the revocation regional plans and regional housing targets;
  - Updates to completions and commitment figures `to 1<sup>st</sup> April 2010;
  - Some revisions to reflect the re-classification of garden land in PPS3 (June 2010); and
  - Deletion of estimates for Green Belt broad locations.
- 1.21 Significant revisions have been made since the draft document following the revocation of the regional housing targets contained in the East of England Plan. Whilst previously, a SHLAA would compare its findings against housing targets, it would now be misleading to retain them. The housing targets are to be reviewed by the Council as part of the Core Strategy and the SHLAA will be part of the evidence in making a decision on the appropriate development rate in future.

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<sup>&</sup>lt;sup>4</sup> See paragraph 4 of a statement from the GLA titled "Addressing PPS3 requirements for a 15-year housing land supply (Interim Approach)" dated March 2008

Table 1 Key Stakeholder List

Table 1 Key Stakeholder List			
AM. Homan	Letchmore Heath Village Trust		
Abbey Developments Limited	McGuire Architecture and Design,		
Aldwyck Housing Association	Metropolitan Housing Trust		
Apcar Smith Planning	Mike Hastings Building Design		
Archkingtech Limited	Mr J Nagler		
Barker Parry Town Planning	Nathaniel & Lichfield		
Barton Willmore (on bahalf of Kayterm PLC)	National Grid Planning		
Bayfordbury Estates Ltd	Network Rail		
Bellway Homes	North Bushey Residents Group		
Bidwells Faulkners	North Mymms District Green Belt Society		
Birchville Court Care Home	Paradigm Housing Group		
Brasier Freeth Limited	Patchetts Green, Roundbush & Aldenham Conservation Society		
Bushey in Balance Residents Group	Paul Wallace		
St Modwen Developments Ltd	Peacock and Smith		
CBRE Richard Ellis	PGA Design Consulting		
CGMS Consulting	Philip Wragg and Partners		
Chris Blandford Associates	Phillips Planning Services Ltd		
Chris Watts Planning Consultant	Planning Perspectives		
Cliveden Homes	Planning Works Ltd		
Community Development Agency for Hertfordshire	Potters Bar in Focus		
CPRE The Hertfordshire Society	Potters Bar Society		
DLA Town Planning LTD	PPML Consulting Ltd		
Drivers Jonas	Preston Bennett Limited		
DTZ Planning & Development	Pro Vision - Planning and Design		
East of England Development Agency	Radlett Society and Green Belt Association		
Edaw PLC	Robson Planning Consultancy		
Edward Symmons	Rolfe Judd Limited		
Elstree and Borehamwood Green Belt Society	RPS Planning		
Environment Agency	Scott Wilson		
Faulkners	Shire Consulting		
Fibbens Fox Associates	South Mimms & Ridge Protection Committee		
Freeth Melhuish	Southgate Associates - Architecture and Planning		
G L Hearns - Property Consultants	St Modwen Developments Ltd		
Genesis Housing Trust	Stonewall		
Great Bear Group Ltd	Strutt & Parker		
Hertfordshire County Council	Terence O'Rourke Ltd		
Highways Agency	The Bushey Forum		
Jeremy Peter Associates	The London Green Belt Council		
Jones Lang LaSalle	Vincent and Gorbing		
King Sturge LLP	Whose!		
KJD Solicitors	William Sutton Homes		
Knight Frank LLP	Woolf Bond Planning		
	Wrotham Park Settled Estates		

#### 2.0 SETTLEMENT AND DEVELOPMENT CONTEXT

#### **Settlement Profile**

2.1 Hertsmere is located in the south of Hertfordshire and adjoins London to the south. The Hertfordshire boroughs of Three Rivers, Watford, St. Albans and Welwyn Hatfield adjoin Hertsmere to the west, north and north east, whilst the London Boroughs of Harrow, Barnet and Enfield adjoin to the south and south east. The M25, M1 and A1 all run through the Borough, whilst Borehamwood, Radlett and Potters Bar are connected to London and the rest of the country by relatively frequent rail services. Given this close proximity and high level of connectivity to London, demand for housing in Hertsmere is high with many residents commuting in and out of London for work.

STALBANS

Sheriley

Boveharmood

LB ENFIELD

Main Settlements

Green Belt

HREE RIVERS

LB HARROW

0

3,000

6,000

Major Road Network

Figure 1: Hertsmere and Neighbouring Boroughs

Based upon Ordnance Survey Mapping with the permission of the Controller of Her Majesty's Stationary Office. Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Licence No: LA078239 Hertsmere. 2000.

2.2 Hertsmere is largely rural, with approximately 80% of its 38 square mile area designated Green Belt. Borehamwood, Bushey, Potters Bar and Radlett are the only urbanised areas. Although 'washed over' with Green Belt designation, Shenley has in recent years also taken on a more suburban character due to redevelopment of the former Shenley Hospital site. The smaller villages of Elstree, Aldenham, Letchmore Heath, Patchetts Green, Ridge and South Mimms are also 'washed over' by the Green Belt and largely retain a rural character.

- 2.3 National policy in PPG2 specifies that housing is an inappropriate use in the Green Belt. As such, relatively intensive housing development has been focussed on the urbanised area, particularly Borehamwood and Bushey. This has placed greater demand on the physical and social infrastructure of these areas. Due to the absence of available large sites, the bulk of this new development and its associated effects have come from re-development of small-scale sites.
- 2.4 Borehamwood, with an area of just over 700 hectares and a population of approximately 30,000, is the largest urban area in Hertsmere. It is well connected to London and parts of Hertfordshire by frequent bus and rail services. Because of this, a significant amount of the working population is employed outside Borehamwood, although the warehousing, industrial and office areas in the east of town, as well as the film and television studios provide some local employment. The retail strip along Shenley Road, the adjacent 'Boulevard' complex and the 'Tesco' superstore are all located centrally and cater for local shopping and service needs.
- 2.5 With a population of approximately 24,000, Bushey is the next largest urban area in Hertsmere. It comprises three distinct residential areas: Bushey Heath, Bushey Village and North Bushey. Unlike Borehamwood, it does not have rail links to London although bus services do run through the area, and there is a rail stop immediately outside the Borough in Oxhey Village. It also does not contain substantial employment activities, with the bulk of the working population commuting out of the area. A limited variety of shops and services are located throughout.
- 2.6 Potters Bar is a key local town in the east of the Hertsmere, with a population of approximately 22,000. It is based around two distinct shopping areas and is relatively remote from the three other urban areas. The first is located along Darkes Lane in the western side of town and is the larger of the two shopping areas. It also contains the only rail station. The second shopping area is located along High Street in the eastern side of town. Collectively, both areas contain a variety of shops and services that cater to the local population. Like the other urban areas, the bulk of the workforce commute out of town for employment, although some employment opportunities exist in the Cranborne Road industrial area in the north west of the town.
- 2.7 With a population of 8,000, Radlett is the smallest of the urban areas, albeit with a large commercial centre. It is connected to London and Borehamwood by a relatively frequent rail service. Shops and services are of a scale that serve the local population, with no significant employment areas.
- 2.8 As noted above, Shenley has been largely expanded by re-development of the former Shenley Hospital site but is still characterised by its rural setting. It contains little in the way of public transport links and is serviced by a limited range of local shops and services.

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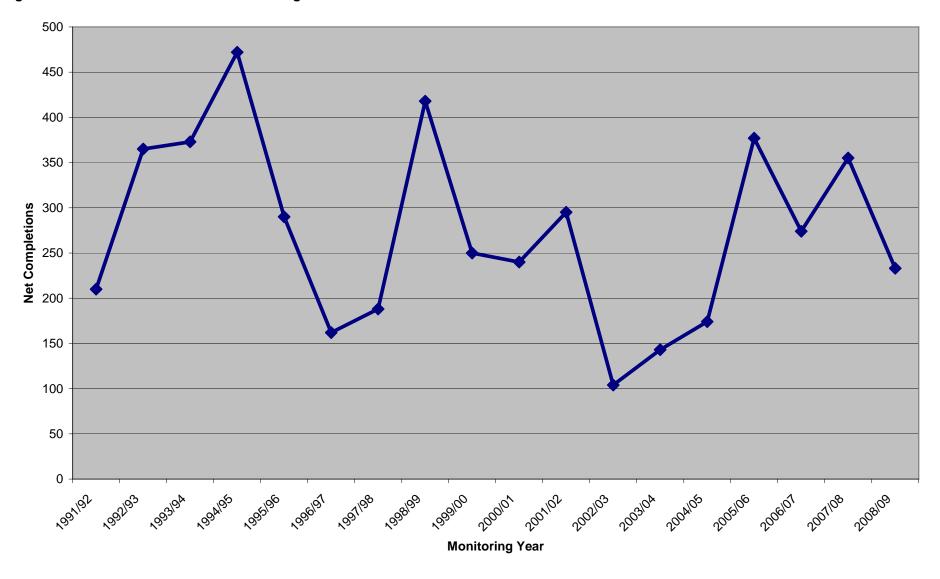
- 2.9 Part in and part outside the Green Belt, Elstree is located within close proximity to Borehamwood. Despite this it retains a village character, with a limited range of local shops and services and little in the way of public transport access.
- 2.10 Aldenham, Letchmore Heath, Patchetts Green, Ridge and South Mimms are small villages within rural settings. They have little to no access to public transport and contain a very limited range of shops and services that primarily cater to rural activities. As such, they are reliant on the larger urban areas for access to a full range of goods and services.

#### **Development Trends**

- 2.11 Policy H1 of the revoked East of England Plan set a build rate which amounted to a net addition to housing stock of 250 new homes per year or 5000 homes between 2001 and 2021. Between 2001 and 2010, 2,228 additional homes were built in the Borough, an average of 247 units per year. Long term development rates are shown in Figure 2 which shows that net additions to the housing stock have ranged from 100 470 dwellings per year. Since 1991/2, the average net addition to stock (over 19 years) has been 270 dwellings per annum.
- 2.12 Over this period, previously developed land has been the main source of supply for housing development with major contributions from former hospitals, commercial land and education sites. Smaller infill and vacant land within residential areas have also made a significant contribution to supply. In addition to brownfield sites, there has been some limited infill development in villages and urban greenfield sites. Given the extent of housing supply, the Council have not seen any reason to release 'safeguarded' land identified in the adopted 2003 Local Plan.
- 2.13 In terms of future supply, there remain some significant short-term housing sites in the urban area such as Blackwell House (Bushey), and the rest of the International University site. In the medium term, urban sources of housing land include BBC Elstree, sites around Elstree Way and the Gasholders site (all in Borehamwood). However, even with these sites it is unlikely that the higher long-term rate (270 dwellings p.a) could be met in the future as there are no longer any large school and institutional sites. Office and commercial sites may offer an alternative source but redevelopment need to be balanced against the economic development needs of the Borough.

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Figure 2: Hertsmere: Net additions to housing stock 1991-2 to 2009-10



# CHAPTER 3 PLANNING POLICY CONTEXT

3.1 This section sets out the key principles in national, regional and local planning guidance that are relevant to housing land supply and the Council's approach to the SHLAA.

#### **National Guidance**

#### Planning Policy Statement 1: Delivering Sustainable Development

- 3.2 Planning Policy Statement 1 (PPS1) sets out overarching strategic planning policies, including the contribution that the planning system can make to the delivery of sustainable development.
- 3.3 Sustainable development is the core principle underpinning the plan making process and the preparation of the LDF. A key objective of PPS1 is to ensure that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities. With regards to housing provision, paragraph 27 sets out the general approach to delivering sustainable development a key approach of which is that planning authorities should seek to:
  - Bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing, taking into account issues such as accessibility and sustainable transport needs, the provision of essential infrastructure and the need to avoid flood risk and other natural hazards;
  - Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges; and
  - Promote the more efficient use of land through higher densities, mixed use development and the use of suitably located vacant and underused previously developed land.

#### **Planning Policy Statement 3: Housing**

- 3.4 Planning Policy Statement 3 (PPS3) establishes the national planning policy framework for delivering the Government's housing objectives. This is the key document is setting out what local planning authorities are expected to address main local planning documents in terms of housing supply. It also contains advice on the role and scope of SHLAA's.
- 3.5 PPS3 states that local planning authorities should set out in Local Development Documents (LDD) their policies and strategies for the provision of new housing for at least 15 years from the date of adoption, taking account of the level of housing provision set out in the Regional Spatial Strategy. It should be noted that government have confirmed that the references to regional policy in national

guidance are not to be given any weight. Local planning authorities may also identify broad locations and specific sites for new housing within a LDD.

3.6 PPS3 also provides a classification of the types of land which are counted as 'previoulsy-developed'. This is monitored to meet national targets on the recycling of development land. In June 2010, revisions were made to PPS3 deleting the classification of private residential gardens as previously developed land. Potential housing sites which include private gardens have been retained in the SHLAA since 'greenfield' status does not prevent sites coming forward. However the status of sites in the assessment sheets in Part 2 have been updated to reflect this change. Currently there is no council policy which would resist development on private gardens and no justification to discount them and not developable, with proposals being considered on their individual merits.

