

# Enfield Council

## Strategic Housing Land Availability Assessment (SHLAA) Methodology

November 2020

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# 1. Introduction

- 1.1 This document sets out a proposed methodology for the preparation of a Strategic Housing Land Availability Assessment (SHLAA) for the London Borough of Enfield.
- 1.2 Before finalising the methodology, the council is seeking views from a range of organisations on the suitability of the approach. Public consultation as part of the SHLAA production process is not required. However, we are consulting on the draft methodology for the SHLAA so that stakeholders have the opportunity to input and help refine the methodology before we start the study. There are a number of assumptions that need to be made in the study and we would welcome input at this early stage. The consultation will run for two weeks from 15 October to 29 October 2020. Comments should be submitted to the council via email to [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk).
- 1.3 Following the consultation and consideration of the responses received, we will consider the responses to this consultation and refine the methodology where necessary to take account of comments made. We will use this as the basis of preparing the Enfield SHLAA and include a schedule in the SHLAA to show how the consultation responses have been taken account of.
- 1.4 Enfield's SHLAA will inform the following:
  - Local Plan housing policies (including Gypsy and Traveller pitch provision);
  - Infrastructure planning;
  - Five-Year Housing Land Supply calculations;
  - Enfield's Brownfield Land Register.

## What is the purpose of the strategic land availability assessment?

- 1.5 A Strategic Housing Land Availability Assessment (SHLAA) is a technical exercise to determine the quantity and suitability of land potentially available for housing development. The purpose of the SHLAA is to identify future supply of land which is suitable, available and achievable for housing uses (including Gypsy and Traveller Pitch provision) over the local plan period.
- 1.6 It is a required part of the evidence base needed for the preparation of a Local Plan<sup>1</sup>. The NPPF requires Local Plans to identify a supply of specific, deliverable sites for years one to five of the plan period (with an additional buffer of 5% or 20%, moved forward from later in the plan period), and specific sites or 'broad locations' for years 6 to 10, and if possible for years 11- 15.
- 1.7 The overall approach of Enfield's SHLAA will be broadly in line with the London Plan Strategic Housing Land Availability Assessment (SHLAA) 2017<sup>2</sup> and updated in line with current national guidance and local progress. The assessment is an important source of evidence to inform the emerging Enfield Local Plan and decision-taking, and the identification of a five-year supply of housing land and seeks to establish realistic assumptions about development potential of the land identified and when development is likely to occur. It provides an update to the London Plan Strategic Housing Land Availability Assessment.
- 1.8 The SHLAA lists and maps sites within Enfield that may have potential for housing development (including Gypsy and Traveller pitch). Most of the sites are submissions from landowners and developers for possible future development potential. **It is important to note that the sites in the SHLAA are NOT allocated for development.** It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs. The inclusion of sites within SHLAAs also does not preclude them from being developed for alternative suitable uses. The exclusion of sites from SHLAAs (either

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<sup>1</sup> NPPF paragraph 67

<sup>2</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/strategic-housing-land-availability-assessment>

because they have not been identified or have been assessed and discounted) does not preclude the possibility of planning consent being granted in the future. The decisions regarding which sites will actually be allocated will be made in the Local Plan documents that will be subject to full public consultation before any decision is made.

- 1.9 Furthermore, where land is found deliverable (or developable) in the SHLAA it does not indicate it should be granted planning permission or will be selected for Local Plan site allocation. The SHLAA includes estimates of housing and/or Gypsy and Traveller pitch potential on individual sites. These are not based on detailed designs so should not be assumed as acceptable for the purposes of development management decisions and should not prejudice any decision that may be made on the site at a later date.
- 1.10 The SHLAA will form a critical part of the evidence base for the future of the Local Plan. It will be updated on an annual basis as further sites may be submitted after the initial call for sites period has ended. The SHLAA is not intended to replace any Position Paper or individual authority's monitoring data such as Authority Monitoring Reports which are published annually as these tend to look back on housing delivery while the purpose of the SHLAA is to form part of an evidence base that provides information in relation to future plan making. SHLAAs do not represent planning policy or planning approval.

## 2. The Enfield Strategic Housing Land Availability Assessment Methodology

- 2.1 The Government's National Planning Practice Guidance (NPPG) - Housing and economic land availability assessment (July 2019), sets out how land availability assessments should be undertaken. The SHLAA will be undertaken in line with the methodology set out in the NPPG<sup>3</sup>. In summary, the method comprises the following five stages:
- Stage 1 - Identification of sites and broad locations with potential for development
  - Stage 2 - assessing their development potential including site suitability, availability and achievability
  - Stage 3 – assessing potential for windfall sites
  - Stage 4 – reviewing the assessment
  - Stage 5 – assessing the core outputs to inform the evidence base for the Local Plan
- 2.2 The proposed Enfield SHLAA methodology aligns with the London SHLAA methodology. The size threshold aligns with the approach taken by the London Plan SHLAA (2017) which estimates capacity on sites above 0.25ha. Within the London Plan SHLAA methodology housing delivery potential on sites beneath 0.25ha was estimated through a modelling exercise where average annual trends in housing completions were adjusted to take into account the expected impact of planning policy changes in the draft London Plan. Our proposed approach to estimating Windfall allowance is set out under Stage 3.
- 2.3 The Government's National Planning Practice Guidance advises on the methodology that should be followed in preparing a SHLAA. It breaks the process into five broad stages and summarises these using the flowchart set out in figure 1 below. The intention is to adopt this broad methodology and the following sections describe how each stage of the Enfield Assessment will be undertaken.

