

Consultation Response to the GLA's Draft SHLAA Methodology

This is a joint response from the Hertfordshire Infrastructure & Planning Partnership to the Greater London Authority consultation on their draft SHLAA methodology.

The Hertfordshire Infrastructure and Planning Partnership (HIPP) is a partnership that represents all ten District/Borough Councils and the County Council in Hertfordshire. This response is based on a separate response from Welwyn Hatfield Borough Council.

Below is a table setting out the concerns of HIPP. (For succinctness, National Planning Practice Guidance on Housing and Economic Land Availability Assessments is referred to as NPPG)

Draft SHLAA Methodology	HIPP response	Suggested change to the draft methodology
The next London Plan will need to be informed by a Strategic Housing Land Availability Assessment (SHLAA)	Consistent with NPPG, the next London Plan will need to be informed by a Housing <u>and</u> Economic Land Availability Assessment. Reference is made at paragraph 1.8 to an already completed Industrial Supply Study and an Industrial Land Demand Study which is underway. It is not clear from the draft methodology if this extends to other employment uses such as offices	Consistent with the NPPG, consider reporting on a combined Housing and Employment Land Availability Assessment (HELAA) as part of the same exercise in order that sites may be allocated for the use which is most appropriate. Clarify in the SHLAA methodology if only Industrial land is to be reviewed or whether this extends to other employment uses such as offices.
Para 1.1: The study will cover a 25 year period from 2016 to 2041	Support this approach	No change
Para. 1.2: Approvals include non-self-contained housing e.g. student accommodation and specialist housing for older people	Is the intention to make an allowance for approvals based on a ratio to convert non self-contained housing to housing numbers? If so, what ratio will be applied and on what basis?	Clarify what ratio is to be applied to convert non-self-contained accommodation to dwelling numbers. If this is not what is intended, clarify what is the intention.
Para 1.12: Confidentiality of potential sites	The SHLAA should identify whether sites are suitable, available and achievable and should include an outline plan of each site.	NPPG sets out the Core Outputs which includes a list of sites cross referenced to locations on maps. The assessment should be made publicly available.
Para. 3.1 – the approach is tailored to London's pressurised market where 98% of housing is delivered on brownfield sites and other sites in active use	Stage 1 of the methodology set out in NPPG does not restrain land availability assessments to land that is already previously developed. All available types of sites should be considered. Sites which have particular policy constraints should be included in the assessment for comprehensiveness. The appropriateness of any constraints should be tested and assessed against national policies and designations to establish which have a reasonable potential for	The assessment should not be restrained by previous tailored approaches. All sites should be considered. This does not mean that all suitable, available and achievable sites will ultimately be allocated for development. The task is to select the most sustainable sites in light of the need to meet FOAN unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when

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	development.	assessed against the policies in the NPPF as a whole.
<p>Para. 3.7 – sites classified as unsuitable and deemed to have a zero per cent probability for development. The list includes Green Belt and Metropolitan Open Land.</p>	<p>HIPP strongly objects to the assumption that the Green Belt should be deemed to have zero development probability.</p> <p>To do so would be pre-empting decisions that will need to be made in taking forward the London Plan.</p> <p>NPPG advises that land availability assessments should identify <u>all</u> sites and broad locations <u>regardless</u> of the amount of development needed.</p> <p>Further, “<i>Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness ... An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints...</i>”</p> <p>NPPG contains a long list of sites that may be relevant to the assessment, this includes agricultural buildings, sites in rural locations, sites in and adjoining villages, potential urban extensions and new free standing settlements.</p> <p>Sites in the Green belt are not excluded from the assessment potential.</p> <p>Stage 2 of the NPPG methodology advises that plan makers will need to consider the appropriateness of identified constraints and whether such constraints could be overcome.</p> <p>Stage 5 of the NPPG methodology reflects the NPPF. Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan.</p> <p>London has not yet established one way or another whether or not exceptional circumstances exists to alter Green Belt boundaries</p>	<p>The methodology should acknowledge that rather than simply accepting previously defined constraints, they should be tested.</p> <p>The Green Belt is not a landscape or wildlife designation, such as an AONB or an SSSI, it is a policy constraint that was previously defined.</p> <p>Local Planning Authorities around London are faced with the challenge of meeting housing needs and Green Belt boundaries are being reviewed due to insufficient supply from urban and other sources.</p> <p>It is simply not acceptable for the GLA to have a blanket ‘zero’ approach to Green Belt sites.</p> <p>The challenge is to find the most sustainable sites and by discounting immediately Green Belt sites means that the GLA SHLAA will not be a comprehensive assessment of land availability.</p> <p>It is important to remember that just because a site is found suitable, available and achievable in a SHLAA does not mean it will be allocated for development in a development plan but to exclude all such sites will mean that the London Plan will not be based on a proportionate evidence base and may run the risk of not being found sound.</p>
<p>Paras. 3.11 and 3.12 – probability assumptions for Industrial Land may need to be revisited</p>	<p>Agree – the assumptions should be revisited following the Industrial Land Demand Study.</p>	<p>Add a caveat that a London borough would only be able to alter the probability assumptions that would result in locally designated employment sites being released for housing where they have an up to date Economy Study and Employment Land Review which indicates that there will be sufficient land to meet the long term employment needs of the borough and that no significant shortfall in employment land would arise as a result of the release, either individually or cumulatively.</p>

