Report for
Anthony Jones
London Borough of Waltham Forest
Cedar Wood House
2d Fulbourne Road
Walthamstow
E17 4GG

Main Contributors
Carl Mort
Alan Chaplin
Anna Cohen
Simon Jackson
Andrew Golland

Issued by
Carl Mort

Approved by
Alan Chaplin

Entec UK Limited
155 Aztec West
Almondsbury
Bristol BS32 4UB
England
Tel: +44 (0) 1454 822 000
Fax: +44 (0) 1454 822 010

London Borough of Waltham Forest
Waltham Forest Housing Land Availability Assessment
Final Report
February 2008
Entec UK Limited
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1. Introduction

1.1 Background

Entec was originally commissioned by the London Borough of Waltham Forest in March 2007 to undertake an Urban Capacity Study covering the Borough. However, following the commencement of this work, the Department of Communities and Local Government published, in July 2007, the finalised version of its “Strategic Housing Land Availability Assessments: Practice Guidance” document.

As a result, Entec reviewed the Practice Guidance and adapted the study to meet the latest Government advice. The assessment will form a key component of the evidence base to support the development of the Waltham Forest Local Development Framework, which will replace the Council’s current Unitary Development Plan adopted in March 2006. A plan showing the study area can be found at figure 1.1.

1.2 What is a Housing Land Availability Assessment (HLAA)?

A HLAA is a study, carried out at a single point in time, to identify all the sites in the study area with potential for future housing development. In identifying those sites with housing potential, the study then needs to make a judgment on two things:-

- The potential for new dwellings on each site in terms of the net gain (or loss) of dwellings; and
- When the site is likely to be developed.

The answer to when a site is likely to be developed is important in defining whether a site can be considered “deliverable” and “developable”, and therefore form part of the planning authority’s 5-year supply of housing land. The assessment in the HLAA of the deliverability and developability of each site is made irrespective of the level of housing provision that will be needed over the plan period.

The HLAA is not a one-off study and updating its findings will need to be an integral part of the Council’s Annual Monitoring Report process.

1.3 What to expect from a HLAA report

The main outcomes from HLAA work are:

- An explanation of the methods, assumptions, judgements and findings of the study;
- A list of sites quantifying the amount of housing that could be delivered on each site (in terms of net gain or loss);
• Maps showing the location of each site;
• Where particular sites or areas have been excluded, an explanation as to why;
• The identification for each site of any constraints that could affect the delivery of the development;
• An indication of when each site is realistically expected to be developed, based upon an assessment of the deliverability and developability of each site in terms of its suitability, availability and achievability;
• Recommendations on how any identified constraints could be overcome and when (e.g. the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, a need to amend restrictive planning policy, etc).

1.4 How does the HLAA relate to Plan preparation by the Planning Authority?

The HLAA provides a key component of the evidence base to support the delivery of sufficient land for housing to meet the community’s need for more housing. While a HLAA does not in itself determine whether a site should be allocated for housing development, its evidence will be of particular relevance at the issues and options stage of development plan preparation by helping the planning authority to identify the choices available in meeting the need and demand for more housing in the plan area.

The HLAA may also help the planning authority to identify subsequent action that may need to be taken to ensure sites will become deliverable, such as new infrastructure investment, or whether plan policies need to be reviewed to allow certain sites to be developed for housing.

Using the HLAA’s findings, the planning authority must identify specific, deliverable sites that will be developable for residential purposes within the first 5 years of its development plan period. It must then keep this 5-year provision subsequently topped-up and demonstrate this 5-year supply as part of its Annual Monitoring Report process.

In order to enable the 5-year supply to be topped-up, the HLAA’s identification of sites with housing potential can be used to identify in the development plan the authority’s proposed specific, developable sites for years 6–10, and ideally years 11–15.

The judgement by the planning authority at the plan-making stage as to whether a site can be considered deliverable and developable is based on the HLAA information on the suitability, availability and achievability of each of the identified sites for housing development.

The existence of a planning permission does not necessarily mean that the site is available (for example, where the developer has still to obtain control of the land).

Where it is unknown as to when a site could be developed (for example, where it is not known when a severe constraint to development might be overcome), then it should be regarded as “not currently developable”.

Where a large proportion of the housing to be provided in the development plan will need to come from small sites, this may mean that the plan will need to identify more smaller sites than
would be necessary in an area where the bulk of the housing supply is dependent on allocating larger sites.

The Assessment is not a policy document and does not allocate land for development.

1.5 Outline of Methodology

The methodology for the Waltham Forest HLAA is detailed in Chapter 4 of this report and broadly follows the guidance contained in the Strategic Housing Land Availability Assessments: Practice Guidance (2007).

The key stages in Entec’s approach to the HLAA are reflected in the flowchart shown in figure 1.2. The first two chapters of this report provide contextual information on the policy background to the study. Chapter 3 - 7 of the report broadly follow the headings contained in the flowchart.

In addition, a separate economic viability and design analysis was also undertaken. The analyses examined, via a number of examples, the extent to which economic viability and design characteristics might affect the deliverability of individual sites.

Figure 1.2: The Strategic Housing Land Availability Assessment process and outputs
1.6 Brownfield Sites

Whilst the HLAA identified sites with potential for future housing development, the identified sites may also be considered for other land uses. In particular, the study has inevitably, in a place like Waltham Forest, identified previously developed (brownfield) sites with potential for redevelopment across the Borough as a whole. As such, the study provides a valuable database for a variety of potential uses and not just necessarily housing.
INSERT FIG 1.1 STUDY AREA
2. Planning Policy Guidance

This section of the report will summarise the status of the following National, Regional and Local planning policy guidance which are relevant to this study:

• Planning Policy Statement 1: Delivering Sustainable Development (2003);
• Planning Policy Statement 3: Housing (2006);
• Public Service Agreement (2007);
• Sustainability Appraisal;
• Habitats Directive;
• Strategic Housing Land Availability Assessment: Practice Guidance (July 2007);
• The London Plan: Spatial Development Strategy for Greater London (2004), including Further Amendments to the London Plan (2006); and
• 2004 London Housing Capacity Study (July 2005).