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<sup>3</sup> Paragraph: 005 Reference ID: 3-005-20190722

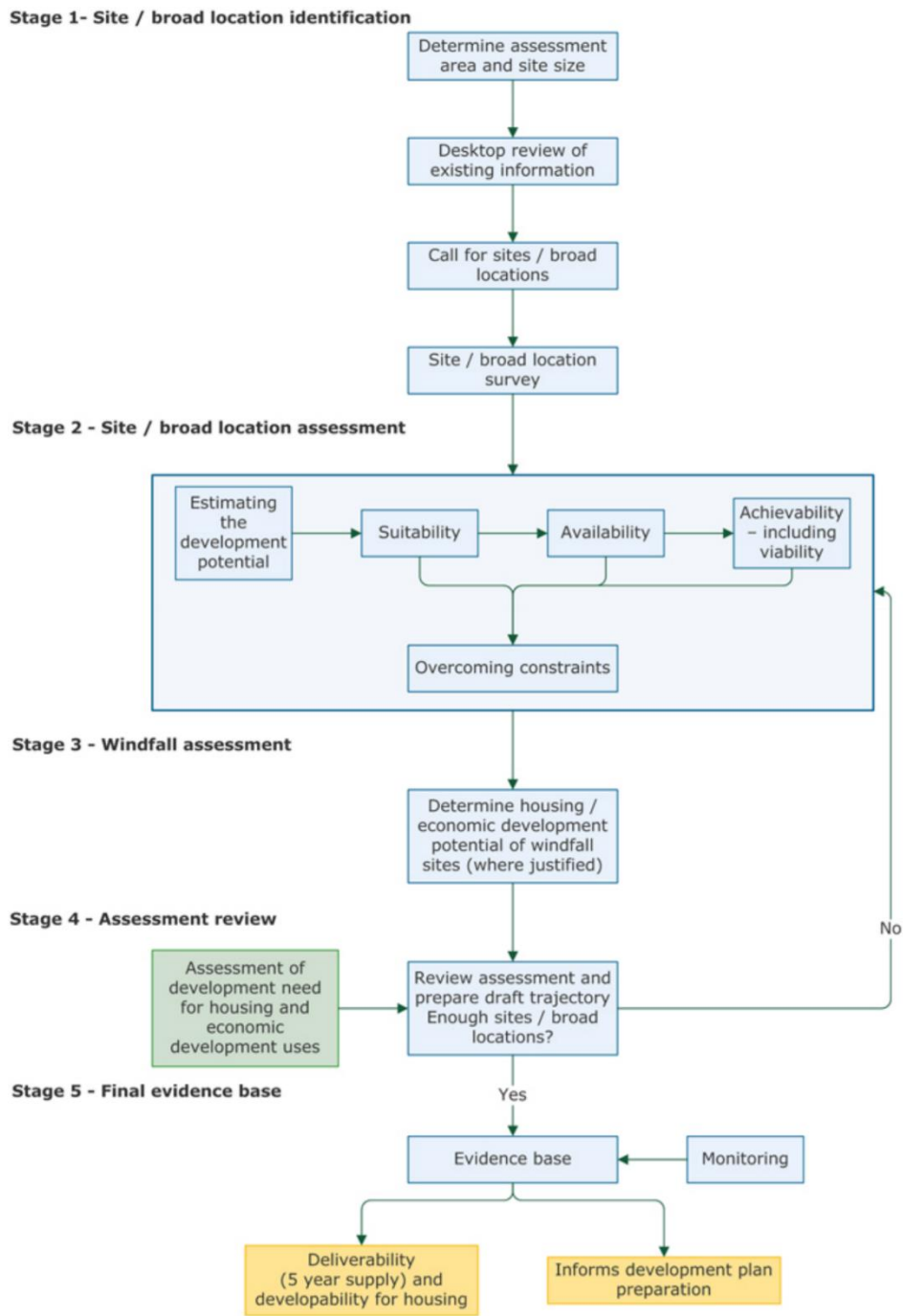


Figure 1: Methodology Flow Chart<sup>4</sup>

<sup>4</sup> Paragraph: 005 Reference ID: 3-005-20190722

## Stage 1 - Identification of sites and broad locations

### What geographical area will the assessment cover?

- 2.4 The National Planning Practice Guidance (NPPG) advises that the area selected for the assessment should be the plan-making area<sup>5</sup>. It goes on to add that assessment needs to be undertaken and regularly reviewed working with other LPAs in the relevant housing market area (HMA) or functional economic area (FEMA). The Council's Strategic Housing Market Assessment (2015) indicates that London has always been considered as a single market area although within it there are a range of sub-markets. The data underpinning the SHMA suggests that Enfield can be considered as a single local market area for housing. The Council is reviewing its FEMA as part of Local Plan preparation, but the existing FEMA covers a geographical area that is much broader than the borough itself. Notwithstanding, as the SHLAA will only seek to identify land availability for housing, therefore the FEMA is not considered to be relevant in deciding the geographical area the SHLAA should cover. The assessment area is proposed to cover the London Borough of Enfield area.

### How will sites be identified?

- 2.5 As the purpose of the SHLAA is to provide evidence for future plan making, we want to take a proactive approach in identifying as wide a range as possible of sites and broad locations for development, and the NPPG advises that authorities should not just rely on sites already known to them and should seek to identify new opportunities through land availability assessments. In accordance with the Guidance, assessments will be made of different site sizes from small-scale sites to opportunities for large-scale developments such as extensions to urban areas and/or villages and new settlements where appropriate.
- 2.6 The Planning Practice Guidance<sup>6</sup> sets out what types of sites and sources of data should be used. It indicates that plan-makers should consider all available types of sites and sources of data and includes a list of those which might be particularly relevant. Appendix 1 sets out which sources are proposed to be reviewed in relation to this guidance.
- 2.7 There will inevitably be a degree of overlap within and between all sources of supply considered. As such, it will be important to 'cleanse' the data to ensure that each site has a correct, unique and identifiable site boundary and that no sites are double counted, either in part or as a whole.
- 2.8 In addition to the sites identified from the above sources, a 'Call for Sites' will be used to identify development sites that are not currently within the planning process and to provide updated information on sites that have previously been identified. The Council has undertaken a number of 'Call for Sites' exercises since 2016. The cut-off date for new sites to be submitted to the latest round was May 2020. However, given the overarching high levels of development needs the Council wants to ensure that the 'door is always open' for anyone who may want to promote a site. As such, any information on new sites which is received outside of this 'formal' call for sites period will not be disregarded - the details will be kept on file and reviewed as part of the next update of the SHLAA.
- 2.9 All new sites identified during the relevant monitoring period will be assessed against the methodology. In addition, all sites previously considered, including those that were previously scoped out of the study, will be 're-visited' to ensure that assumptions made were correct and / or that circumstances have not changed.
- 2.10 A desktop review of existing information will be carried out by the Council to identify potential sites for development. All the sites identified in both the desktop review and 'Call for Sites' will

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<sup>5</sup> Paragraph: 006 Reference ID: 3-006-20190722

<sup>6</sup> Paragraph: 011 Reference ID: 3-011-20190722

be included in a comprehensive list of sites, and information about them will be recorded in the SHLAA database. Table 1 lists sources of potential sites.