#### The Role and Scope of SHLAA's

- 3.7 This is covered in Annex C of PPS3 (Housing) which states that a SHLAA should:
  - Assess the likely level of housing that could be provided if unimplemented planning permissions were brought into development;
  - Assess land availability by identifying buildings or areas of land (including previously developed land and greenfield land) that have development potential for housing, including within mixed use developments;
  - Assess the potential level of housing that can be provided on identified land.
  - Where appropriate, evaluate past trends in windfall land coming forward for development and estimate the likely future implementation rate;
  - Identify constraints that might make a particular site unavailable and/or unviable for development;
  - Identify sustainability issues and physical constraints that might make a site unsuitable for development; and
  - Identify what action could be taken to overcome constraints on particular sites.

In particular, local authorities are required by PPS3 to:

- Identify specific, deliverable sites for the first five years of a plan that are ready for development, and to keep this topped up over-time in response to market information;
- Identify specific, developable sites for years 6-10, and ideally years 11-15, in plans to enable the five year supply to be topped up; and
- Where it is not possible to identify specific sites for years 11-15 of the plan, indicate broad locations for future growth.
- 3.8 For a site to be considered deliverable, paragraph 54 of PPS3 specifies that it 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; and

 Be Achievable – there is a reasonable prospect that housing will be delivered on the site within five years

For a site to be considered developable, sites should be in a suitable location for housing, and could be developed within the timeperiod envisaged

3.9 PPS 3 indicates that development plans should look at least 15 years ahead in terms of housing land supply from the date of adoption. The earliest date for the adoption of a core strategy/site allocations DPD would be during 2011-12. Including 2011-12, a 15 year supply would imply that the availability of land should be considered to at least 2026.

#### Revoked East of England Plan (RSS14)

3.10 The East of England Plan was formally revoked on 6<sup>th</sup> July 2010 and is no longer part of the development plan for Hertsmere. While this plan was taken into account in the setting the approach and scope of this study, the council is no longer bound by the house building targets in the regional plan. In the absence of regional housing targets, government have issued the advice set out below

"Local Planning Authorities will be responsible for establishing the right level of local housing provision in the area, and identifying a long-term sup[ply of housing land without the burden of regional housing targets. Some authorities may decide to retain their existing housing targets that were set out in revoked regional strategies. Others may decide to review their housing targets".

The government has also highlighted that local planning authorities still need to justify the housing numbers in their plans. It advises that "local authorities should continue to collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process".

3.11 Government guidance issued alongside the statement to revoke regional plans makes it clear that an assessment of local housing land supply is required.

"Although the overall ambition for housing growth may change, authorities should continue to identify enough viable land in their DPD's to meet that growth. Strategic Housing Market Assessments and Strategic Housing Land Availability Assessments can help with this"

"Local Planning Authorities should continue to use their plans to identify sufficient sites and broad areas for development to deliver their housing ambitions for at least 15 years from the date the plan is adopted. Authorities should also have a five year land supply of deliverable sites. This too will need to reflect any changes to the overall local housing ambition.

#### The Hertsmere Local Plan

- 3.12 The Hertsmere Local Plan ("the Local Plan") was adopted in 2003. A number of the policies relevant to housing provision have either not been saved by the Secretary of State or will be replaced by those in the submission Core Strategy. However, some are still relevant and these are set out below.
- 3.13 Policy K2 sets out the a settlement hierarchy for Hertsmere. This hierarchy reflects where in Hertsmere development is considered most to least sustainable:
  - "The majority of the Borough's development needs will be steered towards the towns of Borehamwood, Bushey and Potters Bar;
  - In Radlett and that part of Elstree which is excluded from the Green Belt, development which maintains the character of the settlements will be acceptable in principle. However, it is considered that the development opportunities in these areas are more limited than in the Borough's three main towns, and the level of local services and infrastructure is more restricted:
  - In Shenley, and that part of Elstree which is within the Green Belt, limited infilling may be permitted, subject to the other policies of this Plan; and
  - In the Borough's other villages, and throughout the Green Belt, there will be a presumption against inappropriate development'
- 3.14 Policy H2 sets out eight strategic sites that, at the time the Local Plan was adopted, were considered acceptable for housing. Of these eight sites, only two have yet to be developed (i.e. Blackwell House, Bushey and Croxdale Road Shops, Borehamwood). These two sites have been assessed as part of the SHLAA.
- 3.15 Policy H4 sets out six safeguarded housing sites in the Green Belt, to be released should there be insufficient land available to meet housing needs in urban areas. National planning guidance in PPS2 states that release of safeguarded land should be through a review of the development plan. In effect, this means their future status will be addressed through the LDF. Until this time, safeguarded sites are treated as subject to Green Belt Policy. Safeguarded sites where still available have been included in the SHLAA but assessed on the same basis as other sites. The safeguarded sites are:
  - Haydon Dell Farm, Bushey;
  - Land East of Farm Way, Bushey;
  - Land bounded by Heathbourne Road, Windmill Lane and Clay Lane, Bushey;
  - ■16 Watford Road, Bushey
  - Byron Avenue/Vale Avenue, Borehamwood; and
  - West Herts. College Annexe, William Street, Bushey

#### Hertsmere Core Strategy (Submission Version – December 2008)

3.16 The Hertsmere Core Strategy (Submission Version – December 2008) ("the Core Strategy") forms part of a Local Development Framework (LDF) that will

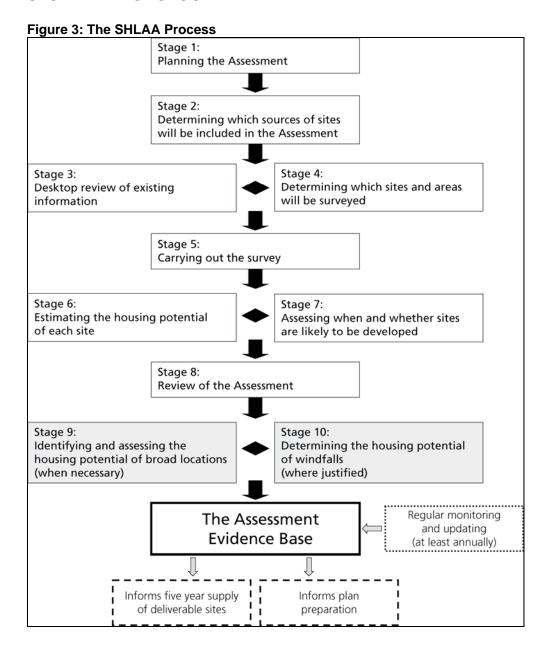
eventually replace the Local Plan. The core strategy was submitted to the Secretary of State in March 2009 and adopted by the Council for development control purposes. Following initial hearings, the examination was adjourned for further studies to be undertaken including the SHLAA. The Council had further discussions with Go-East and the Planning Inspectorate at the end of 2009 which concluded that changes would be needed to the core strategy. The submission core strategy was formally withdrawn in January 2010 but continues to be a material consideration in the determination of planning applications. The submission core strategy forms an important context for the preparation and approach to the SHLAA. Following the revocation of the East of England Plan, it will be necessary to consider changes to certain policies, particularly where they relate to housing targets, phasing of development and any release of land from the Green Belt.

- 3.17 Consistent with PPS1, sustainable development is at the heart of the Core Strategy. How this will be achieved in the Hertsmere context is specified in Policy SP1. With regards to housing provision, Policy SP1 specifies that:
  - New development will be required to prioritise the efficient use of previously developed land;
  - Development will be focussed and prioritised on the urban areas of Potters Bar and Borehamwood, although all urban settlements will be expected to accommodate development opportunities that arise;
  - All development should ensure a safe, accessible and healthy living environment for residents; and
  - Development should seek to mitigate the environmental impact of transport by promoting alternatives to the car and opportunities for linked trips.
- 3.18 Policy CS1 addresses the requirement in the now revoked regional plan to provide for at least 5000 homes in Hertsmere between 2001 and 2021. It specifies that housing development will be focussed on Borehamwood, Potters Bar and Bushey. The identification of new locations for housing in the future Site Allocations DPD will be subject to the following criteria:
  - Environmental constraints and compliance with the key environmental policies set out in the Core Strategy;
  - The density of the surrounding area;
  - The need to retain existing housing;
  - The need to locate new development in the most accessible locations taking account of local infrastructure capacity;
  - The settlement hierarchy identified in the Core Strategy; and
  - The need to focus development within the boundaries of existing built-up areas
- 3.19 The Core Strategy recognises that there is the potential that the housing target set in the revoked regional plan cannot be met without releasing Green Belt land. This eventuality is provided for by Policy CS2, which specifies Green Belt areas of search to the south and east of Borehamwood and to the south, west and north-west of Potters Bar that the Council may wish to designate for housing in the Site Allocations DPD. The allocation of individual sites within these areas will be subject, but not limited to, the following considerations:
  - Air Quality;

#### **Hertsmere Borough Council**

- Noise;
- Transport impact;
- Flood risk
- Nature conservation value and impact;
- Landscape conservation and impact;
- Agricultural land quality;
- Accessibility to, and capacity of, public transport and essential services; and
- The extent of previously developed land on the site
- 3.20 Policy CS3 sets out a phasing of development to ensure a sustainable rate of housebuilding within Hertsmere. It proposes allowing up to 57%, up to 74% and up to 100% of the revoked East of England plan house-building target by March 2011, March 2016 and March 2021, respectively, in a future Site Allocations DPD. Should these proportions be greatly exceeded, unimplemented residential site allocations and large major development schemes for housing would not be permitted. Should these proportions not be met, a review of the Site Allocations DPD would occur to consider whether Green Belt releases need to be brought forward.
- 3.21 The Core Strategy identifies a need for affordable housing within Hertsmere. To remedy this, Policy CS4 requires that all housing schemes providing more than 15 residential units or on sites of greater than 0.5 hectare, provide affordable housing. Of all homes on such schemes/sites, this policy seeks an affordable housing proportion of 35%. Of this 35%, 75% should be social housing and the remaining 25% intermediate.
- 3.22 Related to the borough wide housing affordability issue noted above, the Core Strategy also identified a particular Affordable Housing shortage in the smaller settlements of Shenley, South Mimms and Elstree. To address this, Policy CS5 permits the provision of Affordable Housing in rural areas as an exception to the normal presumption against housing development in the Green Belt.
- 3.23 The Core Strategy also identifies a recent trend toward construction of smaller homes, such as studio and one-bedroom flats, with a commensurate decrease in the numbers of larger homes. To ensure that the size and type of future housing development reflects local need, Policy CS7 provides for control of the housing mix and type on developments greater than 10 units. This same policy also specifies that provision shall be made for sheltered and very sheltered housing on large housing development sites.

#### 4.0 STUDY METHODOLOGY



**Stage 1: Planning the Assessment** 

- 4.1 The most recent government guidance has highlighted the continued importance of undertaking a SHLAA. The Planning Advisory Service (PAS) emphasises that a SHLAA is an essential part of the evidence base for a LDF. An authority bringing forward DPD's without meeting the core requirements is at risk of its plan being found 'unsound'.
- 4.2 In undertaking the SHLAA, the Council have followed the metholodology in best practice guidance<sup>5</sup>. This details core outputs, steps to be followed and approaches to identifying land and assessing deliverability. Table 2 shows the

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Strategic Housing Land Availability Assessments – Practice Guidance" (DCLG) July 2007

- core outputs and processes and where this information has been covered in this SHLAA report.
- 4.3 Figure 3 on the previous page shows a recommended series of steps to undertake a SHLAA based on best practice guidance. The Council have generally followed this approach steps, although to save time have only estimated housing potential for sites considered available and likely to be developed. This reflects the relatively limited initial timescale for the completion of the SHLAA.
- A key issue for a SHLAA is the approach to windfall. This refers to sites which have not been allocated or identified by the Council. Paragraph 59 of PPS3 indicates that windfalls should not be included in the first 10 years of land supply, unless LPA's can provide robust evidence of genuine local circumstances that prevent specific sites being identified. This places greater emphasis on the need to identify sites which can be confidently allocated for housing in LDF's.

#### Stages 2 & 3: Sources of sites and information

- 4.5 PPS3 states that priority should be given to the use of previously developed land for housing, in particular vacant and derelict sites and buildings. It requires local planning authorities to ensure that sufficient, suitable land is available to achieve their previously-developed land delivery objectives.
- 4.6 Practice guidance sets a range of possible sources of land types and information that could be used to identify potential housing sites. These are summarised in tables 5 and 6 and included in the SHLAA Methodology circulated to key stakeholders. No objections or clarifications were made. The only land type mentioned in the guidance but not considered appropriate was for 'new settlements' in the Borough.
- 4.6 A SHLAA is required to consider the potential of greenfield sites. While a SHLAA cannot discount Green Belt land in principle, there is no expectation that every possible greenfield site should be assessed. The important thing is that all greenfield sites which are reasonable candidates for housing should be identified and assessed from the outset. It is also important that the assessment is comprehensive, even through some sites promoted for development will be 'non-starters'. In these cases, the reasons for discounting the site should be shown in the site assessments.