A summary of the relevant guidance contained in each of the above documents is set out below:

2.1 National Guidance

2.1.1 Planning Policy Statement 1: Delivering Sustainable Development

PPS1 is concerned with general planning policies and principles, with an overarching emphasis on the promotion of sustainable and inclusive patterns of urban and rural development. In summary, the guidance advocates an adequate supply of suitable land for development, the protection and enhancement of the natural and historic environment, including existing communities; and the importance of ensuring high quality development through good and inclusive design.

2.1.2 Planning Policy Statement 3: Housing

Published in November 2006, Planning Policy Statement 3: Housing (PPS3) sets out the national planning policy framework for delivering the Government’s housing objectives. In support of the Government’s commitment to the creation of mixed and sustainable communities, the statement emphasises the importance of ensuring an adequate supply, and choice, of housing (including affordable) in all sections of the community.

As with previous guidance, the statement advocates the most efficient and effective use of land, in locations that offer good access to a range of community facilities, key services, employment opportunities and infrastructure. Similarly, the importance of prioritising the re-use of previously development land remains high on the Government’s agenda.
Reflecting the principles of ‘Plan, Monitor, Manage’, Local Planning Authorities are encouraged to ensure that local plans deliver a flexible, responsive supply of land for housing. Drawing on information from the Strategic Housing Land Availability Assessment, local authorities should set policies and strategies for identifying and delivering a level of housing provision. This should include identifying broad locations and specific sites that will enable a continuous delivery of housing for at least 15 years from the date of adoption, whilst identifying sufficient specific deliverable sites to deliver housing in the first five years of the plan.

The guidance states, that to be considered deliverable, sites should, at the point of adoption of the relevant Local Development Document, be Available, Suitable (the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities) and Achievable (there is a reasonable prospect that housing will be delivered on the site within five years). Further information on the 5 Year Supply of Housing Land can be found at appendix A.

### 2.1.3 Public Service Agreement (2007)

Published in October 2007, during the course of this assessment, the Government’s Public Service Agreement (PSA), Delivery Agreement 20, sets out, amongst other things, Communities and Local Government’s proposals to increase long term housing supply and affordability (See [http://www.hm-treasury.gov.uk/media/9/D/pbr_csr07_psa20.pdf](http://www.hm-treasury.gov.uk/media/9/D/pbr_csr07_psa20.pdf)). The PSA aims to increase housing supply across England and to address the growing problems of housing affordability in recent years.

Some of the national headline figures for housing targets are as follows (see para.2.1):

- To increase housing supply to 240,000 net additional homes per annum by 2016 (compared to a current rate of 185,000 net additional homes in 2005-06).
- To deliver 70,000 affordable homes in 2010-11, including 45,000 social homes (compared to a current rate of 44,923 affordable homes in 2005-06, including 23,411 social homes).
- To halve the number of households in temporary accommodation by 2010 to 50,500 households (compared to 101,000 in the 4th quarter of 2004).
- To aim for all new homes to be “zero-carbon” by 2016.

In order to deliver the housing growth targets, the Government also considers that it is vital that enough land is brought forward for development and that local spatial plans are in place as soon as possible so that planning applications can be dealt with efficiently and effectively. (See para.2.1) The national target is that 80% of local planning authorities should have adopted the necessary Development Plan Documents, in accordance with their agreed Local Development Scheme, by March 2011.

The Government states that it is committed to ensuring that that new homes are in sustainable communities (i.e. places where people want to live, work and play, and serviced by the full range of infrastructure, services and amenities that communities need) and that the location of new housing supports the Government’s objectives for sustainable growth and the effective use of infrastructure capacity. New homes also need to be planned around the needs of the environment. The Government recognises that managing flood risk, minimising pressures on water and waste infrastructure, and conserving and enhancing greenspace and biodiversity are
all important concerns, as is design quality for helping to create successful and sustainable places. The Government considers that more homes are needed across the whole country, in both urban and rural areas, as well as in growth areas and at growth points. (See para.3.1).

The strategic housing role is at the heart of Local Authority place shaping – creating vibrant mixed communities by ensuring that the right housing, of the highest quality, is in the right place with the necessary infrastructure and support. (See para.3.30).

The Government expects local authorities to (see para.3.31):

- assess and plan for the current and future housing needs of the local population across all tenures;
- make the best use of the existing housing stock;
- plan and facilitate new supply;
- plan and commission housing support services which link homes to the support and other services that people need to live in them; and
- work in partnership to secure effective housing and neighbourhood management on an on-going basis.

Local planning authorities (LPAs) are expected to manage housing delivery through identifying sufficient, suitable land for housing by identifying at least a 15 year supply of land with a 5 year rolling supply that is available to deliver the level of homes that they need. The Government intends to incentivise authorities through a new Housing and Planning Delivery Grant. (See para.3.36)

The Government also points out that LPAs are required to produce Annual Monitoring Reports showing how actual housing performance for the previous financial year compares to plan housing targets and policies. This will include showing how many sites from the 5 year supply of deliverable housing sites have been built upon during the year, together with a revised list of sites to maintain the five years supply, drawing upon those sites that are to be allocated for housing in their LDFs. The monitoring report should set out the actions that the authority will take where it is “underperforming” compared to its housing trajectories. (See para.3.37)

### 2.1.4 Sustainability Appraisal

Sustainability Appraisal (SA) is mandatory for all new and revised Development Plan Documents (DPD) produced by a Local Planning Authority. The SA must be carried out to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of a DPD. The preparation of the SA should occur in tandem with the production of the relevant plan to be of greatest value to improving the quality of spatial policies and subsequent decision making. An SA should incorporate the requirements of the Strategic Environmental Appraisal Directive and follow the methodology set out in the ODPM SA guidance ODPM 2005 Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents.

### 2.1.5 Habitats Directive

The Habitats Regulations require that, prior to publication, Local Planning Authorities assess the potential effects of Development Plan Documents on European sites of nature conservation.
importance, i.e. Special Areas of Conservation and Special Protection Areas (national guidance also includes candidate/potential European sites and Ramsar sites in these assessments). Depending on the outcome of the assessment it may be necessary to amend the DPD to reduce or remove potentially damaging effects of the DPD on European sites. Where this is not possible it is necessary to consider alternative sites/policies that would have a lesser effect on the European site before implementing the DPD, and if no alternatives are feasible the DPD may only proceed if there are reasons of overriding public interest sufficient to justify the impact on the European site.