Table 1: Sources of potential sites

Source of data
Enfield Planning Applications
The returns from Enfield's Call for Sites and Call for Small Sites (including additional consultation with relevant LBE stakeholders regarding Council estates with capacity for intensification and Council owned land either surplus or likely to become surplus over Plan period)
Public sector land, including that owned by GLA and TfL, either surplus or likely to become surplus over Plan period, in addition to that identified through the Call for Sites (identified through direct consultation with 'GLA family')
Sites currently at pre-application stage
Sites with development briefs and/or developer masterplans
London SHLAA 2017
Existing Development Plan Allocations or neighbourhood plan allocations not yet completed
The GLA's London Development Database (LDD)
Enfield Brownfield Land Register
Sites identified through adopted or emerging Neighbourhood Plans in Enfield

## What size threshold should be considered?

2.11 The NPPG<sup>7</sup> states that it may be appropriate to consider all sites and broad locations capable of delivering five or more dwellings on sites of 0.25ha and above, but that plan makers may wish to consider alternative size thresholds. Looking at the LDD for Enfield and over a 10 year period (2009-2018) to understand the nature of Enfield's housing supply, the data shows that approximately 248 dwellings per annum comes from sites below 10 dwellings (approximately 42% of the supply), with 156 dwellings coming from sites below 5 dwellings (approximately 26.5% of the supply). In light of the NPPG and the nature of Enfield's housing land supply, we consider that a site size threshold of 5 dwellings or more is appropriate. The windfall allowance will factor in sites under 5 homes, and therefore submitted sites beneath this threshold will not be assessed as part of the SHLAA.

<sup>7</sup> Paragraph: 009 Reference ID: 3-009-20190722



## Stage 2: Site / Broad location Assessment

- 2.12 Having collated all sites identified from all the various sources outlined above the next step is to undertake an initial sift to exclude sites that are not considered to have any reasonable development potential, having regard to national and local policies and designations. Sites lying wholly within the constraints identified in Table 2 will be excluded.

Table 2: Constraints on basis of which sites to be excluded

<i>Level 1 – Sites to be excluded</i>
<ul style="list-style-type: none"> <li>• Sites within the functional floodplain (Flood Zone 3b)</li> <li>• Special Areas of Conservation (SAC)</li> <li>• Sites of special scientific interest (SSSI)</li> <li>• Special Protection Area (SPA)</li> <li>• Ramsar sites</li> <li>• National Nature Reserves (NNR)</li> <li>• Ancient Woodland</li> <li>• Suitable Alternative Natural Greenspace (SANG)</li> <li>• Grade 1 and 2 agricultural land</li> </ul>

- 2.13 In accordance with the National Planning Practice Guidance<sup>8</sup>, sites will be assessed to determine their suitability, availability and achievability, including whether the site is economically viable.

- 2.14 The methodology utilises six steps in order to achieve this, as outlined in Table 3.

Table 3: Stages of Site Assessment

<p><b>Step 1: Site Surveys</b> Assemble the key information for each selected site</p>
<p><b>Step 2: Assessing availability</b> Consideration of factors such as site ownership, developer/owners' intentions etc.</p>
<p><b>Step 3: Assessing suitability</b> Consideration of primary development constraints, including spatial and environmental indicators.</p>
<p><b>Step 4: Assessing achievability</b> Consideration of known delivery issues e.g. market costs, etc.</p>
<p><b>Step 5: Finalising assessment outcome</b> Based on the first 4 steps, summarising the deliverability of the sites and likely timescales</p>
<p><b>Step 6: Site capacity (where appropriate)</b> Assessing site capacity using up to date evidence or if this is not available, a formula based approach.</p>

<sup>8</sup> Paragraph: 001 Reference ID: 3-001-20190722

## Step 1: Site surveys

2.15 The site survey will involve both a desk-based assessment and where appropriate, site assessment by officers. The survey will include collecting and assigning information relevant to each site including:

- Site size and address
- Site boundary including assessment of site overlaps
- Ward
- Whether there are any planning permissions / consents on the site or development progress (e.g. ground works completed, number of units started, number of units completed)
- Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development
- Whether there are any lapsed consents
- Current land use and character of surrounding area (bad neighbour impacts)
- Owner intentions (including through discussion with relevant stakeholders where required);
- Potential physical constraints, environmental constraints, access/highways and access to local services
- Planning policy constraints  
The identification of policy or highways constraints present on a site will not result in any such sites being excluded from assessment but will be noted and used in the determination of their development timeframes.

## Step 2: Assessing availability

2.16 This step involves assessing every site and determining whether they are available for development now or if it can reasonably be expected for them to become available during the Plan period. To establish whether a site is 'available', guidance in the NPPG<sup>9</sup> will be followed. It states that a site is considered available for development, when, on the best information available (confirmed by the 'Call for Sites' and information from land owners), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. The existence of a planning permission does not necessarily mean that the site is available. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. Previous planning history may also be taken into account, for example the site may have a history of unimplemented permissions.

