



# Strategic Housing Land Availability Assessment Update October 2023

## **Main Report**

**Dacorum Local Plan 2024 - 2040**

# Contents

1. Introduction .....	3
What is the 'SHLAA'?.....	3
What is the SHLAA Update 2023?.....	3
What has changed since 2020?.....	3
How does the study relate to ongoing plan making? .....	4
2. Policy Context and Evidence .....	4
National Policy and Guidance .....	4
Local Policies .....	5
3. Methodology.....	6
Stage 1: Site Identification and Broad Locations .....	6
Stage 2: Site and Broad Location Assessment .....	8
Stage 3: Windfall Assessment .....	17
Stages 4 and 5: Assessment Review and Final Evidence Base .....	19
4. Outcomes.....	20
Phase One Assessment .....	20
Phase Two Assessment .....	23
Windfall Assessment.....	24
Assessment Conclusions .....	31

## 1. Introduction

### What is the 'SHLAA'?

- 1.1. The Strategic Housing Land Availability Assessment, or 'SHLAA', is a technical study which forms part of a suite of evidence prepared to inform the new Local Plan 2024 - 2040. The study assesses land availability for potential development within the Borough over the lifetime of the Local Plan to 2040. It forms part of process that informs the selection of sites for inclusion in the Local Plan.
- 1.2. The SHLAA has been prepared in accordance with the Planning Practice Guidance for Housing and economic land availability assessment<sup>1</sup>, however this update refers solely to housing land availability. At the time of this assessment, sites identified for economic purposes are under review, pending the results of an updated Economic Study (expected 2024).

### What is the SHLAA Update 2023?

- 1.3. This study sets out Dacorum's updated position, and has been developed following 'the Emerging Strategy for Growth' Regulation 18 consultation, undertaken on a full draft Local Plan from November 2020 to February 2021.
- 1.4. The Emerging Strategy for Growth was accompanied by two separate evidence base studies, which provided the starting point for the site selection process:
  - a. The Site Assessment Study for Dacorum Borough Council (by Aecom). January 2020. ('the Rural SHLAA 2020')
    - i. Also included the 'Addendum to the AECOM Site Assessment Study', prepared by Dacorum Borough Council in November 2020, in order to account for the additional sites submitted to the Council, following the completion of the January 2020 study.
  - b. The Urban Capacity Study (incl. Windfall Assessment) Strategic Housing Land Availability Assessment. November 2020. ('the Urban Capacity Study 2020')
- 1.5. This update aims to build upon these previous studies. Although the previous studies may be referenced within this report where relevant, it should be assumed that this study is the most up to date position, as of October 2023, and that its conclusions supersede those made by previous assessments.

### What has changed since 2020?

- 1.6. This SHLAA update includes:
  - a. All sites that have been rolled forward from the two previous site assessment studies undertaken in 2020;
  - b. New sites that were submitted during the Regulation 18 consultation in 2020/21;
  - c. New sites that were submitted following the Call for Sites in 2021;

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<sup>1</sup> Housing and economic land availability assessment <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment> DLUHC (2019).

- d. New sites that have been identified by the Council as part of technical work separate to the Local Plan process;
  - e. Details of any SHLAA sites that have been deleted and the reason for this; and
  - f. Amendments to the site boundaries have also been included in this update where this is relevant.
- 1.7. 22 new sites were submitted through the 2020 Regulation 18 consultation, and a further 19 new sites via the Call for Sites which took place in 2021. The Council also identified a further 5 sites whilst undertaking additional studies (such as the Hemel Hempstead Town Centre Strategy). This means this SHLAA Update contains 46 new sites in total. The table in **Appendix A** details the new sites that have been submitted.
- 1.8. **Appendix A** also sets out the 16 sites which have been amended as part of this updated process and the reasons for these amendments. It also presents the 20 sites that have been removed from the SHLAA and the reason for their removal.

### **How does the study relate to ongoing plan making?**

- 1.9. It is important to emphasise that while the SHLAA is an important evidence source to inform plan making, it does not in itself determine whether a site should be allocated for development, or that planning permission would be granted if an application was submitted for a site contained within it.
- 1.10. It is the role of the study to provide information on a wide range of sites, however it is the role of the development plan to allocate those sites with the greatest potential to meet the strategy of the plan.
- 1.11. Importantly, it also reviews in detail past and predicted future trends for sites not specifically identified in the Council's development plan (i.e. windfall sites). This is done in order to assess their future contribution to housing supply.

## **2. Policy Context and Evidence**

### **National Policy and Guidance**

- 2.1 The National Planning Policy Framework (NPPF) was first published in March 2012 and updated in September 2023<sup>2</sup>. This assessment does not seek to extensively repeat national policy, but notes that national policy forms an important consideration in terms of the assessment of sites against existing designations and constraints and is expanded upon further within Section 3 (Methodology) of this assessment.
- 2.2 The Planning Practice Guidance (PPG) supports the overarching policies of the NPPF. The PPG contains a dedicated section on the processes underpinning the preparation of housing and economic land availability assessments. The PPG methodology forms the basis on which this study is prepared.

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<sup>2</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 2.3 Section 3 (Methodology) of this assessment sets out in further detail how it aligns with the key stages and wider methodology as set out in the PPG. This report takes account of the most up to-date version of the relevant section of the PPG (July 2019).

### **Local Policies**

- 2.4 Dacorum's Core Strategy was adopted in September 2013, and sets the strategic policy framework for the Borough, and identified a housing figure of 430 net additional dwellings per annum. The Site Allocations DPD, adopted in July 2017 allocates land for housing and other uses and sets out how the policies within the core strategy should be delivered. These documents are also complemented by 'saved policies; from the Dacorum Borough Local Plan 1991-2011 (adopted 2004).
- 2.5 Once adopted, the new Dacorum Local Plan 2024-2040 will replace the Core Strategy, 'Saved Policies' and the Site Allocations DPD.
- 2.6 At the point of preparing this study, the Council has undertaken two statutory consultations on the emerging Local Plan, both in accordance with Regulation 18:
- a. Issues and Options (Published November 2017); and
  - b. The Emerging Strategy for Growth (Published November 2020).
- 2.7 Currently it is anticipated that the Council will consult again in accordance with Regulation 18 on focused changes to the Emerging Strategy for Growth in October 2023, before finalising the Local Plan before its formal publication in October 2024.

### 3. Methodology

- 3.1 As mentioned in the previous section, the methodology aligns itself with the NPPF and PPG. This section sets out in further detail the Council's approach to the various stages of the assessment, including how it has considered various sources of data and how sites are assessed in terms of their suitability, availability and achievability.