Table 2:SHLAA Best Practice: Coverage of Core Outputs and Process Requirements

Best Practice indicates that the SHLAA should, as a minimum, provide a series of core outputs and follow cover two process requirements. These are set out below together with the locations they are covered in the report. Core Output 1: A list of sites, cross-A summary of sites included/discounted from referenced to maps showing locations and housing supply can be found in Table 5 Maps of boundaries of specific sites (and showing specific sites are included in Part 2 of the report and broad locations, where necessary) broad locations are identified in figure 4. The list commitments is included in this report at Appendix 2 Core Output 2: Assessment Detailed assessments can be found in Part 2 of the of the deliverability/developability of each site (i.e. SHLAA report, ordered by settlement. in terms of its suitability, availability and achieveability) to determine identified site is realistically expected to be developed Core Output 3: Potential quantity of housing These are identified on the site assessment sheets that could be delivered on each identified and summary tables in Part 2 of the report site or within each identified broad location (where necessary) or on windfall sites (where justified) Core Output 4: Constraints on the delivery These are identified in the site assessment sheets of identified sites and Core Output 5: Recommendations on how These are identified in the site assessment sheets these constraints can be overcome and when Process Requirement 1: The survey The process of engaging stakeholders is and summarised in section 1 Assessment should involve kev stakeholders including house builders, social landlords, local property agents and local communities. Process Requirement 2: The methods, The methodology itself was agreed/consulted on assumptions, judgements and findings earlier in the process but assumptions, should be discussed and agreed upon judgements and findings have been discussed throughout the process in an open and and displayed throughout this report. Before transparent way, and explained in the being finalised, they will be the subject of Assessment report. comment from key stakeholders. The report should include an explanation as The reasons for discounting a site are set out in the to why particular sites or areas have been site assessment sheets.

- 4.7 In addition to in-house sources of information, key stakeholders (See Chap 1 table 1) were contacted via mail, requesting amongst other things, and information on sites through return of a site questionnaire. The questionnaire asked persons promoting a site to submit the following information:
  - Landowner or agent contact details

excluded from the Assessment.

- Site details, including a site plan, OS grid reference and site area
- Information on the current and potential use, including site occupier details

covered in Table 5.

- When the site would likely be available for development and why
- Information on the economic viability of developing the site, including whether there has been any developer interest and how far progressed

The general areas excluded from assessment are

- Information on site constraints, such as flooding
- Any other relevant information.
- 4.8 It should be noted that a fresh 'Call for Sites' exercise for this study was not considered necessary. A well-publicised 'Call for Sites' was undertaken in November-December 2008, to inform work on the Site Allocations DPD. Key stakeholders at this time contacted directly via a mail-out and the Call for Sites was publicised on the Council's website and local newspapers (see Part 3 for copies of these consultation advertisements).
- 4.9 A 'desktop' shortlist of sites was compiled from in-house and external representations. These were used to inform the site survey stage. All sites were mapped on Geographical Information System (GIS) to eliminate duplicates.

#### Table 3: Sources of sites with potential for housing

#### Sites in the planning process

- planning permissions for housing that are under construction
- unimplemented/outstanding planning permissions for housing
- sites subject to s106 agreements (approved in principle)
- 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

#### 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
- urban extensions (in Hertsmere's case areas of search defined in the core strategy)

Table 4: Sources of Information used in the Study

### **Hertsmere Borough Council**

Source	Purpose
Land/buildings relating to site allocations representations not yet the subject of planning permission	To identify sites
Planning permissions/sites under construction (particularly those being developed in phases) and sites approved subject to s106	To identify sites
Site specific development briefs	To identify sites and any constraints to delivery
Planning application refusals	To identify sites which are still acceptable, in principle, for development
Dwelling starts and completion records	To identify the current development progress on sites with planning permission
Pre-application enquiries/applications	To identify sites
Representations received during the November – December 2008 Site Allocations DPD 'Call for sites'	To identify sites and determine landowner and/or developer intentions
Representations received during the Preferred Options and Submission consultation periods of the Core Strategy	To identify sites and determine landowner and/or developer intentions
Urban Capacity Study	To identify buildings and land, and any constraints to delivery
Potential suitable Gypsy and Traveller Sites	To identify sites
Local planning authority Empty Property Register	To identify vacant buildings
English House Condition Survey (see www.communities.gov.uk)	To identify buildings
National Land Use Database	To identify buildings and land, and any constraints to delivery
Register of Surplus Public Sector Land	To identify buildings and land
Central Hertfordshire Employment Land Review	To identify surplus employment buildings and land
Valuation Office database (see www.voa.gov.uk)	To identify vacant buildings
Local planning authority vacant property registers (industrial and commercial)	To identify vacant buildings
Commercial property databases (e.g. estate agents and property agents)	To identify vacant buildings and land
Ordnance Survey maps (see www.ordnancesurvey.co.uk/oswebsite)	To identify land
Aerial photography and other online resources	To identify land

#### Stages 4 & 5 : Site scoping and survey

4.14 Best practice guidance identifies a number of factors that should be taken into account in determining how comprehensive (in terms of the geographic coverage) and intensive (in terms of the minimum size of site to be surveyed) the survey element of the assessment should be.

#### The nature of the housing challenge.

4.15 Hertsmere is not identified as a strategic growth location in the East of England Plan or where a major Green Belt review should take place. In addition, future development targets are not significantly higher than historic trends (see Chapter 2). Feedback from stakeholders has not highlighted worsening viability although affordability is an issue. On this basis, an intensive and extensive survey of sites was not considered appropriate.

#### The nature of the area

- 4.16 80% of Hertsmere is Green Belt, with the built-up areas of Bushey, Radlett, Borehamwood, Potters Bar and part of Elstree, comprising the remaining 20%. Although located within the Green Belt, the villages of Shenley, Aldenham, Letchmore Heath, Patchetts Green, Ridge, South Mimms and part of Elstree also contain built-up areas that contribute to the housing stock of Hertsmere. It was therefore decided that no particular settlement be excluded.
- 4.17 In terms of Green Belt land, the need to assess these sites relative to urban supply was one of the issues highlighted by Planning Inspector considering the submission Core Strategy. Advice from PAS suggests that "sufficient sites outside existing settlement boundaries should be included to enable the authority to be as confident as possible that enough developable sites will be identified to meet the housing target, and to provide for the genuine consideration of alternatives as part of the plan-making process".

#### **Specific Policy Constraints**

4.18 With the exception of clear-cut statutory designations such as SSSI's, Practice Guidance specifies that the scope of the assessment should not be narrowed down in the first instance. The locations specifically excluded from the study are shown in table 5.

#### The nature of land supply

4.18 An assessment of planning permissions granted in Hertsmere between 2001 and 2008 has been undertaken. Indicating over 99% of all new housing has historically been provided on previously developed land. This tends to fall into two sub-categories: redeveloped non-residential sites (e.g. closed school sites, factories or pubs) and redeveloped small residential land portions (e.g. rear or side gardens).

- 4.19 With regards to potentially redundant non-residential sites, these continue to come forward through pre-application enquiries, planning permission applications and 'Call for Sites' undertaken as part of the LDF process. These have been accounted for and included in the sites identified in the desktop survey (stage 3). it is not considered necessary to identify more potentially redundant non-residential sites other than those already identified.
- 4.20 Turning to development of small residential land sites, it is considered impractical to identify sites other than those the Council is aware of through planning permission applications, pre-application enquiries and responses to 'Call for Sites'. Historically, many of these have only come about through the ingenuity of landowners and developers and are therefore not readily apparent. For example, amalgamation of a number of rear and side gardens owned by several parties has previously occurred, to produce a viable site for housing development where one may not have been obvious. For this reason, the site threshold originally set out in the Council's SHLAA Methodology was removed as it would unnecessarily preclude a number of potential housing sites.
- 4.21 The Guidance also states that mapping the following areas can help identify which geographic areas could be covered by the survey:
  - Development hotspots
  - Town and district centres
  - Principal public transport corridors
  - Regeneration areas within settlements
  - Specific locations outside settlements likely to become available (eg public/government land, planned urban extensions, near new roads etc) –

Following an initial review of potential sites, it was considered that a range and number of sites had been identified without the need for additional detailed surveys or mapping of these areas.

- 4.22 The Council has identified an important regeneration area in the Elstree Way Corridor (Borehamwood) which is the subject of a masterplanning and feasibility study due to report in 2010. This area is centred on the civic offices and land north and south of Elstree Way. There is considerable potential in this location for the relocation, co-location and consolidation of a number of public service users and the feasibility study has been testing an number of residential-led regeneration options for the area. While some individual sites within the regeneration area have been assessed an estimate of long-term supply in this location has been made for the area as a whole. A number of sites in the Elstree Way Corridor have already been developed for housing or have been granted planning permission but are not included in the projected supply for this area.
- 4.23 Following consultation on the SHLAA methodology, the survey was extended to include Green Belt sites without any specific element of previously-developed land. This reflected discussion at the Core-stakeholder workshop and further consideration of the definition of 'Suitable' in paragraph 54 of PPS3, with regards to site deliverability. For a site to be suitable, the site must offer "a suitable location for development now and contribute to the creation of sustainable, mixed communities". This definition does not specifically exclude greenfield sites.

#### Table 5:

#### Locations excluded from the SHLAA survey

- SSSI, Wildlife Sites, Local Nature Reserves and Regionally Important Geological Sites –
  Locating housing on these sites could result in the loss of significant protected species,
  habitat, visual amenity and/or areas of general scientific interest
- Historic Parks and Gardens, Scheduled Ancient Monuments, Historic Battlefields and
   <u>Sites of Archaeological Interest</u> With regards to Historic Parks and Gardens and
   Historic Battlefields, housing on these types of sites would clearly compromise the
   amenity value and/or historic value of such sites. With regards to Scheduled Ancient
   Monuments Sites and Sites of Archaeological Interest, PPG 16 specifies that any
   remains should be left in-situ. This therefore, precludes housing development.
- <u>Land within Type 3a and 3b Flood Risk Areas</u> In the case of Type 3b Flood Risk Areas,
  PPS25 specifies that housing should not be located within these areas. In the case of
  Type 3a Flood Risk Areas, PPS25 specifies that housing should not be located within
  these flood risk areas where there are other more suitable sites that can be used. As
  this is a borough wide study, it is anticipated that more suitable land will come forward.

#### **Locations included in the SHLAA Survey**

- <u>Sites outside the Green Belt and within the settlement boundaries</u> of Borehamwood, <u>Potters Bar, Bushey, Elstree and Radlett</u> – these locations are likely to be most sustainable in terms of access to services, public transport, infrastructure and employment and have the least number of policy constraints
- <u>Sites within the Green Belt and located within the settlements of Shenley, Elstree, Ridge.</u>
   <u>South Mimms, Aldenham and Letchmore Heath</u> these locations have potential to be sustainable in terms of access to services, infrastructure and employment and have more scope for development than surrounding 'open' Green Belt land
- Green Belt Sites outside settlements, nominated by landowners/developers/stakeholders
- 4.24 A survey of all identified sites was carried out in August 2009 using a pro-forma sheet. The pro-forma was circulated to key stakeholders for comment in July 2009 and no objections or clarifications were made. The survey was undertaken by Hertsmere Borough Council's Planning Policy team. Before the survey commenced, a staff briefing session was held to ensure a consistent approach. Where possible, staff were sent out in pairs to further ensure consistency.

<sup>&</sup>lt;sup>6</sup> Settlement Boundaries is defined as those boundaries shown on the proposals maps attached to the Borough Council Local Plan (adopted 2003).

<sup>&</sup>lt;sup>7</sup> A copy of the pro-forma is included within the Methodology see part 3a

#### Stage 7 : <u>Assessing deliverability/developability</u>

- 4.25 The SHLAA assessment distinguishes between two types of sites: sites which are deliverable and sites which are developable. These are defined in best practice guidance as:
  - <u>deliverable</u> 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 site within five years from the date of adoption of the plan; or
  - <u>developable</u> 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.
- 4.26 The Council have used judgements regarding suitability, availability and achievability of a site to group site. Its assessment largely follows the process set out in Practice Guidance, with one exception. Assessment of the housing yield of a site has been undertaken after a sites suitability and availability has been determined, rather than beforehand. This approach was considered more efficient as it would not involve estimating housing potential for sites that would not be found deliverable or developable.

#### **Assessing Suitability for Housing**

4.27 The guidance indicates that a site is suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities.

#### Existing Site Allocations and Planning Permissions

- 4.28 Practice Guidance specifies that sites allocated in existing plans for housing or with planning permission for housing will generally be suitable, although it may be necessary to assess whether circumstances have changed which would alter their suitability. Changes of circumstance could include a change to the policy context from the time that the site was assessed or development of the site.
- 4.29 Green Belt Safeguarded Sites contained within Policy H4 of the Local Plan have not been counted as allocated sites in the assessment in Appendix 10. Policy H4 specifies that these sites will only be released for housing, should insufficient land be available for housing after 2011. As this has not been determined, these sites are not automatically considered suitable. These sites have been assessed with the other sites below.