2.17 The following site statuses, where the site was not completed or superseded by a completed site, are considered to demonstrate evidence of availability, sufficient for them to be counted in the study:

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<sup>9</sup> Paragraph: 019 Reference ID: 3-019-20190722

- Sites submitted for planning application or pre-application in the last 5 years;
- Sites submitted to the London SHLAA Call for Sites;
- Sites submitted to the Council's Call for Sites exercise by either a) a landowner or site promoter, or b) by a third party with evidence of availability from a landowner or site promoter;
- Publicly-owned land identified in consultation with the Council or the GLA family as likely to be available for development within the plan period; and
- Sites for which a Development Brief or Developer Masterplan has been drafted.

2.18 Where sites are submitted or suggested for assessment by a third party that is not the owner, developer or site promoter the methodology aims to establish such sites' availability by further investigation and evidence gathering whilst having regard to the government guidance's on taking a thorough but proportionate approach. These would be sites that were either included as part of the call for sites exercise or included as part of London SHLAA 2017 where the availability was not assessed.

2.19 The assessment of each site will be classified into the categories set out in Table 4.

*Table 4: Availability classification*

<b>Available</b>	Sites where confirmation of availability within the next 15 years has been received from the landowner and there are no known legal issues or ownership problems.
<b>Potentially available</b>	Sites where the landowner or a third party with an interest has promoted the land but confirmation has not been received from the landowner that the land will be available within the next 15 years. In particular, this might include land which is in multiple ownerships and may have site assembly issues, and land which accommodates an existing use which would require re-location but arrangements are not in place to achieve this.
<b>Availability unknown</b>	Sites where the landowner has not expressed an interest in promoting the site; or landownership remains unknown following investigations; or the landowner has expressed an interest in promoting the site in the past but has not responded to subsequent enquires for a period no shorter than three years; or the land is subject to legal issues upon which further information is required before a robust decision can be made on availability.
<b>Not available</b>	Sites where the landowner has confirmed that the land is not available for development in the next 15 years or the land is subject to known legal issues which are unlikely to be overcome within the next 15 years.

2.20 The availability will be recorded in the assessment in terms of the timescale in which a proposal can come forward. The assessment of availability will assist in determining whether a suitable and achievable site can come forward within the first five years.

### Step 3: Assessing suitability

2.21 The NPPG indicates that a site/broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated<sup>10</sup>.

<sup>10</sup> Paragraph: 018 Reference ID: 3-018-20190722

2.22 Having collated all sites identified from all the various sources an initial sift will be undertaken to exclude sites that are not considered to have any reasonable development potential, having regard to national and local policies and designations. This step represents a high-level analysis of available sites' suitability in planning terms for housing via the use of the geographic information systems. The first factors that will be assessed are general suitability factors such as planning policy and physical site constraints. The following general approach will be taken in assessing suitability in relation to key issues:

- Location: Sites will generally be deemed suitable with regard to this factor where they are located within areas that already have appropriate infrastructure and a suitable range of services, community and other facilities, and where the site is in conformity with the spatial strategy of the adopted development plan. Sites will generally be deemed potentially suitable where appropriate infrastructure and a range of services, community and other facilities could be provided to support the development, and where the site is in conformity with the spatial strategy in the emerging development plan. Exceptions might occur for sites which are previously developed or where there are specific industrial requirements.
- Green Belt/Metropolitan Open Land: Sites where the Green Belt assessment suggests land makes a lower contribution to the purposes of Green Belt will generally be deemed *potentially* suitable with regards to this factor. Sites where analysis suggests the land makes an important contribution to the purposes of Green Belt will generally be deemed unsuitable. Exceptions might occur for sites which are previously developed, where there are specific industrial requirements, where development would support community aspirations or where there are specific sustainability benefits.
- Employment: Sites in economic use but not designated for such uses will generally be deemed suitable for redevelopment to provide improved economic premises or potentially to provide alternative uses such as housing, subject to other considerations. Sites which are designated or in economic use will generally be deemed unsuitable for alternative uses.
- Public Open Space: Sites which are designated or recognised public open spaces will generally be deemed unsuitable for development. Exceptions might occur for sites where arrangements are in place to make alternative public open space provision, where development would fund improvements to the quality of the public open space, where the development is linked to the use of the area as public open space. Sites which are currently designated or recognised public open spaces but emerging evidence and policy suggest the site is no longer required will generally be deemed potentially suitable for alternative uses.
- Local Green Space: Sites which are designated Local Green Space will generally be deemed unsuitable for development. Exceptions might occur for sites where development would fund improvements to the quality of the space, or where the development is linked to the use of the space.
- Scheduled Monuments: Sites which contain designated Scheduled Monuments and require demolition of this will be deemed unsuitable for development. Exceptions might occur for sites where development is linked to the benefit of the historic site.
- Historic Parks and Gardens: Sites which are within registered historic parks and gardens will generally be deemed unsuitable for development. Exceptions might occur for sites which are previously developed or where development is linked to the use of the area.
- Agricultural land: Sites which do not comprise best and most versatile agricultural land will generally be deemed suitable with regards to this factor. Sites which comprise best and most versatile agricultural land will generally be deemed unsuitable. Exceptions might occur for sites where there are specific industrial

requirements, where development would support community aspirations or where there are specific sustainability benefits.

- **Other considerations:** Further suitability considerations are set out in the list below; though this is not exhaustive.

2.23 The sites will be assessed against the environmental criteria and categorised into different levels according to their level of planning constraints. The constraints set out in table 5 (below) will be carefully considered. Development within such location could still be suitable in these locations depending on the size of the site and the extent to which the constraint covers a site and its potential impact. Where a site is partially covered by Level 1 constraints capacity will be estimated on the remaining portion. For sites partially covered by Level 2 constraints capacity will be estimated on their entirety, as these sites will only be considered 'potentially suitable' and further work would need to be undertaken to assess whether there is a need to review policy designations. These constraints are likely to have an impact on the capacity of a site (e.g. affect design and layout) and the timing of when development may take place.