#### Stage 1: Site Identification and Broad Locations

- 3.2 Stage 1 of the SHLAA process is to identify sites and broad locations for subsequent further assessment.

##### **Determine assessment area and site size.**

- 3.3 The geographical area the assessment will cover continues to apply to the administrative area of Dacorum Borough, as this aligns with the geographical extent of the new Local Plan. This is fully compliant with the PPG.
- 3.4 The sites identified in this assessment have come from a range of sources and have been collated over numerous consultation exercises.
- 3.5 The most recent SHLAA prior to this update, in this case the 2020 Urban Capacity Study and the 2020 Rural SHLAA, was reviewed in order to identify where sites (including existing development plan allocations) required deletion from future assessments. These were identified using the following criteria:
- a. If the site has achieved planning permission and/or is under construction/completed;
  - b. If the site has 100% overlap with another site; or
  - c. If the site promoter/owner has requested the site to be deleted from the assessment.
- 3.6 This review of has resulted in 266 sites within the study area being carried forward into the new assessment. The sources of these sites are set out within these assessments respectively. This exercise identified 20 sites to be deleted. This filtering has no relationship to the suitability or otherwise of these sites for residential development.
- 3.7 In addition to a review of the existing evidence, 45 new sites were submitted through consultation exercises undertaken following these assessments. This included the 2020 Regulation 18 consultation, and the Call for Sites exercise which took place in 2021. The Council also identified new sites whilst preparing the Hemel Hempstead Town Centre Strategy between 2021 and 2023.
- 3.8 311 sites are therefore considered for assessment within this update. The source of these sites are set out below:

Source	Number of sites in this study
Existing Allocations in the Adopted Development Plan, as per the Site Allocations DPD (2017), which do not have planning permission and/or are not under construction/completed.	23
Rolled over from Rural SHLAA (Jan 2020) including the Addendum (Nov 2020).	140
Rolled over from Urban Capacity Study (Nov 2020).	103*
New sites submitted:	45
a. The 2020 Regulation 18 consultation.	a. 22
b. The 2021 Call for Sites.	b. 19
c. Additional work undertaken to support the Hemel Hempstead Town Centre strategy.	c. 4
<b>Total</b>	<b>311</b>

\*This figure does not include the existing development plan allocations which were reviewed by the study, although it is important to note that H/1, H/6, H/10 and H/16 were included within the full Urban Capacity assessment. All of these sites form part of the 23 existing allocations.

3.9 These sites have been reviewed in order to understand if any amendments to the site area was required. As a result, the area of 16 sites have been amended. Details of the amendments are set out in **Appendix B**

3.10 Because the sites came from a range of sources, and a number of sites have been removed, the numbering/identifier for each was not consistent with the pool of sites as a whole. As such, all sites were renumbered for the purposes of this update, and no further reference was made to any previous site number.

3.11 Each site was linked to the settlement it is located in, or its nearest and/or adjacent settlement.

Settlement Hierarchy	Number of Sites
<b>Strategic Settlement</b>	
Hemel Hempstead	125
<b>Market Towns</b>	
Berkhamsted	42
Tring	28
<b>Large Villages</b>	
Bovingdon	24
Kings Langley	25
Markyate	15
<b>Selected small villages in the countryside</b>	
Aldbury	2
Chipperfield	6

<b>Settlement Hierarchy</b>	<b>Number of Sites</b>
Flamstead	9
Long Marston	3
Potten End	5
Wigginton	4
Wilstone	6
<b>Other small settlements in the countryside</b>	
Bourne End	7
Bridens Camp	1
Cow Roast	4
Flauden	2
Great Gaddesden	1
Little Gaddesden	2

## **Stage 2: Site and Broad Location Assessment**

3.12 Due to different sources of information, the site assessments vary depending on each the existing land use designation, allocation, or planning status.

### **Existing Allocations in the Adopted Development Plan**

3.13 The majority of sites are subject to a full assessment, however allocations made in the current adopted development plan are subject to targeted reviews in order to determine whether they require full assessment. The approach taken is considered to be fully consistent with national policy and guidance.

3.14 Existing allocations were reviewed to determine their current status and to identify any issues with delivery of these sites. Where there was uncertainty about the deliverability of some existing allocations (through engagement with the development management team, site promoters, landowners and/or agents), these were reintroduced into the study and subject to a full assessment.



Status	Recommendation
The site (or part of the site) is completed, under construction or has full or outline planning permission	Recommend to delete whole or relevant part of allocation and remove from assessment.
The site is subject to a live planning application	Retain the existing allocation and to review its development potential against evidence submitted through the planning application.
There is sufficient evidence to demonstrate that the site is deliverable within the next five years.	Retain the allocation and review its development potential through undertaking a full assessment.
There is a reasonable prospect that the site will come forward by 2040	Retain the allocation and review its development potential through undertaking a full assessment.
There is no reasonable prospect that part/all of a site will come forward for development in the plan period	Review the site for its development potential through undertaking a full assessment, and to delete the allocation from the emerging local plan.

### Estimating development potential

- 3.15 The Planning Practice Guidance sets out that a SHLAA should consider all sites capable of delivering 5 or more dwellings, however it only becomes apparent whether a site is capable of delivering 5 units or more after the development potential is estimated.
- 3.16 If sites were identified and assessed for providing less than 5 units, they were tagged as potential windfall sites and not taken further in this assessment. There will be a windfall allowance in the final housing number.
- 3.17 This filtering has no relationship to the suitability or otherwise of these sites for residential development. As such, landowners promoting sites with a development potential of less than 5 dwellings are encouraged, if they wish to apply for planning permission, to do so in the normal way, seeking where appropriate pre-application advice from the Council having appropriate regard to the constrained nature of the study area (Green Belt, AONB etc.) rather than to seek allocation through the Local Plan.

#### *Assuming Densities*

- 3.18 A proportionate approach is taken to estimating the density of each site.
- 3.19 The study assumes an average of 25 dwellings per hectare (gross) for sites other than within the built up area of the six main settlements.
- 3.20 Where sites are considered to be within the built up area of the six main settlements in the Borough, the density was increased to a minimum of 40 dwellings per hectare (gross), This is considered to be a reasonable starting point based on current analysis of development trends and completions where these consist of schemes of five or more residential units and do not include conversions/change of use and/or prior approvals.

- 3.21 Further work was then undertaken to understand where density within the urban area could be uplifted to make efficient use of the site. The density typologies for urban sites are carried forward from the 2020 Urban Capacity Study.

