



Nathaniel Lichfield
& Partners

Planning. Design. Economics.



Epping Forest District Council
**Strategic Land Availability
Assessment**

Main Report

May 2012



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**Epping Forest Strategic Land Availability
Assessment (SLAA)**

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Epping Forest District Council

May 2012

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Glossary

Suitability

The acceptability of the site, in planning terms, for accommodating development whilst minimising any adverse impacts.

Availability

The extent to which the legal ownership, or interests in the land, could prevent development from occurring.

Achievability

The overall economic viability of delivering development on the site.

Deliverable

To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable.

Developable

To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

Windfall(s)

Windfall sites are those that come forward for development but have not been specifically identified in the local plan process. They will include the many small developments which deliver new homes. For the purposes of this study, a windfall site includes any development of up to 5 dwellings or less than 0.2 ha. Windfalls and smaller sites can be considered separately if necessary in the Local Plan process for rural locations where even small developments represent significant growth.

1.0 Introduction

- 1.1 Nathaniel Lichfield & Partners (NLP) was appointed by Epping Forest District Council (EFDC) to undertake a Strategic Land Availability Assessment (SLAA) for the District.

Scope of Study

- 1.2 Epping Forest District Council must plan positively and seek opportunities to meet the future development needs of the District¹. This means finding where to put homes, offices, shops and business premises, although this has to be balanced against policies, inter alia, protecting the Green Belt, heritage and natural resources.
- 1.3 The purpose of this Strategic Land Availability Assessment (SLAA) is to assess sites throughout the District to identify the extent of their potential for housing, employment or retail development. The information from this assessment will then be used to develop options for future growth for the new Local Plan. The National Planning Policy Framework (NPPF) published in March 2012 states that all Local Planning Authorities should (para 159):
- “prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.”*
- 1.4 Local Planning Authorities should also (para 161):
- “assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments.”*
- 1.5 The study surveys sites, assessing their potential for housing, employment and/or retail development considering the **suitability, availability** and **achievability** of identified sites for development in order to arrive at conclusions on **deliverability** and **developability**. To this end this SLAA identifies and provides an initial appraisal of sites which the Council may want to test and consider for allocation through the current Local Plan process, providing evidence on site specific factors to enable comparison of the options available to meet development needs in the District. The study applies the methodology developed by EFDC, which underwent public consultation in November 2011. The study has also been undertaken in conformity with The Strategic Housing Land Availability Assessments Practice Guidance (2007) published by the Department for Communities and Local Government (CLG).

¹ NPPF Paragraph 14

- 1.6 Strategic Housing Land Availability Assessments have emerged as having a critical role within the planning evidence base and are particularly important in contributing towards the delivery of housing. The pending revocation of Regional Strategies and the local authority housing targets contained within them means that in the future the onus for setting housing and other development targets will fall upon Local Planning Authorities. The SLAA forms an important part of the evidence base informing the approach to planning for development in Epping Forest District, albeit it is focused on providing a supply side perspective. The need and demand for housing, as well as other forms of development, fall outside the scope of the SLAA. The need for development will be determined by the separately commissioned Essex Planning Officers Association (EPOA) Population and Household Projections, alongside other parts of the evidence such as the Employment Land Review (ELR) and Town Centres Study.

Purpose of the Study

- 1.7 For this reason, it should be noted that, as an evidence base document, the SLAA is only one input into the Local Plan process and will sit alongside other evidence base documents which will allow EFDC to make informed policy decisions. Particularly in relation to the scope of the study it should be noted that:
- a **the SLAA does not allocate land for development or indicate that the Council would support its development.** It merely highlights the potential of land for development against agreed criteria;
 - b the SLAA is not, and is not intended to be, a proxy for a site allocations document within the Local Plan; and
 - c the SLAA site assessments use an agreed, objective and consistent methodology which seeks to capture information on factors, opportunities and constraints as they exist now.
- 1.8 The main purpose of the study is to assess the suitability, availability and achievability of each potential site assessed. Using this information, a judgement can then be made on whether or not the site can be considered to be deliverable or developable for development. The NPPF defines each of these terms:
- “Deliverable – To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and, in particular, that development of the site is viable.*
- Developable – To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged “*
- 1.9 In assessing the deliverability or developability of the sites, CLG guidance (Paragraphs 37 – 40) requires consideration of the following factors:

- Suitability – including relevant policy restrictions, physical problems, potential impacts and the environmental conditions (Stage 7a);
- Availability – no evidence of legal or ownership problems (Stage 7b); and
- Achievability - a judgement about the economic viability of the site affected by market factors, cost factors, and delivery factors (Stage 7c).

1.10 The SLAA looks into each of these factors and seeks to identify sites which have the potential for development over the plan period and can be considered within the Local Plan process. NLP has carried out the Study using the methodology set by EFDC, the CLG guidance and the parameters set out by the Council in the consultants' brief for undertaking the SLAA. A further review of the methodology has also been carried out subsequent to the publication of the NPPF.

Structure of the Report

1.11 The report, which is focused upon answering the key questions posed by the CLG SHLAA Guidance, is structured as follows:

- Section 2: Methodology
- Section 3: Parameters, Source Data and Database
- Section 4: Initial Site Filtering
- Section 5: Estimating the Development Potential of Sites
- Section 6: Suitability
- Section 7: Availability
- Section 8: Achievability and Overcoming Constraints
- Section 9: Deliverability and Developability
- Section 10: Windfall Housing Delivery
- Section 10: Conclusions and Recommendations

2.0

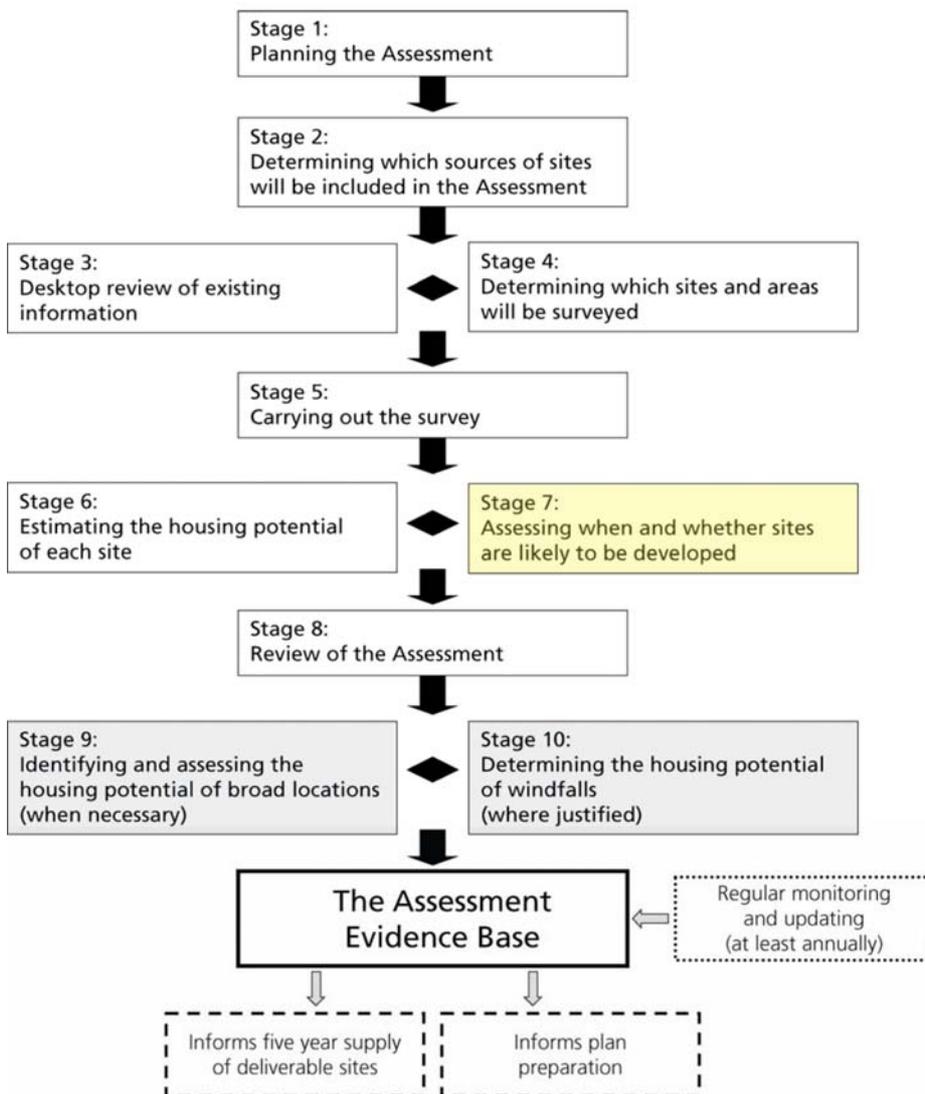
SLAA Methodology

Context

2.1

The Strategic Housing Land Availability Assessments Practice Guidance (2007) published by the Department of Communities and Local Government (CLG) sets out a methodology for the preparation of a Strategic Housing Land Availability Assessment. The principles of the SHLAA methodology are equally applicable to appraising sites for other development uses, including employment and retail development. Below is an extract from the CLG guidance summarising each of the ten main stages of the process (Paragraph 18).

Figure 2.1 SHLAA Methodology



Source: SHLAA Practice Guidance - CLG 2007

2.2

In 2011, the draft Epping Forest District SHLAA methodology was prepared by the Council's Forward Planning team. This methodology was considered by the

Local Development Framework Cabinet Committee and was published for public consultation in late 2011. The consultation used an online survey and hard copy survey, with some people providing independent comments. In total EFDC received 41 responses including from Parish Councils, statutory consultees, developers, site promoters and private individuals. This informed the finalisation of a methodology which NLP has subsequently applied in the SLAA. The methodology reflects CLG guidance and sets out what tasks need to be undertaken at each stage.

- 2.3 The full methodology is contained within Appendix 1 and the main stages are summarised as follows.

Identifying Sites and Initial Filtering

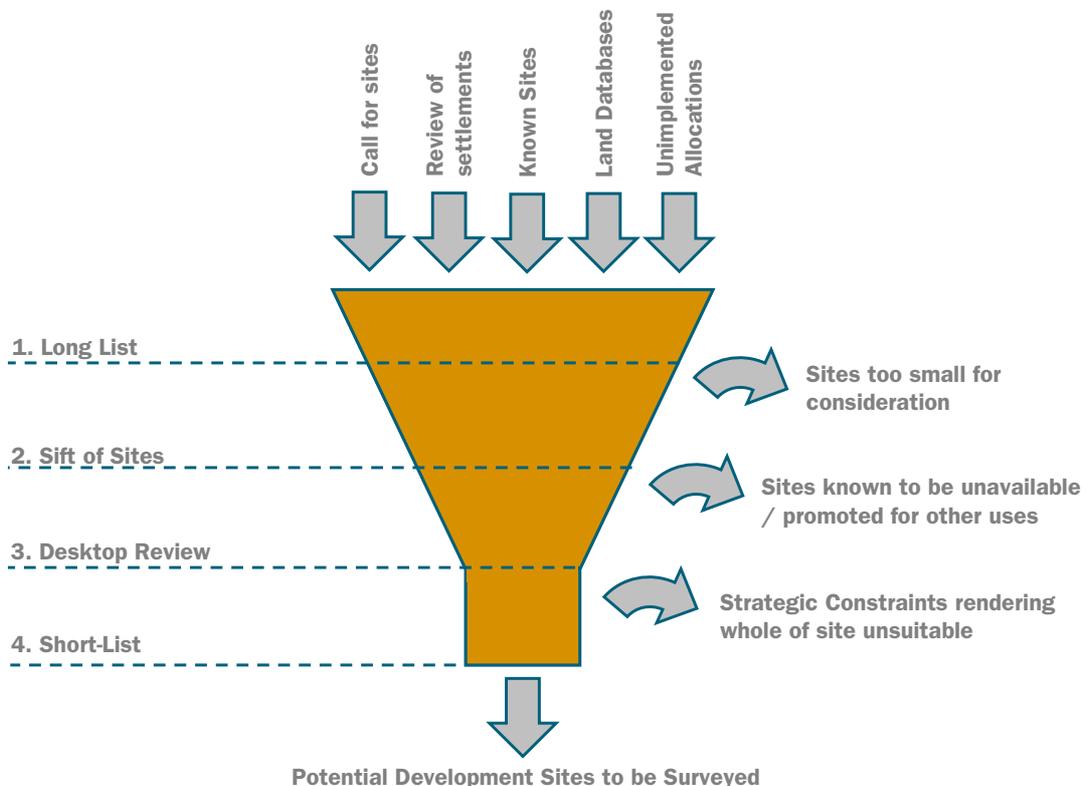
Stages 1 and 2: Planning the assessment and source of sites

- 2.4 In undertaking Stages 1 and 2 of the assessment, EFDC and NLP compiled a 'long list' of sites with potential for housing. This was formed from a variety of sources including;
- a Sites from the Call for Sites:
 - i Sites put forward by local landowners and developers through the Call for Sites exercises undertaken in 2008 and again in 2011. Many parties who submitted sites in 2008 resubmitted sites in 2011, although many had variants on the size of the site and/or number/mix of uses. Additionally many sites were submitted by more than one party with variants on site boundaries, although all of these sites fed into the process initially.
 - b Sites from other Sources:
 - i Sites identified from other evidence base studies, including the Employment Land Review and Town Centres Study as well as development briefs being prepared for Loughton Broadway and St John's Road, Epping;
 - ii Unimplemented allocations and known sites by EFDC officers;
 - iii Potential sites from a review of EFDC land ownership identified within the EFDC Land Terrier Database;
 - iv Other registers of land and buildings, including the HCA register of surplus public sector land and national brownfield land database; and
 - v A review of all land, plots and broad areas adjacent to and surrounding each of the main settlements within the District, to create a ring around each settlement to ensure all options and directions of growth were assessed. This creates a very comprehensive site review, and goes beyond the minimum requirements set out in the CLG SLAA practice guidance.