Table 5: Environmental and policy criteria on basis of which sites to be excluded

<i>Level 1 – Sites to be excluded</i>	<i>Level 2 – Sites with policy constraints to be considered</i>
<ul style="list-style-type: none"> <li>• Grade 1 and 2 agricultural land</li> <li>• Sites of special scientific interest (SSSI)</li> <li>• Special Areas of Conservation (SAC)</li> <li>• Ramsar sites</li> <li>• Ancient Woodland</li> <li>• National Nature Reserves (NNR)</li> <li>• Special Protection Area (SPA)</li> <li>• Suitable Alternative Natural Greenspace (SANG)</li> <li>• Cemeteries</li> <li>• Common land</li> <li>• Flood Zone 3</li> </ul>	<ul style="list-style-type: none"> <li>• Grade 3 agricultural land</li> <li>• Green Belt</li> <li>• Metropolitan Open Land</li> <li>• Strategic Industrial Land</li> <li>• Locally Significant Industrial Sites</li> <li>• Flood Risk Zone 2</li> <li>• Lee Valley Regional Park</li> <li>• Scheduled Ancient Monuments</li> <li>• Historic Parks and Gardens</li> <li>• Contaminated land where mitigation would not be possible</li> <li>• Local Open Space</li> <li>• Allotments</li> <li>• Notified Safety Zones (gas, aerodromes etc)</li> <li>• Site of Importance for Nature Conservation (SINC)</li> </ul>

2.24 The assessment of each site will be classified into the categories set out in Table 6 (below). The assessment of suitability is indicative only and does not prejudice assessments made through the Local Plan or planning application processes.

Table 6: Suitability classification

<b>Suitable</b>	The site offers a suitable location for development and there are no known constraints which significantly inhibit development for the defined use
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<b>Potentially suitable</b>	The site offers a potentially suitable location for development but is subject to a policy designation which inhibits development for the defined use. The development plan process will determine the future suitability for the defined use
<b>Suitability unknown</b>	The site requires further assessment before a robust decision can be made on its suitability for being developed for the defined use
<b>Unsuitable</b>	The site does not offer a suitable location for being developed for the defined use or there are known constraints which significantly inhibit development. The site is unlikely to be found suitable.

## Step 4: Assessing achievability

- 2.25 This step will assess all the available and suitable sites' viability. To establish whether a site is 'achievable' guidance in the NPPG will be followed which states that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time<sup>11</sup>. This is essentially a judgement about the economic and viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.
- 2.26 Given the importance of a site's suitability and availability to the assessment of achievability, the Council will ordinarily only undertake an assessment of sites which have been assessed as suitable or potentially suitable, or available or potentially available.
- 2.27 It is considered impractical to do detailed viability assessments of all sites and broad locations. A more general assessment approach will therefore be undertaken. The Council will draw on generic viability information, such as that which has been used to inform the Community Infrastructure Levy, and considering a range of factors including-

### Site factors:

- Availability of access;
- Agreements regarding necessary third-party land or property.

### Market factors:

- Adjacent uses;
- Economic viability of existing, proposed and alternative uses in terms of land values;
- Attractiveness of the locality;
- Level of potential market demand.

### Cost factors:

- Site preparation costs relating to any physical constraints;
- Abnormal works costs;
- Strategic infrastructure costs;
- Prospect of funding or investment to address identified constraints or assist development.

### Delivery factors:

- Phasing / realistic build out rates;

<sup>11</sup> Paragraph: 020 Reference ID: 3-020-20190722

- Single developer or several developers offering different housing product;
- Size and capacity of the developer.

2.28 The assessment of each site will be classified into the categories set out in Table 7.

*Table 7: Achievability classification*

<b>Achievable</b>	There is a reasonable prospect that the site will be developed for the defined use within the next 15 years
<b>Potentially achievable</b>	The achievability of the site is inhibited by an external factor where the timing of resolution is unknown. The delivery of the resolution will determine the future achievability of the site.
<b>Achievability unknown</b>	The site is subject to issues upon which further information is required before a robust decision can be made on achievability
<b>Unachievable</b>	There is no reasonable prospect that the site will be developed for the defined use within the next 15 years

## Step 5: Finalising assessment outcome

- 2.29 This step comprises summarising the environmental, availability and achievability assessment of the sites. Sites with no clear reasons as to why the site could not be developed are identified as such. Once the suitability, availability and achievability of sites have been assessed, and any constraints identified, the likely timescale and rate of development for each site will be assessed. This will be continuously updated throughout the Local Plan Review process, with advice being sought from developers on likely timetables, progress made, and any further constraints which may arise.
- 2.30 For sites in the SHLAA that are considered to have development potential, a judgement will be made on when they are likely to be capable of being delivered. In accordance with landowner intentions of other identified site-specific matters which may affect the timescales by which sites can come forward, the likely phasing of deliverable sites is taken into account. It is proposed that information on sites' suitability, availability and achievability will be used to make a judgement on when sites are likely to be brought forward.
- 2.31 It is proposed that information on indicative lead in times and build out rates will be gathered from a range of sources, including knowledge of recent development sites in the district/borough, information provided by developers and landowners and engagement with stakeholders.
- 2.32 For sites where specific information was not available the following assumptions on lead in time to first completions have been used:
- +0 months for sites where works on site have commenced;
  - +24 months for sites with a current full planning permission;
  - +30 months for sites with prior approval for development and "hybrid" permission; and,
  - +36 months for sites with a current outline planning permission.
- 2.33 The assessment of each site will be classified into the categories set out in Table 8.
- Sites classified as "deliverable" or "developable" may be expected to be developed within the next 15 years.
  - Sites classified as "potentially developable" comprise a basket of sites from which some might be deemed developable following further consideration through the local plan process.

- Sites classified as “not developable within the next 15 years” cannot realistically be expected to be developed in the foreseeable future.