#### *Calculating development potential*

- 3.22 The development potential (number of dwellings) of each site that is subject to a full assessment is determined using the following calculation:

$$\text{Site area} \times \text{estimated density} = \text{development potential}$$

- 3.23 Where constraints have been identified at different stages of testing, the following formula was applied:

$$(\text{Site area} - \text{a deduction to the area based on known constraints}) \times \text{estimated density} = \text{development potential}$$

### **Phase 1 assessment**

#### *Suitability*

- 3.24 This assessment takes a proactive approach to site suitability. Sites are broadly considered suitable for further consideration (for their potential to be allocated in the Local Plan, or whether they could contribute towards a future windfall allowance) unless there are intrinsic constraints which are so severe that very limited or no development could feasibly come forward.
- 3.25 This approach is consistent with that taken by the Rural SHLAA (2020) and the Urban Capacity Study (2020), however the methodology for presenting constraints has been refreshed by this update to provide consistency.
- 3.26 Firstly, an initial assessment of each site's suitability for development has been made. Sites were then assessed against a range of constraints, and have been scored using a 'Red/Amber/Green ('RAG') rating system, where:
- a. Red: Intrinsic constraint, evidence that development of the site would be unsuitable.
  - b. Amber: Potential major constraint, requires further investigation at detailed testing.
  - c. Green: Likely that there is minor/no constraint.
- 3.27 It is important to note that this is only a high level initial assessment as a result of this if a site has received a 'Red', this does not mean that it is impossible to achieve development when a more finer grained analysis is undertaken.

Constraint	Criteria	Score
<b>Natural Environment</b>		
Special Areas of Conservation (SAC)	Development of the site would result in a net increase of dwellings within the 500m exclusion zone of the Chilterns Beechwoods SAC and Tring Woodlands SSSI.	Red
	Development of the site would not result in a net increase of dwellings within the 500m exclusion zone of the Chilterns Beechwoods SAC and Tring Woodlands SSSI.	Green
Sites of Special Scientific Interest (SSSI)	Site is wholly or partially designated as a Site of Special Scientific Interest.	Red
	Site is within 800m of a SSSI.	Amber
	Site is not within 800m of a SSSI.	Green
Ancient Woodland	Site area is ≥50% designated as Ancient Woodland.	Red
	Site is partially designated as Ancient Woodland (less than 50%).	Amber
	Site does not contain ancient woodland	Green
Wildlife Site	Site is wholly or partially within a Local Wildlife Site	Amber
	Site is not within a Local Wildlife Site	Green
Local Nature Reserve	Site is within 400m of a Local Nature Reserve	Amber
	Site is not within 400m of a Local Nature Reserve	Green
Tree Preservation Orders	Site contains protected tree(s)	Amber
	Site contains no protected trees	Green
Source Protection Zones	Site is located wholly or partially within Source Protection Zone 1.	Amber
	Site is not located within Source Protection Zone 1.	Green
<b>Historic Environment</b>		
Scheduled Ancient Monuments	Site area is ≥50% a Scheduled Ancient Monument.	Red
	Site is partially designated as Scheduled Ancient Monument (less than 50%).	Amber
	Site is not, wholly or partially, designated as Scheduled Ancient Monument.	Green
Sites on the National Register of Historic Parks & Gardens	Site area is ≥50% in a Grade I/II* registered historic park / garden.	Red
	Site area is partially within a designated registered historic park / garden. (less than 50%).	Amber
	Site area is not designated as a registered historic park / garden.	Green
Listed Buildings	Site contains or may impact a listed building.	Amber

Constraint	Criteria	Score
	Site is unlikely to impact upon any listed buildings.	Green
Conservation Areas	Site is within or adjacent to a designated conservation area	Amber
	Site is unlikely to impact upon a designated conservation area	Green
Locally Registered Parks and Gardens	Site contains a locally registered park.	Amber
	Site does not contain a locally registered park.	Green
Area of Archaeological Significance	Site contains or overlaps an area of archaeological significance.	Amber
	Site is not located within or adjacent to an area of archaeological significance.	Green
Flooding		
Flood zone 2/3	Site area is ≥50% located within Flood Zone 3.	Red
	The site has not been assessed as 'low risk' of flooding.	Amber
	The site has been assessed as 'low risk' of flooding.	Green
Landscape		
Area of Outstanding Natural Beauty	Site area is ≥50% within the AONB boundary.	Red
	Site is partially within the AONB (less than 50%) or is adjacent to it.	Amber
	Site is not within or adjacent to the AONB.	Green
Other Constraints		
Green Belt	Site is wholly or partially within the Green Belt	Amber
	Site is not within the Green Belt	Green
AQMA	Site is within 800m of an Air Quality Management Area	Amber
	Site is not within 800m of an Air Quality Management Area	Green
Agricultural land classification	Site is likely to contain BMV (grade 1-3)	Amber
	Site is unlikely to contain BMV (4-5) or is urban land	Green
	Site is non-agricultural	N/A
Landfill Records	Site is, wholly or partially, located within or overlaps an authorised or historic landfill site	Amber
	Site is not wholly or partially located within an authorised or historic landfill site	Green
Open Countryside		
Open Countryside	Site is not within or adjacent to existing settlement boundaries or smaller settlements in the Borough.	Red

Constraint	Criteria	Score
	Site is located within or adjacent to a small settlement within the Borough.	Amber
	Site is located within or adjacent to one of the six main settlements within the Borough.	Green

3.28 The first step following the completion of this assessment was to filter any sites that are affected by an intrinsic constraint, and have been subsequently classified as 'red', out from further assessment.