Stages 3 and 4: Filtering the 'long list' of Sites

- 2.5 NLP filtered the 'long list' of sites as set out in the EFDC SLAA methodology. Sites falling within the following categories were eliminated from further assessment:
- a Sites in rural areas (i.e. outside of settlement boundaries as identified by current Green Belt boundaries) yielding less than 6 units and/or below 0.2ha;
 - b An initial suitability filter based on sites having national/international designations.
- 2.6 In addition, the following sites were also filtered:
- a Sites being put forward for another use (i.e. not housing, employment or retail development);
 - b Sites where the promoter subsequently requested the site be removed from the SLAA process; and
 - c Site proposals that were superseded by a more recent, and amended, proposal on the same site or where a whole site was incorporated into another and could be assessed jointly (e.g. where smaller sites formed part of larger proposals put forward).
- 2.7 This process of filtering is illustrated in Figure 2.2.

Figure 2.2 Filtering Process for Sites



Source: NLP

- 2.8 In total 416 sites were identified as a 'long list'. A total of 44 were filtered and omitted from further assessment, leaving 372 sites to be appraised against the assessment criteria. A further 28 sites were filtered due to strategic constraints, leaving 344 sites to survey in detail as part of the SLAA.

Undertaking the Assessments

Stage 5: Site Survey

- 2.9 Site surveys were undertaken through a desk based assessment using mapping, aerial photography and GIS layers and data to assess policy and physical constraints and identify features of the site.
- 2.10 A site visit was undertaken for each of the 344 sites. This took place during March 2012 and involved recording key features. The site visits were also used as a means of verifying the information provided by the individual/agent promoting the site and also to complement information gained from the desk based assessments. Photographs were taken as a record of each visit and have been supplied to Epping Forest District Council to accompany the SLAA.
- 2.11 Each site was assessed on a constant and objective basis against the criteria set out in EFDC's Site Appraisal Sheet as contained within Appendix 1 of this report. This sets out a traffic light assessment – green, amber, red – against a series of 40 individual site criteria. Each criterion was scored and weighted based on a judgement of the significance of that criterion to allow identification on a sliding scale of how suitable a site is for development. This is shown in the matrix illustrated in Table 2.1.

Table 2.1 Matrix for Scoring Site Suitability Criteria

	Weighting			
Traffic	100%	75%	50%	25%
Green	1	1.25	1.5	1.75
Amber	2	2	2	2
Amber/Red	2.5	2.5	2.5	2.5
Red	3	2.75	2.5	2.25

Source: NLP

- 2.12 Essentially, the closer to 1 (Green) the site scores, the more suitable is the site against the SLAA criteria. The closer to 3 (Red) the less suitable it is. This ensures that the SLAA provides both an absolute measure of whether a site is suitable or unsuitable for development, but also a measure of its relative suitability when compared against other sites in the process. However, this should **not** be seen as a definitive indication of whether the site should be allocated for development as there will be many other factors which inform what sites could be taken forward for consideration in the Local Plan. For example, although a number of sites might be deemed 'suitable' as a result of the application of the Council's methodology, this does not mean they are all 'equally suitable' – some sites are clearly 'better' than others, and in different parts of the District, different suitability criteria may carry more weight than

others. On top of this, there are wider factors of market viability and spatial strategy choices for different locations, which are outside the scope of the SLAA.

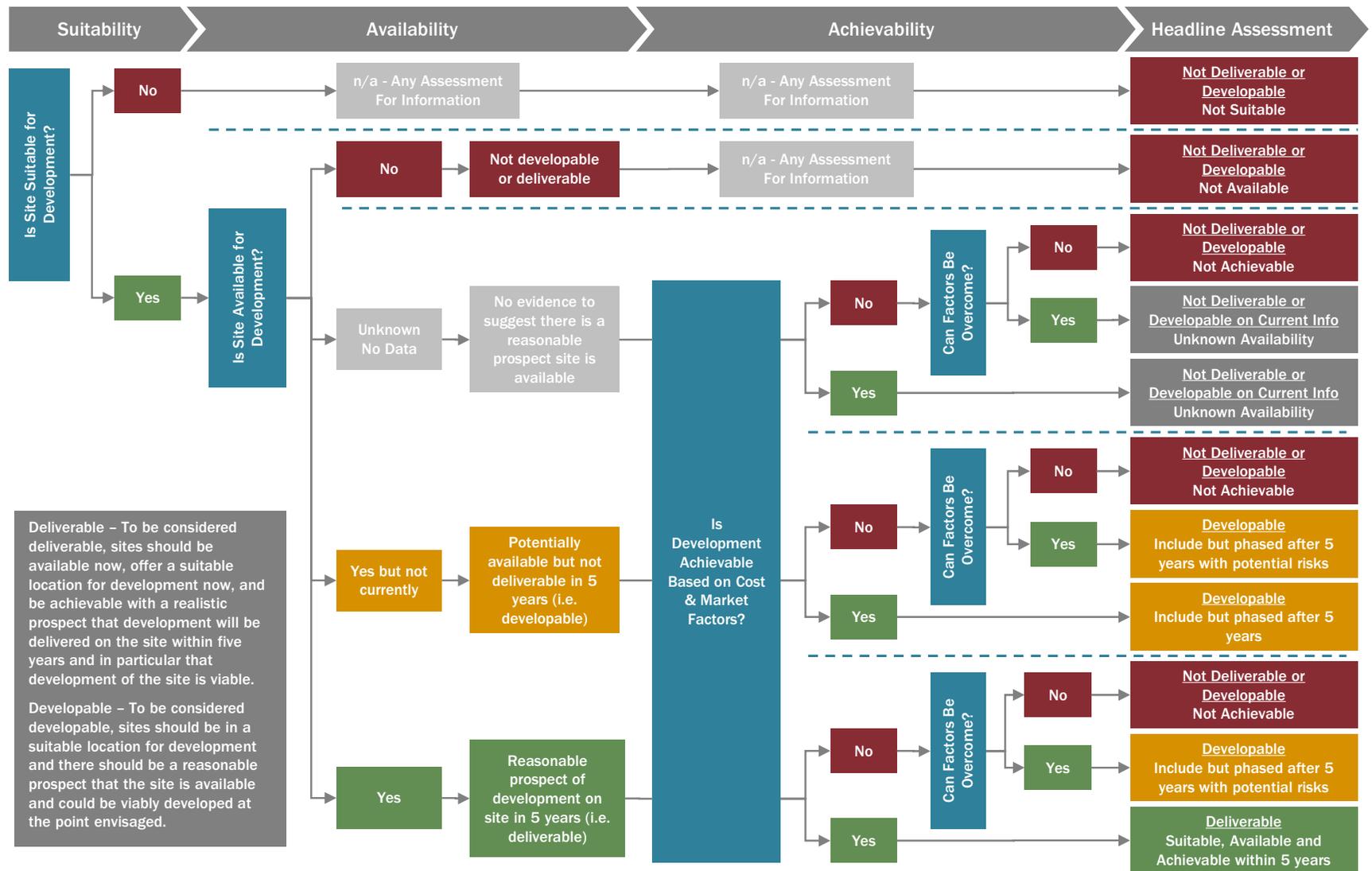
Stage 6: Estimating Housing Potential

- 2.13 An initial dwelling yield for each site was identified either from the site capacity being put forward by site promoters or, where not identified, through a range of density assumptions, depending on the type of site and its location. These initial dwelling yields were then refined based upon individual site characteristics, including where there were particular constraints identified which may reduce the housing potential of a site, to provide an indicative constrained dwelling yield.

Stage 7: Applying the key tests - Decision Tree

- 2.14 The purpose of Stage 7 is to assess the suitability, availability and achievability of each potential site put forward for development. Using this information, a judgement can then be made on whether or not the site can be considered to be 'deliverable' or 'developable'. The definition of these terms is prescribed by national policy, as previously identified.
- 2.15 Stage 7 of the SHLAA looks into each of these factors and seeks to identify sites which will have the potential for development over the plan period. NLP has based this assessment upon the CLG guidance, the EFDC SLAA methodology and NLP's own experience.
- 2.16 The SLAA process is effectively one through which a series of tests are applied to a number of sites. For the purposes of Stage 7 of the SLAA, NLP applied a diagnostic tool, effectively a decision tree, which describes the approach taken, as shown in Figure 2.3.
- 2.17 The decision tree seeks to illustrate how the different tests are applied to arrive at a conclusion on the extent to which they are deliverable or developable, and to inform a phasing judgement. The approach to the application of this decision tree at each stage is described in Sections 5.0 to 7.0.

Figure 2.3 SLAA Decision Tree



Study Process Summary

2.18

Overall, the process of undertaking the SLAA was as follows:

- a **Planning the Assessment:** develop and refine the methodology to apply it in Epping Forest. Review the existing evidence and data collated through the Call for Sites process;
- b **Initial site sieving:** initial sieving process whereby any sites initially identified were removed where it was considered that there were overriding factors that meant sites were not appropriate for development;
- c **Site Visits:** undertake site visits of all sites for assessment in order to review physical attributes and where possible verify information provided by the site promoter;
- d **Assessing Suitability for development:** subject the sites to an analysis of their 'suitability' for development, i.e. whether they offer a suitable location for development and would contribute to the creation of sustainable, mixed communities;
- e **Assessing Site Availability for development:** detail the planning history of the site; details submitted regarding site ownership and the owner's intentions for the site; and the extent to which it is being actively promoted for development. This helps indicate whether the site is likely to come forward for development within the allotted timeframe. Sites identified for assessment adjacent to the settlements that were not put forward in the Call for Sites may need further availability assessment, should these sites be pursued. Land Registry Searches would be required, followed by contacting the relevant land owners.
- f **Assessing Site Achievability for development:** a judgement about the viability of a site for development over a certain period. This involves seeking commercial views from key bodies on matters of achievability as part of wider external stakeholder workshops, as well as the appraisal of key criteria concerning market, cost and delivery factors;
- g **Assessing whether and when sites are likely to be developed:** drawing upon the preceding analysis, a judgement is made regarding whether the identified sites can be considered currently deliverable, developable or not. This includes providing an indication of likely forms of development (including if the site is only suitable for a certain type of development), phasing, identification of constraints and measures necessary to overcome them;
- h **Review of the Assessment:** drawing together the results of the analysis, ascertaining the overall development capacity of the sites.

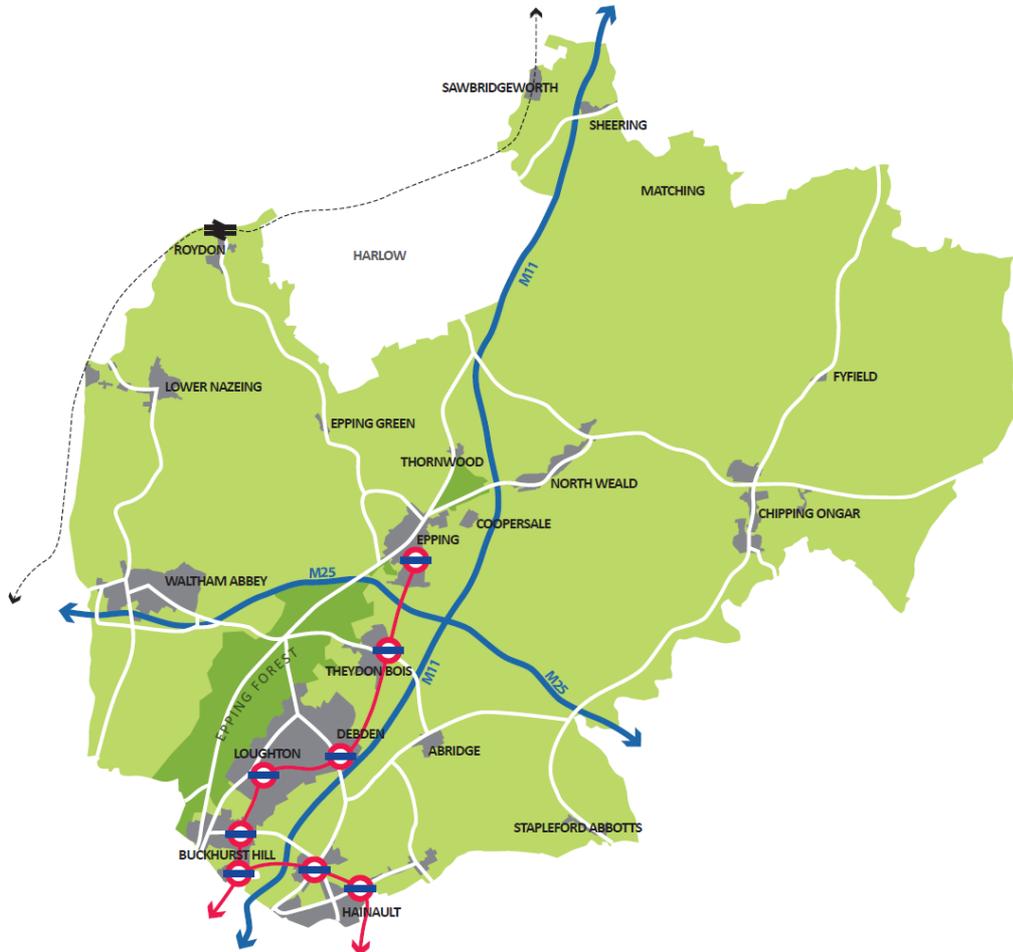
3.0 Parameters, Source Data and Database

Parameters

Study Area

- 3.1 The study area comprises the whole Local Planning Authority area of Epping Forest District. Epping Forest is a mainly rural area with 92.4% being within the Metropolitan Green Belt, including areas of horticultural glasshouses in the Lee Valley. The south west of the District is the most densely populated including Loughton, Buckhurst Hill, and Chigwell. Much of the rest of the population is located in the smaller towns of Epping, Waltham Abbey and Chipping Ongar. There are several villages and smaller rural settlements, predominantly towards the north.