2.1.6 Strategic Housing Land Availability Assessments: Practice Guidance

The Strategic Housing Land Availability Assessment: Practice Guidance (SHLAA) was published in July 2007 and provides local authorities with practical guidance on how to undertake an assessment to identify the capacity of potential housing sites within a study area.

The Assessment is an important evidence source to support and inform the preparation of development plans. Although in itself, the Assessment does not determine whether a site should be allocated for housing or not, it does identify land suitable for housing and provides an assessment of the deliverability and developability of each site.

2.1.6.1 What general locations should be considered for housing development?

- Urban areas (brownfield and greenfield); and
- Any locations outside settlement boundaries on brownfield sites.

Whilst not relevant in the case of Waltham Forest, other general locations that can be considered for housing are urban extensions and rural settlements.

2.1.6.2 What types of sites should be considered for housing development?

- Sites with outstanding planning permission for housing;
- Sites with a planning permission for housing that are under construction;
- Sites with an existing unimplemented UDP housing allocation;
- Sites covered by a development brief that includes housing;
- Sites with a planning application refusal where the objection might realistically be overcome (e.g. those rejected on prematurity grounds);
- Sites which are no longer required for employment purposes or other non-residential land uses, which may be suitable for re-development for housing (in total, or as part of mixed-use development), including town centres and as well as employment areas;
- Sites that contain derelict land and buildings, or are vacant;
- Surplus public sector sites;
- Sites containing an underused or surplus-to-requirements car park; and
• Sites in established residential areas, such as potential infill land and under-used garage blocks, where a housing development opportunity exists.

2.1.6.3 What types of land or areas can be excluded from the HLAA?
The scope of the assessment should not be narrowed down by existing policies designed to constrain development and excluding any site from the assessment will need to be justified. Excluding sites should normally be confined to those affected by the more clear-cut restrictive designations, such as Sites of Special Scientific Interest.

The guidance states that it may be useful to map excluded areas and ascribe a nil housing potential to them in order to make these sites explicit and transparent for others to see.

2.1.6.4 How should the area be surveyed?
As a minimum, all sites identified by the desk-top review should be visited, ideally, as part of a street-by-street survey (as has been the case in Waltham Forest). As a minimum, public transport corridors, town and district centres, development hotspots, regeneration and renewal areas, surplus public land, and any areas identified in the RSS should be included in the survey, although a street-by-street survey would provide the most comprehensive coverage.

2.1.6.5 How should the housing potential on each site be assessed?
Existing/emerging plan policy should guide the estimation of housing potential of each site, particularly with regard to density. The London Plan density figures have been used in the case of Waltham Forest. A copy of the density matrix can be found at appendix B.

An alternative is to compare the site with a sample exemplar scheme which represents the form of development considered desirable on a particular site.

2.1.6.6 Assessing the suitability of sites for housing
When assessing the suitability of sites for housing, the following factors need to be taken into account:

• Allocated housing land and sites with planning permission.
• The planning policy context, including restrictive designations and protected areas.
• Physical problems or limitations, such as access, infrastructure, ground conditions (if known), flood risk, hazardous risks, pollution or contamination (if known).
• Potential impacts on landscape features and upon conservation.
• The environmental conditions which would be experienced by prospective residents.

2.1.6.7 Assessing the availability of sites for housing
Assessing the availability of sites for housing should normally take into account the following potential legal and ownership problems where known. In the case of this study, these elements were unknown and would need to be taken into account by the Council when evidence comes to light as the sites are being monitored and updated on an annual basis.
• Multiple ownerships;
• Ransom strips;
• Tenancies; and
• Operational requirements of landowners.

2.1.6.8 Assessing the achievability of sites for housing
A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and sell the housing over a certain period. A residual valuation model can help determine economic viability; including providing affordable housing, whilst the views of local property agents and housebuilders can provide useful background information (An example of a residual valuation model can be found in Chapter 6).

Achievability will be affected by:

• **Market factors** – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and, particularly for larger sites, the projected rate of sales.

• **Cost factors** – including site preparation costs relating to any physical constraints, any exceptional works necessary, relevant planning standards or obligations, and the prospect of funding or investment to address identified constraints or assist development.

• **Delivery factors** – including phasing, the realistic build-out rates on larger sites, whether single developer or several developers, and the size and capacity of the developer.

2.1.6.9 Finalising the Assessment
Where the assessment concludes that insufficient sites have been identified (in terms of the required 5 year supply or overall plan period provision), either:

• Further sites will need to be sought and identified (which could be difficult/impracticable in Waltham Forest); or

• The assumptions made in the assessment will need to be revisited, for example in respect to the housing potential of particular sites by applying increased density figures.

If there are still insufficient sites, the options will be:

• To apply a windfall allowance (but only where justified, such as where the conversion of existing buildings is a significant element of an area’s additional housing provision and can only be projected forward as an estimate for future years); and/or
To identify broad locations for future housing growth within and outside settlements (but which again could be difficult/impracticable in Waltham Forest).

### 2.2 Regional and Local Planning Policy

#### 2.2.1 The London Plan

The London Plan was adopted in February 2004 and sets out the strategic policy framework for the distribution of proposed housing provision amongst the 33 London boroughs (including the Corporation of London) until 2016. Subsequent alterations to the 2004 Plan were published in 2006, and provide a revised minimum target of 30,500 additional homes per annum throughout the Capital.

In the case of Waltham Forest, the figure constitutes an annual target of 665 dwellings, representing a total of 6,650 dwellings over the Plan period 2007/08 - 2016/17. The target is for net additional homes, and includes additional dwellings provided through development and redevelopment, the conversions from residential and non-residential properties, and the re-use of long-term vacant properties.