Table 8: Deliverable and developable classification

<b>Deliverable (years 1-5)</b>	The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years.
<b>Developable (years 6-10, 11-15)</b>	The site is a suitable location for defined use and there is a reasonable prospect that the site is available and could be viably developed in years 6-10 or 11-15
<b>Potentially developable</b>	The site has been identified as potentially suitable and/or potentially available. Whether the site becomes developable will depend on further assessment through the plan making process, e.g. whether circumstances support the amendment or removal of existing designations, and further investigations into its availability
<b>Not developable within the next 15 years</b>	Those sites assessed as having significant policy and/or environmental constraints that means that the site is unlikely to be become suitable in the next 15 years. Those sites assessed as being unlikely to become available in the next 15 years. Those sites assessed as having no reasonable prospect of becoming achievable in the next 15 years

## Step 6: Site capacity

- 2.34 Following Step 5, site capacities for all suitable sites will need to be determined. This step involves identifying a site capacity for each site. As an overarching principle, sites should aim to make the best use of land. Every site has its own characteristics and specific set of circumstances that may influence the net developable area and density.
- 2.35 For the vast majority of sites, this will be done through a design typology case study approach. Design typology case studies will be applied to all sites under a certain size threshold, the rationale for this approach is discussed below.
- 2.36 A set of design case studies will be developed (the precise number will depend on the range of site sizes and characteristics apparent across all suitable sites). Each suitable site will then be assigned the most appropriate, relevant design typology depending on its own context and characteristics. Assignment of a design case study for each suitable and available site then enables its capacity to be estimated. This approach has been successfully defended at examination previously.
- 2.37 The design case studies will need to set reasonable, Enfield-specific assumptions about the potential capacity of sites in view of the regional and local policy and evidence context. This will involve developing a design-led approach, taking into account a wide number of important factors, including, but not limited to:
- Appropriate building heights;
  - Infrastructure capacity, including provision of blue green infrastructure requirements;
  - Development viability;
  - Climate change, nature recovery and biodiversity requirements;
  - Provision of car parking;
  - Piccadilly Line upgrades and other planned improvements to public transport accessibility; and
  - Environmental considerations



- Design and heritage considerations (having appropriate regard to conservation areas and listed buildings).
- 2.38 The aim of a capacity assessment is to provide a reasonable, in-principle, assessment of sites that are suitable, available and achievable for residential development. In this sense, the design case studies should always be thought of as a guide to the available development potential rather than having any planning status of their own. Most sites being assessed will be in private ownership. Therefore, the exact form, density and massing of the development that may eventually come forward will most likely be a product more of the planning application and determination process rather than of the capacity exercise.
- 2.39 A slightly different approach will be required for the larger sites. Design case studies become less meaningful over a certain site size. For these larger sites, use can be made of, for example, exemplars based on existing or proposed development in a comparable context, previous design or masterplan work, site promoter estimates (unless they are clearly not compliant with policy), and/or capacities already specified for the London SHLAA. While we recognise that the London SHLAA sites' capacity was determined by the GLA in line with the adopted London Plan Density Matrix and PTAL, and that this density matrix is no longer part of the new Draft London Plan, the principles of the density matrix and PTAL nevertheless remain at least a reliable starting point to determining indicative density. In addition, when determining densities and capacities, an approach that has previously been approved at Examination by a planning inspector carries significant weight, and this applies to the London SHLAA approach, which has been tested not only through multiple London borough plans but also at the London Plan Examinations.
- 2.40 On the largest sites (generally sites over 10-15 hectares) there is also a need to reflect the additional land-take required for non-residential development including on-site infrastructure such as schools, employment and larger open space. Experience suggests that it would be appropriate and reasonable to consider carefully both gross and net densities (which can differ significantly even on the same site), having regard to the local context, including recent similar developments or implemented planning applications.
- 2.41 The output from this step will be an interim residential capacity figure across all suitable identified sites that have evidence of current availability.

### **Stage 3: Determining Windfall assessment (where justified)**

- 2.42 Paragraph 70 of the NPPF and Planning Practice Guidance<sup>12</sup> states that 'windfall' assumptions for the projected rate of housing delivery on unidentified sites can be included in assessments of potential housing supply in years 6-15, providing there is 'compelling evidence' that such sites have consistently become available in the area and will continue to provide a reliable source. Any allowance should be realistic and have regard to both historic windfall delivery rates and expected future trends.
- 2.43 A significant level of housing development has historically come forward on small sites of under five dwellings, which fall below the defined SHLAA site size threshold. A windfall allowance has therefore been included for smaller developments falling below the defined SHLAA threshold of 1-4 dwellings.
- 2.44 We intend to update the assessment of likely housing delivery through windfall sites. We do not intend to provide an assessment of windfall for economic development as part of the SHLAA. Based on assumptions as set out in the GLA SHLAA for LB Enfield (2017) and London Development Database completions data for Enfield over a ten year period (2009-2018), the borough has an average windfall delivery of 248 or 156 homes (1-9 units and 1-4 units respectively) from smaller sites per annum.
- 2.45 The annual windfall allowance will be determined by applying a trend-based approach based on an analysis of completions over a period of 10 years. Completions will comprise

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<sup>12</sup> 023 Reference ID: 3-023-20190722

developments of 1-4 net additional homes but will exclude development on residential gardens, allocated sites and rural exception sites. A windfall allowance will be made from year 4 onwards in the housing trajectory. This is to avoid double counting against existing unimplemented planning permissions, which are normally valid for 3 years and therefore likely to be completed within this time.