Figure 3.1 Epping Forest District



Source: Epping Forest District Council

- 3.2 The M25 and M11 pass through the District and have local road connections. The Central Line provides a good link to central London via 8 stations from Epping and Chigwell. Roydon is the only main line rail station in the District

to meet the needs of Harlow). It is not, however, the purpose of the SLAA to look at these distinctions in any detail, although they should be considered when interpreting the outputs and making policy choices as part of the Local Plan process.

Source Data

- 3.5 The information used to assess each of the sites was derived primarily from three sources:
- a A desk based review of information, including other evidence base studies and available constraint based mapping through the use of GIS and satellite mapping. All available mapped data sources, including national constraints, local GIS data and the Local Plan map were used to identify where sites fell within or nearby to potential constraints, policies or designations;
 - b Site visits were undertaken of all assessment sites in March 2012 to validate the desk based review of information and survey the physical attributes of the site; and
 - c Information and views put forward by landowners and site promoters, regarding their own sites, following the Call for Sites exercise undertaken by Epping Forest District Council.
- 3.6 These were supplemented by further information that came forward on individual sites, either through further research, further evidence provided to NLP in the course of the assessments, or general information within the public domain.
- 3.7 A comprehensive set of information was not available for every single site and therefore NLP has exercised its professional judgement to assess the sites where information was not available or forthcoming.
- 3.8 A full list of data sources is included in Appendix 8.

Consultation

- 3.9 Two sets of consultation workshops were held in March 2012. The first was held with site promoters and technical stakeholders on 8th March 2012. All parties who had submitted sites to the SLAA as well as professional stakeholders such as local property agents, local planning agents, registered providers for affordable housing, neighbouring Local Authority planning officers and other agencies and bodies, such as the Environment Agency and Natural England, were invited to the workshop. The workshop was split into two identical sessions (one in the morning and one in the afternoon) and combined had over 80 attendees.
- 3.10 This workshop provided the opportunity for NLP to introduce stakeholders to the process and particularly, through facilitated round-table discussions with attendees, to discuss issues affecting the achievability of development within

the District. The workshop was necessarily focused on identifying strategic factors to inform site assessments and not the promotion of individual sites. This provided the opportunity for NLP to receive invaluable stakeholder feedback and key information which will ensure robust assessments and informed judgements are made on the achievability of development. The invitation letter and summary findings from this stakeholder workshop are included in Appendix 2.

- 3.11 The second workshop (held on 30th March 2012) invited all EFDC councillors and all Parish/Town Councils to a presentation on the SLAA. The purpose of the presentation was to introduce the SLAA study, outline its role and, as the presentation followed the initial and draft outputs from the suitability analysis, to present some of the emerging headline findings.
- 3.12 Other than the original call for sites and consultation on the methodology, no wider public consultation has taken place as part of NLP's assessments, reflecting the factual and evidence base nature of the study. Any sites taken forward for consideration through the Local Plan process by EFDC will be subject to extensive further public consultation before any site is allocated for development.

Database

- 3.13 In addition to this SLAA report, a key output requirement for the work has been the preparation of a database and associated mapping layers which collates all the available data and provides a clear understanding of thought processes taken in order to reach the conclusion for each site, including the assessments made for each of the criteria assessed.
- 3.14 The database, maintained in Microsoft Excel, has been designed in such a way that Epping Forest District Council is able to maximise its functionality and potential, particularly for the monitoring and updating of the SLAA. Its key features are:
- 1 A valuable tool which can assemble all site information in one place. It is readily expandable, both in terms of the number of sites, and the inclusion of additional assessment criteria as required by future national and local monitoring and assessment requirements;
 - 2 It clearly shows the suitability, availability and achievability scores given to each site. The suitability categories correspond directly back to the suitability site appraisal sheet adopted by EFDC as part of the methodology;
 - 3 Comment boxes are included to allow notes on any unique site characteristics or assumptions made which have resulted in a particular 'traffic light' assessment being given. This also enables the highlighting of where particular constraints would need to be overcome for a site to be deliverable/developable; and

- 4 Where known, comprehensive ownership and agent details are included, including information provided as part of the Call for Sites process. Where this information is currently missing it can be added to at a later date.

3.15 This database provides Epping Forest District Council with a key monitoring and analysis tool which will help the Council to update the SLAA in the future.

4.0 Initial Site Filtering

Introduction

4.1 As part of Stages 2-4 of the SLAA methodology, Epping Forest District Council and NLP jointly undertook an extensive site identification phase, collating sites from a range of sources. This 'long list' of sites was then filtered to remove sites which were not to be included in the full Stage 7 assessments. The resultant 'short list' of sites was reviewed with regards to the existing information available for each and then the initial development potential for each site was identified. Subsequently these sites were taken forward for full assessment.

Approach to Assessment

4.2 The purpose of the initial site filtering was to ensure that sites which would have no potential for coming forward for strategic² housing development were excluded at an early stage.

4.3 As outlined in the methodology chapter the filters applied were:

- Sites in rural areas yielding, or being explicitly promoted for, less than 6 units equivalent to sites of less than 0.2ha - to ensure that the assessment is manageable, practicable and strategic these sites were excluded at this stage (this of course does not preclude such sites from being considered for development by the Council outside the scope of the SLAA and the Council is still able to consider allocating smaller sites in rural areas where this appropriate);
- Strategic constraints - To protect significant and important sites any site which is wholly constrained by an international or national designation is filtered, including:
 - Environmental designations such as Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar Sites, Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR), Environmentally Sensitive Area (ESA), Ancient Woodland, Epping Forest Land and Epping Forest Buffer Land;
 - Heritage designations such as Listed Buildings, Scheduled Ancient Monuments or Historic Parks & Gardens; and
 - Flood Risk Zone 3b Floodplain.

² Note: for the purposes of this section of the SLAA 'strategic' means sites capable of accommodating 6 or more housing units or of 0.2ha or more in a rural area.

- 4.4 All sites identified were appraised against these filters to achieve the short list of sites. In addition to the filters above a number of other sites were filtered from the assessment:
- Duplicated sites were filtered where they were either replicas of other sites or where they were wholly contained within another site (albeit in these cases it was ensured that this would not unduly prejudice the superseded site and it should be noted that the assessment would not preclude the development of a smaller parcel);
 - Sites already with planning permission (or already developed) were filtered from assessment, in that they are assumed to be deliverable and are a committed part of the development pipeline, or have already been delivered;
 - Sites being put forward for another use (i.e. not housing, employment or retail development) and therefore the site was assumed unavailable at the outset and filtered; and/or
 - Sites with other factors, including existing uses incompatible with development, such as cemeteries and sites only recently redeveloped for new uses, and sites which were wholly outside of the District.
- 4.5 Sites where the promoter subsequently requested the site be removed from the SLAA process have been removed altogether from the process rather than filtered.
- 4.6 The resulting 'short list' of sites, and their site boundaries, were then taken onto Stage 5 and beyond for a full site survey.

Core Outputs

- 4.7 The core outputs from the initial filtering are shown in Table 4.1

Table 4.1 Filtered Sites

Sites Identified	Sites Filtered						Sites to Assess
	Sites Below Threshold	Existing Planning Permission	Promoted for Other Use	Duplicate / Superseded	Other Factors	Not Suitable Strategic Constraints	
416	9	4	4	24	3	28	344

Source: NLP Analysis

- 4.8 A total of 72 sites were filtered from the long list, leaving 344 sites to assess in detail. 28 of these 72 sites were deemed not suitable for development due to strategic constraints, meaning a total of 372 sites were assessed for strategic constraints at the first stage of the suitability analysis.

5.0 **Estimating the Development Potential of Sites**

Introduction

- 5.1 Stage 6 of the SLAA methodology requires the estimation of the development potential of each identified site. As part of the initial site filtering and identification of a short list of sites to assess, the site capacity, in the form of a dwelling yield and/or a commercial or retail floorspace yield, was identified for each site.

Approach to Assessment

- 5.2 In the first instance development yields were taken from the site capacity being promoted by site owners and site promoters. This ensures the SLAA reflects the owner/developer aspirations for the site and also adequately assesses the site in the context of the scheme that may come forward on the site.
- 5.3 To enable the testing of the site, where a development capacity was not identified or promoted through the site identification exercise, the SLAA applied a range of density assumptions, depending on the type of site and its location. Particular regard was taken of the predominant form and density of adjacent uses. The density assumptions for housing were adopted based on a review of the range of densities being suggested by developers through the Call for Sites exercise as well as a review of other recently permitted and completed schemes, using EFDC's annual monitoring data. This provided a range of densities as follows:
- a 30 dwellings per hectare on rural sites;
 - b 30-50 dwellings per hectare on sites within the main settlements either in lower density areas or in more suburban locations;
 - c 50 to 100 dwellings per hectare on built-up urban and town centre sites (e.g. where flatted developments may be suitable);
- 5.4 For employment and retail development sites an assumption of floorspace yield (square metres) has been applied. For employment this is based on a plot ratio of 0.4, as identified in the then ODPM's Employment Land Review guidance. For retail an assumed ground floor unit on the developable area is adopted, based on the characteristics of the site.
- 5.5 These were refined based upon individual site characteristics and this provided a range of potential development capacity. In particular, development capacities may be net (e.g. where an assumption has been made based on undeveloped parts of the site being developed only) or gross (e.g. where an assumption has been made that existing built form on site would be replaced/redeveloped), the assumption being made clear for each site within the database.

Constraints Reducing Dwelling Yield

- 5.6 The estimation of the dwelling yield from sites is an iterative process and the CLG SHLAA guidance identifies that Stages 6 and 7 of the SHLAA can be usefully carried out in parallel. To ensure that site constraints which could reduce the dwelling capacity of a site were taken into account, the initial baseline dwelling yield for each site was then refined through the Stage 7 suitability analysis (as set out in the following chapter). This provided a final constrained dwelling and/or floorspace capacity which was adopted as the site yield, i.e. the number of housing units or amount of commercial floorspace that could realistically be built on the site.
- 5.7 Unsuitable sites have been prescribed a nil capacity for development, reflecting that no appropriate development would be able to be brought forward on the site.
- 5.8 This approach ensures the SLAA is pragmatic in its assessment of suitability by taking account of the measures that can be taken through design to ensure a scheme is appropriate for a particular site. It also ensures that sites within the SLAA are not prejudiced as a result of the application of a suitability assessment which does not take wider account of the ability of a scheme to deliver design solutions for a particular constraint.

Core Outputs

- 5.9 Table 5.1 identifies the overall constrained development capacity which has been refined through the suitability analysis. This is based only on the sites, and constituent parts of sites, which are suitable for development (see Section 6.0) and illustrates the scale of overall physical capacity for development in the District. In relation to sites which have been assessed for more than one use, where they have been promoted for a mixed development (e.g. both uses on the site) the development capacity reflects both uses. However, where sites are assessed on an alternative development basis (e.g. either housing or employment, but not both in the same theoretical scheme) only the capacity for the primary use is identified in order to avoid the double counting of development capacity on the same parcel of land.

Table 5.1 Constrained dwelling capacities for sites assessed as 'Suitable'

Number of Suitable Sites	Constrained Dwelling Yield	Constrained Commercial/ Employment Yield (B-Class)	Constrained Retail/Leisure Yield
335	83,249 dwellings	1,600,334 m ²	32,870 m ²

Source: NLP Analysis

- 5.10 These capacities, alongside the outputs of the whole SLAA, are reflective of the combined capacity identified following an independent assessment of each site. It is a simple sum of the capacity of all sites which have been identified as not having fundamental constraints. This sum total does not take into consideration the cumulative implications of development, in particular:

- a Whether there are specific infrastructure constraints in any area which would mean either bringing forward a combination of sites, or achieving particular levels of development, would not be possible;
- b Whether there is a market saturation point (e.g. not enough builders to build or not enough buyers to buy) which would mean too many development sites or too much development in a particular location would not be achievable; and
- c Whether particular combinations of sites bring about unacceptable impacts. i.e. whilst sites assessed on their individual merits may be suitable, when brought forward jointly with other sites their development would become unsuitable.

5.11 In this context the totalled numbers above are not representative of what could be achievable in development terms within the District. The overall quantum of development and the spatial distribution of this throughout the District are matters outside the scope of this SLAA. The SLAA is just one part of the evidence base which informs the local strategy-making process which is to be progressed through the Local Plan.

6.0

Suitability

Introduction

6.1

Stage 7a of the study (as defined by the CLG SHLAA Guidance) requires that each site is assessed for its suitability to deliver development. This task focuses on subjecting the potential sites to an analysis of whether or not they are 'suitable' for housing, employment or retail, i.e. whether they offer a suitable location for development and would contribute to the creation of sustainable mixed communities.³ This was based on application of the Council's methodology.

6.2

The purpose of this section is therefore to describe the process and outputs of the assessment of suitability. The outputs from this section include:

- Those sites considered suitable for development (and carried forward for testing in terms of Availability and Achievability); and
- Those sites not considered suitable for development.

Approach to Assessment

6.3

The suitability assessment appraises all aspects of the suitability of each site to accommodate development. As different sites, with different levels of constraints, are suitable for different types of uses (e.g. a site suitable for commercial development may not be automatically suitable for housing development) we have appraised suitability against the use that the site is being promoted for. Where not being specifically put forward for a use, we have assumed a scheme appropriate to the context of the site. Where appropriate more than a single use has been considered on site e.g. in Town Centres where a mixed-use development with retail, offices and/or residential may be suitable.