Policy 4B.3 of the London Plan states that boroughs should ensure that development proposals should achieve the highest possible intensity of use compatible with local context. It puts forward recommendations for density based on whether sites are located in central (highest density), urban and suburban (lowest density) areas. These areas are defined in terms of their proximity to town centres and public transport links. Typically, densities range from 240 - 435 dwellings per hectare in central areas and 55 – 175 units per hectare in urban areas. The density assumptions used in this assessment are dealt with in more detail in Section 4.

#### 2.2.2 London’s Housing Capacity

The 2004 London Housing Capacity Study (LHCS) was the fourth comprehensive assessment of London’s potential housing capacity. Formulated in conjunction with the 33 London boroughs, the study forms the basis to underpin the new housing provision targets in the London Plan for the period 2007/08 to 2016/17.

The study derives an estimated housing capacity from four key sources—large sites; small sites; non self-contained units; and reductions in vacant housing stock. The capacity sources are then combined to provide an estimate of total capacity for each borough. An illustration of how the component parts aggregate to provide an estimate of total housing capacity can be seen in figure 2.1 below.
The total housing capacity in London for net additional dwellings between 2007/08 and 2016/17 is estimated at 315,327. In the case of Waltham Forest, the study identified a potential housing capacity of 6,005 dwellings. This capacity assessment for the 10-year period equates to an annual average of 600 dwellings. A summary table of the findings contained in the LHCS for the Borough of Waltham Forest are set out in table 2.1 below.

Table 2.1 Summary of GLA capacity results for Waltham Forest 2007/08 to 2016/17

<table>
<thead>
<tr>
<th>Source of Capacity</th>
<th>Total Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large* identified sites</td>
<td>2,342</td>
</tr>
<tr>
<td>Small sites</td>
<td>3,099</td>
</tr>
<tr>
<td>Non Self-Contained</td>
<td>184</td>
</tr>
<tr>
<td>Vacants</td>
<td>380</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>6,005</strong></td>
</tr>
</tbody>
</table>

* Large sites were those identified with a yield of 10 or more dwellings.

2.2.3 Waltham Forest Unitary Development Plan

The Waltham Forest Unitary Development Plan (WFUDP) was adopted in March 2006, and remains the adopted plan whilst the new Waltham Forest Local Development Framework (WFLDF) is being progressed. The Council’s general housing policies are set out in section 3 of the WFUDP, with information regarding the level of housing provision addressed within policies HSG1 and HSG2. The policies provide a clear indication of the level of housing provision to be provided within the Borough to 2016. In particular, policy HSG1 stipulates that the identified allocated housing sites (as shown in schedule 6 of the WFUDP) will provide for a total of 750 new dwellings within the plan period (2002-2016). This figure will contribute to the annual target figure of 460 new dwellings per annum (1997-2016).

The Waltham Forest UDP 2006 housing target has been superseded by the Early Alterations to the London Plan 2006 (i.e. 665 per annum 2007/8 – 2016/17).
2.2.4 Local Development Framework

The findings of the Housing Land Availability Assessment (HLAA) will form an integral part of the evidence base for the preparation of the emerging Waltham Forest Local Development Framework (WFLDF). The various documents that collectively make up the WFLDF can be seen in figure 2.2 below.

Figure 2.2: Waltham Forest Local Development Framework
3. Sources of sites with potential for housing

Entec’s approach to the assessment of capacity in the London Borough of Waltham Forest follows that contained in the SHLAA Practice Guidance. The guidance suggests that following an initial desk top review of potential housing sources, a comprehensive site survey should be undertaken to aid in the identification of further potential housing sites not identified by the desk top review, and to provide the study with a more up-to-date view of development progress.

It is also suggested that a survey provides an opportunity for surveyors to identify inconsistencies in data sources, as well as highlighting possible constraints to development associated with a particular site. Consequently, it was agreed with the Council that a comprehensive street-by-street survey of the Borough was the most appropriate approach.

It was decided, in discussion with the Council, that certain sensitive areas within the local authority boundary would be omitted from the area of survey. The areas in question were a combination of local and national designated areas that were deemed to be significantly constrained by existing policy, and therefore unlikely to be suitable for residential development. The omitted areas, as seen in Table 3.1 below, form one of two constraint groups that were formulated to assess the suitability of sites. More information regarding the methodology used for the assessment of sites can be found in Chapter 4.

Table 3.1: Sensitive areas omitted from survey

<table>
<thead>
<tr>
<th>Constraint Group</th>
<th>Designation status</th>
<th>Designations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>National</td>
<td>SSSIs, SLNCI, PSNCI, Metropolitan Open Land, Metropolitan Green Belt, Lea Valley Regional Park.</td>
</tr>
<tr>
<td></td>
<td>Local</td>
<td>Local Nature Reserve, Playing Fields, Parks and Gardens if Local Historic Interest, Park.</td>
</tr>
</tbody>
</table>

It was recognised that some sites with the potential for housing development could not easily be assessed by survey alone, and as such, the HLAA is also based on additional data supplied by Waltham Forest Borough Council and the Greater London Authority. Additional potential housing sources included regeneration areas, garage sites, housing estate sites, and de-designated employment sites. More information regarding the additional data sources can be found in the text below.

3.1 Survey Sites

Between 11th and 22nd June 2007 Entec undertook a comprehensive street-by-street survey of the London Borough of Waltham Forest.
A considerable amount of planning was undertaken prior to commencement of the site work to ensure that those involved in the process followed a consistent approach when identifying and recording information on potential sources of housing development. This was achieved through the issue of an agreed checklist that detailed specific site criteria, which was used to assist surveyors in making a valued judgement.

The sources of sites with the potential for housing to be identified by the survey were defined in conjunction with advice found within *Tapping the Potential*¹ and through discussion with Waltham Forest Council. The categories were refined following publication of the new SHLAA practice guidance in July 2007.

Some additional categories have been added to provide more clarity for those undertaking the site survey. For ease of reference they will be referred to as survey categories in the remainder of this HLAA.

A brief description of each of the survey categories is as follows:

- **Conversion of occupied commercial buildings**: Commercial buildings include those being used for any form of business use. Entec took the view that the market for converted commercial residential units was likely to be strong in Waltham Forest. Premises in good condition with high levels of occupation were not included as a potential housing source.