## Stage 4: Assessment Review

- 2.46 Stage four of the assessment methodology set out in the PPG includes a review of the development needs of the borough. For Enfield, both assessments of housing need and economic needs have been commissioned. These will be published to support future iterations of the Enfield Local Plan.
- 2.47 The assessment forms the basis for considering which sites may be suitable for allocation in the borough in the emerging Local Plan and will provide evidence as to whether the housing needs can be met on the sites available and whether there are likely to be any issues with the delivery phasing of these development types.
- 2.48 Determining housing need in this context is not an easy task and especially in Enfield. All English Councils are struggling to consider the long-term implication of the White Paper. Councils are also trying to consider shorter term changes to the 'current' planning system including a new Standard Method (for housing targets). For Enfield there is the added complication that the borough is a second-tier plan making area and needs to apply the policies in the strategic London Plan. However, the Mayor of London (and GLA) disagree with the Secretary of State (SoS) and the Inspectorate regarding the London Plan. Key to this disagreement is the Plan's housing strategy and proposed housing targets. The 'changes to the current planning system' proposes to change the standard method used to calculate housing need. This results in an increase in the housing need for the borough from 1117 homes per annum (capped need) under the current standard method to 2213 homes per annum under the proposed standard method. The Council will consider what the most appropriate housing target is to plan for in order to meet need as further clarity is gained following the changes proposed to be introduced by government through the 'Changes to the Current Planning System' consultation and the 'Planning for the Future' White Paper.
- 2.49 Following the assessment of all sites, an indicative housing trajectory will be produced setting out how much housing can be provided across each of the Plan areas and at what point in the future it could be delivered. The trajectory will be used to determine whether sufficient sites have been identified to meet the targets for housing set out in the emerging London plan or, where necessary, evidence of the objectively assessed need using the Standard Methodology. This includes a five-year supply of 'deliverable' sites, and whether this can be maintained on a rolling basis, and sufficient 'developable' sites for years 6 to 15. The final trajectory will be included in the Annual Monitoring Report.
- 2.50 **If insufficient sites have been identified to meet to meet London Plan targets, or the development needs of the Plan area, the site assessments within Stages 1 to 3 will be revisited to review the development potential assumptions on particular sites.** This may include, for example, discussions with landowners/agents, reviewing density assumptions, and further research on identifying sites and overcoming constraints. Following the review process, if there are still insufficient sites, then it will be necessary to investigate how this shortfall should be addressed. The Council will need to consider how many cycles of review are appropriate, or when to re-run the process.
- 2.51 If there is clear evidence that the target or necessary need, cannot be met in Enfield, it will be necessary to consider how needs might be met by neighbouring authorities through the duty to co-operate process. In these circumstances the Council's SHLAA report will progress to Stage 5 with the potential shortfall.

## Stage 5: Final Evidence Base

- 2.52 Stage five of the land availability assessment methodology set out in the planning practice guidance is the production of the final evidence base report including outcome.
- 2.53 The council will publish its SHLAA report containing the core outputs defined in the PPG, namely:
- A list of all sites or broad locations considered, cross-referenced to their locations on maps;
  - An assessment of each site or broad location, in terms of its suitability for development, availability and achievability (including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when;
  - An assessment of the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
  - A list of discounted sites with clearly evidenced and justified reasons;
  - An indicative trajectory of anticipated development and consideration of associated risks.

## Monitoring

- 2.54 The assessment of sites should be kept up-to-date as part of the annual monitoring process. The SHLAA will be regularly reviewed and published on the Councils' website. It will be necessary to undertake a full review of sites when development plans are reviewed.
- 2.55 Updates to the SHLAA report will account for changes which have taken place during the reporting period. Changes may include:
- Changes in the status of existing planning permissions, e.g. whether development has commenced or been completed;
  - The inclusion of new sites with planning permissions;
  - The inclusion of newly identified sites;
  - Changes in the suitability of a site, e.g. as a result of new information or changes in the extent of severity of constraints;
  - Changes in the availability of a site, e.g. as a result of changes in ownership or the landowner's intentions;
  - Changes in the achievability of a site.
- 2.56 The council will continue to accept new sites for consideration through the SHLAA process. However, any new sites received after 31 March each year will be taken into account in the next annual review.

## Appendices

### Appendix 1 – LB Enfield sources to be reviewed in relation to PPG guidance

The NPPG sets out a list of sources to be reviewed<sup>13</sup>.

PPG list of types of site	PPG list of potential data sources	Enfield Strategic Housing Land Availability Assessment – Sources to be reviewed
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning applications records Development Briefs	Sites identified through Neighbourhood Plans in Enfield  Existing Development Plan Allocations not yet completed  Sites with development briefs and/or developer masterplan  The most recent London Strategic Housing Land Availability Assessment (SHLAA) 2017  Sites currently at pre-application stage
Planning Permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completions records	Enfield Planning Applications (6 March 2015 to 6 March 2020)  The GLA's London Development Database  Enfield Annual Monitoring Reports  Enfield Housing Trajectory
Planning applications that have been refused or withdrawn	Planning application records	Enfield Planning Applications (6 March 2015 to 6 March 2020)
Land in the local authority's ownership	Local authority records	The LBE-submitted returns from Enfield's 2019 - 2020 Call for Sites and Call for Small Sites (including additional consultation with LBE Housing and Property regarding Council estates with capacity for intensification and other Council owned land either surplus or likely to become surplus over Plan period)
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, central government, National Health Service, police, fire services, utilities	Public sector land including that owned by GLA and TfL, either surplus or likely to become surplus over Plan period, in addition to that identified through the Call for Sites (identified through direct communications with 'GLA family')

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/820367/190718\\_paragraph\\_012\\_table\\_PUBLICATION\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/820367/190718_paragraph_012_table_PUBLICATION_FINAL.pdf)

	services, statutory undertakers	
Sites with permission in principle, and identified brownfield land	Brownfield land registers (parts 1 and 2) National Land Use Database Valuation Office database Active engagement with sector [TR1]	Enfield Brownfield Land Register  Enfield Planning Applications (6 March 2015 to 6 March 2020) which include PiP  Call for Sites Submission by Enfield Road Watch and CPRE and their "Space to Build Enfield" report
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	Local authority empty property register English Housing Survey National Land Use Database Commercial property databases (eg estate agents and property agents) Valuation Office database Active engagement with sector Brownfield land registers	Sites from all categories can fall into this category:  Enfield Planning Applications (1948 to 6 March 2020)  The returns from Enfield's 2019 - 2020 Call for Sites and Call for Small Sites (including additional consultation with relevant LBE stakeholders regarding Council estates with capacity for intensification and Council owned land either surplus or likely to become surplus over Plan period)  Public sector land, including that owned by GLA and TfL, either surplus or likely to become surplus over Plan period, in addition to that identified through the Call for Sites (identified through direct consultation with 'GLA family')  Sites currently at pre-application stage  Existing Development Plan Allocations not yet completed  Sites with development briefs and/or developer masterplans  The most recent London Strategic Housing Land Availability Assessment (SHLAA) 2017  Call for Sites Submission by Enfield Road Watch and CPRE and their "Space to Build Enfield" report  The GLA's London Development Database  Enfield Annual Monitoring Reports  Enfield Housing Trajectory  Enfield Brownfield Land Register