6.4

All suitability assessments for all sites, and the assumptions they are based upon, have been provided to EFDC as part of the SLAA database. However, this report only contains the headline results from this assessment identifying whether a site is considered suitable, suitable only for a particular type of development, or not suitable, and if not suitable, the reason for this conclusion. Full details are provided in the database supplied with this report.

³ The NPPF identifies a definition of sustainable development namely: "Resolution 24/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy: Securing the Future, set out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly."

Appraisal

6.5

A Site Appraisal Sheet to review the suitability of each site for development was prepared by Epping Forest District Council as part of the methodology and the final sheet can be found in Appendix 3. 40 factors were considered important in determining whether a site should be considered as suitable and each site was given a traffic light 'score' of 'Green', 'Amber', 'Red' against each of these factors:

- a Stage A – Strategic Constraints
 - i Flood Risk;
 - ii National/international environmental and natural/ecological designations;
 - iii National heritage assets including Listed Buildings, Scheduled Ancient Monuments and Historic Parks & Gardens;
- b Stage B – Local Constraints
 - i Green Belt;
 - ii Greenfield and Brownfield (Previously Developed Land) and proximity to existing settlements;
 - iii Landscape character;
 - iv Local environmental and natural/ecological designations;
 - v Tree Preservation Orders;
 - vi Relevant planning history;
 - vii Minerals and Waste Plan allocations;
 - viii Lee Valley Regional Park;
 - ix Underground and overhead electricity transmission lines/cables and high pressure gas pipelines;
 - x Conservation areas;
- c Stage C – Other Constraints and Factors
 - i Accessibility - Distance to nearest:
 - Bus stop with hourly service;
 - Central Line station;
 - Railway station;
 - Local employment provision;
 - Primary school;
 - Secondary school;
 - GP surgery or health centre;
 - Existing village/local shop/post office;
 - Principal/smaller/district shopping centre;
 - Local shopping centre;
 - ii Potential for contamination on site;

- iii Potential for noise problems;
- iv Topography of site;
- v Air Quality Management Areas;
- vi Car parking;
- vii Site access;
- viii Access and egress to other properties across site;
- ix Overlooking/adjacent buildings;
- x Prejudicial impact upon a larger strategic site;
- xi Locally listed buildings;
- xii Protected lanes;
- xiii Other heritage assets;
- xiv Shape of site;
- xv Relationship with existing communities;
- xvi Common land;
- xvii Identified employment sites; and
- xviii Urban open space or performing a similar amenity function.

6.6 Whilst all factors have positive, neutral and negative aspects (represented by the traffic light appraisal) which are useful in comparing sites for their relative suitability, not all factors will ultimately constitute a 'showstopper' that automatically rules a site as 'unsuitable'. 'Showstopping' suitability factors are those that, as the site and evidence relating to a site currently stands, have constraints that fundamentally could not be overcome to enable development on site.

6.7 CLG Guidance advises against the use of existing policy as a definitive constraint against the suitability of a site for housing. Where the Site Appraisal Sheet has referred to factors which are directly or indirectly influenced by current local planning policy, including the Green Belt, these factors have been recorded but have been balanced with the other suitability criteria in the overall assessment of the sites. When assessing site factors influenced by local planning policy, a site's traffic light score for those criteria reflects current policy and does not necessarily prevent a site from being considered as suitable (i.e. it is not classified as a 'showstopper'), although it may instead influence its timescale for delivery (or indeed inform the policy choices that might subsequently be made by the Council in determining its plan and allocations). Where sites have been identified as 'suitable' but are within the Green Belt or subject to an existing Local Plan policy that seeks to prevent development (e.g. open space), this has been identified so that the results of the assessment can be usefully interpreted in terms of the kinds of policy 'trigger' or change that might be required were the site to be allocated for development.

6.8 It is important to note that the EFDC SLAA methodology states:

“For Stage B one or more red traffic lights means the site is unlikely to be suitable although it will not be discounted at this stage and further investigation will be required.”

The SLAA adopts this approach intentionally to ensure the evidence base contained within this assessment does not artificially narrow the options open for consideration through the Epping Forest Local Plan. Whilst relative to other sites, those with many constraints will be less suitable and score less well than others, the SLAA only seeks to rule sites out where it is perceived there are fundamental obstacles to development. As a result of this, relatively few sites are discounted as ‘unsuitable’, although clearly not all sites can be considered to be equally ‘suitable’.

- 6.9 To help inform the balance of suitability, all of the above criteria have been given a separate weighting based on the importance of each one to how suitable or unsuitable a site may be in planning terms. Each factor is therefore scored against its ‘traffic light’ assessment and the weighting for that factor, with these then averaged to give a composite site suitability score. This scoring allows a relative comparison of potential suitability between sites, but should be used cautiously as there will be many other contextual factors not captured through the SLAA analysis which will inform whether a site is ultimately suitable for consideration through the Local Plan process.

Source of Assessment Data

- 6.10 The information used to assess each of the sites was derived primarily from three sources:
- a A desk based review of information, including other evidence base studies and available constraint mapping;
 - b Site visits; and
 - c Information and views put forward by landowners and site promoters.
- 6.11 These were supplemented by any further information that came forward on individual sites, either through further research, further evidence provided to NLP in the course of the assessments, or general information within the public domain.

Core Outputs

- 6.12 Stage 7a of the CLG guidance requires an assessment of suitability of potential development sites. Appendix 4 provides a summary of the overall suitability assessment and scoring for each site assessed. Table 6.1 summarises the number and capacity of ‘suitable’ and ‘unsuitable’ sites across the District, including defining whether or not a site’s development would conform with existing Local Plan Policy in either Green Belt or other terms. From the 372 sites assessed, a total of 37 sites are considered unsuitable for housing development based on existing evidence. This comprises the 28 sites which were considered unsuitable due to strategic constraints, as outlined in the

initial site filtering, as well as a further 9 sites considered unsuitable due to local/site specific constraints.

Table 6.1 Suitability of Sites

	Sites Assessed	Suitable Sites					Unsuitable Sites	
		Within Current Policy	Suitable for Commercial Only Within Current Policy	Outside Current Policy - Green Belt	Outside Current Policy (Other)	Outside Current Policy (GB & Other)	Strategic Constraints	Local/Site Constraints
Number of Sites	372	25	7	275	17	11	28	9
Dwelling Yield	~	1,216	0	78,827	1,900	1,306	~	~
Commercial Yield (m ²)	~	4,000	46,860	1.495m	4,000	50,960	~	~
Retail Yield (m ²)	~	24,870	0	6,000	2,000	0	~	~

Source: NLP Analysis

- 6.13 A total of 335 sites are considered suitable for development, albeit only 32 within the 'envelope' of current policy and 7 of these have been identified as suitable only for employment development (e.g. existing protected industrial estates not considered for housing development) with the remaining 25 considered suitable for housing and/or employment and/or retail development.

Suitability 'Showstoppers'

- 6.14 In accordance with the Council's methodology, the Site Appraisal Sheet identifies a number of criteria where there are constraints which would render a factor as a potential 'showstopper' and, if traffic lighted red, the site would be considered unsuitable and would no longer be analysed for achievability. As above, these fall into two categories, all the strategic constraints represented by the factors in Stage A of the methodology, and a select number of local constraints within Stages B & C. The most common 'showstopping' factors identified through the suitability assessment are as follows:

- a Strategic Constraints (with some sites falling into more than one of these constraints):
 - i Sites wholly constrained by Flood Risk Zone 3b Floodplain (11 sites fall into this category)
 - ii Sites wholly constrained by environmental designations with the most common being sites within SSSIs, designated as ancient woodland or part of Epping Forest and its buffer lands (17 sites fall into this category);

- iii Heritage designations including Scheduled Ancient Monuments and Historic Parks & Gardens (3 sites fall into this category); and
 - b Local Constraints:
 - i Sites wholly constrained by Tree Preservation Orders (TPOs) whereby to achieve any development on site would necessitate removal of protected trees (2 sites fall into this category);
 - ii Sites falling wholly within a Local Wildlife Site (LoWS) where development would have a significant adverse impact which cannot be mitigated against (2 sites fall into this category);
 - iii Sites where the shape and context of the site means development of a suitable scheme would not be able to be achieved (1 site falls into this category); and
 - iv Sites which are landlocked or with no identified (or to be reasonably assumed) access arrangements (4 sites fall into this category).
- 6.15 There are many sites which perform poorly against the suitability criteria but do not have any single showstopping factors and theoretically could be suitable. However, these sites have a combination of negative impacts which when assessed cumulatively, and taking account of all other suitability factors, result in the site scoring poorly in their weighted average. Such sites have not been filtered out for the purpose of the SLAA, but may be considered unsuitable for development following further investigation if it is considered such impacts could not be adequately mitigated to make the site suitable in planning terms.

Constraints Reducing Capacity

- 6.16 As outlined in the previous chapter, as part of Stage 7 the development potential of each site was reviewed in the context of the constraints identified through the suitability analysis. On a number of suitable sites there were constraints which, whilst on their own would not prevent development on at least part of the site, would need to be integrated into the design of the scheme to ensure suitable mitigation, potentially reducing the site capacity. Common examples within the SLAA include sites where a cluster of trees on part of the site may be subject to a TPO and there would be a strong preference for retaining the trees, but the remaining portion of the site is suitable for development; or where a watercourse and area of associated flood risk flow through a site, but could be incorporated into a development scheme which avoids or mitigates flood risks.
- 6.17 The constrained development capacity is the development yield adopted for this report and represents the likely level of development that could be accommodated on a particular site, taking into consideration the site specific constraints.

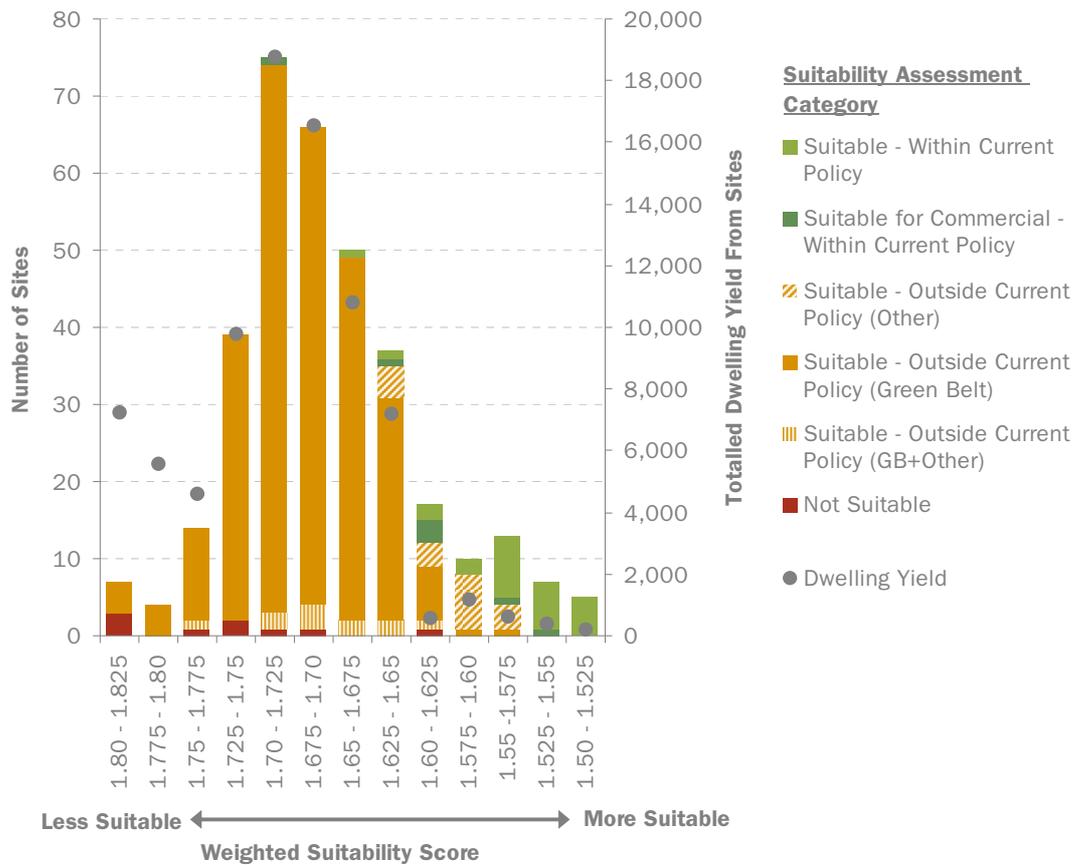
Suitability Overview

- 6.18 For the purpose of the SLAA, only absolute suitability is considered in arriving at a conclusion on a site (i.e. a site is suitable or is not suitable), though it is

acknowledged that Epping Forest District may wish to look at the relative suitability of sites which may flow from consideration of current or future policy, through the Local Plan process. The suitability assessments made for each site will assist in making these judgements, as will the weighted scorings applied.

- 6.19 Based upon the criteria considered under the assessment matrix and the assessment made, the suitability summary table shows that the majority of sites could be considered suitable for development individually and on their own merit, although most of these are outside the parameters of existing planning policy (in the majority of cases due to Green Belt or open space policies).
- 6.20 For any of these suitable sites, some mitigation measures may need to be used to ensure minimisation of adverse impacts arising from development. The level and nature of these mitigation measures would depend on the individual site and the nature of the proposed development. Where it is likely that significant improvement works are required (such as site remediation or costly infrastructure works which might impact on viability), these have been reviewed further as part of the achievability section.
- 6.21 The suitability assessments are based only on the data available at the current time, using a standard common assessment methodology. Information may emerge in the future that will alter the conclusion on the suitability of a site, particularly where a scheme is brought forward and particular mitigation measures are demonstrated. Therefore, the SLAA suitability assessments need to be viewed in the context that, where there are high levels of constraint, the onus is on proving the site is or can be made suitable, and thus suitability assessments may change over time.
- 6.22 Not all of the sites necessarily perform equally in terms of suitability. Where locations emerge from the SLAA with a greater supply of potentially deliverable and developable sites than is required to meet development needs, there may be the opportunity to rule sites in or out. This would be based on the overarching approach to distributing new development set out in the Local Plan, the Sustainability Appraisal/SEA process, other principles (e.g. around the strategic focus for growth in the District) and/or on relative performance against the suitability criteria. This is a matter outside the scope of the SLAA, although the weighted scoring against criteria provides an assessment of comparative individual site performance to support those relative judgements.
- 6.23 Figure 6.1 identifies the distribution of the performance of sites against suitability criteria based on the scoring matrix. It cross tabulates this with their overall suitability assessment and the overall dwelling yield falling within each range of suitability scoring.