#### All Other Sites

- 4.30 Practice Guidance recommends that the following factors should be considered to assess a site's suitability for housing:
  - <u>Policy restrictions</u> such as designations, protected areas, existing planning policy and corporate, or community strategy policy;

- <u>Physical problems or limitations</u> such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- <u>Potential impacts</u> including effect upon landscape features and Conservation Areas; and
- <u>Environmental conditions</u> which would be experienced by prospective residents.
- 4.31 Paragraph 27 of PPS1 sets out other matters that guide an assessment of whether a site contributes to the creation of a sustainable mixed community. With regards to the location of housing, the following matters are relevant:
  - Jobs, health, education, shops, leisure and community facilities should be accessible by foot, bicycle or public transport; and
  - The need to travel is minimised and public transport access is maximised.
     To this end, housing should be focused on existing centres and near major public transport interchanges.
- 4.32 The Town and District Centres of Borehamwood, Potters Bar, Bushey, Bushey Heath and Radlett generally contain the services and amenities noted in paragraph 27 of PPS1; relatively high levels of public transport access and are centres in their own right. Accordingly, sites within the pedestrian catchments of the Town and District Centres were considered sustainable provided education facilities (i.e. primary and secondary schools) were also within a ten minute walking distance.
- 4.33 Sites outside the pedestrian catchments of the Town and District Centres were generally considered sustainable provided the following was met:
  - Essential services and amenities (i.e. food shops, a GP Surgery, primary school and secondary schools) are within ten minutes walking distance; or
  - 2) A bus stop or train station with frequent services in any one direction is located within five minutes walking distance of the site. For the purposes of this assessment frequent has been defined as at least three services an hour during peak times and two services an hour off-peak, and can include a combination of bus and train services. These bus or train services should connect to a town/district centre, primary school and secondary school, either in or outside Hertsmere.
- 4.34 Straight-line distances of 600 and 300 metres were used as a guide to determining a service or amenities pedestrian catchment in 10 minute and 5 minute walking times, respectively. It is acknowledged that both these distances are shorter than the 800 and 400 metre distances commonly used to determine 10 and 5 minute walking distances, respectively. Based on mapping exercises undertaken by the Council previously, these straight-line 600 and 300 metre distances most accurately reflect 800 and 400 metre walking distances, respectively, when barriers to the most direct route are taken into consideration.

Despite being located within a straightline distance of 600 or 300 metres of a service, amenity or public transport stop/station, some sites may nonetheless not

be considered within a five to ten minute walking distance of a service, amenity or public transport stop. This was usually due to a physical obstruction. For example, a rail line may separate a site from a Town or District centre, despite being within a 600 metre straightline distance. This would mean that the actual walking distance would exceed ten minutes. Where this is apparent, this has been factor into the assessment.

4.35 It is important to reiterate at this point that a site assessed as being suitable for the purposes of the SHLAA does not mean that it will be allocated for housing in the Core Strategy or Site Allocations DPDs or granted planning permission. The SHLAA forms part of the evidence base for these documents, but does not set policy. The results of the SHLAA and other items of evidence, as well as the needs of other land uses will be used to inform the overall policy direction advocated in these DPDs whilst other material considerations need to be considered when determining planning permissions

### Assessing Availability for Housing

- 4.36 Paragraph 39 of the Guidance sets out that a site should be considered available if it is controlled by a housing developer who has expressed an intention to develop, or the land owner has expressed an intention to sell. The Council should also be satisfied that there are no legal or ownership problems such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. The returned site questionnaires, correspondence from landowners, comments made during the core-stakeholder workshop and the planning application history (where applicable) was used to form a view as to whether and when a site was available.
- 4.37 As noted in paragraph 39 of the Guidance, the existence of a planning permission does not necessarily mean that a site is available as planning permission can be made by any person who does not have an interest in a site. To ensure that a site with planning permission is still available, the Site Ownership certificates attached to each planning permission application were checked to ensure that a landowner or developer had made the application. A check of property transactions for these sites was also carried out, to ensure that the site had not changed hands since planning permission was granted. In all cases, it was found that a landowner, developer or agent acting on either parties behalf had made the application and that the site had not changed hands.
- 4.38 Where an issue was identified that may impact when a site would become available (e.g. remediation of a contaminated site), an assessment was made as to when this could be overcome and factored into when a site would be available.

#### **Stage 6: Estimating Housing Potential**

4.39 The methodology employed in the Council's previous Urban Capacity Study (UCS) was used to determine housing yield, although in a slightly modified fashion to account for assessment of greenfield sites beyond urban areas.

- A base density of 30 dwelling per hectare (dph) was assumed across the Borough which reflected guidance in PPS3. This national minimum density has recently been dropped in revised guidance. Given the nature of the housing market in Hertsmere, and the average density of new housing across most of the Borough, it is not considered the approach taken in the SHLAA should be reviewed at this point. From this starting point, the anticipated density on each site was determined using multipliers relating to the area type, the prevailing density, accessibility and the likely housing type.
- 4.41 Where a site is within or immediately adjacent to an urban area, the prevailing density has been taken from the survey of Typical Urban Areas (TUAs) undertaken for the 2006 UCS. Whilst it is acknowledged that these TUAs were determined in 2006, it is the Council's view that they represent a minimum typical density, as housing development has been focussed almost entirely on urban areas over the intervening three years. For sites outside or not adjoining an urban area, a low density has been assumed given the rural nature of these sites.
- The accessibility rankings have been based upon joint work with Hertfordshire County Council assessing accessibility to key services across the Borough. Further information on the accessibility ratings can be found in Part 3 to this report. It is acknowledged that the accessibility maps focus on areas in and immediately around existing urban areas. For the purposes of the SHLAA, the accessibility maps are still considered appropriate as these urban areas have the highest levels of public transport, services and amenities in the Borough, with this tapering off the further a site is from these urban areas.
- 4.43 For the area type and likely housing categories, the professional judgement of the members of the planning policy team has been employed. For each of these categories, the base density was increased by up to 35%. Table 6 below details the multipliers and criteria used in the calculation of unconstrained capacity.

Table 6: Density multipliers used to calculate unconstrained capacity

_	Multiplier					
Criteria	+35%	+20%	+10%	+0%		
Area type	Central	Transitional		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		

Note: Base Density: = 30 dwellings per hectare (dph)

4.44 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

4.45 Using the multipliers above provides a maximum theoretical density of 100 dph (net) in the most central and accessible locations. This is considered a justifiable level given the advice in PPS3. The method used for these multipliers is given further support by examining permissions for housing in the Borough since the start of the plan period. At the time the 2006 UCS was produced, planning permission had been granted for eight major (10 or more units) residential applications above 95dph, since 1 April 2001. In seven instances, the permitted density was in excess of 100 dwellings per hectare. As the policy context in Hertsmere has not changed since this time, such density levels are still considered possible in the most central and accessible locations.

#### **Implementation Rates**

4.46 It is reasonable to assume that not all schemes granted permission will be developed Therefore the housing yield has been adjusted to take account schemes which may never start. To obtain a completion rate, analysis has been undertaken of permissions and completions between 2001-2 and 2005-6. This period was chosen as this information is easily obtainable from the Council's annual monitoring work and is not biased by recent permissions, which have yet to expire. It was found that planning permission was granted for 1118 homes whilst only 41 were not constructed. This equates to a completion rate of approximately 96%. This rate has been applied to the commitments and SHLAA sites to give a 'net' potential figure

#### **Assessing Achievability for Housing**

- 4.47 An assessment was made as to whether housing development was likely to be economically viable on each site, taking into account any extraordinary development costs that may be incurred (e.g. if a site is heavily contaminated, would require demolition of existing buildings etc), the attractiveness of the locality to developers, adjacent land uses and levels of potential market demand. In general, clear evidence over a long period of time was that demand for housing land (despite the recent downturn in the housing market) was still high in Hertsmere and that standard development costs for the average site, even making allowances for Section 106 contributions, were unlikely to render a housing scheme unviable over a reasonable period of time.
- 4.48 This approach is supported by a Development Economics Study for the Borough commissioned as part of the evidence base for the Local Development Framework (Three Dragons, May 2010). While this study is primarily focused on the viability of affordable housing development, it tests viability for a model housing site in the area at a range of densities. On sites with no public housing,

the study highlights positive viability across the range of types assessed. Whilst there are various toolkits available for assessing development viability, it was decided that using such a toolkit for assessing individual sites rather than more general evidence would not be appropriate for the SHLAA. Toolkits are better suited to the assessment of current development schemes, where 'real' information (e.g. costs, number of dwellings etc) can be used to fill out all the necessary fields in the template. For the SHLAA, many of the identified sites have no previous planning history and therefore it would not be possible for accurate financial information or for the results to be robust over a 15 year period.

#### **Overcoming Constraints**

- 4.49 Where constraints have been identified during the site assessments, the Guidance specifies that the Council should consider what action would be needed to remove them.
- 4.50 Approximately 40 of the sites, considered deliverable or developable are located within Green Belt. These sites would require formal release from the Green Belt through the Local Development Framework process. The case for the release of individual sites would need to follow setting out the overall context for changing Green Belt boundaries in the Council's Core Strategy
- 4.51 The location of several sites were not considered sustainable due to the absence or relative infrequency of bus services within a five minute walking distance. This could be overcome through increasing or introducing services in these areas but there would need to be the prospect that a genuine long-term service could be sustained.

#### **Site Assessments**

- 4.52 For sites with planning permission or allocated for housing under the extant Local Plan, an assessment has been made in the spreadsheet attached as Appendix 2. It has been assumed that, unless there has been a change in circumstances since permission was granted, the site is deliverable. The sites suitability will have been established through grant of planning permission, as would its achievability as it can be assumed that the number of units permitted is viable as it will have been sought by a landowner or developer. Similarly, availability has been established as a landowner or developer has indicated an intention to develop through making the application.
- 4.53 For all other SHLAA sites an individual site assessment sheet has been completed. The assessment sheets (divided into areas within Hertsmere) can be found in Part 2 of this report. All site assessments and the methodology used to arrive at the conclusions within them have been scrutinised by the Planning Policy Team. The key stakeholders have also had the opportunity to comment on the entire assessment.

#### **Estimating future Completions (Housing Trajectories)**

- 4.54 Paragraph 43 of the Practice Guidance specifies that a housing trajectory should be produced as part of the SHLAA. The purpose of a trajectory is to show the contribution of different sources of supply over time. Inevitably there are uncertainties in predicting how individual schemes will progress, or exactly when a scheme with planning permission will start or a SHLAA site will come forward.
- 4.55 The draft SHLAA circulated to stakeholders in January 2010 contained trajectories based on evidence from historic implementation rates. However this does not take account of the significant change in the development industry. Given current market conditions, there is less certainty when development might start. A more 'estimate—led' approach has been taken in the final report. In projecting development, an even rate of completions has been assumed for commitments and SHLAA sites.
- 4.56 For sites with full planning consent, the net total has been divided equally over the next five years (2010/11 2014/15), Sites subject to legal agreement or agreed in outline are allocated to the period 2011/12 2015/16. For schemes already under construction, the level of future completions are based on development monitoring or local knowledge. For SHLAA sites, the net figure for each five-year period has been divided by five to apportion it to a year. It has then been assumed that 20% of this figure will be completed in each of the following five years during that period.
- 4.57 Following the revocation of the East of England Plan, housing targets are to be reviewed and agreed at a district level. Assessment of supply against the former East of England Plan has been dropped from the study as this is not in any case, a key outputs of the SHLAA as set out in guidance.

#### 5.0 LONG TERM SOURCES OF SUPPLY

Paragraph 55 of PPS3 specifies that, where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated in development plans. The findings in chapter 7 highlight that few specific SHLAA sites have been assessed as coming forward in this period. In addition, the estimates of housing potential in broad locations can be counted towards a 15 year suply.

#### **Definition of Broad Locations**

- 5.2 Although not defined in PPS3, paragraph 46 of the Practice Guidance defines broad locations as areas where housing development is considered feasible and will be encouraged. It goes on to provide the following examples of broad locations:
  - <u>Within and adjoining settlements</u> for example, areas where housing development is or could be encouraged, and small extensions to settlements; and
  - <u>Outside settlements</u> for example, major urban extensions, growth points, growth areas, new free-standing settlements and eco-towns.

Based on the former East of England Plan, the option for assessing broad locations outside existing settlements was discounted.

