

***Epping Forest District Council
Strategic Housing Land Availability Assessment
Draft Methodology for Consultation
April 2011***

Introduction

1. This document proposes the method to be used for carrying out a Strategic Housing Land Availability Assessment (SHLAA). The SHLAA is an important part of the evidence base to support the delivery of sufficient land for housing to meet the local need for more homes.
2. The methodology has been prepared in accordance with Strategic Housing Land Availability Assessments, Practice Guidance published by the Department for Communities and Local Government (July 2007).

Local Planning Context

3. Local planning authorities in England and Wales are required to produce a Local Development Framework (LDF) containing policies to guide development within their area. Epping Forest District Council is in the process of producing an LDF to replace the existing Local Plan and Alterations.
4. The key document in the LDF is the Core Strategy which will make decisions about the locations for new housing, employment, infrastructure and community facilities within Epping Forest District. The SHLAA will provide information on potential housing sites within the district to assist the decisions that will be made in the Core Strategy. It is important to note that the SHLAA will only provide background information on potential housing sites. The SHLAA is not a policy document.
5. The Government has publicised its intention to abolish Regional Spatial Strategies, including the review of the East of England Plan (EEP) which was intended to look forward to 2031, and all their associated housing and employment land targets. Abolition is now expected in early 2012 when the Localism and Decentralisation Bill is enacted. The Core Strategy will therefore need to set new, locally derived, housing targets for the district for the period up to 2031.
6. The Bill also contains a provision concerning a “duty to co-operate” with adjoining authorities, and it is anticipated that this will be strengthened which means that continued co-ordinated working, particularly with Harlow, will be expected. Urban extensions of the town, but within this district, will therefore remain an option while the new housing targets are being established. The main difference will be that those housing numbers would now count towards this Council’s figures rather than Harlow’s, as was the case under the EEP.

National Planning Policy

7. The national approach to planning for housing is contained in Planning Policy Statement 3: Housing (PPS3) which seeks to provide a ready supply of land for housing to meet future demand and needs. To ensure there is sufficient land available at the local level PPS3 requires planning authorities to carry out an assessment of land supply for housing in their area known as the SHLAA.. The Assessment should identify:
 - specific deliverable sites for the first five years of a plan that are ready for development – this information is to be kept up to date and topped up as sites are developed;
 - specific developable sites for years 6-10, and ideally years 11-15, in plans to enable the five year supply to be topped up¹.
8. For years 11-15 broad locations for growth can be indicated where it is not possible to identify specific sites. An allowance for windfall sites² should not be made for the first 10 years of the plan. However, where local circumstances make it difficult to identify specific sites, a windfall allowance may be justified.

Purpose of the SHLAA

9. The role of the SHLAA is to identify sites with potential for housing in appropriate locations; assess their potential; and assess when they are likely to be developed.

Overall aim of the SHLAA

10. According to the Practice Guidance the SHLAA should aim to achieve the following outcomes:
 - i. A list of sites, cross referenced to maps showing locations and boundaries of specific sites (or broad locations where applicable);
 - ii. An assessment of each site's deliverability/developability and a realistic timescale for when the site is expected to be developed i.e. during the period 0-5 years, 6-10 years or 11-15 years;
 - iii. An estimate of the potential number of houses that could be developed on the site;
 - iv. Provide details of any constraints on the site;
 - v. Recommendations on how these constraints could be overcome and when.

Partnership Approach

11. Where possible the SHLAA should be carried out at the level of the Housing Market Area which usually extends across the boundary of neighbouring local authorities. A number of Housing Market Areas have been identified in the sub-region, and Epping Forest District actually falls within 5 separate areas, so it is not possible to adopt this approach.

1 Strategic Housing Land Availability Assessments, Practice Guidance – Department for Communities and Local Government (July 2007)

2 Windfall – a housing site that was not allocated by local planning policy and becomes available for development at a later date

12. A joint Housing Market Assessment has been carried out for the local authorities in the sub-region known as the M11/London Commuter Belt East. This area comprises the districts of Uttlesford, Epping Forest, Harlow, Brentwood, East Hertfordshire and Broxbourne. Given the different stages of preparation of their individual Core Strategies, it was decided that it was not practical to prepare the SHLAA in partnership with these neighbouring authorities, so this SHLAA is to be prepared for the area of Epping Forest District only. This approach is acceptable under the Practice Guidance. The other authorities in the Housing Market Assessment Area will be consulted on the Epping Forest SHLAA, in particular East Hertfordshire and Harlow.