Figure 6.1 Distribution of Weighted Site Suitability Scores by Suitability Category and Dwelling Yield



Source: NLP Analysis

6.24 This shows that the distribution of relative suitability is wide. As would be expected, most sites that are suitable within current policy score relatively well against the weighted factors, whilst most sites that are not suitable score relatively poorly against the weighted factors. In terms of suitable sites that are outside of current policy, those subject to the Green Belt tend to score less well than those outside of the Green Belt, reflecting the location of many Green Belt sites in less sustainable areas further away from local services. However, suitable sites subject to other policy factors tend to be areas of urban open space within existing settlements, and are therefore better related to existing communities. Clearly, however, were the Council to need to identify sites for development that were outside current policy constraints, it would need to make a policy judgement that balanced different factors – e.g. the value of Green Belt vs. access to local open space within urban areas.

6.25 Significantly, the overall dwelling yields of sites across the distribution are skewed. Sites scoring as more suitable yield small development capacities, whilst lower scoring sites yield larger development capacities. In essence, larger sites tend to score less well against the suitability criteria. This is a reflection of the generally greater number of constraints faced by large sites and also that large sites are likely to be greenfield development, potentially without current infrastructure provision and further away from existing services. The scoring takes limited account of the ability of individual sites, particularly

large strategic sites, to mitigate impacts. In particular, because the criteria focus on assessing potential constraints to development, they do not take account of the ability of sites to deliver economic, social or environmental benefits. For example larger sites may help deliver new shops, services and community facilities, and therefore in sustainability terms may deliver a more 'suitable' development than a small site. Such issues will need to be weighed up through the spatial planning process in the production of the Local Plan, highlighting that the relative suitability scoring should be treated with caution in its interpretation.

- 6.26 Notwithstanding this, the SLAA output does highlight that more suitable sites (in SLAA methodology terms) deliver lower amounts of development. This is illustrated by the estimated yield of the 25 sites that are 'suitable' within the envelope of existing Council planning policy (i.e. no significant policy change would be required) being only 1,216 dwellings. Not all 'suitable' sites within the scope of current planning policy are without planning issues. A number of sites are existing car parks and as such not all of them could be developed without giving rise to accessibility and/or parking strategy issues in some locations.
- 6.27 Of the other sites identified as suitable but outside of current planning policy (i.e. requiring a significant change to the current policy position) 17 sites, with a theoretical capacity for 1,900 homes, are not in the Green Belt but are subject to other factors. For example many of these are open green spaces within urban areas, such as playing fields, allotments or amenity open space and would require associated policy changes. 286 sites, with a combined theoretical capacity of 80,133 homes, are within the Green Belt and would require alterations to Green Belt boundaries if they were to be developed.
- 6.28 Notwithstanding, the reality is that **if** alterations to the Green Belt are required, only a proportion of this suitable site capacity in the Green Belt is likely to be necessary to meet development needs in the District, with development needs being determined separately from this SLAA, based on the Essex Planning Officers Association (EPOA) Population and Household projections work. Purely by means of comparison, Epping Forest District currently has a dwelling stock of 54,220 dwellings⁴ and a theoretical Green Belt release for 80,000 dwellings would be equivalent to growth twice the current size of Harlow Town being located in the District – clearly, nothing of this sort is proposed.

⁴ CLG Live Table 125: Dwelling Stock Estimates by Local Authority (2011)

7.0 **Availability**

Introduction

7.1 Stage 7b of the study (as defined by CLG SHLAA Guidance) requires an assessment of the availability of the site for delivering development. This task focuses on identifying whether or not a site is ‘available’ for housing taking account of issues such as legal requirements and ownership information, including landowner intentions and aspirations.

7.2 The purpose of this section is therefore to describe the process and outputs of the assessment of availability. The outputs from this section include:

- Those sites considered to be available for housing on site in 5 years (i.e. potentially deliverable);
- Those sites considered to be potentially available but not deliverable in 5 years (i.e. potentially developable); and
- Those sites not considered to be available.

Approach to Assessment

7.3 An appraisal of availability was undertaken for all sites which had passed the suitability assessment. The availability assessment appraises aspects of the control of land relating to a site and the availability of the site to accommodate development. Each availability assessment has been provided to Epping Forest District Council as part of the SLAA database. However, this report (Appendix 4) only contains the headline results from this assessment identifying if a site is available, not available or if no assessment was made and availability is currently unknown due to lack of information.

Source of Assessment Data

7.4 Stage 7b of the CLG SHLAA Guidance is the assessment of site availability for housing, with paragraph 39 advising that:

“A site is considered available for development, when on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners...”

7.5 For the purposes of this SLAA the best information available at the time of assessment came predominantly from the call for sites forms submitted between 2008 and 2011. Thus the source of assessment data was the information provided and no exhaustive searches for ownership information were undertaken.

7.6 Legal searches can provide the “*best information*” on ownership but these can only be relied upon for a short period and would require extensive consultation with landowners to establish intentions. Many SHLAAs do not rely upon legal

searches, with the focus being towards placing the onus on the relevant landowners or controlling interests to provide information on matters of availability. NLP considered that this is the most appropriate means of establishing the necessary information.

- 7.7 The Epping Forest Land Terrier (a database and mapping layer of all EFDC owned land) was used to identify any parcels of land which the Council own. Unless there was evidence suggesting Council land was unavailable all Council land was considered available for the purpose of the SLAA testing. This of course does not mean that the Council has made the decision to promote the site for development, but it is assumed that were it to make the policy judgement to identify the site for development, it would do so in line with its approach to corporate asset management.

Appraisal

- 7.8 In assessing ownership factors, a judgement was made as to how ownerships and other availability factors could affect a site in coming forward for development and being delivered. This included consideration of three main aspects:
- a Current ownership and the potential for multiple ownerships which may prevent the site from coming forward or potentially pose a risk to delivery;
 - b Potential for ransom strips, whereby third parties could hold development up by refusing to relinquish their interest in a parcel of land (or by demanding an inflated value for the land) which is essential to enable development. This could be where (i) the apparent access to a site is across third party land or (ii) there are other interests in the land which could represent a ransom; and
 - c The current and future attitudes of a landowner to development, aspirations for development and the current operational requirements of the land. For example, existing occupiers or uses may need to be relocated or a landowner may only wish to sell the land at a particular point in the future (or may not wish to see a certain type of development on the land at all).
- 7.9 As with the assessment of suitability, a traffic light system was used to score factors in relation to availability on the basis of 'Green', 'Amber', 'Red' against each of these factors. Understanding site ownership issues is essential to underpinning the likelihood that a site will be available and deliverable for development and as such the assessment has sought to score the availability of sites by assessing ownership factors and, where identified, the attitudes of owners towards residential development, based upon the information submitted through the 'call for sites' exercise.
- 7.10 The current available information for site ownership and landowners' intentions for development is not comprehensive and whilst details have come forward for sites that landowners or agents are actively promoting through the Local Plan process, for many of the sites ownership information is unavailable. As

identified in CLG guidance the availability of sites should be based on best information, with sites considered available where land is owned by a housing developer who has expressed an intention to develop, or the landowner has expressed an intention to sell. Additionally, the NPPF states that to be considered developable there must *“be a reasonable prospect that the site is available”* for development. This means that there is a requirement for evidence to identify a site as available (i.e. evidence is needed to rule a site in) as opposed to the assumption that a site is available until evidence is identified that excludes its availability.

- 7.11 In consideration of this, where no information has come forward on the availability of a site, ownership or legal issues, NLP has assumed that the site availability for development is unknown on current information and therefore the site cannot be deemed deliverable or developable. These sites are scored as ‘unknown’ availability.
- 7.12 It is possible that new site information may become available in future, that was not originally supplied, which allows a new conclusion to be drawn that the site is likely to come forward. The implication of the evidential requirements is that, in NLP’s view, there may be sites that are available but where the evidence is not produced to justify this conclusion for the purposes of this study. Due to the non availability of ownership information for many of the sites we recommend that, if Epping Forest District Council finds itself in the position of looking to allocate any of these sites through the Local Plan, further investigations are undertaken to underpin the availability of the site, as required by the NPPF. In some instances it may be the case that further information on a site’s availability will be forthcoming once the SLAA has been published.
- 7.13 Where information has been obtained through the SLAA, the site ownership and attitudes to development can have a bearing on when the site is likely to become available for development:
- a Where landowners or agents have come forward with information regarding land ownership, the review of availability has assumed that if they have indicated a site is in single ownership (or multiple ownership with all interested parties involved in the site promotion) and available immediately, then the assessment is that the site is available immediately i.e. within the first 5 years;
 - b Where landowners or agents have come forward and have identified that there are some issues with ownership (e.g. tenancy holdings without exercisable break clauses, or multiple ownership where some interests may not be aware) it has been assumed that the site is not immediately available, but will be available subject to overcoming ownership issues in the future;
 - c Where landowners or agents have come forward and have specifically indicated that their aspirations for development are not within the first 5 years (e.g. due to continued existing use of the site) it has also been

assumed that the site is not immediately available, but will be available subject to the identified phasing preference; or

- d Where information from landowners or agents, through the call for sites exercise, or the local authority, where other material information is available, indicates that the site is not available for development, the site cannot be deemed available and therefore not deliverable or developable.

7.14 This approach will ensure that all sites identified as immediately available for the first 5 year tranche of development are fully supported by evidence.

Core Outputs

7.15 Of the 335 assessment sites, some form of ownership details were identified for 251 sites, mainly using information from the call for sites process and the Epping Forest Land Terrier. The sites were scored based on the three criteria; site ownership, ransom strips and attitude to development/operational requirements.

7.16 Looking at these aspects gives a broader picture as to the availability of sites and the impacts that ownership and development attitudes will have on whether and when sites will become available for development. These assessments have been taken into account in identifying within which 5 year tranche the site is likely to become available for development. Table 7.1 below provides an overview of the identified availability of sites.

Table 7.1 Availability of Sites

	Suitable Sites	Sites Available Within 5 Years	Sites Available but Beyond 5 Years	Sites Not Available	Unknown/ No Evidence
Number of Sites	335	230	20	1	84
Dwelling Yield	83,249	41,794	8,369	20	33,066
Commercial Yield (m ²)	1,600,334	997,414	243,020	0	359,900
Retail Yield (m ²)	32,870	25,570	5,300	0	2,000

Source: NLP Analysis

7.17 Clearly, a number of larger sites are identified as being available within five years, but this does not mean that all of the dwelling capacity will come forward in that time. So, not all of the 41,794 dwelling capacity identified as available within five years would be able to be developed within that initial period.

7.18 For the majority of sites where availability information was identified, these did not have any ownership issues (i.e. being in single ownership, being jointly submitted or having an option which implies single ownership) and were available immediately either for development or for sale to a developer.

- 7.19 A small number of sites (circa 6% of all suitable sites) were identified as being available but only at a point in the future or being available but with uncertainties over the phasing and when the site may come forward. The majority of these sites were in an existing use, with plans to relocate the current use but with uncertainty over the phasing for release of the land for development.
- 7.20 Only one suitable site was identified as unavailable through this review of ownership information, a site including a number of private ownerships with none actively promoting development.
- 7.21 84 suitable sites have no evidence to support an assessment of availability. These cannot be assessed as being available, although there is no evidence to currently suggest that they are not available or would not be made available in the future. These sites are identified as having no evidence and unknown availability.
- 7.22 Overall, the majority of sites for which availability information has been identified are currently available and only a minority of sites have unknown availability information. Individual sites where availability has not been established should be reviewed prior to inclusion in any future Local Plan.

8.0 **Achievability and Overcoming Constraints**

Introduction

- 8.1 Stage 7c of the study (as defined by CLG SHLAA Guidance) requires that each site is assessed for its achievability to deliver development. This task focuses on assessing prospects for achieving development on sites taking into account constraints and viability. This is combined with Stage 7d which requires the identification of, and actions needed to overcome, constraints to development.
- 8.2 Paragraph 40 of the CLG guidance stipulates that a site is considered achievable for development where there is a *'reasonable prospect'* that the site will be developed at a particular point in time. This is essentially a judgement about the viability of a site and the ability of the developer to complete and sell/lease the development over a certain period. It will be affected by:
- Market factors (e.g. adjacent uses and economic viability of existing, proposed and alternative uses); and
 - Cost factors (e.g. site preparation costs, physical constraints, prospect of funding etc).
- 8.3 Paragraph 42 of the CLG guidance also states that where constraints have been identified, the assessment should consider what action would be needed to overcome them. Actions could include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement or a need to amend planning policy which is currently constraining housing development.
- 8.4 Consequently, the outputs from this section include the following:
- Those sites considered achievable based on cost, market and delivery factors;
 - Those sites not considered achievable for development (i.e. where there is no reasonable prospect of a site coming forward at a particular point in time);
 - The identification of constraints and potential mitigation measures.