3.29 The justification for the selection of intrinsic constraints are set out below:

- a. **Special Area of Conservation:** Development of the site would result in a net increase of dwellings within the 500m exclusion zone of the Chilterns Beechwoods SAC.
  - Justification: In previous assessments, the Council assessed land in accordance with its overlap or proximity to the Chilterns Beechwoods Special Area of Conservation. However, more recently, the Footprint Ecology Report (published March 2022) recommended a 500 metre exclusion zone for residential development around the CBSAC. Within the zone there is a presumption against development, i.e. ensuring no increase in the number of dwellings there.
  - Footprint Ecology point to the heightened risks to designated sites (such as the CBSAC) from development that is in such close proximity to them. Recreational use is much higher from homes that are in easy walking distance of the site, and it is considered very difficult to deflect such access with alternative greenspace. Fire risk, fly-tipping, light and noise and other urban effects are also more acute close to their boundary. Furthermore, mitigation approaches, such as access management and warden control, are less effective.
- b. **Site of Specific Scientific Interest:** Site is wholly or partially designated as a Site of Special Scientific Interest.
  - Justification: NPPF Paragraph 180b states that development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it should not normally be permitted.
- c. **Ancient Woodland:** Site area is  $\geq 50\%$  designated as Ancient Woodland.
  - Justification: NPPF Paragraph 180c states that development resulting in the loss or deterioration of ancient woodland should be refused, unless there are wholly exceptional reasons. A conservative approach is applied, which assumes that sites intersecting by  $< 50\%$  could conceivably be designed to avoid effects. Other sites which contain, in part, this constraint will be considered suitable for further consideration.
- d. **Scheduled Ancient Monument:** Site area is  $\geq 50\%$  a Scheduled Ancient Monument.
  - Justification: The NPPF attaches particular importance on the need to protect heritage assets of the highest significance from any harm or loss. A conservative approach is applied, which assumes that sites intersecting by  $< 50\%$  could conceivably be designed to avoid effects.
- e. **Registered Park / Garden:** Site area is  $\geq 50\%$  in a Grade I/II\* registered historic park / garden.

- Justification: NPPF attaches particular importance on the need to protect heritage assets of the highest significance from any harm or loss. Other sites which contain, in part, this constraint will be considered suitable for further consideration, however a deduction will be made to the development potential of the site. A conservative approach is applied, which assumes that sites intersecting by <50% could conceivably be designed to avoid effects.
- f. **Flood Zone 3:** Site area is  $\geq 50\%$  located within Flood Zone 3.
- Justification: All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change. Other sites which contain, in part, this constraint will be considered suitable for further consideration, however a deduction will be made to the development potential of the site.
- g. **Area of Outstanding Natural Beauty:** Site area is mostly ( $\geq 50\%$ ) within the AONB boundary and would likely constitute as ‘major development’.
- Justification: Paragraph 176 of the NPPF sets out that great weight should be given to conserving and enhancing landscape and scenic Beauty in Areas of Outstanding Natural Beauty, and that development within these areas should be limited. The NPPF paragraph 177 states that major development in the AONB should be refused unless the relevant tests can be demonstrated at planning application stage. It is important to note that ‘major development’ in this context is a matter for the decision maker, however principles from the Dacorum Landscape study
- h. **Open countryside:** Site is not within or adjacent to existing settlement boundaries or smaller settlements in the Borough.
- Justification: NPPF Paragraph 80 states that planning policies and decisions should avoid the development of isolated homes in the countryside, unless they comply with the relevant criteria. NPPF paragraph 85 states that rural sites should be physically well related to existing settlements. Paragraph 85 is also clear that rural development should be sensitive to its surroundings, not have an unacceptable impact on local roads, and exploit opportunities to make an area more sustainable.
  - Therefore if a site could potentially generate opportunities to make an area more sustainable the site was not screened out.

3.30 Following the filter of intrinsic constraints, the sites were assessed in accordance with the settlement hierarchy of the Borough.

Settlement Hierarchy		
Settlement Hierarchy	Site is located within or adjacent to a selected small village in the Green Belt, and would likely amount to inappropriate development as set out in paragraph 149 of the NPPF.	Red
	Site is located within or adjacent to a selected small village within the rural area.	Amber

Settlement Hierarchy		
	Site is located within or adjacent to one of the six main settlements within the Borough.	Green
	Site was previously assessed as open countryside but there is potential to make the site more sustainable.	N/A

3.31 The settlement hierarchy forms part of the evidence base for the Local Plan. The most recent report was prepared by Dacorum in 2017, however the designation ‘selected small villages’ has been carried forward from the adopted Dacorum Borough Local Plan (2004), into the adopted Core Strategy (2013).

- a. The selected small villages of Chipperfield, Flamstead, Potten End and Wigginton are all washed over by the Green Belt. As a result of their location in the Green Belt only limited forms of development to support local needs and essential services are permitted.
- b. The selected small villages of Aldbury, Long Marston and Wilstone all fall within the Rural Area beyond the Green Belt. Development is also restricted in the Rural Area, although more modest scale opportunities for housing, employment and local services is permitted there.

3.32 Paragraph 149 of the NPPF sets out what development is inappropriate within the Green Belt, therefore sites are filtered out from further assessment if evidence suggests they do not comply with this. Sites within or adjacent to the selected small villages in the rural area have not been filtered out, however they are classified as ‘amber’, as their location has been assessed as less sustainable than the six main settlements within the Borough.

#### *Availability*

3.33 The study has regard to information provided by site promoters through the call for sites process, formal consultation responses, planning history, and any other correspondence which would indicate if the site is available for development and when it could come forward for development

3.34 Where there is no information on the availability of some sites (including many carried forward from previous assessments), the assessment does not necessarily assume that they are unavailable for development. Although they are not currently promoted for development, the assessment does not preclude the option that the site may come forward for development at some point in the plan period, and could contribute towards housing supply as a windfall site.

#### *Achievability*

3.35 A number of development scenarios have been developed and tested in terms of their viability. This includes various development typologies and scales of development in locations across the borough. This assessment has been used to broadly determine if sites are achievable, having regard to a range of factors and assumptions in accordance with the PPG. In addition to the wider ‘typology approach’, large sites which have the potential as being considered as strategic allocations have been subject to specific viability testing.

- 3.36 The viability assessment has identified if there are any fundamental issues with the deliverability of each site, based on their scale, location, existing use, and market values in the area, and likely additional costs required as a results of other policy considerations (e.g. affordable housing, space standards, etc.)
- 3.37 The Viability Assessment takes a proportionate approach, building on the Council’s existing available evidence, and considers also the effect of the proposed local and national policies that will apply to new development. This study is based on typologies representative of the sites with potential to be allocated in the new Local Plan. In addition, the potential Strategic Sites have been modelled separately as they are most important to the delivery of the Plan.
- 3.38 This viability assessment has applied the policies set out in the Dacorum Borough Local Plan (2020-2038) Emerging Strategy for Growth, other than when legislation or national policy has overtaken this. These policy requirements are likely to change as the plan-making process continues, and will be finalised prior to the formal publication of the Local Plan (scheduled to take place in October 2024). Therefore, in this assessment no sites are filtered out of phase 1 testing on the grounds of achievability, as the policy requirements have yet to be agreed, however sites which are subject to detailed testing have comments attached where relevant.