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Table 8 – Land ownership constraints	<p>The maximum reduction in probability is set at 20% - suggest that in certain cases, the probability reduction could be much higher.</p> <p>Land Registry data is a starting point only. Should land be in multiple ownership or if Land Registry data indicate constraints that may not be possible to overcome, then a higher reduction may need to be applied. Not to do so could be over-estimating the deliverability of certain complex sites.</p>	<p>Site promoters should be required to identify and clarify any complex land owner matters so that the GLA can demonstrate that there is a reasonable prospect that sites could be delivered.</p> <p>Allow for a higher impact on probability where complex land ownership issues arise and where a doubt remains that such matters could be overcome by 2041.</p>
Para. 3.25 – 400 sites classified as unsuitable due to ownership	<p>Land ownership is not a suitability assessment, it is an availability and achievability assessment. A site could be suitable (free from physical and environmental constraints) but may not be available if not all landowners are willing or deliverability achievable if legal constraints affect a site.</p>	<p>Clarify that land ownership relates to availability and achievability, not suitability.</p> <p>If the concerns of the GLA is that too many sites were dismissed because of land ownership issues, then this supports the need to work with site promoters to assess if there is a reasonable prospect that constraints could be overcome.</p>
Para. 3.28 – boroughs will consider if policy constraints can be overcome	<p>Green Belt should be added to the list in Table 9.</p> <p>In exceptional circumstances, Green Belt boundaries can be altered.</p> <p>Whether or not the GLA considers that exceptional circumstances exist, a Green Belt site could be suitable.</p> <p>Such a site would however only be allocated if exceptional circumstances were to exist, if a site was considered the most sustainable option against all reasonable alternatives and then removed from the Green Belt.</p>	<p>Add Green Belt sites to the list in Table 9.</p> <p>They are constrained by a policy that could be reviewed should exceptional circumstance exist to do so (a separate decision).</p>
Para. 3.34 – Listed buildings or scheduled monuments / primary and secondary schools excluded	<p>Refer to para. 132 and 133 of the NPPF. If development would result in substantial harm to or total loss of significance of a designated heritage asset (or its setting), consent should be refused unless the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss.</p> <p>It therefore follows that if such a circumstance exists, a site should not be considered suitable in the SHLAA</p> <p>Schools are automatically excluded in paragraph 3.34 but then allowed for in limited circumstances in paragraph 3.35 where a programme is in place. The SHLAA may need to consider with the</p>	<p>The first test in the 5th bullet point should relate to substantial harm or loss of significance of a heritage asset.</p> <p>Even ‘sympathetic’ enabling development could result in substantial harm to the setting of a heritage asset.</p> <p>Consider the potential for housing on school sites in liaison with the relevant education authority.</p>

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	<p>relevant education authority whether between 2016 and 2041 further school sites, e.g. those that are no longer fit for purpose because either the buildings have reached the end of their practical life or the site is not big enough to accommodate expansion needs are likely to come forward for redevelopment, which may include some opportunities for housing</p>	
<p>Para 3.45 – boroughs may consider office sites as suitable if they are likely to come forward during the plan period.</p>	<p>The suitability of office sites for housing should be assessed in light of a proportionate evidence base on the forecasts needs of the economy.</p>	<p>Add a caveat that a London borough would only be able to alter the probability assumptions that would result in office sites being released for housing where they have an up to date Economy Study and Employment Land Review which indicates that there will be sufficient land to meet the long term employment needs of the borough and that no significant shortfall in employment land would arise as a result of the release, either individually or cumulatively.</p>