Approach to Assessment

- 8.5 Historically, viability has not been a significant barrier to housing delivery in Epping Forest District. This is underpinned by the high residential values achieved in the District, and also the relatively high prices for development land in the District as identified in the SHMA Viability Assessment. However, following the recession and the associated stagnation in the housing market, certain sites, particularly those in more marginal locations with exceptional site development costs, have been affected by tightening viability and are less likely to be deliverable in the relatively short term.

- 8.6 Consequently, depending on the extent and severity of the current market downturn, matters of viability and the market are key elements of the deliverability of sites.

Source of Assessment Data

- 8.7 The methodology used to assess the achievability of sites has involved a pragmatic and justifiable approach involving the identification of market factors and site cost factors from the suitability assessments undertaken and the site visits. This has been complemented by the evidence contained within the SHMA Viability Study and combined with landowner, technical and commercial views from key stakeholders as part of the SLAA Stakeholder workshops. Attendees included commercial agents, developers (including housebuilders), developers' consultants, Council Officers and other relevant stakeholders.
- 8.8 Broadly, the stakeholders identified that Epping Forest District does not face any particular viability pressures for development. The underlying dynamics of the housing market in Epping Forest remain strong, with the proximity to Central London and excellent transport links continuing to mean that Epping Forest has some of the highest house prices in the sub-region. This strategic location and the attractiveness of the District fuel demand, ensuring a buoyant market within the District. Notwithstanding, Epping Forest has not been immune to the legacy impacts of the recession, with continued tightened access to finance constraining realisable demand, even if the structural demographic drivers of demand remain.
- 8.9 Broadly the market perspective put forward by the evidence base and the Stakeholders is as follows:
- a Residential – viability of development is good and underpinned by high house prices, which means that very few residential developments do not 'stack-up' in economic viability terms within the District. This is particularly the case in the parts of the District within the Central Line corridor, where the accessibility and links to Central London mean residential properties sell for a premium. Values drop off towards Harlow, although development is still economically viable in those areas, even within the current market (and provided that planning obligations are sought at an appropriate level)⁵.
- This is further supported by the 2010 SHMA Viability Assessment which identified that there were minimal viability pressures for residential development across the District assuming middle market conditions. Viability is also set to improve over the Local Plan period. The only sub-area of the District where viability for residential development is identified as more marginal is the CM17 postcode area (East of Harlow).

⁵ Reflecting provisions of paragraph 173 of the NPPF

- b Commercial and Industrial – the viability of B-class employment development in the District is reasonable. The ELR identifies relatively strong demand for employment floorspace, with economic growth forecasts and local businesses both indicating need for expansion in the current local supply.
- c Retail – demand for smaller town centre retail units is currently low, with vacancy rates relatively high in each of the main town centres. Agents at the Stakeholder events suggested this would continue into the foreseeable future, with structural trends and factors, such as online shopping and regional shopping centres (e.g. Stratford City and Lakeside), meaning demand will continue to be low and viability for such uses much more marginal. However, demand for new development sites from supermarkets remains strong in all of the main town centres/settlements within the District.

8.10 These judgements on the market factors associated with each location were complemented with site specific considerations arising from the site surveys and the assessment of suitability.

Appraisal

8.11 The achievability assessment appraised all those sites judged as being 'suitable' and 'available' for housing development. In summary, the approach to ascertaining achievability of housing on the sites involved the consideration of the following criteria, again assessing them based upon a traffic light scale of 'Green', 'Amber', 'Red':

- a Market Factors and Wider Economic Viability:
 - i Attractiveness of locality: consideration of the market strength of the locality and recent developer interest, as outlined above and in the SHMA viability study for each area;
 - ii Site factors: consideration of how long the site has been available or marketed for development and the level of interest in the site, where known; and
 - iii Scale and type of development: consideration of the scale of development relative to the market and constraints and whether this may present economic viability risks.
- b Cumulative Factors or Abnormal Cost/Delivery Factors:
 - i Site preparation costs: based on the findings of the suitability assessment a judgement was made on the potential for abnormal site preparation costs associated with topography, contamination or existing buildings etc.

Core Outputs

8.12 Table 8.1 presents a summary of the results of the achievability assessment. On the basis of the results emerging from the achievability factors assessed, a

judgement was made on the overall achievability of each site coming forward for development in the following manner:

- a Achievable – sites where there are few factors which would pose abnormal costs or, where there are costs, there is a good prospect that they could be overcome (e.g. due to market strength). Sites in more marginal market areas may be achievable where there are no cost or delivery factors which may affect viability;
- b Unknown or Marginal – sites where there are identified site works which are likely to present abnormal costs and where combined with weaker market areas, there is a question mark over the viability of a scheme. In these instances further feasibility work is likely to be required to assess the extent to which these factors will impact upon viability and can be overcome.
- c Not Achievable – Sites where the identified works associated with the site (e.g. strategic infrastructure) would not be able to be delivered as part of the value generated by the scheme – i.e. the required mitigation for development of the site for housing would render development unviable.

Table 8.1 Achievability of Sites

		All Suitable & Available Sites	Achievable	Unknown/Marginal	Not Achievable
Available Within 5 Years	Number of Sites	230	219	10	1
	Dwelling Yield	41,794	41,193	601	0
	Commercial Yield (m ²)	997,414	890,894	102,520	4,000
	Retail Yield (m ²)	25,570	23,570	0	2,000
Available Beyond 5 Years	Number of Sites	20	16	4	0
	Dwelling Yield	8,369	7,138	1,231	0
	Commercial Yield (m ²)	243,020	201,020	42,000	0
	Retail Yield (m ²)	5,300	1,500	3,800	0
Availability Unknown	Number of Sites	84	76	8	0
	Dwelling Yield	33,066	31,884	1,182	0
	Commercial Yield (m ²)	359,900	230,780	129,120	0
	Retail Yield (m ²)	2,000	0	2,000	0

Source: NLP Analysis

8.13

Overall, of the 334 sites assessed for achievability, 311 are considered achievable, 22 have unknown or marginal viability and only one is considered unachievable based on the current assessment. These results are summarised as follows:

- a Only one site which may be deliverable is considered not achievable, relating to a smaller commercial scheme where the market for a potentially suitable development is considered relatively poor;

- b Of the 229 other sites considered suitable and available within the next five years, the vast majority are considered achievable (95%). 10 sites have achievability risks, with more marginal viability factors;
- c Of the 104 sites considered suitable, but not available in the first five years or with unknown availability, 92 (88%) are considered achievable, with the remaining 12 considered to have marginal achievability.

8.14 It should be noted that the assessment is one made on a site-by-site basis and does not take account of cumulative market capacity or the ability of the market to bring forward a certain quantum of development in any given local area. For example, a number of sites in and around a settlement might be judged as achievable on an independent basis, but this does not mean that all those sites could all be viably delivered at the same time. This will be a factor that will need to be considered by the District Council in determining its policy approach.

Overcoming Constraints

- 8.15 In a number of instances site specific constraints to development have been identified which could preclude development in the short-medium term. In order to overcome these development constraints specific engineering works, enhancements or mitigation works may be necessary. The principal potential constraint which affects many sites is potential for contamination, with the industrial and agricultural heritage of many sites meaning there is potential for ground contamination. However, as set out previously, the high development values across the District, particularly for residential, mean that such development should still be viable, despite cost factors.
- 8.16 The evidence base for strategic infrastructure capacity in Epping Forest District is under-going preparation by the Council. This has meant that constraints such as utilities infrastructure capacity and the capacity of the strategic highway network have not informed the review of suitability and achievability within this SLAA. These factors are particularly sensitive to the strategy for, and distribution of, development throughout the District. As such a full assessment will be addressed separately at a later stage of the Local Plan preparation, including a full Transport Assessment to test potential impacts on the highway network.
- 8.17 These may indicate a number of key areas where comprehensive, long term, investment may be required to overcome constraints and to enable development to come forward. Strategic infrastructure capacity is likely to require further investigation and technical evidence to underpin suitability and achievability assessments.

9.0

Deliverability and Developability

Introduction

9.1

This section draws upon the preceding analysis of the suitability, availability and achievability assessments. A judgement has been made regarding whether the identified sites can be considered deliverable, developable or not currently deliverable or developable for development, based on if and when they are likely to come forward. This has allowed an overall indicative housing, employment and retail capacity to be identified for the District.

Approach to Assessment

9.2

Using the results of the suitability, availability and achievability assessments, an analysis of where in the series of 5-year tranches a site is likely to come forward, in line with the CLG Guidance definitions of Deliverable and Developable, has been undertaken.

Core Outputs

9.3

All 372 sites identified for assessment have been appraised on their individual merits, ensuring that Epping Forest District Council has the best possible picture of current development land availability when it comes to deciding upon its strategy for delivering their Local Plan objectives.

9.4

The results for the overall Deliverability and Developability of sites within Epping Forest District are as follows:

- Deliverable sites:
 - 219 sites, comprising capacity for circa 41,200 dwellings, are considered deliverable, to start within the first 5 years – albeit only 20 of these sites, with a capacity for 1,122 dwellings, are within the scope of current planning policy;
 - These 219 deliverable sites have a capacity for circa 891,000 m² of commercial floorspace and over 23,500 m² of retail or leisure floorspace, albeit only 3,000 m² and 17,570 m² respectively are within the scope of current planning policy;
- Developable sites:
 - 30 sites, comprising capacity for circa 8,970 dwellings, are considered developable, starting beyond 5 years – albeit again only 4 of these, with capacity for 68 dwellings, are within the scope of current planning policy;
 - These 30 deliverable sites have a capacity for circa 360,000 m² of commercial floorspace and 5,300 m² of retail or leisure floorspace. Whilst all of this potential retail/leisure floorspace is within the scope of current planning policy, only circa 2,200 m² of the commercial floorspace is;

- Not Deliverable or Developable on current information:
 - 84 sites, comprising capacity for circa 33,100 dwellings, are not deliverable or developable on current information as availability is unknown. Only 6 of these are within current policy with only one suitable for housing development comprising capacity for 6 dwellings;
 - These sites have a capacity for circa 360,000 m² of commercial floorspace and 2,000 m² of retail/leisure floorspace;
- 39 sites are considered not to be deliverable or developable, 37 due to suitability.

9.5 Table 9.1 identifies the deliverability and developability of sites.

Table 9.1 Deliverability and Developability of Sites

	Site Classification	No. of Sites	Dwelling Yield	Commercial Yield (m ²)	Retail Yield (m ²)
	Suitable Within Current Policy, Available & Achievable	20	1,122	3,000	17,570
	Suitable Outside Current Policy, Available & Achievable	199	40,071	887,894	6,000
	Deliverable (0-5 Years) Sub Total:	219	41,193	890,894	23,570
	Suitable Within Current Policy, Available in Future & Achievable	1	19	0	1,500
	Suitable Outside Current Policy, Available in Future & Achievable	15	7,119	201,020	0
	Suitable Within Current Policy, Available/Available in Future & Unknown/Marginal Achievability	3	49	2,200	3,800
	Suitable Outside Current Policy, Available/Available in Future & Unknown/Marginal Achievability	11	1,783	142,320	0
	Developable (5 Years Onwards) Sub Total:	30	8,970	345,540	5,300
	Suitable Within Current Policy, Unknown Availability, Achievable	3	6	10,140	0
	Suitable Outside Current Policy, Unknown Availability, Achievable	73	31,878	220,640	0
	Suitable (Within/Outside Current Policy), Unknown Availability & Unknown/Marginal Achievability	8	1,182	129,120	2,000
	Not Deliverable or Developable on Current Information Sub Total:	84	33,066	359,900	2,000
	Suitable & Available but Not Achievable	1	20	0	0
	Suitable but Not Available	1	0	4,000	2,000
	Not Suitable – Local or Site Specific Constraints	9	~	~	~
	Not Suitable – Strategic Constraints	28	~	~	~
	Not Deliverable or Developable Sub Total:	39	~	~	~
	Grand Total	372	~	~	~
	Of Which Suitable	335	83,249	1,600,334	32,870
	Of Which within Current Planning Policy	32	1,216	50,860	24,870

Source: NLP Analysis

What the Capacity Shows

- 9.6 These numbers represent the total capacity of the individual sites identified as appropriate to deliver development. They show whether or not the individual sites assessed have a reasonable prospect of being developed (and if so when) without giving priority to any particular spatial distribution of sites or taking account of other legitimate planning judgements of the District Council outside the scope of the SLAA. They are intended to provide an initial basis upon which Epping Forest can assess whether it has enough sites to meet overall housing, employment and retail requirements and provide information on the site options available through the Local Plan process.
- 9.7 What is clear from the development capacities identified in the SLAA is that the District currently has only 32 sites that are either previously developed (i.e. brownfield) and/or within settlement boundaries and broadly consistent with the existing policy approach for the District (as defined by the Local Plan 'saved policies'). In residential terms, on a site by site basis, this amounts to a capacity of 1,216 homes. The 32 sites are reduced to 24 sites with capacity for 1,190 homes when excluding those sites that are not deliverable and developable. This excludes sites already with planning permission which, using the EFDC 5-year assessment of land supply monitoring report for 2012, would add 859 dwellings to the residential development pipeline. This would total up to a 'suitable' supply within the scope of existing policy of circa 2,400 dwellings.
- 9.8 If the objectively assessed need for development in the District is greater than can be accommodated on those sites identified in this assessment, the Council will need to review its existing policies to explore whether it should:
- Look at whether green spaces within towns and villages might be developed (i.e. 'suitable' sites not in the Green Belt, but outside the scope of existing policy); and/or
 - Review its Green Belt boundaries to allow some development (i.e. 'suitable' sites currently in the green belt); and/or
 - Look at the existing land use designations (e.g. for industry) and determine whether these should be changed to permit other uses.
- 9.9 In exploring these options the Council and local community will have a choice over the strategy and which sites to allocate, but it must be evidence based and justified. The mapping contained within appendices 5 and 6 shows there are deliverable sites across the District, including within and surrounding each of the main settlements. The implication of this for the District Council's policy choices is that the spatial strategy for growth in the District can, if necessary, achieve development in all parts of the District, allowing an element of flexibility in making policy choices between different locations. This is not to say that development will be appropriate in all locations, but there are options available if that sits comfortably with the Council's spatial planning priorities. This is important as it could allow EFDC to respond effectively to any identified local needs and aspirations.