#### **Phase 2 Assessment: Further detailed testing**

- 3.39 Those assessed to be suitable, available and achievable were then considered for further detailed testing. With this the assessment considers sites with the development potential to deliver at least fifty residential units, as these are likely to make the greatest potential towards future housing delivery and an associated infrastructure.
- 3.40 Where the site’s development potential was estimated as lower than 50 dwellings, these are unlikely to make a significant contribution towards future needs. Smaller sites are also likely to have less issues with respect to their design and infrastructure requirements and can more appropriately be addressed and considered through the development management process (i.e. as a windfall site). This is provided proposals are in accordance with the strategy and relevant policies of the new Local Plan.
- 3.41 Where relevant and available, conclusions from the previous site assessment studies are referenced within the detailed testing and are often carried forward where there are no material changes in circumstances.
- 3.42 The purpose of this assessment was to identify sites suitable for further detailed testing. Sites were categorised as follows:
- a. Suitable for further consideration
  - b. Suitable for further consideration with major constraints
  - c. Unsuitable for further consideration.
- 3.43 The outcomes of this assessment is presented in **Appendix C** of this study.



### Stage 3: Windfall Assessment

3.44 As defined by the NPPF (CD6.1) in Annex 2, windfall sites are sites that are not specifically identified in the development plan. The NPPF and PPG allow councils to add a windfall allowance as part of their five-year housing land supply where there is compelling evidence that they will provide a reliable source of supply:

*“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will 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. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area”<sup>3</sup>*

3.45 This section summarises the steps that the Council takes when considering what to include in the windfall assessment.

#### *Completions*

3.46 The starting point for considering the quantum of windfall is to establish overall levels of (net) completions since the start of the current plan period i.e. from 2006. On this basis, the study uses monitoring data as at 1 April 2022. This covers a 16 year period. The Council reviews housing delivery rates on an annual basis as part of its regular development monitoring routines and in preparing the following documents:

- Residential Land Position Statements; and
- Authority Monitoring Reports

3.47 The data used to produce these documents is the same as that used to inform the windfall assumptions in this study. The data relates to individual dwelling completions at the end of each financial year rather than fully completed sites.

#### *Sources of Plan allocations*

3.48 To understand the level of historic windfall completions over the period 2006-20, sites allocated in the following Development Plan Documents have been removed to ensure consistency with the NPPF definition for windfall sites:

- Core Strategy (adopted September 2013);
- Site Allocations (adopted July 2017); and
- Dacorum Borough Local plan (adopted April 2004).

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<sup>3</sup> NPPF, Paragraph 71

### *Office to Residential, and other Prior Approvals*

- 3.49 The Council has chosen to exclude from this review completions delivered under the Prior Approvals process i.e. converting offices to residential. It were an important part of housing completions and commitments in recent years, particularly in Hemel Hempstead. However, it is clear that there is a need to protect the remaining stock of offices in order to meet future employment needs.
- 3.50 Since key legislation was introduced in 2013, over three hundred schemes were granted through the Prior Approval process. In 2020, the Council introduced safeguards to its stock of offices in key employment areas through the application of Article 4 Directions. This requires proposals to be considered through the standard planning application process including consideration of national and local policies.
- 3.51 Following the COVID-19 outbreak, Government introduced additional permitted development rights and other flexibilities to support the economic recovery. There is limited data available to understand the implications of these recent changes by both the Council and Government and whether they will result in more or less completions.
- 3.52 Historic data relating to prior approvals is therefore not considered a reliable source of data, and there is insufficient evidence to determine likely future trends at this stage. For these reasons, prior approvals are not considered further as part of the windfall assessment. It is expected that prior approvals will continue to make a contribution towards future windfall delivery dates, and excluding them at this stage provides a degree of resilience towards meeting annual windfall targets.

### *Types of windfall sites subject to review*

- 3.53 Windfall sites reviewed in this assessment are categorised as follows:
- 3.54 Minor windfall sites (new build, conversions and replacement dwellings) – Sites with planning permission that have delivered between up to 9 units (net) but excludes prior approvals. Such sites are of similar scale to sites that are not normally considered through a land availability assessment, but are not considered ‘major development’ .
- 3.55 Major windfall sites (new build, conversions and replacement dwellings) – Sites with planning permission that have delivered 10 units or more (net) and excludes prior approvals. Such sites are also of similar scale to sites that can be considered through a land availability assessment, and meet the definition of ‘major development’.

#### **Stages 4 and 5: Assessment Review and Final Evidence Base**

- 3.56 The study will draw together the various sources of housing supply to determine whether there is a sufficient supply of sites capable of meeting the requirement set by the current Standard Method for Calculating Housing Needs (1,017 dwellings per annum). If there is an ample supply of land/sites, then the study will be finalised in accordance with national guidance.
- 3.57 The study will be updated and finalised following the Revised Strategy for Growth consultation, for the purposes of informing the new Local Plan 2024-2040.
- 3.58 The consultation is supported by a further “Call for Sites” where additional sites may be promoted. Equally, updated information may be submitted for sites previously promoted to the Council. These will be taken into account following consultation and reflected in the next and final iteration of the study.
- 3.59 The assessment represents a starting point for the consideration of sites with the potential for allocation in the new Local Plan. It is a proportionate study that considers a wide range of sites in different locations across the borough.
- 3.60 Where there is significantly more sites/land than is required to meet future housing needs, it is reasonable for the finalised study to recommend a ‘shortlist’ of sites with the greatest potential for allocation. These can then be subject to more detailed testing including:
- Sustainability Appraisal;
  - Habitats Regulations Assessment;
  - Viability testing;
  - Transport modelling;
  - Infrastructure delivery; and
  - Anything other evidence as considered appropriate (e.g. landscape sensitivities)

## 4. Outcomes

### Review of Allocations in the adopted development plan

4.1 A comprehensive review of 34 existing allocations was undertaken to determine their current status and to identify any issues with delivery of these sites. The updated review of existing allocations is presented in Appendix A. Of these 33 sites, 22 were included in the assessment and a summary of those proposed to be retained is presented below:

Table 1: Allocations in the adopted development plan proposed to be retained in the new Local Plan

Reference (2017)	2017 Allocation	2020 Recommendation	2023 Recommendation
LA1	350	Retain for 385	Retain for 382
LA2	80	Retain for 90	Retain for 90
LA6	60	Retain for 40	Retain for 40
MU/1	600	Retain part for 200	Retain part for 200
MU/2	400	Retain for 450	Retain for 450
MU/3	75	Retain for 350	Retain for 350
MU/4	200	Retain for 350	Retain for 360
H/2	350	Retain for 400	Retain for 440
H/13	150	Retain for 170	Retain for 170
H/20	10	Retain for 20	Retain for 20

4.2 There is one Neighbourhood Plan allocation at Grovehill. The Council has assumed that this has a development potential for around 200 dwellings in addition to the other allocations above.