Key Local Stakeholders

13. The work of producing the SHLAA will include the input of key local stakeholders such as house builders, social landlords, planning agents, town/parish councils and any other agencies that have a recognised interest in the district. These key local stakeholders ('the SHLAA Partnership') will be consulted on this methodology and their views will help to shape the way in which the SHLAA is carried out. In addition, the views of key local stakeholders will be sought in assessing the deliverability and developability of potential sites.

Stages in the Methodology

14. These stages are set out below and follow the approach given in the Practice Guidance.
 - 1) Planning the Assessment
 - 2) Determining which sources of sites will be included in the Assessment
 - 3) Desktop review of existing information
 - 4) Assessing which sites and areas will be surveyed
 - 5) Carrying out the survey
 - 6) Estimating the housing potential of each site
 - 7) Assessing when and whether sites are likely to be developed
 - i. Assessing suitability for housing
 - ii. Assessing availability for housing
 - iii. Assessing achievability for housing
 - iv. Overcoming constraints
 - 8) Review of the Assessment
 - 9) Identifying and assessing the housing potential of broad locations (where necessary)
 - 10) Determining the housing potential of windfall (where justified)
15. The Forward Planning team at Epping Forest District Council will manage the production of the SHLAA via the appointed consultants. The team has extensive knowledge of local policies and the development of housing sites within the District which will be relayed to the appointed consultants. At different stages other officers of the Council will be needed to provide specific assistance (see Stages 6 and 7). Consultation with key local stakeholders will ensure that the assessment is properly conducted to the expected level of detail and in accordance with the Practice Guidance.

Stage 2: Determining which sources of sites will be included in the Assessment

16. Table 1 below lists the sources of potential sites that will be considered in the assessment. If any other sources of potential sites become apparent during the Assessment these will also be investigated.

Table 1

Sites in the planning process	
Source of potential sites	Source of information
Unimplemented planning permissions for housing	In-house database
Planning permissions for housing under construction	In-house database
Housing allocations	Local Plan and Alterations
All other land allocations	Local Plan and Alterations
Sites not currently in the planning process	
Vacant and derelict land and buildings	National Land Use Database Urban Housing Capacity Study 2002 Empty Property register Valuation office database LPA vacant property registers (industrial and commercial) Commercial property databases English House Condition Survey
Surplus public sector land	Essex County Council Land Terrier Primary Care Trust(s) Environment Agency British Waterways Contact Utility companies for Land holdings EFDC Land Terrier via Asset Management Group Register of Surplus Public Sector Land
Land in non-residential use which may be suitable for redevelopment for housing	Urban Housing Capacity study 2002 National Land Use Database Call for Sites Site visits Desktop survey
Additional housing opportunities in established residential areas	Urban Housing Capacity Study 2002 Desktop survey using Aerial Photographs Site visits
Large scale redevelopment and redesign of existing residential areas	Call for Sites Development and Design Brief St John's, Epping Broadway Options Development Brief, Debden Broadway Site visits
Sites in rural settlements and rural exception sites	Local Plan representations that were not allocated. Call for Sites

	Parish Council information Site visits
Urban extensions	Call for Sites
New free standing settlements	Call for Sites

17. Wherever possible the initial assessment will not exclude consideration of any type of land. The exceptions will be those sites that have particular designations and are protected from harmful development, for example Sites of Special Scientific Interest.