- **Redevelopment of commercial buildings**: This survey sub category was not identified for assessment in the Council’s initial brief. It was noted whilst undertaking the survey that some commercial buildings were not considered suitable for conversion. These buildings were therefore identified as being more suitable for demolition to provide residential uses.

- **Intensification of existing areas**: Intensification is making more efficient use of land in a given area, for example developing garage courts, large gardens and backlands. The potential from intensification becomes more important in areas where housing potential from other sources is limited.

- **Redevelopment of existing housing**: The redevelopment of poor quality housing can be a source of housing potential in most authorities. Unlike the redevelopment of empty homes, properties must be occupied in order to be classified in this source category. The category includes estate renewal opportunities and redevelopment of large houses to smaller units.

- **Redevelopment of car parks**: It has been acknowledged that in certain circumstances, car parks can yield a significant amount of capacity. Vacant sites are often used as temporary car parks and significant amounts of underused car parking often exists in high street areas behind retail units. Well used car parks such as those associated with supermarkets were not considered as suitable sources of housing potential.

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¹ *Tapping the Potential – Assessing urban housing capacity: towards better practice* (DETR, 2000).
• **Redevelopment of previously developed vacant and derelict land:** It is recognised that, nationally this is a significant source of housing capacity and includes a variety of sites. It includes former industrial land and vacant lots. Some of these sites may contain temporary uses and generally fit in with the normal public perception of brownfield land. For the most part these sites will be suitable for residential development and should be recorded as a capacity source unless the site is subject significant physical constraints.

• **Vacant land not previously developed:** This category includes land shown within built up areas as undeveloped ‘white land’ on ordnance survey and Local Plan proposals maps. Whilst this is an important source of capacity it does not constitute a significant capacity source in Waltham Forest.

• **Flats over shops:** Entec interpreted this category as being vacant premises above retail units. Research in London suggests that there may be as many as 100,000 dwellings situated above a shop. It should be noted, that opportunities for sub-division were not immediately obvious when undertaking survey work.

### 3.2 Planning Permissions

The Council provided Entec with a schedule of planning permissions for residential development granted by the Authority from January 2001 to January 2007. The schedule detailed applications currently under construction as well as those yet to commence. Information regarding the net increase of dwellings was also provided.

Subsequently, an addendum to the planning permission schedule was provided by the Council in October 2007. The updated schedule contained additional planning permission data that had been collated between January and October 2007. This schedule contained information sent to Government Office of London as part of the Council’s monitoring responsibilities for housing delivery.

Entec has assumed that outstanding planning consents which are more than 5 years old, cannot, or are unlikely to be implemented under the original consent. Therefore, these sites have been removed as a planning permission, but retained as a potential housing source. On this basis, this represented 15 outstanding consents for residential development applications within the Borough, which theoretically, could provide a net residential gain of 37 dwellings. More information regarding the methodology used to determine housing potential and density assumptions can be found in **chapter 4**.

### 3.3 GLA Housing Capacity Study 2004

The Council provided Entec with details a number of housing sites which had been identified by the GLA. The sites in question were identified as part of the production of London’s Housing Capacity (LHCS), the urban capacity study produced in 2004 as part of the preparation of the alterations to the London Plan (2006).

The HLAA assessment has included all sites as identified by the LHCS, save those sites which have subsequently been completed. The assessment has also adopted the same housing potential
capacity figures as prescribed by the LHCS report. More information regarding site housing potential capacity calculations can be found in detail in chapter 4.

3.4 Waltham Forest Unitary Development Plan

Entec were provided with a list of the Council’s allocated housing sites, as identified within schedule 6 of the Waltham Forest Unitary Development Plan 2006. The schedule indicated the location and boundary of each of the allocated sites, along with a capacity figure of 750 dwellings. However, specific information regarding the potential capacity of each individual site was not available. As a result, it was decided in agreement with the Council, that a density figure be calculated to achieve an estimated capacity yield on each site. The estimated density was calculated based on density zones as prescribed in the London Plan (2004, updated 2006). More information on density assumptions can be found in chapter 4.

The Council also provided information on a number of other allocated sites that had been earmarked for an element of residential development. Those sites include Major Opportunity Sites (MOS), and Mixed Use Regeneration Areas (MURA). Similarly, no estimated capacity figures were provided to Entec.

3.5 Other sources of sites with the potential for housing

A number of additional sources of sites with the potential for housing were also provided by the Council for inclusion within the assessment. Entec were informed that the additional sources represented sites that had been identified by a number of Council led regeneration initiatives and programmes, and provided a significant level of potential capacity. The estimated housing capacity of each of the categories was calculated using a variation of the density matrix as prescribed in the London Plan (2004, updated 2006). More information regarding the methodology used to determine potential housing capacity can be found in chapter 4. A brief description of each of the additional sources follows:

• **Regeneration areas:** The Council provided Entec with a schedule of sites that had been earmarked for development as part of an on-going regeneration programme for Blackhorse Lane and Walthamstow town centre. An estimated housing potential capacity was calculated based on density zones in the London Plan to achieve an estimated capacity yield for each site.

• **Garage sites:** The Council provided Entec with a list of underused or derelict garage sites that had been identified as suitable locations for residential development. Redevelopment would consist of a mix of new build and intensification of existing sites.

• **Housing estate sites:** Waltham Forest, like most inner city authorities, has a number of housing estates where the major issues are associated with socio-economic conditions rather than the quality and condition of the housing stock. Consequently, the Council, through a joint initiative with Ascham Homes has identified a number of blocks/estates where re-design of the existing accommodation has been considered a more appropriate means of improving the
existing stock. Entec were provided with a schedule of existing Council owned housing estates which have been identified as suitable for redevelopment.

- **De-designated employment sites**: The Council provided Entec with a list of employment sites identified within the recent Waltham Forest Employment Land Study as having the potential for de-designation. The study, carried out by consultants URS, outlined recommendations for the potential release/de-designation of designated employment sites within the Borough. The eleven sites, all use classes B2/B8 (general industrial / storage and distribution), where assessed according to the employment land field survey conducted in April 2007 and deemed appropriate for potential residential uses.
4. **Assessment Methodology**

The methodology for the Waltham Forest HLAA broadly follows the guidance contained in the Strategic Housing Land Availability Assessments: Practice Guidance (2007). The key stages in Entec’s approach to the HLAA are reflected in the flowchart shown previously in figure 1.2.