- 5.3 Guidance from the Planning Advisory Service indicates that broad locations within settlements could include existing residential areas where existing or proposed planning policy actively encourages additional housing (e.g. through infilling and redevelopment). It highlights that it is in the nature of such areas that it is not possible to identify individual sites, because one cannot predict where property owners will bring forward proposals.
- An assessment of the potential supply from these broad locations can be made by reference to past levels of development and assessment of the future potential. It should be noted that, as this supply is not unexpected and, assuming it is based upon proactive policy, the likely supply from such a broad location is not treated as windfall in terms of PPS3 policy. It can therefore be included in the SHLAA, but only for the 11-15 year period.
- The Guidance also notes that the options for, and housing potential of, broad locations may be considered as part of the SHLAA and that it may be useful to establish a set of criteria. To determine a potential housing yield for identified broad locations, the Guidance recommends consideration of the following three factors:
  - Any evidence underpinning the RSS;
  - The nature and scale of potential opportunities within the broad location; and
  - Market conditions

#### **Urban Areas as Broad Locations**

5.6 Historically, much of the housing development in Hertsmere has occurred within the existing urban areas of Borehamwood, Potters Bar, Bushey and Radlett ("urban areas") and shown in figure 4.

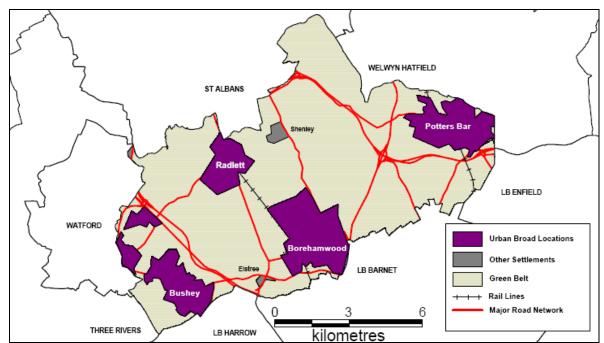


Figure 4: Urban Area Broad Locations

Based upon Ordnance Survey Mapping with the permission of the Controller of Her Majesty's Stationary Office. Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Licence No: LA078239 Hertsmere. 2000.

- 5.7 Many of these sites came forward from sites that were not specifically allocated in the Local Plan or that the Council was otherwise aware of from pre-application discussion. These sites come from a range of sources such as intensification within housing areas, infill or change of use. As these schemes are small in scale, they tend not to come up in pre application enquiries.
- 5.8 There are a number of reasons why an estimate from these types of sites should be included as part of the overall estimate of long-term housing land supply. These include:
  - the relatively high house prices and land values in the Borough;
  - evidence on the viability of development in the urban area;
  - the constraint of tightly drawn green belt boundaries; and
  - specific policies in the draft submission Core Strategy and adopted Local Plan which promote urban development.
- 5.9 In terms of house prices, the average in Hertsmere was £316,712 as at April 2009<sup>8</sup>. At the same time, the Hertfordshire average was £212,766 whilst the average for all of England was £152,767. Similarly, the average for Hertsmere in

National and regional house price information can be obtained from: <a href="http://www1.landregistry.gov.uk/houseprices/housepriceindex/report/">http://www1.landregistry.gov.uk/houseprices/housepriceindex/report/</a>
Local house price information can be obtained from: <a href="http://www.statistics.gov.uk/default.asp">http://www.statistics.gov.uk/default.asp</a>

April 2001 was £204,861 whilst the average for Hertfordshire and all of England was £138,888 and £89,364, respectively. Given these high house prices, development of even some of the most constrained urban sites has and will continue to be viable. This position is also supported by the Development Economics Study (May 2010) . In testing, viability was found to be strong across the Borough and profitable even with significant proportions of affordable housing and other costs. Both the adopted Local Plan and submission Core Strategy have specific policies to promote development in the urban areas and recycle brownfield land.

- 5.10 Table 7 indicates the proportion of net housing completions since 2002 on sites that unexpectedly became available in the broad urban locations in the district. It shows that, on average, 54% of all housing completions in urban areas come from unallocated sites (see Part 3 for a more detailed analysis)
- 5.11 Over this period, unallocated sites have contributed around 150 dwellings per annum (net) Taking out institutional sites which are less likely to come forward in the future, the net contribution is around 125 dwellings per annum. Based on these trends, it is reasonable to predict that unallocated sites could provide at least 100 units per annum. This estimate has been applied from 2021/22 to 2025/26 (Years 11-15 from adoption (see table 12).
- 5.12 This estimate gives some allowance for the revisions to PPS3 made in June 2010. These changes are intended to give planning authority's greater discretion over the redevelopment of private garden land and to remove the obligation to a consider a minimum density level of 30 dwellings per hectare. In the case of garden land, however, the revisions do not affect the principle of development and future supply will be guided by updated design guidance issued by the Council. It is also not clear whether the change in density guidance will be significant. The average density of housing completions in the Borough in 2009-10 was 32 dwellings per Ha which suggests there is no immediate need to review this approach.

Table 7: Proportion of housing completions on Allocated and Unallocated Sites (2002/03 – 2009/10)<sup>9</sup>

	Net Completions								
Year	Allocated Site <sup>10</sup> Unallocated		Unallocated In Urban Area						
2002/03	26%	74%	67%						
2003/04	19%	81%	81%						
2004/05	0%	100%	98%						
2005/06	33%	67%	50%						
2006/07	58%	42%	28%						
2007/08	28%	72%	67%						
2008/09	54%	46%	32%						
2009/10	57%	43%	34%						
Average	36%	54%	57%						

See Part 3g for a detailed analysis of sites.

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<sup>&</sup>lt;sup>10</sup> Includes sites allocated/identified in earlier versions of the current Local Plan

#### **Elstree Way**

- 5.13 In June 2009, the Council commissioned Colin Buchannan and Partners to undertake a masterplanning, feasibility and transport study for Elstree Way. The purpose of this work is to assess the options for redevelopment of north and south of Elstree Way and has been guided by a group of project partners including the main landowners and led by the Council's Chief Executive. The study aims to develop a comprehensive masterplan including reprovision of facilities for a number of existing public service users, new public spaces, pedestrian routes alongside offices and residential development. Although much of the work is largely complete, it is not clear when specific sites might become available as this will be linked to a comprehensive development approach including possible highway improvements Therefore rather than assess individual sites a general estimate has been included in housing land supply based on study preferred options to date. The study area is identified in the site maps in Part 2 of the report (site \$400).
- The top-end of the feasibility study is based on the potential of 1000 dwellings coming forward in the masterplan area phased over a 12 year period. Taking into account a number of sites which already have permission, an estimate of 400 dwellings have been included in medium to long-term supply (see table 13) and 400 dwellings after 2021.

#### **Green Belt Broad Locations**

- In the submission Core Strategy (based on former regional plan numbers), it was considered that there may be a need to consider Green Belt sites to meet a 15 year land supply. Work was undertaken to assess general locations around existing settlements, which might be sustainable and had the least impact on the role and function of the Green Belt. The result of this work was the 'areas of search' around Potters Bar and Borehamwood which appeared in the Key Diagram accompanying the submission Core Strategy.
- 5.16 While the areas of search have not been specifically defined, a number of Green Belt SHLAA sites could be considered to fall within these locations. Other land within the area of search has not been specifically promoted.
- 5.17 Following any review of district housing requirements, the 'areas of search' may or may not be retained in the Core Strategy. Further work to estimate the housing potential of this area could be undertaken if required.

### 6. ASSESSMENT OF SUPPLY

- 6.1 The SHLAA provides a review of future housing supply in Hertsmere from 2010 to 2026. Estimates of housing potential have been made for 5 different sources of housing land supply. These are:
  - · Committed and allocated sites;
  - Identified sites deliverable/developable under the existing policy context;
  - Identified sites deliverable/developable but currently in Green Belt:
  - Development coming forward in broad urban locations; and
  - Development in the Elstree Way area.

### **Commitments**

- 6.2 Commitments are development sites in the planning process where there is some certainty they will come forward. It includes land allocated for development in the adopted Local Plan, proposals with detailed or outline planning permission or been approved in principle subject to a legal agreement. Each of the committed sites has been assessed to ensure they remain available and it is considered they are developable within five years of this assessment. A schedule of sites is set out at appendix 2.
- As at 31<sup>st</sup> March 2010, there were 102 sites counting towards commitments with a total housing yield of 1009 units. Applying a 4% non implementation rate (see para 4.46) this equates to net yield of 968 units (see Table 8)

Table 8: Commitments - housing supply by location

LOCATION		Uni Net additio	its		TOTAL		
	Allocated Underway Detailed Outline						
Borehamwood	10	11	197	48	266		
Potters Bar, Ridge and South Mimms	0	5	49	11	65		
Bushey, Aldenham, Patchetts Green	130	376	63	43	612		
Elstree and Shenley	0	1	9	1	11		
Radlett	0	3	52	0	55		
Total	130	396	370	103	1009		
Less 4% (non- implementation rate)	134	380	355	99	968		

#### **SHLAA Sites**

6.4 115 sites have been assessed as part of the SHLAA (see table 9) of this total, 63 are considered as deliverable or developable and 52 discounted from the housing supply, largely as they were not considered to meet sustainability criteria. Full details are given in the individual site assessments, which form Part 2 of the study.

Tahla 9:	Sitas	Assessed and Gross site area	2
Table 3.	ones	ASSESSEU AIIU GIUSS SILE AIEC	1

LOCATION	Sites	Site Area	Deliverable/ Developable	Discounted
Borehamwood	33	110	20	13
Potters Bar, Ridge and South Mimms	28	95	17	11
Bushey, Aldenham, Patchetts Green	31	111	17	14
Elstree and Shenley	10	45	6	4
Radlett	13	93	3	10
Total	115	454	63	52

### **Existing Policy Context**

- 6.5 Existing policy context sites are those which could be considered as acceptable for housing development in principle under existing Local Plan, submission Core Strategy or national Planning Policy Guidance/ Statements. The majority of these sites fall within urban areas and involve the use of previously developed land. This category also includes a limited number of Green Belt sites where planning history or pre-application discussions indicate there may be a case for development to be permitted under 'special circumstances'.
- Table 10 indicates that sites coming forward over the next 15 years could deliver 1037 dwellings. Including a non-completion rate of 4%, this equates to a net housing yield of 996 dwellings.
- 6.7 Sites in Borehamwood make up most of the supply (70% or 777 dwellings), 10% are located in Bushey and 6% in Potters Bar.
- 6.8 590 dwellings (net) are assessed to be deliverable within 0-5 years of plan adoption. These are considered to form part of the Council's short-term supply of housing land. A further 404 dwellings (net) are considered developable in years 6-10.

#### SHLAA sites subject to Green Belt Policy

6.9 The second category contains sites considered deliverable or developable but are within the Green Belt. This also includes some locations designated as 'safeguarded land' in the adopted Local Plan, which are still subject to Green Belt policy. These sites <u>cannot</u> come forward immediately and would need to be

released through the Local Development Framework. It should be noted that the assessment of these sites is based on the agreed SHLAA methodology. The inclusion of Green Belt housing estimates does not imply the council will propose any specific boundary changes in the Core Strategy.

- 6.10 Table 11 indicates that the assessed Green Belt sites which could be delivered over the next 15 years have a housing potential of 1906 dwellings. Including a non-completion rate of 4%, this equates to a net housing yield of 1830 dwellings.
- 6.11 Locations in Potters Bar make up the majority of the housing yield (56% or 1059 dwellings) 24% is located in Borehamwood and 12% in Bushey.
- 6.12 More than two thirds of the Green Belt sites (1,330 dwellings net) are assessed to be deliverable within 0-5 years of plan adoption. This reflects the fact that most of this land is agricultural land would not require significant remediation to come forward.
- 6.13 The distribution of supply between the Borough's main settlements is illustrated in figure 5. It highlights that that the balance of housing supply from different sources is not evenly spread between the Borough's main settlements. Bushey has the highest level of existing commitments and Borehamwood, the highest level of supply from SHLAA sites which can come forward under existing policies. Supply in Potters Bar would be through identified Green Belt sites. The availability of supply will have implications for the review of Core Strategy policy.
- 6.14 The combined totals from existing site allocations, planning permissions and SHLAA sites (urban and Green Belt) result in a net yield of 3,794 dwellings over 15 years. This overall figure can be used to test whether the scope of the SHLAA has identified sufficient sites to meet future requirements. While there are now no regional housing requirements, if the former development rate in the East of England Plan were to continue to 2025/26, this would equate to a need to plan for 4,022 dwellings. Given that the net yield is in broad alignment with the former regional plan target, it is considered that the study has considered a sufficient range of sites to be considered robust.