10.0 **Windfall Housing Delivery**

Introduction

- 10.1 Windfall sites are those that come forward for development but have not been specifically identified in the local plan process and include the many small developments which deliver new development. Whilst the SLAA assesses a wide selection of sites throughout the District, it does not look at any sites that would deliver less than 6 dwellings or are less than 0.2ha and such sites would not normally be allocated through the Local Plan. However, cumulatively these small developments can deliver significant amounts of new housing. Additionally, whilst this SLAA has compiled a comprehensive list of sites to assess, there may be further suitable sites which become available during the Local Plan period and can contribute to the supply of new homes, despite not being identified previously.
- 10.2 The assessment of the deliverability and developability of sites (Section 9.0) illustrates the scale of constraints on the delivery of development which Epping Forest District faces, particularly in relation to housing. Whilst there are a number of identified sites which fall within the scope of existing policy, the majority of sites fall outside existing policy and the scale of both physical and policy constraints which affect development in Epping Forest District mean that it is appropriate to consider how much development could come forward through ‘windfalls’.

Approach to Assessment

- 10.3 The NPPF identifies (para 48) that:
- “Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”*
- 10.4 The CLG SHLAA guidance outlines that where a windfall allowance can be justified, this should be based on an estimate of the amount of housing that could be delivered in the District on land that has not been identified in the list of deliverable and developable sites. This ensures that no double counting occurs.
- 10.5 This assessment of windfalls has therefore looked at historic delivery rates of housing windfalls (i.e. on sites not allocated in the Local Plan). In particular this has been categorised as follows:
- a By size – with a distinction drawn between windfall schemes of 5 dwellings or less, falling below the threshold of this SLAA, and schemes

- of 6 dwellings or more, for which some sources of sites may already have been identified and assessed in the SLAA;
- b By site type, as a garden or non-garden – to meet the requirements of the NPPF which states that any windfall allowance should not include residential gardens; and
 - c By scheme type, as a new build or conversion – to illustrate the extent to which windfall development relies on the conversion of existing buildings, for which there may be a finite supply, and the extent to which windfall development could impact on the overall supply of certain types of stock (e.g. where conversion of family homes into flats could affect the mix of properties in the housing stock and create adverse housing market outcomes).

Source of Assessment Data

- 10.6 Epping Forest District Council maintains records of windfall housing delivery as part of its monitoring data, with figures available for each year between 2005/06 and 2011/12. This means that 7 years of trend data can be analysed, which provides a sufficient evidence base for analysing the extent to which such sites have consistently become available in the past, as required by the NPPF.

Core Outputs

- 10.7 The Council's monitoring data shows that over the past 7 years a total of 1,674 dwellings (net) have come forward on windfall sites, an average of 239 dwellings per annum. Table 10.1 outlines the past trends in delivery, broken down by the key variables relating to site size, residential garden development and type of development as new build or conversion.

Table 10.1 Past Trends in Delivery of Windfall Housing in Epping Forest District

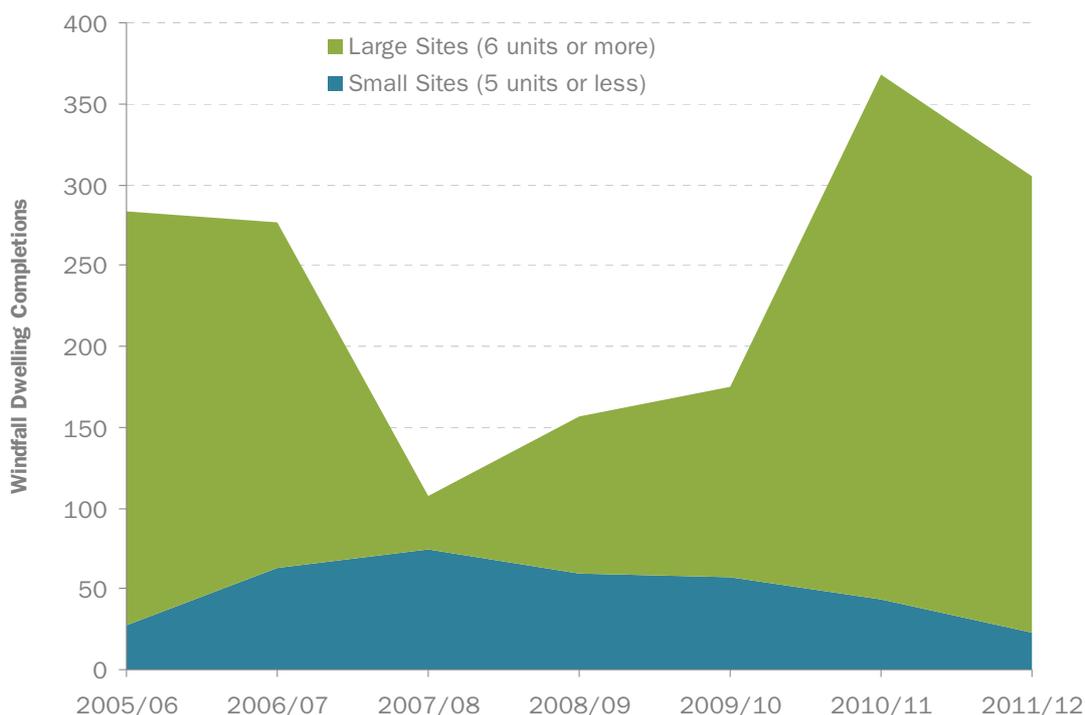
Financial year	Net units on sites of 5 units or under				Net units on sites of 6 units or more				Total
	Garden		Non-garden		Garden		Non-garden		
	New Build	Conversion	New Build	Conversion	New Build	Conversion	New Build	Conversion	
2005/06	3	0	5	19	0	0	257	0	284
2006/07	25	0	31	7	7	0	193	14	277
2007/08	24	1	21	28	0	0	34	0	108
2008/09	20	0	22	18	6	0	82	9	157
2009/10	11	0	36	10	0	0	108	10	175
2010/11	9	1	14	19	0	0	314	11	368
2011/12	3	0	20	0	25	0	251	6	305
Annual Average	14	0	21	14	5	0	177	7	239

Source: EFDC Monitoring Data (2005/06 - 2011/12) Note: Numbers may not sum due to rounding.

- 10.8 Although peaking at 368 dwellings in 2010/11, delivery of homes on windfall sites has been as low as 108 dwellings in 2007/08, albeit windfall delivery in the two most recent monitoring years has been the highest. These high levels

of windfall delivery reflect the fact that the finite supply from allocated sites in the Local Plan (adopted 1998 with alterations in 2006) has become exhausted as these sites were built out, meaning that overall housing supply in Epping Forest District has been increasingly dependent on windfall delivery for this monitoring period. This is also partly reflected in the size of windfall sites coming forward, with proportionally more large sites of 6 units or more coming forward in the more recent monitoring years, as larger sites which were not allocated in 1998 have since become available and come forward. Figure 10.1 illustrates the delivery of windfall dwelling completions by site size.

Figure 10.1 Windfall Completions by Large and Small sites



Source: EFDC Monitoring Data (2005/06 - 2011/12)

10.9 Completions on sites totalling 5 units or less have averaged 50 dwellings per annum, whilst completions on sites totalling 6 units or more have averaged 190 dwellings per annum over the last 7 years. This illustrates that the smaller sites which fall below the SLAA threshold only form circa 21% of windfall delivery. While it can be reasonably assumed (subject to the issue of garden land development, considered below) that such small schemes could continue to provide windfall deliveries in the future, the recession and associated impacts appear to have had an impact on the rate, which has been falling since a peak in 2007/08. Such an allowance on small sites would not represent a double counting of capacity from the SLAA sites.

10.10 Large sites form a greater proportion of windfall supply, with a small number of larger windfall schemes having made a particular contribution over the last 7 years, including the Epping Forest College site in Loughton (246 dwellings), the Former Parade Ground Site in North Weald (124 dwellings) and the St Margaret’s Hospital site (131 dwellings). The extent to which similar previously

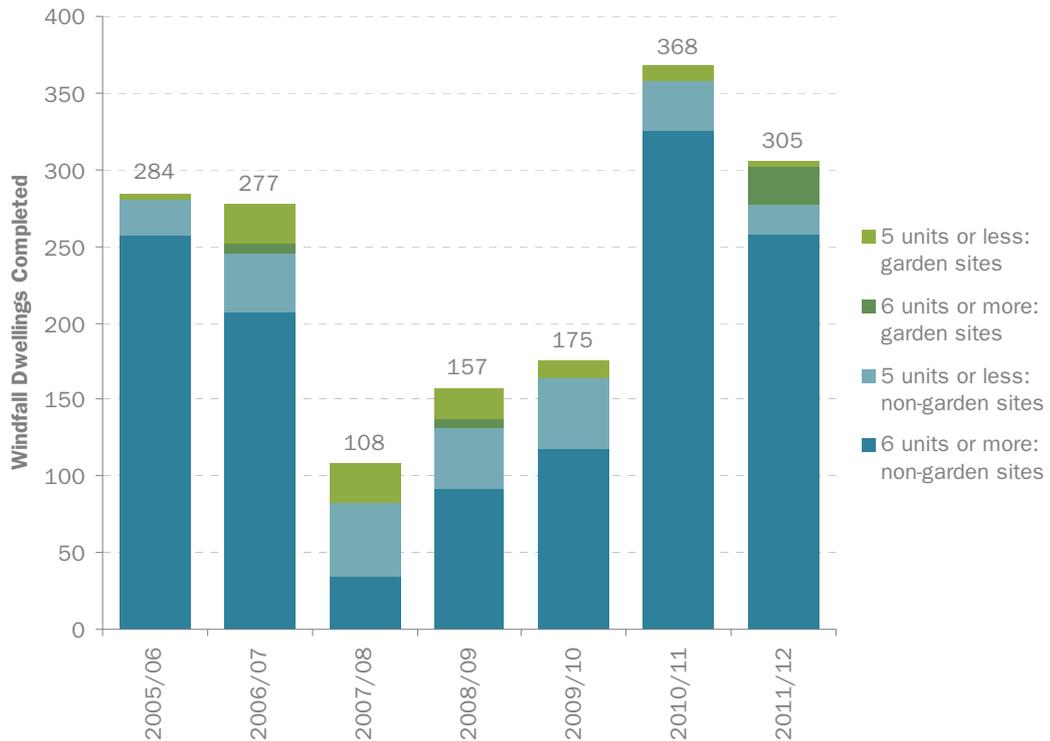
developed sites will come forward in the future is less clear. It would not be appropriate to assume that windfalls on large sites will continue to come forward at the same average rate as some of the future sources of such larger windfalls are likely to have been assessed through the SLAA and could form new allocations. However, it is also impractical to assume that no sites over 6 dwellings will come forward as windfalls, particularly as landowners who currently occupy sites may not have put them forward through the Call for Sites process if they have not made a decision on their future occupation. For example, where there are existing uses present on a site and the SLAA has therefore not specifically assessed the site, it could be that over the course of the Local Plan period those existing uses cease and the site can come forward for redevelopment, similar to that which has occurred since the last set of site allocations in 1998. On this basis some large sites may continue to come forward as windfalls.

- 10.11 Whilst the methodology of the SLAA is robust and consistent with Government guidance, it cannot predict every eventuality in respect of sites coming forward and it would not be a proportionate or manageable process to assess all parcels of land in the District simply on the chance that they may come forward in future years (a factor that would likely be unknown at this point time in any case, if it hasn't been put forward by a party promoting development).
- 10.12 It is clear that in including an allowance for windfalls on large sites, a pragmatic approach needs to be adopted to ensure that such delivery is not double counted with sites already in the SLAA process. Logically, large windfalls will not come forward in the formative years of the new Local Plan, as they will have been identified and allocated during the process. However, as these are built out an increasing number of completions on sites of 6 units or more may come forward in latter years of Local Plan, as has been seen recently.

Garden Sites and Property Conversions

- 10.13 The majority of windfalls have occurred on non-garden sites, with an average of only circa 9% of total windfall delivery on residential gardens. The scale of windfall delivery on residential garden sites is illustrated in Figure 10.2.

Figure 10.2 Trends in Garden and Non-Garden Windfall Development



Source: EFDC Monitoring Data (2005/06 - 2011/12)

10.14 The NPPF identifies that for the purposes of five year land supply analysis, any windfall allowance must exclude residential gardens. For the sake of consistency, NLP has assumed that this principle applies to windfalls across the plan period. These completions must be removed from any analysis of past trends when arriving at a conclusion of what could realistically come forward as windfalls in the future. Average delivery on non-garden sites over the past 7 years has been 35 dwellings per annum on sites of 5 units or less and 184 dwellings per annum on sites of 6 units or more.

10.15 A further consideration in assessing future windfall analysis is the extent to which any allowance could generate other outcomes. In many places where there are constraints on the supply of new dwellings and property prices are high, a common source of windfall dwellings is conversion of other buildings or sub-division of existing units. This can place particular pressures on the existing stock of buildings, including employment floorspace where offices may be converted to residential units, and also larger family properties, which may be sub-divided to create a number of flats. Theoretically, for conversions there may be a decreasing number of opportunities, limiting the extent to which these will continue to come forward, or there may be other policy reasons for reducing the scale of windfalls that come forward through conversions. However, conversions only account for circa 9% of all windfalls on non-garden sites averaging just over 20 dwellings per annum. The number of windfalls from conversions is therefore relatively small in comparison with other sources and also in comparison with the existing stock of property in the District. Any reduction would therefore assume that they would cease completely, an

outcome for which there is no evidence. It is thus reasonable to assume that conversions could continue at a similar level in the future.