4.1 **Comprehensive Survey**

4.1.1 **Planning the Survey**

A considerable amount of planning was undertaken prior to commencement of the site survey work to ensure that those involved in the survey were fully aware of what to look for on site and the objectives of the process.

The first stage in the process was to design a site survey form to record the potential capacity sources identified during the site work. The form was designed in consultation with the Council to provide all necessary information about the site and to allow data to be recorded quickly and accurately. The primary function of the form was to record the location of the site and the housing potential source into which it falls. Entec also asked surveyors to record details of the land uses surrounding the site, as well as details of why the site was considered suitable for residential development. Information such as physical constraints, site boundaries and site characteristics were also collated. A copy of Entec’s survey form can be found in appendix C of this report.

To ensure that accurate and consistent results were recorded from the survey, all key staff, including site surveyors, were fully briefed on the process at an early stage in the project. A guidance note was produced to ensure that all surveyors were clear on how to identify and record capacity sources. In addition, all project staff undertaking site survey work were briefed on personal safety and issued with a letter from the Council to present to members of the public who queried the purpose of their work. A copy of the letter can be found in appendix D.

4.1.2 **Undertaking the Survey**

The site survey work was undertaken by four surveyors from Entec between 11th June and 22nd June 2007. To provide a structure for those undertaking the survey and to ensure that the Borough was accurately surveyed, Entec divided the Borough into a series of 155 equal grid squares. A map showing the areas is contained in appendix E of this report.

Each surveyor was able to assess the housing potential of approximately 3-4 grid areas per day. In accordance with the SHLAA practice guidance, ordnance survey maps of the Borough were provided to each surveyor to assist in their navigation of the Borough and to record the boundaries of each potential housing source.

As detailed in chapter 3 (table 3.1), a number of sensitive areas within the local authority boundary were omitted from the area of survey, as they were deemed to be significantly constrained by existing policy, and therefore unlikely to be suitable for residential development.
4.1.3 Survey Site Quality Control
Following completion of the survey sites, the survey site boundaries were digitised into a GIS layer from the paper survey maps, and a unique site ID field was also recorded. This GIS layer was then joined to an access database containing all survey information related to each site, such as the type of existing development, access information and number of existing and adjacent storeys. All GIS and survey records were then manually checked to ensure the information corresponded.

4.2 Capacity Layers

4.2.1 Hierarchy of Source Information
As detailed in Chapter 3, Entec, in collaboration with the Council, identified a comprehensive list of potential housing sources. The sources of potential housing were then categorised in hierarchical order according to their deliverability potential. The hierarchy of source information is shown in Table 4.1 below.

Table 4.1 Housing sites information sources

<table>
<thead>
<tr>
<th>Hierarchy Order</th>
<th>Source Name</th>
<th>Description</th>
<th>Housing Potential Derived From</th>
<th>GIS Layer Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Planning Permissions</td>
<td>Planning permissions &gt; 5Ha (with boundary information)</td>
<td>Net Gain</td>
<td>WF_Polygons</td>
</tr>
<tr>
<td></td>
<td>Planning Permissions</td>
<td>Planning permissions (point information only, no boundary information)</td>
<td>Net Gain</td>
<td>Housing_02_06</td>
</tr>
<tr>
<td>2</td>
<td>UDP Proposed Housing Sites</td>
<td>Proposed Housing Sites (Waltham Forest UDP)</td>
<td>Site area (Ha) * density zone</td>
<td>Proposed_Housing_Sites</td>
</tr>
<tr>
<td>3</td>
<td>Regeneration Areas</td>
<td>Specific regeneration areas as identified by the Council</td>
<td>Site area (Ha) * density zone</td>
<td>Regeneration_Zones</td>
</tr>
<tr>
<td></td>
<td>Regeneration Areas</td>
<td>Specific regeneration areas as identified by the Council</td>
<td>Site area (Ha) * density zone</td>
<td>Regeneration_Zones</td>
</tr>
<tr>
<td>4</td>
<td>GLA Sites</td>
<td>Sites identified by GLA London Housing Capacity Survey (2004)</td>
<td>Total0 (GLA figure)</td>
<td>WalthamForest_HCS.shp</td>
</tr>
<tr>
<td>5</td>
<td>UDP Major Opportunity Sites</td>
<td>Proposed Major Opportunity Sites (Waltham Forest UDP)</td>
<td>Site area (Ha) * density zone</td>
<td>Major_Opportunity_Sites</td>
</tr>
<tr>
<td></td>
<td>UDP Mixed-Use Regeneration Areas</td>
<td>Proposed Mixed-Use Regeneration Areas (Waltham Forest UDP)</td>
<td>Site area (Ha) * density zone</td>
<td>Mixed_Use_Regeneration_Areas</td>
</tr>
<tr>
<td>6</td>
<td>De-Designated Employment Sites</td>
<td>Sites identified in URS Employment Land Survey as surplus employment land</td>
<td>Site area (Ha) * density zone</td>
<td>De-Designated_Council</td>
</tr>
<tr>
<td></td>
<td>Garage Sites</td>
<td>Existing garage sites identified by the Council as having the potential for</td>
<td>Site area (Ha) * density zone</td>
<td>Garage Sites</td>
</tr>
<tr>
<td></td>
<td>Housing Estate Sites</td>
<td>Existing housing estate sites identified by the Council as having the potential for housing redevelopment</td>
<td>Site area (Ha) * density zone</td>
<td>Housing_Estate_Sites</td>
</tr>
<tr>
<td>7</td>
<td>Survey Sites</td>
<td>Entec surveyed sites</td>
<td>Site area (Ha) * density zone</td>
<td>Survey_10thJuly</td>
</tr>
</tbody>
</table>
4.2.2 Overlaps and Double Counting

Each of the capacity layers was initially investigated to identify overlaps and likely duplication of capacity counting. The majority of Entec identified survey sites were new sites, not previously identified in other studies or already subject to planning permission.