Table 10: SHLAA sites Existing policy context - potential housing supply by location

LOCATION	(Ye		RAME is Assessmo	ent)	TOTAL (Within 15 Year Period)	TOTAL (includes all sites)
	0-5 yr	6-10 yr				
Borehamwood	408	369	0	0	777	777
Potters Bar, Ridge and South Mimms	75	6	0	92	81	173
Bushey, Aldenham, Patchetts Green	102	46	0	0	148	148
Elstree and Shenley	24	0	0	0	24	24
Radlett	7	0	7	7		
Gross Yield	616	421	1037	1129		
Net Yield <sup>11</sup>	591	404	0	88	996	1084

Table 11: SHLAA Green Belt sites - potential housing supply by location

LOCATION	(Ye	TIMEF ars from thi	nent)	TOTAL (Within 15 Year Period)	TOTAL (includes all sites)	
	0-5 yr	6-10 yr				
Borehamwood	151	315	0	254	466	720
Potters Bar, Ridge and South Mimms	908	0	151	0	1059	1059
Bushey, Aldenham, Patchetts Green	274	0	0	0	274	274
Elstree and Shenley	52	0	0	0	52	52
Radlett	0	0	55	55		
Gross Yield	1385	315	1906	2160		
Net Yield	1330	302	198	244	1830	2074

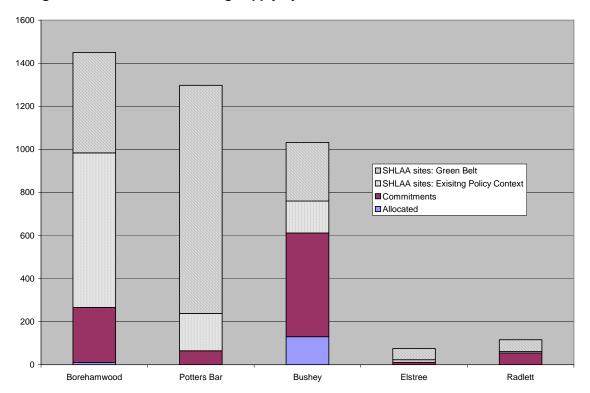


Figure 5 Distribution of housing supply by settlement

### **Broad Locations**

- In addition to specific SHLAA sites, housing estimates for two broad locations have been considered in the study. Urban Broad Locations were considered appropriate in the latter years of the SHLAA timeframe (i.e. 11 + years) given the constraining effect of Green Belt and national policy statements, particularly PPS1 and PPS3. Hertsmere was not a location directed to undertake a Green Belt boundary review as part of the former East of England Plan. In addition, the submission Core Strategy contains policies to support housing growth on previously developed land and near existing centres.
- 6.16 In addition to urban broad locations, an estimate has also been made for the potential of housing-led regeneration in Elstree Way, west of Borehamwood town centre. This area is currently subject to a feasibility and transport study, which may lead to a more specific masterplan. It has been included as a separate element of medium to long-term supply.
- 6.17 The SHLAA does not include a general estimate from windfall. However, windfalls have historically and will continue to contribute to housing numbers in the borough. As such, the assessed urban housing supply above is likely to underestimate the actual housing supply in Hertsmere.
- Table 12 summarises the net potential of all the urban sources of supply. The SHLAA assessment indicates that urban areas and sites developable under existing policies could provide just over 3,200 dwellings (net) over the next 15 years.

Table 12: Summary of Housing Potential within the Urban Area

SITE SOURCE			RAME		TOTAL (Within 15 Year Period)	TOTAL (all sites)
	0-5	6-10	11-15	16+ or unknown		
Existing Allocated Site	140	0	0	0	140	140
Sites with Planning Permission	869	0	0	0	869	869
Sites Considered Deliverable or Developable Within Existing Policy Context	616	421	0	92	1037	1129
Urban Broad Locations			500		500	500
Elstree Way		400	400	0	800	800
Gross Yield	1625	821	900	92	3346	3438
Net Yield					3212	3300

#### **Affordable Housing**

- 6.21 It is expected that the identified sites in the SHLAA will make a significant contribution to the delivery of affordable housing in the Borough. The submission Core Strategy seeks a requirement to provide 35% of units as affordable on schemes over 15 units or 0.5 Ha in area. A recent housing viability study has indicated that this is viable across the Borough and there is scope to lower this threshold to 5 units and raise the contribution.
- Based on a contribution of 35% and a threshold of 10 units, the potential level of affordable units would be 1,140 dwellings. 392 dwellings (34%) could come from urban sites and 738 in Green Belt locations. Over 15 Years, this would equate to just over 75 dwellings per annum.

### **Housing Trajectory**

6.23 The housing trajectories in Appendix 1 give an illustration of how the various sources of housing supply might be delivered over the next 15 years. With the exception of schemes under construction, it is difficult to predict exactly when a scheme or SHLAA site will start and the time period over which it could be delivered. The assumptions made in producing the trajectory are set out in Chapter 4 (paras 4.54-4.57). Since a trajectory spreads out completions over time, it assumes that not all the development allocated in years 11-15 will be completed by 2025-26. The level of housing delivery is therefore lower than the total assessed supply in tables 22 and 23.

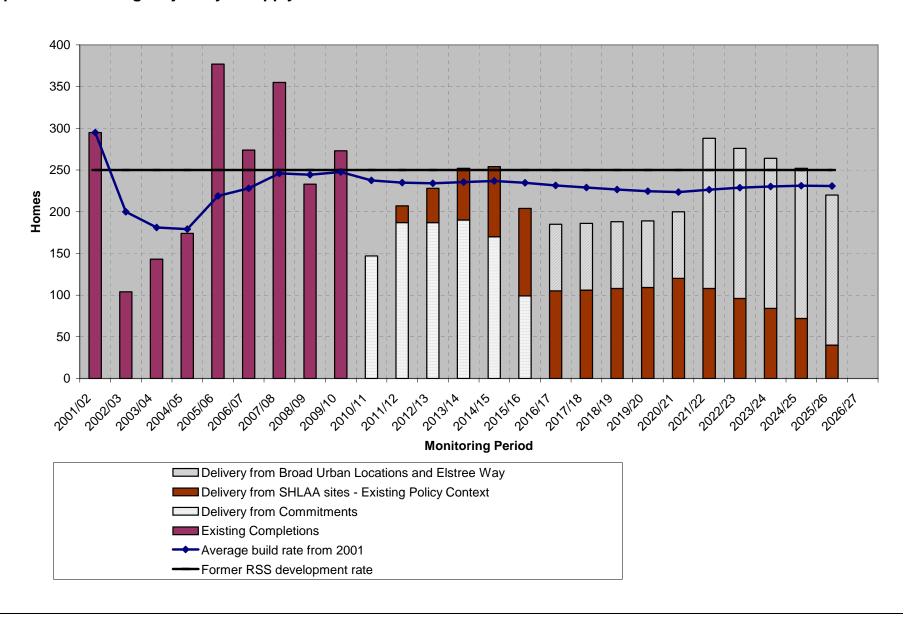
6.24 Appendix 1 shows a trajectory based on the estimates of housing potential for committed schemes, urban SHLAA sites and urban broad locations (including Elstree Way). It gives an indication of the level of housing delivery if no land were to be released from the Green Belt and no windfall schemes came forward in the next 10 years. It indicates that the average rate of housing delivery (from 2001) would fall back from 250 dwellings per annum in 2009/10 (the former RSS target) to just over 225 dwellings per annum by 2025/26.

#### Monitoring and updating

- 6.25 Once published, the SHLAA will need to be updated at regular intervals and will form part of the development monitoring process undertaken by the Council. The following issues will be of particular relevance in future updates:
  - (a) monitoring of completions and new 'windfall' commitments;
  - (b) Progress of SHLAA sites in the planning system; and
  - (c) New sites identified to the Council; and
  - (d) Any housing target set by the Council.

The SHLAA may also need to take account of changes in national legislation to assess whether any the assumptions used in the SHLAA would need amending.

Appendix 1: Housing Trajectory: Supply from Commitments and urban sites 2001-2026



# Appendix 2a Commitments : Schemes under construction

Table 1: S	chemes under cons	struction as at 1st April 2010									
SHLAA Reference Number	Application Number		Net Gain	2010/11	2011/12	2012/13	2013/14	2014/15	2015-16	2015/16	Notes
S91		International University Site, The Avenue, Bushey	300	23	51	51	52	52	0	52	Assumes completion of Blocks A2 & A7 i 2010-11 and remainder from 2012.
S106	TP/07/0757	Land at Girtin Road and Munro Road and, Gulland Close, Bushey	126	20	20	20	21				Net addition to stock of 81 units from 2010
S245	TP/08/0700	8-12 Theobald Street & 19 Glenhaven Avenue, Borehamwood	8	8							
S112		Kings Head, 10 Little Bushey Lane, Bushey	7	7							
S236	TP/07/2010	Land At Bowmans Close, Potters Bar	4	4							
S248	TP/09/339	14-18 Rudolph Road, Bushey	4	4							
S258		4 The Ridgeway, Radlett	2	2							
S184	TP/08/2021	77 Windmill Lane, Bushey	2	2							
S232	TP/07/0638	Adj 40 London Road, Shenley	1	1							
S174	TP/09/0661	land r/o 15 Mornington Road, Radlett	1	1							
S223		R/O 39-43 Mimms Hall Road, Potters Bar	1	1							
S252	TP/08/1050	Adj Cotswold, Bushey	1	1							
S193	TP/08/1520	27 Ayot Path, Borehamwood	1	1							
S158	TP/06/0454	1 Cranes Way, Borehamwood	1	1							
	TP/08/0425	Land adj 2 Newcombe Rd	1	1							
	TP/07/0525	50 Craigweil Avenue							0		
			460	77	71	71	73	52	0	<b>52</b>	

Appendix 2b Commitments: Schemes with full planning consent

	enaix 2b C	ommitments : Schem	<u>ies with</u>	tuli piar	ining o	conse	nt			
SHLAA Reference Number	Application Number	Address	Year Granted	Net Gain	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16
	TP/09/0596	Oaklands College	16/02/10	125						
S82	TP/08/1468	195 Darkes Lane	08/12/09	23						
S198	TP/08/0519	61-73 Shenley Road, Borehamwood	2008	16						
S116	TP/08/1469	18-20 Watford Road, Radlett	2008	14						
S97	TP/06/1039	9 Finch Lane, Bushey	2007	14						
S121	TP/07/1812	The Lazy Fox, 72 Sparrows Herne, Bushey	2007	13						
S125	TP/08/1611	Land at corner of Fetherstone Close and, Chace Avenue, Potters Bar	08/06/09	12						
S108	TP/07/1509	128 Aldenham Road, Bushey	2007	12						
S93	TP/06/1301	The Lair, 41 Gateshead Road, Borehamwood	2007*	12						
S120	TP/08/1425	Former Builders Yard and 22 Station Road, Radlett	09/04/10	10						
S122	TP/08/1777	Brook Court, Watling Street, Radlett	2008	8						
S241	TP/08/0121	Opus Court, Borehamwood	2008	5						
	TP/09/0141	Land adj 11 Koh-I-nor Ave, Bushey	09/04/2009	4						
	TP/08/2040	Garages at Coningsby Drive	26/01/10	4						
S113	TP/08/0985	The Marians, Barnet Lane, Elstree	2008	4						
S220	TP/09/1947	25 Grove Road, Borehamwood	2009	4						
	TP/09/881	84 Watling Street	19/08/09	3						
S128	TP/09/0377	Stirling House, Manor Way, Borehamwood	06/07/09	3						
S189	TP/08/1001	The Coach House, 1B Furzehill Road, Borehamwood	01/07/09	3						
S260	TP/07/1926	First Place Nursery, Bushey	2007	3						
S218	TP/05/0550	Chase Farm, Potters Bar	2007	3						
S99	TP/06/0234	Gullimore Farm, Sandy Lane, Bushey	2006	3						
	TP/09/681	Brook Court, Watling Street, Radlett	30/07/09	2						
S169	TP/09/0196	69-71 High Street, Potters Bar	20/07/09	2						
S176	TP/08/0051	Girl Guide Hut, The Rutts, Bushey	2008	2						
S110	TP/09/2021	Land rear of 102-110 Chiltern Avenue, Bushey	26/03/10	2						
S124	TP/07/2300	Land Rear of Bure House, Skybreak, Cushey and Hawthorns, The Warren, Radlett	2007	2						
		land adj 73 A Coleridge Way		1						
	TP/08/1900	191-195 Sparrows Herne	05/08/09	1						
		3 Cragg Avenue, Radlett	22/01/10	1						

1.2

1.3

Appendix 2b Commitments: Schemes with full planning consent (cont)