		Sites identified through Neighbourhood Plans in Enfield
Additional opportunities for un-established uses (e.g. making productive use of under-utilised facilities such as garage blocks) [CE2]	Ordnance Survey maps Aerial photography [TR3] Planning applications Site surveys	Sites from all categories can fall into this category (see above)
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector	N/A as this study considers only land for housing; the PPG includes methodology for housing and economic land assessment together
Sites in rural locations	Local and neighbourhood plans Planning applications Ordnance Survey maps Aerial photography Site surveys	Sites identified through Neighbourhood Plans in Enfield  The returns from Enfield's 2019 - 2020 Call for Sites and Call for Small Sites (including additional consultation with LBE Housing and Property regarding Council estates with capacity for intensification and Council owned land either surplus or likely to become surplus over Plan period)  Planning applications 2015-2020  Call for Sites Submission by Enfield Road Watch and CPRE and their "Space to Build Enfield" report

## Appendix 2: Glossary

<b>Achievability</b>	A site which is regarded achievable for development where there is a practical view that housing can be developed on the site at a certain point in time. This is fundamentally a judgement about the economic viability of the site, and the capacity of the developer to complete and sell the housing over a certain period.
<b>Allocation</b>	The council's development plan identifies area of land for development. The allocation will also indicate the Council's preferred use for the land.
<b>Annual Monitoring Report (AMR)</b>	A monitoring report submitted to the Government which reviews progress and the extent to which policies in Local Plan are being successfully implemented.
<b>Availability</b>	A site which is seen as 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. This means that it is controlled by a housing developer who has expressed an intention to develop, or the landowner has expressed an intention to sell.
<b>Brownfield</b>	A land which is or was occupied by a permanent structure, including curtilage of the developed land and any associated fixed surface infrastructure.
<b>Call for Sites</b>	Exercise undertaken by the Council inviting interested parties to submit sites for consideration in the Strategic Housing Land Availability Assessment and the Local Development Framework.
<b>Community</b>	A 'Community' includes all individuals, groups and organisations that live, work and operate within specific geographic areas.
<b>Community Infrastructure Levy</b>	A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.
<b>Conservation Area</b>	Areas of special architectural or historic interest, the character, appearance or setting of which it is desirable to preserve or enhance.
<b>Deliverability</b>	A site is considered to be deliverable if it is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within 5 years from the date of adoption of the plan.
<b>Density</b>	A measure illustrating the potential number of dwellings that can be accommodated within a defined area. (Usually measured as the number of dwellings per hectare). See also Gross Density and Net Density.
<b>Developable</b>	A site should be in a suitable location for housing development, and there should be a reasonable prospect that it will be available for and could be viably developed at a specific point in time.
<b>Development Plan</b>	A document setting out the local planning authority's policies and proposals for the development and use of land and buildings in the authority's area. This includes adopted Local Plans, neighbourhood plans and the London Plan, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.
<b>Green Belt</b>	Green Belt is a designation that restricts certain types of development. Its aims and purposes are set out in the NPPF under protecting Green Belt Land. It is an area of open land defined on the Proposals Map, where strict controls on development are applied in order to check the unrestricted sprawl of large built up areas, safeguard the countryside from encroachment, prevent neighbouring towns from merging with one another, preserve the special character of historic towns and assist in urban regeneration.
<b>Gross Density</b>	Applying the total area of a site to the Density measurement, before discounting any land for uses not directly associated with housing.

<b>Housing Trajectory</b>	Report comparing past housing supply performance against future rates of predicted supply.
<b>Local Development Database (LDD)</b>	A joint project between the Mayor and the London boroughs to monitor planning permissions, starts and completions throughout London which began in 2004.
<b>Local Plan</b>	The Local Plan contains a series of documents (LDDs) that set out how the borough will change and develop in the future and how its places and environs will be protected and enhanced, these are drawn up by the Local Planning Authority
<b>London Plan</b>	The London Plan is the name given to the Mayor's spatial development strategy for the capital in the United and published by the Greater London Authority.
<b>Local Planning Authority</b>	The local authority or council that is empowered by law to exercise planning functions.
<b>Metropolitan Open Land</b>	Strategic open land within the urban area that contributes to the structure of London.
<b>Net Density</b>	Measurement of the site's area that will be developed for housing and directly associated uses (i.e. discounting land for shops, major roads, wider open spaces).
<b>National Planning Policy Framework (NPPF)</b>	This sets out the Governments requirements on planning policy for England and how it expects them to be applied.
<b>Permitted Development (or Permitted Development Rights)</b>	Permission to carry out certain limited forms of development without the need to make an application to a local planning authority, as granted under the terms of the Town and Country Planning (General Permitted Development) Order.
<b>Scheduled Ancient Monuments</b>	(Class 1 Archaeological Areas) – Archaeological remains which enjoy special protection by virtue of being scheduled under the Ancient Monuments and Archaeological Areas Act 1979.
<b>Special Protection Area (SPA)</b>	Areas which have been identified by the European Commission as being of international importance for certain breeding, feeding, wintering or migration of rare and vulnerable species of bird populations found within the EU countries. They have statutory protection under the EC Directive for the Conservation of Wild Birds 79/409.
<b>Suitability</b>	A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. For sites not allocated for housing in development plans or having the benefit of planning permission for housing, policy restrictions, physical problems or limitations, potential impacts and environmental conditions should be considered.
<b>Windfall Sites</b>	Sites that have not been identified in the local plan process and comprising previously developed sites that have unexpectedly become available.