Stage 3: Desktop review of existing information

18. The sources of information for potential sites have been listed in Table 1 above. A Call for Sites exercise was commenced in 2008 to enable landowners, developers and members of the public to put forward potential development sites. Due to the delay in producing the Core Strategy, sites being put forward under the Call for Sites process are still currently being accepted.
19. Apart from setting out the sources of information, another key aspect is deciding the size of sites that will be included in the assessment. It is possible to look at all sites that have potential for at least one dwelling. However the total housing yield from that exercise would be unlikely to justify the amount of extra work involved. Analysis of the information for the 5 year housing land supply for the District shows that while there are a considerable number of small sites they contribute a relatively small number of dwellings to the overall housing supply. A 5 year housing land supply can still be achieved even when those sites with five or less dwellings are removed from the figures.
20. It is proposed that thresholds of 6 dwellings minimum per site, or a minimum site area of 0.2 hectares are set. This area allows for 6 dwellings at a density of 30 dwellings per hectare.
21. As part of the desktop review each site will be assessed against a Site Appraisal Sheet (see Appendix to this report). This asks a series of standard questions that draw out further information about each site and its potential suitability for housing development.
22. All the sites identified by the desktop review will be listed and mapped at the scale of 1:1250.

Stage 4: Assessing which sites and areas will be surveyed

23. All the sites identified by the desktop review will be visited. In addition to considering all identified sites attention will be paid to the following:
- Current development hotspots that are the focus of recent planning permissions which give an indication of current market demand;
 - Town and district centres and an area within 10 minutes walking time of these centres (up to 800 metres is approximately a 10 minute walk time);
 - Principal public transport corridors and their walking catchment areas.

24. The survey of potential sites will follow a sequence with the most sustainable sites considered first. In this context the sequence will be:
- urban brownfield sites in the main towns located close to existing public transport routes;
 - brownfield sites in the main towns;
 - brownfield sites surrounding the main towns;
 - greenfield sites around the main towns;
 - brownfield sites in smaller settlements;
 - sites on the edge of smaller settlements;
 - brownfield sites located away from existing settlements; and finally
 - greenfield sites located away from settlements.
25. The above sequence is based on the guidance in PPS3 to give preference to brownfield sites in urban areas particularly where located close to existing public transport links and infrastructure, eg a town or district centre. Any site in the above sequence that is located close to existing public transport links will be considered more sustainable and preferred over a similarly located site that is not as close to such links.

Stage 5: Carrying out the survey

26. A standard site visit sheet will be used by all those carrying out the survey, to ensure a consistent approach.

Stage 6: Estimating the housing potential of each site

27. The housing potential for each surveyed site will be guided by the dwelling densities that are appropriate to that particular area of the District. It may be worthwhile in some cases to consider a number of different densities, which will give a range of different housing figures, but all details and assumptions should be appropriately recorded.
28. Where an estimation of potential has already been made this will be used e.g. unimplemented planning permissions, pre-application discussions, development briefs.
29. For other sites the estimate will take into account the context of the location and existing dwelling densities. This will be combined with using examples of recent schemes in other similar areas to determine an appropriate density.

Stage 7: Assessing when and whether sites are likely to be developed

30. In deciding when and whether development is likely to occur consideration must be given to the suitability, availability and achievability of the site. Any constraints and whether they can be overcome should also be considered.
- Suitability – a site would be considered suitable for housing development if it offers an appropriate location for development and would contribute to the creation of sustainable mixed communities. Factors to be considered include (a) planning policy restrictions; (b) physical problems or limitations such as access, flood risk or contamination; (c) potential impacts such as effect on

landscape features or natural habitats; and (f) environmental conditions that would be experienced by prospective residents;

- Availability – this depends on (1) there being no restrictions in terms of legal ownership, (2) an owner prepared to sell for development or (3) a developer expressing interest to develop the site. Planning permission does not necessarily indicate availability if, for example, a landowner is not willing to sell the site. Assessment will be made on the best available information on the ownership and legal status of a site;
- Achievability – where the economic conditions allow for development at a particular time the site can be considered achievable. Essentially the cost of development needs to be balanced against the eventual value of the dwellings when sold. To gauge whether a site is economically viable for development, views will be sought from Council officers, housebuilders and developers/agents to gain an understanding of viability. Their comments on the selected sites can then be used to check whether conclusions drawn on the economic viability of the remaining sites are correct;
- Overcoming constraints – Any constraints and the actions needed to overcome them will be considered. For example a new road access may be needed to make development possible.

31. A conclusion can then be reached about whether, according to the Practice Guidance, the site is deliverable or developable.