SHLAA Reference	Application Number	Address	Year Granted	Net Gain	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16
Neierence	TP/09/1131	207 Park Avenue		1						
	TP/09/1337	33 Loom Lane		1						
	TP/10/0351	Plot adj 24 The Highlands, Potters Bar	06/04/2010	1						
S216	TP/09/2138	28a Gills Hill, Radlett	08/04/2010	1						
S192	TP/08/1662	Land betw. 12-14 Edulf Road, Borehamwood	09/04/09	1						
S173	TP/09/0481	Land between 1 and 3, Turner Road, Bushey	24/06/09	1						
S172	TP/09/0477	Land Adjacent to 20, Mostyn Road (Between 4 Turner Rd & 20 Mostyn RD), Bushey	2009	1						
S171	TP/09/0460	Land Adjacent to 15, Mostyn Road, (between 2 Turner Road & 15 Mostyn Road), Bushey	2009	1						
S170	TP/09/0258	168 Dugdale Hill Lane, Potters Bar	16/06/09	1						
S168	TP/09/0190	Barn at Church Farm, Deeves Hall Lane, Ridge	16/04/09	1						
S259	TP/09/1239	Old Barn House, Elstree	2009	1						
S197	TP/07/2343	Danes Lodge, Theobald Street, Radlett	2008	1						
S194	TP/08/1622	76 Hackney Close, Borehamwood	2008	1						
S191	TP/08/1101	53 Bairstow Close, Borehamwood	2008	1						
S190	TP/08/1022	251 Park Avenue, Bushey	2008	1						
S188	TP/08/0965	Land adj. 22 St Francis Close, Potters Bar	2008	1						
S186	TP/08/0823	Land between, 83-85 Windmill Lane, Bushey	2008	1						
S183	TP/08/1455	2 Wentworth Avenue, Elstree	2008	1						
S181	TP/08/0515	57 High Road, Bushey	2008	1						
S180	TP/08/1682	20 Osborne Road, Potters Bar	2008	1						
S179	TP/08/0438	39 Cleveland Crescent, Borehamwood	2008	1						
S178	TP/08/0929	12 Hatherleigh Gardens, Potters Bar	2008	1						
S177	TP/08/0802	11 Micklefield Way, Borehamwood	2008	1						
S175	TP/08/1969	70 Masefield Avenue, Borehamwood	19/05/09	1						
S167	TP/08/0942	3 Mead Way, Bushey	21/04/09	1						
S126	TP/08/1874	62 Aldenham Avenue, Radlett	27/07/09	1						
S119	TP/08/1524	Kendal Hall Farm, Watling Street, Radlett	2008	1						
S111	TP/08/0085	1 & 2 Rydal Mount Cottages, Baker Street, Potters Bar	2008	1						
S257	TP/08/1671	Adj Homeleigh, Borehamwood	2008	1						
S254	TP/08/1201	Adj 449 Bushey Mill Lane, Bushey	2008	1						

Appendix 2b Commitments: Schemes with full planning consent (cont)

	perior 25 Communication . Ochemes with run planning consent (Cont)									
SHLAA Reference	Application Number	Address	Year Granted	Net Gain	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16
S253	TP/08/1083	10 Newlands Avenue, Radlett	2008	1						
S250	TP/08/0918	145 Bournehall Avenue, Bushey	2008	1						
S249	TP/08/0877	35 Well End Road, Borehamwood	2008	1						
S247	TP/08/0806	Adj 136 Stanborough Avenue, Borehamwood	2008	1						
S244	TP/08/0537	27 Manor Way, Borehamwood	2008	1						
S222	TP/06/0313	41 Darkes Lane, Potters Bar	2007	1						
S196	TP/07/0751	Land Adjacent To, 1 Kenilworth Close, Borehamwood	2007	1						
S166	TP/07/0985	126 Watling Street, Radlett	2007	1						
S123	TP/09/2231	1 The Avenue, Radlett	17/02/10	1						
S101	TP/07/1517	Little Orchard, Barnet Lane, Elstree	2007	1						
S238	TP/071539	41-43 Highfield Road, Bushey	2007	1						
S237	TP/07/2143	Grasmere Lodge, Potters Bar	2007	1						
S210	TP/09/1526	Adj 19 Woodlands Close, Borehamwood	19/11/09	1						
S156	TP/09/0613	191-195 Shenley Road, Borehamwood	2010	12						
S219	TP/09/1268	Garage Site Between 17-19 Battlers Green Drive, Radlett	2009	4						
	GROSS TOTAL			370						
	NET TOTAL	(Less 4% Implementation rate)		351	70	70	70	70	71	

# Appendix 2c Commitments: Schemes with full outline consent or s106(cont)

SHLAA Reference Number	Application Number	Address	Year Granted	Net Gain	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16
S117	TP/07/2234	10-16 Arundel Drive, Borehamwood	2007	18						
S109	TP/07/2194	H N H Timber, Station Road, Borehamwood	2007	12						
S187	TP/08/0907	Corner of Castleford Close and, Allerton Road, Borehamwood	2008	7						
	TP/08/1825	24a The Broadway, Darkes La. Potters Bar	02/02/10	4						
S118	TP/07/2223	3 London Road and 54-64 Vale Road, Bushey	2008	40						
S233	TP/07/1310	Former Day Care Centre, Borehamwood	2008	11						
S107	TP/07/0845	Hertsmere Primary Care Trust, The Elms Health Clinic,High Street, Potters Bar	2007	7						
S127	TP/09/0864	54-62 Chiltern Avenue, Bushey	28/08/09	3						
	TP/09/2019	Land adj 47 Barham Avenue, Elstree	13/01/10	1						
	GROSS TOTAL			103						
	NET TOTAL			98		19	19	20	20	20

# Appendix 2d Sites allocated in adopted local plan (2003)

SHLAA Reference	Application Number	Address	Year Granted	Net Gain	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16
Number	• •									
S12		Blackwell House, Bushey (Veolia Water) site	2007	130						
S200		Croxdale Road Shops	2007	12						
	GROSS TOTAL			142						
	NET TOTAL			135		27	27	27	27	27

Appendix 3a SHLAA Sites in Borehamwood

	AA Sites in Borehamwood				Existing Po	licy Context			Green B	elt Sites	
Ref	Site Address	Site Area (ha)	PDL	0-5 yr	6-10 yr	11-15yr	16+ or unknown	0-5 yr	6-10 yr	11-15yr	16+ oı unknow
S2	Land north of Barnet Lane and on south side of Furzehill Road and Carrington Avenue	13.0	No					151			
S5	Instalcom Site, Manor Way	0.4	Yes	17							
S8	Land to the east of Theobald Street	11.0	No		•						254
S14	Fire and Ambulance Stations, Elstree Way.	0.0	Yes				[1]				
S15	Borehamwood Library and adjoining clinic, Elstree Way	0.0	Yes				[1]				
S16	Oaklands College , Elstree Way	0.0	Yes	[3]	]						
S27	Elstree Distribution Centre	2.3	Yes		•						
S28	Former Sports Ground, Rowley Lane	13.0	No								
S32	Land rear of Hartfield Avenue	2.5	No								
S37	Old Haberdashers Association, Sports Grounds, Croxdale Road	4.1	No	107							
S39	BBC Elstree, Clarendon Road	6.3	Yes		308						
S52	Land adjacent to the north east of Borehamwood (Site A)	20.0	No						315		
S53	Land adjacent to the north east of Borehamwood (Site B)	15.0	No							-	
S59	L+C36and to south of Elstree and Borehamwood Station	0.7	No	60	]						
S61	57-59 Oakwood Avenue,	0.3	No								
S64	Oakleigh and Arden, Mildred Avenue	0.2	No								
S76	Suffolk Punch, Howard Drive.	0.2	Yes	9							
S129	Station Road Gas Holders	0.5	Yes		44						
S131	Studio Plaza, Elstree Way	1.0	Yes	85							
S132	East side of Glenhaven Avenue, Borehamwood	0.2	Yes	15							
	43-47 Theobald St	0.3		30							
	Land r/o Crown Road	0.3	No								
	Maxwell road Garages off Grove Road	0.3 0.1	No Yes	4	1						
S142	r/o 16-28 Masefield Avenue, Adj. 13-	0.1		4	1						
S144	43 Milton Avenue r/o 13-21 Hartforde Road, s/o 16-18 Spring Close, r/o 3-7 Winstre Road	0.2	Yes	4	-						
S148	Junction Elstree Way, Manor Way and Bullhead Road	1.0	Yes		J						
S149	Stratfield Road Estate	2.9	Yes		17						
	Borehamwood Civic Carpark	0.7	Yes								
	JobCentre Plus, Elstree Way Land to south of Borehamwood,	0.0									
S163	above Elstree rail tunnels and north of Barnet Lane	3.2	No		1						
S199	Allum Lane (next to B/hamwood Station)	0.9	Yes	73	]						
S400	Land in Elstree Way Corridor [1]										

<sup>[1]</sup> Housing potential included as a separate estimate for Elstree Way Corridor

Last updated 13-9-2010

<sup>[2]</sup> SHLAA site in draft stakeholder report - now inlouded in Commitment figures

# Appendix 3b SHLAA Sites in Potters Bar, Ridge and South Mimms

	AA sites in Potters Bar, Ridge		e e luii		Existing po	icy context			Gree	n Belt Sites	
Ref	Site Address	Site	PDL	0-5 yr	6-10 yr	11-15yr	16+ or	0-5 yr	6-10 yr		16+ or
(CI	Site Address	Area	FUL	0-5 yi	6-10 yi	11-15yl	unknown	0-5 yi	6-10 yi	11-15yr	unknown
		(ha)					UTIKTIOWIT				UTKTOWI
64	Potters Bar Bus Garage	1.2	Yes				70				
J <del>-1</del>	otters bar bus Carage	1.2	163				70				
313	Wash Lane, Bignells Corner	1.0	No				ļ				
	Vadir Edilo, Bigriolio Corrier	1.0	''								
318	Station Close, Darkes Lane	1.1	Yes	57	]						
				-							
329	Land for redevelopment in Blanche	0.3	No		•						
	Lane										
335	Land to north of M25 and south of	0.4	No								
	Barnet Road										
340	27-31 Heath Road	1.2	No								
544	Potters Bar Golf Course	41.0	No					=			
			١.,		1			508	1		
345	Oakmere Library	0.4	Yes	14							
\ <del>-</del>	F 0 1 1 1 1		١,,	11	J				7		
347	Former Sunnybank School Site (2.8	1.4	Yes					60			
250	Ha proposed for development)	4.0	NI-					69			
S50	Land to rear of 28-30 Manor Road	1.0	No					41			
25.4	Lander the Court of Datters Day	0.0	NI-					41			
S54	Land to the South of Potters Bar	9.0	No					151			
355	(Site C) Land at Bentley Heath (Site D)	17.4	No					101	ł		
555	Land at Bentiey Heath (Site D)	17.4	INO					16			
356	Land to the South of Potters Bar	8.0	No					10	1	Ī	
550	(Site E)	0.0	INO								[1]
365	1-3 Osborne Road	0.3	No							Ŀ	
366	45-55 Southgate Road,	0.4	No		1						
67	434-436 Mutton Lane,	0.2	No		-						
					_						
368	Barnet Court, Hill Crest,	0.0	No	[3]	1						
371	171 Mutton Lane	0.0	No								
				[3]							
S79	Garages at Coningsby Drive.	0.1	Yes								
			l		6						
882	195 Darkes Lane,	0.3	Yes	[0]							
2400	0011 # 5 :		١	[2]							
3130	23 Heath Drive	0.1	No	[2]							
2400	Landard Alexandria October			[3]							
\$138	Land at Aberdale Gardens	0.2	No								
2151	Potters Bar Carpark	0.4	Vaa								
3151	rollers bar Carpark	0.4	Yes								
21/6	NIBSC Site North, Blanche Lane	5.7	No								
140	NIDOC SILE NOTH, DIAIRCHE LAIR	5.7	INU								
3159	Elm Court, 363 Mutton Lane	2.2	Yes								
	Sourt, Soo Matton Lane						22				
3160	Former Cranbourne Library and	0.1	Yes		1						
50	Clinic, Mutton Lane	٥.,	l	7							
3161	Bridgefoot farm	8.5	No						Ī		
		0.0						123			
3162	Land to the south east of Potters	17.4	No						•		
	Bar and north of M25		"							151	
	Potters Bar, Ridge and Shenley										

 <sup>[1]</sup> Site acknowledged to have potential but specific yield figure not included in housing supply
 [2] Included in draft stakeholder report - site yield now counted within commitments.
 [3] Assessed as 1 unit and therefore not significant part of housing land supply

Last updated 17-6-2010

Appendix 3c Sites in Bushey, Aldenham and Patchetts Green.