4.3 The review of existing allocations has resulted in a number of sites being deleted (e.g. has come forward and is now completed) or reintroduced for assessment (owing to other factors such as uncertainty on deliverability/availability).

4.4 As a result of this review, 300 sites were subject to the next steps of the assessment.

### Phase One Assessment

#### *Estimating Development Capacity*

4.5 28 sites were excluded from assessment as it was deemed that its development capacity would not exceed 5 dwellings.

#### *Suitability*

4.6 Firstly, the sites were assessed against a number of intrinsic constraints relating to suitability, and were filtered out of the assessment if any identified intrinsic constraints were present.

Intrinsic Constraint	Number of sites filtered out
Special Area of Conservation (SAC)	4
Site of Special Scientific Interest (SSSI)	0
Ancient Woodland	2
Scheduled Monument	3
Registered Park / Garden	0
Flood Zone 3	3
Area of Outstanding Natural Beauty	29
Open Countryside	37

4.7 This filter left 194 remaining sites.

4.8 Sites were then subject to a further filter in accordance with the settlement hierarchy

4.9 The following 10 sites were removed from further assessment due to their location within or adjacent to selected small villages within the Green Belt. It is important to note that whilst the sites have been excluded from further assessment, this is not a detailed assessment of what would be considered as 'limited' in accordance with planning policy.

Site	Site Location	Reason
Chip001R	Site is adjacent to a selected small village in the green belt (Chipperfield).	Site comprises greenfield land in the Green Belt in a location where it is not proposed to release Green Belt land.
Chip003R	Site is within a selected small village in the green belt (Chipperfield).	Site is greenfield land in the Green Belt in a location where it is not proposed to release Green Belt. While limited infilling in villages is permitted by national Green Belt policy, this is a larger site unlikely to be considered as limited infilling.
Chip004R	Site is adjacent to a selected small village in the green belt (Chipperfield)	Site comprises previously developed land in the Green Belt in a location where it is not proposed to release land from the Green Belt. While limited infilling in villages is permitted by national Green Belt policy, this is a larger site unlikely to be considered as limited infilling.
PEnd001R	Site is adjacent to a selected small village in the green belt (Potten End).	Site comprises greenfield land in the Green Belt in a location where it is not proposed to release Green Belt land.
PEnd003R	Site is adjacent to a selected small village in	Site comprises greenfield land in the Green Belt in a location where it is not proposed to release Green Belt land.

Site	Site Location	Reason
	the green belt (Potten End).	
PEnd004R	Site is within a selected small village in the green belt (Potten End).	Site comprises previously developed land in the Green Belt in a location where it is not proposed to release land from the Green Belt. While limited infilling in villages is permitted by national Green Belt policy, this is a larger site unlikely to be considered as limited infilling.
Flam003R	Site is adjacent to a selected small village in the green belt (Flamstead).	Site comprises greenfield land in the Green Belt in a location where it is not proposed to release Green Belt land.
Flam005R	Site is adjacent to a selected small village in the green belt (Flamstead).	Site comprises greenfield land in the Green Belt in a location where it is not proposed to release Green Belt land.
Flam007R	Site is adjacent to a selected small village in the green belt (Flamstead).	Site comprises greenfield land in the Green Belt in a location where it is not proposed to release Green Belt land.
Flam009R	Site is adjacent to a selected small village in the green belt (Flamstead).	The site comprises mostly greenfield land in the Green Belt in a location where it is not proposed to release land from the Green Belt.

### Availability

4.10 Of the sites assessed to be without intrinsic constraints, the following table presents a breakdown of those sites considered to be available for development (i.e. promoted for potential allocation in the Local Plan) and those that are currently not available.

	Available	Not Available
<b>Urban</b>	55	53
<b>Rural</b>	75	1
<b>Total</b>	130	54

### Achievability

4.11 Sites are considered to be achievable (or viable) at this early stage. This is on the basis that the policy requirements of the new Local Plan have not yet been finalised. It is recognised that some areas, such as brownfield sites in Hemel Hempstead, may struggle in terms of viability, but this will be subject to more detailed testing of sites at a later stage, following the completion of this study.

4.12 As a result, 130 sites have been assessed as broadly suitable, available and achievable.

### Phase Two Assessment

4.13 As noted above, 130 sites passed the phase 1 assessment.

- a. 58 are capable of delivering less than 50 dwellings and are discounted from further assessment.
- b. 72 are capable of delivering 50 dwellings and above and are carried forward to the next step.

The makeup of these sites are as follows:

	Rural	Urban	Total
<b>Hemel Hempstead</b>	14	21	35
<b>Berkhamsted</b>	12	3	15
<b>Tring</b>	5	1	6
<b>Bovingdon</b>	6	1	7
<b>Kings Langley</b>	4	0	4
<b>Markyate</b>	2	0	2
<b>Wider Countryside</b>	3	N/A	3
<b>Total</b>	46	26	72

4.14 Having regard to the methodology set out in section 3, the detailed assessment of each site is presented in **Appendix C**. The following table summarises the key outputs of the assessment of sites:

Settlement	Suitable for further consideration.	Suitable for further consideration subject to major constraints.	Unsuitable
Hemel Hempstead	14	9	12
Berkhamsted	3	7	5
Tring	0	3	3
Bovingdon	2	4	1
Kings Langley	0	3	1
Markyate	0	1	1
Wider Countryside	0	1	2
<b>Total</b>	<b>19</b>	<b>28</b>	<b>25</b>
<b>Estimated Development Potential</b>	<b>4,951 dwellings</b>	<b>30,457 dwellings</b>	<b>N/A</b>

## Windfall Assessment

4.15 The Council has undertaken an assessment of historic windfall rates. The data on windfall completions covers a 16 year period between 2006/07 to 2021/22. The dwelling completions are net figures. We factor in any losses or no net gain in dwellings to the calculations, for example in residential conversions or replacement dwellings.

### *Review of Historic Windfall Delivery*

4.16 The first step in the windfall analysis is to review the total number of windfall completions each year in the borough as a proportion of total completions. This is presented in the table below.