Before the overlaps were resolved, each layer was investigated and sites were discounted where appropriate. A discount flag and notes field was added to the GIS table to help future investigation of the reasons for discounting.

In the planning permission layer, sites with an unimplemented planning permission that had been determined prior to June 2002, and which had not commenced, were judged to have expired and were also discounted. Planning permission points which were the same as those in the WF polygon layer, i.e. where the planning permission number was the same, were discounted from the points layer.

For the GLA layer, the Council provided Entec with boundary information and a spreadsheet detailing site capacity and a description of development. On the advice of the Council, sites within the spreadsheet which showed a “New Total” of zero were deemed either undeliverable or already developed, and therefore subsequently discounted.

Survey sites were checked and any site judged to be very small, or too awkward for development was discounted.

Where sites partially overlapped, for instance where a planning permission boundary fell within a UDP polygon, the UDP site capacity was discounted by the number of dwellings covered by the planning permission. Small boundary differences (<5m) were resolved by re-digitising the survey boundaries to ensure no overlaps with other capacity source sites. All overlaps between the point and polygon layers were then manually checked to determine which source should take precedence, according to the hierarchy identified in table 4.1.

4.2.3 Planning Permission Data

The planning permission data supplied by LBWF (January 2007, updated October 2007), consisted of two separate data sets. The first set comprised of detailed planning permission polygon information, which included details of site boundary, size and total net dwellings. The second set, which formed in excess of 90% of the overall permissions, was supplied devoid of polygon (boundary) information. In absence of the polygon information, the location of the individual sites was derived from planning permission point data generated from a spreadsheet supplied by the Council.

A consequence of this approach was that there was no way to derive the size and shape of the site boundary from the single point information, and therefore no way to distinguish the site from other capacity layer information present within the immediate vicinity of the site.

In absence of the boundary information, Entec, in agreement with the Council, prescribed a formulaic approach to distinguishing between planning permission point data and identified survey sites. It was agreed that, where planning permission points fell within 10 metres of an Entec identified survey site, the presumption was that they represented the same site. Subsequently, the planning permission point was then affiliated with the boundary attributes of the survey site. A total of 42 planning permission point sites where investigated after showing an element of overlap with other capacity sources.
In total, 21 planning permission points, falling within 10 metres of survey sites were identified and manually checked to see if they applied to the same sites.

### 4.2.4 Layer allocation

All the capacity layers were assembled on a Ward basis. Where a site boundary crossed Ward boundaries, the site was allocated to the Ward within which the majority of the site resided. All of the polygon capacity layers were then merged in to one single capacity layer, with overlaps resolved based on the hierarchy identified in table 4.1.

All housing potential estimates from the survey and UDP layers, along with the planning permission net gains, GLA housing potential estimates, and additional housing potential sources, were combined in an access database to generate the results presented in chapter 7.

### 4.3 Assessing the Yield

#### 4.3.1 Estimating Housing Potential

The next stage in the assessment was to determine the yield of the sites, and the total number of dwellings that they are likely to be able to realistically support. In order to assess the yield, Entec has made assumptions about the average density that would be developed on each site.

The assumptions used have been based on discussions with the Council regarding development density in the Borough and the suggested density figures found within the London Plan. A copy of the London Plan Density Matrix can be found in appendix B.

#### 4.3.2 Density Zones and Calculating Housing Potential

All sites of housing potential, with the exception of the GLA sites (where yield estimates were provided by the GLA), were generated a housing potential figure, based on the potential density which could be supported at that location, applied to the area of the site in hectares. Planning permission sites were also omitted from the calculation.

The density was derived from a density zone map, as supplied by the Council, which was based on the Public Transport Accessibility Level (PTAL) study. The PTAL zones were reclassified to an average density assumption, based on the London Plan (2004) as shown in table 4.2. A new GIS layer for the density zones was produced, as shown in figure 4.1.

This layer was overlain on all sites (with the exception of the GLA and planning permission sites) to identify a likely housing density for each site. Where a site crossed more than one density zone, the average density was used.
Table 4.2  Housing density zones as derived from public transport accessibility levels (PTAL)

<table>
<thead>
<tr>
<th>PTAL</th>
<th>Density zone (Dwellings per Ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td></td>
</tr>
<tr>
<td>1a</td>
<td>40</td>
</tr>
<tr>
<td>1b</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>50</td>
</tr>
<tr>
<td>3</td>
<td>70</td>
</tr>
<tr>
<td>4</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>180</td>
</tr>
<tr>
<td>6a</td>
<td>240</td>
</tr>
<tr>
<td>6b</td>
<td></td>
</tr>
</tbody>
</table>

The site area in hectares was then calculated, and multiplied by the density to produce an initial calculated housing potential figure for each site. Where this was calculated at less than one, the figure was rounded up, as it was assumed that any identified site must be able to support at least one dwelling. Above a figure of one dwelling, the total was rounded to the nearest whole dwelling at individual site level.

Detailed mapping and constraint information for each of the individual capacity sources can be found in appendix F.

4.4  Assessing when and whether sites are likely to be developed

4.4.1  Assessment of Deliverability and Developability

Having identified the calculated capacity figure for individual sites, the next stage in the assessment was to establish whether a site can be considered deliverable, developable or not currently developable for housing development, which in turn, would dictate where in the three 5-year phases of delivery each site would reside. Ultimately, this involved a judgement of when and whether sites were likely to come forward for development, based on their suitability, availability and achievability.

The methodology used for determining a sites deliverability and developability was based on advice found in the SHLAA practice guidance. A description of what defines each term can be found below:-

**Deliverable** – site 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 five years from the date of adoption of the plan; and
Developable – 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 developed at a specific point in time.

Not currently developable – it is unknown when a site could be developed. This may be, for example, because one of the constraints to development is severe, and it is not known when it might be overcome.

A representation of the methodology and processes involved in the classification of individual sites can be found in more detail in table 4.4.

4.4.2 Assessing Suitability, Availability and Achievability

In assessing a site’s suitability, availability and achievability as a location for housing development, either now or in the future, the initial task was to identify a comprehensive list of policy, physical or environmental constraints that could potentially constrain the delivery of development.