Adopting a Windfall Allowance

- 10.16 The above analysis of past trends in windfall housing delivery shows that over the past 7 years almost all housing delivery in Epping Forest has been from windfall sites, reflecting the fact that previous allocations had been built out. The extent to which these trends in windfalls will continue is based on a range of factors including whether patterns of redevelopment or the market are likely to remain the same or change. With regard to both of these factors, engagement with key stakeholders during the SLAA identified that the structural drivers of housing in Epping Forest will remain strong and that the relative strength of the housing market, with high values, will continue to support the delivery of development at both small and larger scales. This suggests that windfalls will continue to be delivered in the future, although a key change will be the extent to which new land is allocated within the new Local Plan or the extent to which policies change to allow windfalls to come forward (such as policy changes to enable greater numbers of small infill developments within villages in the Green Belt, which is an option the Council may consider through its production of the new Local Plan).
- 10.17 It is reasonable to assume that dwelling completions on small sites of 5 units or less will continue at a similar rate, with none of these sources of completions likely to have been assessed through this SLAA. Large windfall sites, however, will not come forward at the same rate, with many such sites likely to have been assessed in the SLAA. Applying a figure for large site windfalls based on past trends is inherently difficult for Epping Forest District due to the contribution that such sites have made to supply in the absence of allocated sites which were already built out. It also requires a judgement on the extent to which this SLAA has been exhaustive in identifying such sites which may otherwise form large windfall sites.
- 10.18 If no sites were allocated in the District it may be reasonable to assume that the past average rate of 184 dwellings per annum on large windfall sites could come forward in the future. However, with many of these sites likely to be identified through the SLAA (and allocations subsequently made through the local plan), a nominal rate of 25% of this past trend is reasonable to assume as a continuation over the course of a new local plan period. This would be a discount on past trends, reflecting the fact that previous trends would not prevail as new allocations are made, but that similarly this SLAA has not been exhaustive in assessing existing urban sites with incumbent uses. This would total an average annual delivery of 46 dwellings, equivalent to a site similar in size to the Meadow View development near Ongar Station (40 dwellings) coming forward each year (or alternatively a number of smaller sites).
- 10.19 The NPPF is clear that housing windfalls on residential garden sites should be excluded. On this basis, a realistic windfall allowance, would be as follows:

- a An allowance for 36 dwellings per annum on sites of 5 units or under and not on residential gardens, based on the average rate seen on such sites which have reasonably consistently come forward, despite the impacts of the recession;
- b An allowance for 46 dwellings per annum on sites of 6 units or over and not on residential gardens, based on assumed rate of delivery of 25% of recent trends on large sites (184 dwellings per annum). This assumption reflects a discount to take into account that (i) some large sites will have been identified in the SLAA and (ii) delivery on large windfall sites will be minimal in the early years of the new Local Plan but is likely to increase in later years as new sites not assessed in the SLAA or allocated in the Local Plan emerge (for example those in years 10-15 of the plan).

10.20

Overall, based on past windfall housing delivery and consideration of market trends, it is anticipated that an average of circa 82 dwellings per annum is a justified and evidenced rate of windfall housing delivery which could come forward in Epping Forest District. This would not necessarily be a constant level of delivery as it would be anticipated that windfalls would be lower in the early part of any Local Plan period and higher in the latter part of any Local Plan period. It does, however, provide a smoothed average which could be anticipated over the course of a full Local Plan period of 15 years.

11.0

Conclusions and Recommendations

11.1

This study has undertaken the SLAA to the adopted EFDC methodology, consistent with the requirements of the NPPF and the approach outlined in the CLG SHLAA guidance. In particular the SLAA has assessed whether and when sites could be developed for housing, employment and retail uses. In addition the study has undertaken site appraisals and derived an estimation of the deliverability and developability of some 372 potential development sites in the District.

11.2

Assessing the suitability, availability and achievability of a site will provide the information on which a judgement can be made in the plan-making context as to whether a site can be considered deliverable, developable or not currently deliverable or developable for development. The evidence presented in this report represents an objective view of the housing, retail and employment space potential for sites and will assist Epping Forest District Council in taking policy decisions during its preparation of the EFDC Local Plan.

Key Findings

11.3

The study has identified a wide range of potential development sites which are considered suitable, available and achievable. In total the SLAA identifies that Epping Forest District has sites with an overall land capacity for 83,249 dwellings, 1.6 million square metres of employment floorspace and 32,800 square metres of retail/leisure floorspace, **if** all sites assessed as suitable were built out (which of course in reality they would not be). Table 11.1 provides a summary of the sites and dwellings that are deliverable and developable.

Table 11.1 Summary of Sites and Development Capacity Findings (for Suitable sites only)

Site Classification	No. of Sites	Dwelling Yield	Commercial Yield (m ²)	Retail Yield (m ²)
Deliverable (0-5 Years):	219	41,193	890,894	23,570
Developable (5 Years Onwards):	30	8,970	345,540	5,300
Not Deliverable or Developable on Current Information:	84	33,066	359,900	2,000
Not Deliverable or Developable:	39	~	~	~
Total	372	~	~	~
Of Which Suitable	335	83,249	1,600,334	32,870
Of Which within Current Planning Policy	32	1,216	50,860	24,870

Source: NLP analysis

11.4

This indicative level of development capacity suggests Epping Forest District does not need to identify further broad areas to meet its likely housing requirements given the scale of opportunities assessed in this assessment. Notwithstanding, only a small amount of development capacity, equivalent to only 1.5% of all capacity for housing assessed, is within the parameters of existing local planning policy (as reflected by the adopted Local Plan 'saved policies'). On this basis, and in line with the provision of the NPPF which allows

windfalls to be included within prospective supply, it is appropriate to consider the extent to which windfalls could contribute to supply beyond the sites identified in the SLAA. It is estimated that circa 82 dwellings per annum could be delivered as windfalls, which over a 15 year Local Plan period could total supply of up to 1,230 dwellings across the District on sites not identified in the SLAA.

- 11.5 It is important to acknowledge that it is highly unlikely that the total development yield of all sites indicated in the SLAA could be built-out across the area. To do so would require a considerable change in the demand and supply dynamics for development in the District, including an increase in realisable demand so as to not flood the market with properties that wouldn't be able to be sold or occupied. Additionally, to deliver such increased levels of development would be dependent upon other factors which will affect the overall delivery of sites, such as the need to make substantial investment in local infrastructure to support growth. Therefore, it is important to emphasise that the SLAA remains the starting point for EFDC in preparing its Local Plan to ensure that there is an adequate development land supply to meet the objectively assessed development needs of the area.
- 11.6 Despite the above demonstrating a supply that is potentially far in excess of objectively assessed housing requirements (which are currently being examined through the EPOA Population and Household Projections work) there are a number of key issues and constraints which the SLAA process has highlighted which may be a key consideration in some of the choices that EFDC faces, in planning for growth in the future.

Green Belt

- 11.7 The majority (86%) of the sites fully assessed are within the Green Belt and of those the majority are greenfield sites, including many which take on characteristics of previously developed land associated with their previous agricultural uses (e.g. derelict nurseries) but are in fact specifically excluded from the definition of previously developed land within the NPPF.
- 11.8 The NPPF outlines the national policy on Green Belt stating that:
“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”
- 11.9 The SLAA provides an objective assessment of many Green Belt sites, which, if it is deemed necessary to review Green Belt boundaries through the preparation of the Local Plan, could meet development needs in the District. With a limit on the capacity of non Green-Belt land to accommodate development, and even then further factors affecting non Green Belt sites (such

as allocation as local open space or recreational land), release of land from the Green Belt is one option which may be considered and the SLAA identifies that there are numerous potential suitable development locations throughout the District that might warrant consideration for Green Belt amendments.

Release of Urban Open Space or Employment Land for Housing

- 11.10 There are a number of sites assessed within the SLAA, including many of those not in the Green Belt, which are currently allocated or performing a function as urban open space, such as playing fields or allotments, or employment land, such as existing industrial estates. Given the small number of sites judged to be deliverable or developable outside of the Green Belt, an alternative (or additional) option to Green Belt release in a location may be the release employment land or urban open space for housing development.
- 11.11 The NPPF advises that provision of facilities for outdoor sport and recreation could be appropriate for the Green Belt, if it preserves the openness of the Green Belt. It may be appropriate, through the sites identified in the SLAA, to relocate existing recreational facilities within settlements to areas nearby in the Green Belt to enable development to occur without a loss of recreational amenity.
- 11.12 Due to the interplay between competing uses and the existing policies seeking to protect the Green Belt, Employment Land and Urban Open Space, the Local Plan will need to clarify and respond to these challenges, creating a unified policy approach.

Strategic Sites and Urban Extensions to Harlow

- 11.13 There are a number of large strategic sites identified within Epping Forest District but adjacent to Harlow, which were identified on the basis of their perceived ability to meet the growth needs of Harlow. These include sites to the west of Harlow near Roydon, sites to the south of Harlow and sites to the east of Harlow. These options for strategic development are comprehensively reviewed as part of the Harlow Area Spatial Options Appraisal Technical Study undertaken in 2010. These strategic sites vary in size, but form over 10,000 dwellings worth of the total capacity for residential development identified in the District.
- 11.14 Clearly, depending on the scale of growth now required in Harlow, not all of these sites will necessarily need to come forward, and there are other options, outside of Epping Forest District (and not assessed as part of this SLAA), which could similarly meet the expansion needs of Harlow. In this regard, the SLAA has objectively assessed each of the Epping Forest sites against the methodology and the adopted criteria, to arrive at a conclusion on the Deliverability and Developability of each individual site. As stated elsewhere, the assessment is one focused on how a site performs in terms of constraints rather than benefits and opportunities. The strategy for Harlow's growth will need to consider all of the options available, including cross-boundary issues and the extent to which development adjacent to Harlow within Epping Forest

District could achieve a pattern of sustainable growth for both Local Planning Authorities.

Recommendations

- 11.15 Flowing from the conclusions, there are a number of recommendations that Epping Forest District Council should take into account when using and applying the outcomes and findings of the SLAA.

Monitoring and Updating

- 11.16 This SLAA only provides a moment in time snapshot assessment of the suitability, availability and achievability of sites and this will need to be regularly updated to reflect changes in available evidence relating to each site or changes in policy/assessment criteria. The CLG Guidance suggests that SHLAAs should be updated annually to demonstrate a rolling 5-year supply of land and to reflect the most up to date information.
- 11.17 NLP has undertaken the SLAA to a consistent methodology based upon the information available at the time of the assessment. It is inevitable that the information will change and that the site assessments may also change in relation to the evidence available. This SLAA provides a methodology and a framework, including a database tool, to enable Epping Forest District Council to update the SLAA in the future.

Integration with the wider Evidence Base

- 11.18 The SLAA is only one input into the Local Plan and the policy making process that Epping Forest District Council will need to go through. Particularly in the context of the removal of regional housing targets it will be necessary for Epping Forest District Council to consider what the objectively assessed need for housing and other uses is, and the aspirations the Council has for development within the District, taking into account the objectives, principles and policies of the NPPF.
- 11.19 In this context, whilst the SLAA provides a supply based assessment of the land potentially available to meet development needs in the District, it will need to sit alongside other evidence, including assessments of local need and demand for development provided in the ELR for employment, the Town Centres Study for retail and leisure, the EPOA Population and Household projections for housing, and the consideration of development options for Harlow. The SLAA will also need to sit alongside other evidence on the capacity of the District to accommodate growth, including an infrastructure study, a transport assessment and an assessment of market capacity. Combined, these will help to inform updates to the SLAA and may highlight issues which alter the assessments made. The other technical assessments within the evidence base will need to be considered alongside the SLAA in the formulation of policy and allocation of sites.

Competing Land Uses

- 11.20 As identified in the conclusions, an important issue is the potential for competing land use aspirations on sites. A key recommendation of the SLAA is that the assessments of sites contained within this study as to the suitability of individual sites for development should be considered against the appraisals of the sites' quality and contribution to meeting needs for its existing use. For example, whilst the SLAA may identify a site as suitable for housing development and score it relatively well against the suitability criteria, the site may be of greater value in its current use. Particularly for sites such as recreational land (e.g. playing fields), car parks, employment land, the relative scarcity of good quality sites in these uses may weigh against the degree to which a site is viewed as suitable for redevelopment. Assessments of the contribution of a site to its existing use (e.g. through the ELR or through the Open Space, Sport & Recreation Assessment) will need to be considered.

Ownership

- 11.21 The SLAA incorporates a wide range of potential sites that have come forward through a call for sites exercise. The sites in the Call for Sites exercise have in the main been submitted by the site owner or a third party with the owner's consent and, therefore, for these sites a reasonably comprehensive database of ownership details has been collected. Other sites have either been submitted through the call for sites exercise with incomplete ownership information or have been identified outside of the call for sites process. As a result, the availability and achievability analysis has been undertaken without a full understanding of certain availability constraints for certain sites, and these sites have not been identified as deliverable or developable on current information. Without a complete picture of whether the sites can truly be considered available, the inclusion in the SLAA can only be treated as an indication of potential. It is recommended that, if EFDC wishes to include a certain site or area within its emerging strategy through the Local Plan, land ownership and aspirations are established, either through consultation exercises or directly through land registry searches.

Summary

- 11.22 This SLAA reveals a considerable number of suitable, available and achievable sites, with a substantial capacity for development of new housing, employment and retail, which Epping Forest District Council can work within. This gives scope for the Council to work further on the identification of site specific issues to underpin the production of its Local Plan and to support the making of key spatial choices for housing, employment and retail development within the District.



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