	DendIX 3C Sites in Bus AA Sites in Bushey, Aldenhan					attric	itis On	cerr.			
OIIL	AA Oites in Busiley, Aideiman	ii da i a		is Oreen		licy context			Gree	n Belt sites	
Ref	Site Address	Site	PDL	0-5 yr	6-10 yr	11-15yr	16+ or	0-5 yr	6-10 yr	11-15yr	16+ or
		Area					unknown				unknown
00		(ha)									
S3	Closed swimming pool and grounds, Falconer Road	0.4	Yes					12			
S9	Birchville Court, Heathbourne Road	0.9	Yes					25			
S10	Bushey Hall Farm	19.0	No						ļ		
S21	Metropolitan Police Sports Club, Aldenham Road	14.7	No								
S23	23 Glencoe Road, Bushey (an	0.1	Yes								
S24	unused ice cream depot)  Land adjacent to the Ramada Hotel, A41 Watford Bypass	3.6	No	6	l						
S31	Former West Herts College Annexe, William Street	2.3	No								
S33	Bushey Hall Golf Course	41.4	No								
S34	Land off Hartspring Lane	1.2	No						_		
S36	Land east of Farm Way	1.0	No					36			
S38	White Cottage and Roundcroft Kennels, Sandy Lane, Bushey	0.9	Yes						1		
S41	Attenboroughs Fields (Land at Merry Hill Road)	4.9	No								
S42	Land at Little Bushey Lane	7.7	No					162			
S43	10 acre site Hartsping Lane (Winfield Yard)	2.2	Yes						J		
S48	Patchetts Green Equestrian Centre	3.6	Yes								
S49	Land to the rear of Richfield Road and Clarks Mead	1.1	No	16							
S57	Haydon Dell Industrial Estate	1.0	Yes		ı			39	]		
S58	Land off Bushey Hall Road to east of rail line	0.9	No								
S72	Rossway Industrial Estate, Rossway Drive,	1.8	Yes		46						
S74	121 - 123 Aldenham Road,	0.2	No	6							
S77	4 Clarence Close,	0.1	No		-						
S78	Land Rear of 24 Melbourne Road	0.1	No	2							
S80	Roundbush Garage, Round Bush	0.2	Yes	_							
S81	Lane, 125-127 High Road,	0.2	Yes	<u>5</u> 8	l I						
S84	2a Windmill Lane and 164-168 High	0.2	No	20							
S87	Road 2-8 Hartsbourne Road	0.4	No		l						
S134	The Otter Public House, 506 Bushey	0.2	Yes	8							
S135	Mill Lane Herne House, 3 Little Bushey Lane	0.2	Yes	8							
S136	Land at Caldecote Gardens	0.6	No	23							
	5 Grange Road	0.0	No	[1]							
	Pegmire Lane, Pattchets Green	0.1	No	<u> </u>	l						
ТОТА	L	111.5		102	46	0	0	274	0	0	0
											lata d 47 C 0044

[1] Assessed as 1 unit and therefore not significant part of housing land supply

Last updated 17-6-2010

# Appendix 3d SHLAA Sites in Elstree, Shenley & Radlett

					Existing Po	licy Context			Green B	elt Sites	
Ref	Site Address	Site Area (ha)	PDL	0-5 yr	6-10 yr	11-15yr	16+ or unknown	0-5 yr	6-10 yr	11-15yr	16+ or unknown
S1	Tokonoma Bonsai Nursery, 14 Shenley Road	0.5	No	13							
S20	Land to West of Shenley Hospital and North of Cricket Ground	31.8	Yes		-			24			
S25	43 London Road	3.0	Yes								
S30	The Rise and r/o Clare Close	6.2	No						_		
S51	Land at Fortune Oaks, Fortune Lane	2.3	No					28			
S70	High Carrs, Barnet Lane,	0.1	No						4		
S73	54 Sullivan Way,	0.2	No	1							
S75	Stoneycroft & The Bungalow, Fortune Lane	0.2	No	7							
S83	Elstree Free Church, High Street,	0.6	Yes	3							
S85	South Medburn Farm, Watling Street,	0.3	No		1						
	Total	45.3		24	0	0	0	52	0	0	0

Last updated 17-6-2010

SHL	AA sites in Radlett										
					Existing Po	licy Context			Green B	elt Sites	
Ref	Site Address	Site Area (ha)	PDL	0-5 yr	6-10 yr	11-15yr	16+ or unknown	0-5 yr	6-10 yr	11-15yr	16+ or unknown
S6	Starveacres', 16 Watford Road	2.8	No							55	
S7	Kemprow Farm, Cemex Land	44.3	No								
S17	Scrubland off Loom Lane	0.9	No								
S19	Land r/o The Warren	19.7	No								
S22	Land owned by Wood Hall	7.3	No								
	Securities										
S26	Rear of 18 Cobden Hill	12.0	No		_						
S46	Former Fire Station [1]	0.1	Yes	6							
S60	Land rear of the Warren	1.8	No		-						
S63	2-3 Theobald Street,	0.1	No								
S69	65-67 Goodyers Avenue,	0.3	No		_						
S86	High Gable, The Pathway,	0.2	No	1							
S145	Moses Dell, Watling Street	2.1	No								
S147	The Fruit Farm, Common Lane	0.9	No								
	Total	92.5		7	0	0	0	0	0	55	0

[1] Assessed Housing potential subject to planning brief or future studies

Last updated 17-6-2010

Appendix 4

Ref	`Objector	Date	Site Details	Comments Made	Council Response
		Received			
	OGY-RELATED REPRES				T
001	Robson Planning Consultancy on behalf of Gilston Investments	4/02/2010	Gilston Sites around Bushey and Borehamwood.	Questions five year land supply Suggests that SHLAA demands a wider Green belt review.	These are matters better addressed through the Core Strategy. No changes to be made to study
002	Pro-Vision Planning on behalf of KPWG Intl.	04/02/2010	(S8) Land E. of Theobald Street	SHLAA should take account of RSS roll-forward.	EERA has consulted on a number of housing and employment growth scenarios. The draft roll-forward document proposes a continuation of current development rates. However it is not clear whether the review will be taken forward and therefore does not provide a basis for testing SHLAA findings.
				Question the definition and reliance on the 'areas of search in the SHLAA. This should be reconsidered now the core strategy has been withdrawn.	The areas of search form part of the agreed study methodology. The objector has the opportunity to test this issue through the Core Strategy consultation. No changes to be made to SHLAA
003	Barton Wilmore	18/1/10	Land SE of Ramada Jarvis Hotel)	Question urban extensions approach as introducing constraints to the SHLAA. which is not in the guidance	Noted but scoping issues were addressed in methodology which was subject to consultation.
				Question whether Council should now consider a joint SHLAA	Even with a revised date for core strategy submission, this would add further delay.
				Consider implementation rates are too optimistic given current market and HBF comments on build-out rates. Also highlight that a number of committed schemes may be due to lapse.	The commitments (see Appendix 2) have been reviewed as well as the approach to the trajectory (see para 4.54)

Boreham	wood				
004	Herts CC (as landowner)	5/02.2010	Various sites	Support inclusion of HCC sites but suggest sites S14 and S15 in Elstree Way are included as developable in the long term as SPD being prepared for the area	Agree these sites should be considered as developable in the long term but do not consider it appropriate to put site specific housing estimates into the SHLAA at this stage. This will be reviewed as work on regeneration and development options on Elstree Way emerges.
005	Brasier Freeth on behalf of clients	8/02/10	(S32) Land to r/o 2-22 Hartfield Avenue, Elstree	Object to assessment that site is unsuitable and not available. for housing	Site assessment amended to indicate site is available. It remains a discounted site in the SHLAA on the basis of accessibility.
006	D Rinsler on behalf of Owner (Mr J Onona)	5/02/2010	Byron Avenue/ Barnet Lane	Suggest developability of site is re-assessed on basis that a viable pedestrian link can be made to town centre	The potential to create a pedestrian link is noted but does not appear to be straightforward to deliver. It is considered this should remain a discounted site in the SHLAA based on accessibility grounds.
002	Pro-Vision Planning on behalf of KPWG Intl.	04/02/2010	(S8) Land E. of Theobald Street	Object to site assessment which appears to restrict developable area and may also preclude the need for enabling access from Theobald Street. Assessment should acknowledge a wider scale of development is possible	For the purposes of the SHLAA study, the 11 Ha area included in the SHLAA estimates is considered to meet the accessibility criteria. This would not be consistent with inclusion of a wider area. However the site assessment has been amended to acknowledge the issue of access.
007	Mark Wilson on behalf of National Grid.		(S129) National Grid Site, Station Rd, Borehamwood	Seek an adjacent site in same ownership to be included in the assessment and suggest timeframe is brought forward.	An enlarged site was included in the draft SHLAA. Site boundary maps ,yield and timing have been amended although original site area was found to be overstated in any case.
001	Gilston Investments		S52 Land East of Borehamwood (site A)	Object to Sites (S52/53) being delayed to years 6-10 as only based on workshop discussion.	The site assessment acknowledges the agents view that the land could be made available earlier. While no specific requirement of enabling infrastructure has been identified, it appears reasonable that it is counted towards medium-term supply.
			S53 Land East of Borehamwood (site B)	This site should be reconsidered as a sustainable urban extension to Borehamwood	These sites have been discounted from 15 year supply on sustainability grounds. However they are located within the Core Strategy Areas of Search so should not be discounted entirely.

008	Scott Wilson	18/2/2010	S56 Baker Street, Potters Bar (site E)	This site should be reconsidered as adjacent to other areas considered suitable  Note inclusion of site but	SHLAA amended and site moved to 0-5 yr
000	Goott Wilson	10/2/2010	Haberdashers Sports Ground, Croxdale Rd	expect land to be available within 5 years as alternative sports facilities will be in place by 2011	category.
Bushey					
009	Rolfe Judd on behalf of Zog Investments		(S31) W Herts College Annexe	Object to assessment that site S31 is not sustainable.	The accessibility of this site has been re-assessed as it is close to the boundary with Watford and to consider its relative proximity to Watford High Street station. Overall, it is considered this site should remain as discounted as it does not meet the accessibility criteria set out in the SHLAA methodology. However, the site assessment has been amended to acknowledge that this position could change if local transport links were improved.
			(S57)Haydon Dell Farm, Bushey	Support assessment subject to correction of site description	Correction made – However original site yield calculation appears to be incorrect and has been revised.
010	Aldenham Parish Council	4/2/2010	Pegmire Lane, Patchetts Green	Submitted details of a site in Pegmire Lane (29/09/09) but this was not included in document	Site will be added for completeness but does not meet the accessibility criteria in the SHLAA. If it was to come forward as a rural exception site for village housing it would be treated as 'windfall' rather than 15 year supply.
011	ArchKingtech Ltd	21/0110	(S09) Birchville Court, Bushey	Support assessment but suggest larger site is considered than shown in maps	Site assessment and yield revised to include the two haulage yards as promoted.
012	Josie Mann (Bidwells) on behalf of landowner	2/2/2010	(S41) Attenborough Fields	Object to assessment that site is unsuitable for housing – have re-submitted details.	The accessibility criteria forms part of the agreed methodology of the study. It is not considered there is any reason to change the site assessment on the basis of the information submitted.

013	PPML Consulting on behalf of Annington Property	3/2/2010	(S36) Land E. of Farm Way, Bushey	Support assessment of suitability but object to assessment that site cannot be accessed.	Further details submitted to demonstrate access and deliverable scheme. Site assessment has been updated and included in SHLAA estimates.
014	PGA Design Consulting	25/01/10	(S33) Bushey Hall Golf Club	Object to not being invited to workshop. This land is suitable and available. Consider this site has not been properly assessed when compared with Potters Bar Golf club.	Site assessment has been amended to correct availability of the site. It remains a discounted site in the SHLAA on the basis of accessibility and suitability for housing.
003	Barton Wilmore	18/1/10	Land SE of Ramada Jarvis Hotel	Object to assessment that site is not available and unsuitable for housing development	Site assessment has been amended to correct availability of the site. It remains a discounted site in the SHLAA on the basis of accessibility and suitability for housing.
Radlett					
015	Mr Homan, Starveacres	29/01/10	Starveacres, Radlett	Object to status of site which does not take account of Local Plan 'safeguarded status'	Site assessment revised as long-term deliverable site and site use amended.
016	Alex Wilson (Drivers Jonas) on behalf of CEMEX	5/02/2010	Kemprow Farm, Radlett (S7)	Object to the assessment that site S7 is not sustainable.	The accessibility criteria forms part of the agreed methodology of the study. The frequency of bus services do not meet the peak criteria in para 4.34. It remains a discounted site in the SHLAA on the basis of accessibility and suitability for housing.
017	DLA Town Planning on behalf of Owner	22/01/10	(S60) Land r/o The Warren	Consider site is 'deliverable'.	Site assessment amended to indicate site is available. It remains a discounted site in the SHLAA on the basis of accessibility.
Potters Bar					
018	J Beardsell on behalf of Potters Bar Golf Club	4/02/2010	Potters Bar GC	Confirmed they have no further comments to make at this stage	Noted
001	Gilston Investments		Sites E (S56)	Consider site E is suitable for housing and yields would be much higher than indicated on the other sites	See comment for S53 Borehamwood)

OTHER COM	MMENTS				
019	Herts CC as	21/01/10		No objections in principle but	Noted
	Highways Authority			suggest some minor clarifications/corrections	
020	D Raine on behalf of	02/02/10	(S1)Tokonoma	Support the document in	Noted
	landowner		Bonsai	relation to this site.	
021	Potters Bar Society	04/02/10		Raises some general concerns	Noted
				about development in Potters	
				Bar and seeks some	
				clarifications on status of the	
				document.	
001	Robson Planning	. 4/02/2010	Gilston Sites	Agreed amendments to	Comments added for S55 and S57
	Consultancy		around Bushey	workshop minutes (6 <sup>th</sup> October	
			and Borehamwood	2009) have not been made	