- Deliverable – this is where (1) a site is available immediately, (2) it offers an appropriate location for housing development and (3) there is a reasonable prospect that housing will be delivered on the site within five years from the date of adoption of the plan.
- Developable – this means that a site should be in an appropriate 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.

32. It is important to note, however, that the identification of a site in the SHLAA does not mean it will ultimately be found to be a suitable development site. Allocation of sites for housing purposes will be via the Local Development Framework.

Stage 8: Review of the Assessment

33. Once stages 6 and 7 are completed a list of sites will have been generated where the housing potential of each site has been assessed and a judgement made on when the site could come forward for development. A map showing the boundary of each site will also be produced.

34. The information collected will be used in updating the five year land supply of deliverable housing sites and will also be used to produce a housing trajectory showing when potential housing sites are likely to come forward up to 2031.

35. The collated information will be set out in a spreadsheet showing the likely delivery of the identified sites with housing potential over the periods 0 to 5 years, 6 to 10 years and 11-15 years as required. The 15 year period covered by the SHLAA would start in 2014 when it is intended the Core Strategy will be adopted.

Stage 9: Identifying and assessing the housing potential of broad locations (where necessary)

36. If insufficient sites have been found the next step would be to identify broad locations for housing development. These would give some indication to the local community about where future development will be directed and provide some certainty to developers about where development will be encouraged. If it is necessary to find broad locations for housing development regard will be had to the nature and scale of opportunities in the area identified and market conditions.

Stage 10: Determining the housing potential of windfall (where justified)

37. PPS3 makes it clear that, where possible, the supply of land for housing should be based on specific sites or, where necessary, broad locations as these provide a more positive approach with greater certainty over the future direction of housing growth. The intention is therefore not to make an allowance for windfall sites as part of the housing supply. This position will be kept under review as the SHLAA progresses.

Appendix 1

Key Stakeholders for Consultation

Strategic Housing Market Assessment (SHMA) Neighbouring Councils

Borough of Broxbourne
Brentwood Borough Council
East Hertfordshire District Council
Harlow Council
Uttlesford District Council

Other Neighbouring Authorities

Chelmsford Borough Council
Enfield Council
Havering London Borough
Redbridge Council
Waltham Forest Council

Housing Associations

East Thames Housing Group (Dan Read, 0208 522 2000 email: dan.read@eastthames.co.uk)
Hastoe Housing Association (Ulrike Maccariello, 01799 522901 email: umaccariello@hastoe.com)
London and Quadrant Housing Trust (Andrew Clarke, 0208 535 2931 email: aclarke.lqgroup.org.uk)
Moat Housing Group (Paul Martin, 01621 841180 email: paul.martin@moat.co.uk)
Warden Housing Association (Home Group) (Jay Rutnam, 01279 621621 email: jay.rutnam@homegroup.org.uk)

Town/Parish Councils

Abbess, Beauchamp and Berners Roding Parish Council
Buckhurst Hill Parish Council
Chigwell Parish Council
Epping Town Council
Epping Upland Parish Council
Fyfield Parish Council
High Ongar Parish Council
Lambourne Parish Council
Loughton Town Council
Matching Parish Council
Moreton, Bobbingworth and the Lavers Parish Council
Nazeing Parish Council
North Weald Bassett Parish Council
Ongar Town Council
Roydon Parish Council
Sheering Parish Council
Stanford Rivers Parish Council
Stapleford Abbots Parish Council
Stapleford Tawney Parish Council
Theydon Bois Parish Council
Theydon Garnon Parish Council

Theydon Mount Parish Council
Waltham Abbey Town Council
Willingale Parish Council

Housebuilders or Planning Agents

Andrew Newman
BB Partnership
Bellway Homes Essex
Bidwells
BRD Tech
Clear Designs
Colin Southgate
Crest Nicholson (Eastern) Ltd
Darren Hunt
David Sadler
Hill Partnerships
Higgins Homes Plc
JB Planning
JCN Design Ltd
JSP Partnerships
JTS Partnership
Ken Fox
Ken Judge
Martyn Pattie
Redrow Homes Eastern Ltd
Sworders Agricultural
White & Mileson

Other Agencies/Bodies

Corporation of London
English Heritage
Environment Agency
Essex County Council
Lee Valley Regional Park Authority
Natural England