#### *All net windfall completions 2006/07 to 2021/22*

Year	Total Net Windfall Completions	Total Overall Completions	Windfall as a %	Status of development plan
2006/07	290	411	70.6	The Local Plan 1991-2011
2007/08	264	390	67.7	
2008/09	308	415	74.2	
2009/10	188	237	79.3	The Local Plan 1991-2011 out of date
2010/11	597	600	99.5	
2011/12	398	447	89	
2012/13	219	290	75.5	
2013/14	102	219	46.6	Core Strategy (2013)
2014/15	190	379	50.1	
2015/16	369	660	55.9	
2016/17	395	723	54.6	
2017/18	288	586	49.1	
2018/19	306	557	54.9	Core Strategy (2013) out of date
2019/20	373	481	77.5	
2020/21	458	711	64.4	
2021/22	210	801	26.2	
Totals	4,955	7,907	62.6	

4.17 In total, windfall completions represent more than 60% of all completions in the borough since 2006. Looking at the annual data, windfall completions range between 26% and 99% of total completions. In no fewer than thirteen of the sixteen years, windfall completions represent the majority of all completions (i.e. >50%).



- 4.18 The Council considers this to be compelling evidence that windfall sites represent a reliable and consistent source of supply for the borough, in accordance with paragraph 71 of the NPPF.

*Review of Windfall Delivery for Minor Developments*

- 4.19 The Council examined windfall completions on sites delivering less than 10 dwellings. The following table below presents completions on minor development windfall sites between 2006/2007 and 2021/2022. These figures do not include sites approved through permitted development rights/prior approvals.

*Historic Windfall Completions – Minor Developments*

<b>Year</b>	<b>1-4 dwelling schemes (no. of dwellings)</b>	<b>5-9 dwelling schemes (no. of dwellings)</b>	<b>Total dwellings on minor windfall sites</b>
2006/2007	113	38	151
2007/2008	109	26	135
2008/2009	120	19	139
2009/2010	68	9	77
2010/2011	53	50	103
2011/2012	90	29	119
2012/2013	80	39	119
2013/2014	63	16	79
2014/2015	76	20	96
2015/2016	72	51	123
2016/2017	95	26	121
2017/2018	75	27	102
2018/2019	101	49	150
2019/2020	98	40	138
2020/2021	165	87	252
2021/2022	96	74	170
<b>Totals</b>	<b>1,474</b>	<b>600</b>	<b>2,074</b>

- 4.20 Although it is noted that there are some peaks and troughs in annual data completions (252 dwellings in 2020/21, compared to 77 dwellings 2009/10), the Council considers the supply to be reasonably consistent for most years.

- 4.21 The mean average completions on minor windfall developments is 129 dwellings per annum. The median average is 122 dwellings per annum. The mean average over the last three years is 186 dwellings per annum.

4.22 In all but three of the last sixteen years, completions on minor windfall developments exceeded 100 dwellings per annum.

4.23 The Council considers the inclusion of a minimum windfall allowance of 100 dwellings per annum is appropriate and justified given that:

- this figure is below any historic annual completions for such windfall sites;
- minor developments represent a strong source of supply once permission is granted;
- it reflects the Council’s positive approach to bringing forward sites of this scale; and
- in considering likely future trends, there is no evidence to suggest that such trends may change. Such sites are not normally promoted to the Council in advance of a planning application being submitted. There continues to be a healthy number of applications for such scales of development currently being considered, many of which will likely receive permission in due course.

4.24 Having regard to the historic data, the following table summarises the average time it takes minor developments to be completed from the date that permission is granted.

*Minor Developments – Average Time from Permission to Completion*

Year	<5 dwellings	5-9 dwellings
2006/2007	2.0 years	2.4 years
2007/2008	1.8 years	1.9 years
2008/2009	2.2 years	2.1 years
2009/2010	2.1 years	2.1 years
2010/2011	2.1 years	1.9 years
2011/2012	2.1 years	2.2 years
2012/2013	2.0 years	1.2 years
2013/2014	2.2 years	2.6 years
2014/2015	2.2 years	2.6 years
2015/2016	1.6 years	2.2 years
2016/2017	1.9 years	2.4 years
2017/2018	1.9 years	2.2 years
2018/2019	2.3 years	3.3 years
2019/2020	2.5 years	2.1 years
2020/2021	2.5 years	2.3 years
2021/2022	1.9 years	1.9 years

4.25 Since 2006, it takes roughly 2.5 years for minor developments to be completed, following a grant of detailed permission. In all but one instance, the average time is below 3 years. Having regard to this information, the Council assumes those with the benefit of planning permission (and which are now ‘commitments’) will come forward for development in years 1-3.

4.26 Given that more applications are likely to come forward in the coming years, the Council considers that a windfall allowance on minor developments of 100 dwellings from 2026/27 is both realistic and justified.

### *Review of Windfall Delivery for Major Developments*

- 4.27 The Council examined windfall completions on major development sites (those that delivered 10 or more dwellings). The table below shows completions on these sites between 2006/07 and 2021/22. These figures do not include sites approved through permitted development rights/prior approvals.

*Historic Windfall Completions – Major Developments*

<b>Year</b>	<b>Total</b>
2006/2007	139
2007/2008	129
2008/2009	169
2009/2010	111
2010/2011	494
2011/2012	279
2012/2013	100
2013/2014	23
2014/2015	94
2015/2016	246
2016/2017	274
2017/2018	186
2018/2019	156
2019/2020	235
2020/2021	206
2021/2022	40
<b>Total</b>	<b>2,881</b>

- 4.28 It is evident from the above table that supply fluctuates more significantly year-on-year than with minor developments. The lowest supply from such sites was in 2013/14 (23 dwellings) and again more recently in 2021/2022 (40 dwellings). The highest supply was 494 dwellings in 2010/11.
- 4.29 Notwithstanding this, it is important to note that the total number of homes delivered on major windfall sites is c.40% higher than the number delivered on minor development sites since 2006.
- 4.30 The Council considers that such developments represent an important source of supply alongside minor developments.
- 4.31 Between 2006 and 2022, the mean average completions on minor windfall developments is 180 dwellings per annum, while the median average is 162 dwellings per annum. The mean average in the last three years is 160 dwellings per annum.
- 4.32 In looking at ways in which to better understand how an appropriate annual windfall assumption can be determined alongside modest fluctuation in delivery rates, the following table presents the same annual completions alongside three and five year averages.

*Historic Windfall Completions – Three and Five  
Year Averages for Major Developments*

<b>Year</b>	<b>Total</b>	<b>3 Year Average</b>	<b>5 Year Average</b>
2007	139		
2008	129		
2009	169	146	
2010	111	136	
2011	494	258	208
2012	279	295	236
2013	100	291	231
2014	23	134	201
2015	94	72	198
2016	246	121	148
2017	274	205	147
2018	186	235	165
2019	156	205	191
2020	235	192	219
2021	206	199	211
2022	40	160	165

- 4.33 In all but one instance, the average is greater than 100 dwellings per annum, with 72 dwellings per annum between 2013 and 2015 being the exception.
- 4.34 Using this table, average figures do not exceed 300 dwellings per annum, and in recent years, averages are steadily between 160 and 230 dwellings per annum.
- 4.35 Taking a cautious approach to this, the Council considers the inclusion of a minimum windfall allowance of up to 140 dwellings per annum for major development is appropriate and justified given that:
- historic trends demonstrate that this figure is both realistic and deliverable, taking particular account of averages across both three and five years since 2017;
  - there is no evidence to suggest that future trends will significantly change;
  - it represents a strong source of housing supply for the borough; and
  - it reflects the Council's positive approach to bringing forward sites of this scale.

*Review of Windfall Delivery for Permitted Development / Prior Approval*

- 4.36 Prior approvals for conversion/change of use to residential (for example from offices and agricultural use) provide a steady supply of housing growth. The table below shows the delivery from relevant prior approvals in Dacorum since their introduction in 2014.

*Prior approval - historic delivery*

<b>Year</b>	<b>&lt;10 dwellings</b>	<b>10+ dwellings</b>	<b>Total</b>
2014/15	5	0	5
2015/16	35	73	108
2016/17	27	19	46
2017/18	10	39	49
2018/19	12	64	76
2019/20	3	26	29
2020/21	22	20	42
2021/22	4	16	20
<b>Total</b>	<b>118</b>	<b>257</b>	<b>375</b>

4.37 The average number of conversions through prior approvals is 46 dwellings per annum. Completions from prior approvals are not counted in any of the other historic windfall datasets above and are presented here for information purposes to demonstrate that they have been a reliable source of supply to date.

4.38 The Council considers it difficult to justify likely future trends and therefore does not seek to identify a windfall allowance element for such schemes. Despite this, the Council expects some permitted developments to continue to come forward, and that these will add a degree of contingency (or buffer) for years where the windfall allowance on minor/major developments are not met.

*Total Windfall Allowance*

4.39 Taking account of the evidence presented above, and the predicted supply of commitments at this stage (minimising the risk of double counting with those major windfall sites that now have planning permission), the Council considers it appropriate to put forward the following total windfall allowance for the draft Local Plan.

*Total Windfall Allowance for Dacorum Borough Council*

<b>Type</b>	<b>Windfall allowance</b>	<b>Effective from</b>
Minor Development Sites	100 dwellings	2026/27
Major Development Sites	67 dwellings	2026/27
	75 dwellings	2027/28
	100 dwellings	2030/31
	140 dwellings	2031/32

4.40 These figures will be updated when the Local Plan is due to be finalised in 2024.

*Distribution of Windfall Allowance*

4.41 The proposed distribution for windfall development is based upon historic delivery rates over the last 14 years taking an average by settlement. This data can be used to estimate how a future windfall allowance could apply to the six main settlements (and to the rest of the borough). The proposed distribution of windfall allowance is as follows:

*Windfall Distribution to each settlement*

<b>Settlement</b>	<b>Proportion of historic windfall completions</b>
Hemel Hempstead	71%
Berkhamsted and Northchurch	9%
Tring	6%
Bovingdon	1%
Kings Langley	2%
Markyate	1%
Rest of the borough	10%

4.42 Applying this for the plan period 2024 – 2040, the following table presents the estimated number of dwellings expected to come forward annually on sites not allocated in the draft Local Plan.

<b>Settlement</b>	<b>2026/27</b>	<b>2027/28</b>	<b>2028/29</b>	<b>2029/30</b>	<b>2030/31</b>	<b>2031/32 onward</b>
Hemel Hempstead	119	124	124	124	142	170
Berkhamsted and Northchurch	15	16	16	16	18	22
Tring	10	11	11	11	12	14
Bovingdon	2	2	2	2	2	2
Kings Langley	3	4	4	4	4	5
Markyate	2	2	2	2	2	2
Rest of the borough	17	18	18	18	20	24
<b>Annual Allowance</b>	<b>167</b>	<b>175</b>	<b>175</b>	<b>175</b>	<b>200</b>	<b>240</b>

4.43 In total, the windfall allowance will contribute just over 3,000 homes towards the overall housing supply in the Local Plan period. Of this, 1,400 homes are estimated to come forward as minor developments (<10 dwellings in total), while 1,600 are estimated for major development sites.

4.44 A degree of caution is required between these outcomes and the capacities identified in the phase two assessment outcomes, owing to the potential for double counting two different forms of supply. It is important to note that windfall sites are those that are not identified or allocated in the Local Plan. For this reason, any site considered in this assessment has the potential to be a windfall site if it is not allocated in the Local Plan, but does come forward for development on a speculative basis.

4.45 The assessment therefore assists the Council in determining the likely future trends regarding windfall sites, mainly on major development sites.

## Assessment Conclusions

4.42 The assessment has considered a range of sources of housing supply. These are presented in the table below.

Housing Supply	Source	Contribution towards Supply
Commitments (applicable from 1 April 2024)	Annual Monitoring	2,390 homes
Review of existing allocations	Section 4, para 4.1	2,702 homes
Sites suitable for further consideration	Phase Two Assessment / Appendix C	4,951 homes
Sites suitable for further consideration with major constraints	Phase Two Assessment / Appendix C	30,457 homes
<b>Total</b>		<b>40,500 homes</b>

- 4.42 The standard method for calculating housing need is 1,017 dwellings per annum. This represents the starting point for determining a Local Plan housing requirement. The Local Plan period is 16 years, and results in an overall requirement of 16,272 dwellings (1,017 x 16).
- 4.42 The outcomes of this study and the table above demonstrate that there is sufficient land available within the borough to meet future housing needs. However as a result of this, there is a requirement to consider sites up to and including those with major constraints identified, if the overall requirement is to be met. Not all sites are required to be allocated and it will be for more detailed evidence studies, including the Sustainability Appraisal and Habitats Regulations Assessment to inform an appropriate strategy for the new Local Plan, taking account of the outputs of this work.
- 4.42 It also demonstrates the potential supply of sites that *could* assist with the identified windfall allowance of around 3,000 homes, having regard to potential future trends.