It was determined, in agreement with the Council, that the local plan policy designations should form the basis for the constraint information. In addition, flood risk information was sourced from the Environment Agency and included within the constraint analysis. A list of the constraint categories can be found in table 4.5.

In accordance with the guidance, the assessment has assumed that sites with existing planning permission are generally accepted to be suitable locations for residential development, and were therefore not included in the constraint analysis. Similarly, the Council put forward a number of sites for housing which were considered to be absent of any serious constraints or obstacles to development and were therefore deemed both available and achievable within the first 5 years of the plan period. The sites in question consisted of UDP allocated housing sites and phase 1 garage sites.

The Council also identified a number of additional sites (phase 2 garage sites) where they were reasonably confident that housing will be developed on the site at a particular point in time.

No further site specific information regarding land ownership, viability or tenancies agreements was available.

4.4.3 Phasing

Having identified all potential capacities sources and applied the agreed constraint information to each site, the final task was to determine when in the 15 year life-span of the plan the identified sites were likely to come forward for development.

In accordance with government guidance, and in agreement with the Council, three 5-year phases were established to reflect the three levels of deliverability, as defined by the SHLAA Guidance (i.e. deliverable, developable or not currently developable). As can be seen from table 4.3, a series of rules were formulated, and assumptions made, that effectively, organically filter the sites into one of the three delivery phases. A description of the methods used to determine the level of constraint (if any) present on individual sites can be found later in this chapter.

A thorough breakdown and analysis of the capacity findings can be found in chapter 7.
Table 4.3 Phases of delivery

<table>
<thead>
<tr>
<th>Site Status</th>
<th>Phase (Years)</th>
<th>Capacity source / Site inclusion rules</th>
</tr>
</thead>
<tbody>
<tr>
<td>DELIVERABLE</td>
<td>Phase 1 (Years 1-5)</td>
<td>Planning Permissions&lt;br&gt;Local authority identified sites (allocated housing sites / phase 1 garage sites)</td>
</tr>
<tr>
<td>DEVELOPABLE</td>
<td>Phase 2 (Years 6-10)</td>
<td>Unconstrained sites&lt;br&gt;Sites with &lt;25% of its overall site area affected by constraints&lt;br&gt;Local authority identified sites (allocated housing sites / phase 2 garage sites)</td>
</tr>
<tr>
<td>NOT CURRENTLY DEVELOPABLE</td>
<td>Phase 3 (Years 11-15)</td>
<td>Sites with &gt;25% of its overall site area affected by constraints</td>
</tr>
</tbody>
</table>

Table 4.4 offers a brief overview of what characteristics were taken into consideration (where available) when determining where in the 15 year housing trajectory individual sites would fall.

Table 4.4 Assessment of Site Deliverability / Developability

<table>
<thead>
<tr>
<th>Suitability</th>
<th>Availability</th>
<th>Achievability</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Policy Restrictions</td>
<td>- Planning application</td>
<td>- Market Factors&lt;br&gt;Adjacent uses / Economic viability of existing, proposed and alternative uses in terms of land values / Attractiveness of Locality / Level of potential market demand / Projected rate of sales</td>
</tr>
<tr>
<td>Designations / Protected Areas / Existing Planning Policy / Community Strategy Policy</td>
<td>- No legal or ownership problems</td>
<td>- Cost Factors&lt;br&gt;Site Preparation relating to physical constraints / any exceptional works necessary / Relevant planning standards or Obligations / Prospect of Funding or Investment to address identified constraints or assist development</td>
</tr>
<tr>
<td>- Physical Problems or Limitations</td>
<td>- Multiple ownership / Ransom Strips / Tenancies / Operational requirements of landowners</td>
<td>- Delivery Factor&lt;br&gt;Developers Phasing / Realistic Build-out Rate on larger sites / Likely start and completion dates / Single or Multiple Developers / Size and Capacity of Developer</td>
</tr>
<tr>
<td>Access / Infrastructure / Ground Conditions / Flood Risk / Hazardous Risks / Pollution / Contamination</td>
<td>- Interest to develop&lt;br&gt;Land controlled by developer expressed an intention to develop</td>
<td></td>
</tr>
<tr>
<td>- Potential Impacts</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Effect upon landscape features and conservation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Environmental Conditions</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Which would be experienced by prospective residents</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Individual Site Assessment

Deliverable (Years 1-5)  Developable (Years 6-10)  Not Currently Developable (Years 11-15)
4.4.3.1 Identifying and Categorising Policy Constraints
The constraints layers were separated into two distinct categories.

**Category 1 Constraints: SENSITIVE AREAS OMITTED FROM SURVEY**

**Category 2 Constraints: PHYSICAL, POLICY & ENVIRONMENTAL CONSTRAINTS**

As discussed in chapter 3, the requirement to separate the constraint layers was necessitated by the fact that a number of policy areas, such as the SSCI, were omitted from the original Entec street-by-street survey area. A detailed list of the constraint categories can be found in table 4.5.

Table 4.5: How policy constraints were categorised into groups.

<table>
<thead>
<tr>
<th>Constraint Group</th>
<th>Constraints</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>SSSIs, SLNCl, PSNCI, Lea Valley Regional Park, Metropolitan Open Land, Metropolitan Green Belt, Local Nature Reserve, Playing Fields, Parks and Gardens if Local Historic Interest, Park.</td>
</tr>
<tr>
<td>2</td>
<td>Allotments, Conservation Area, Crossrail 2 Safeguard land, Archaeological Priority Zone, Area of Special Character, Borough Employment Area, Local Employment Area, Strategic Employment Area, Temple Mills Land for Rail TLRN (Transport for London Road Network), Principal Road, Sites for Community Services, Flood Zones (Category 2 &amp; Category 3).</td>
</tr>
</tbody>
</table>

4.4.3.2 Applying Constraints

Entec undertook an analysis of the identified capacity sources to determine the extent to which they were affected by the constraints outlined in table 4.5. The analysis investigated the level to which each site was affected by each constraint layer, both individually and collectively. A percentage figure was calculated for each site to identify the degree of constraint coverage, which in turn, was used to determine the phase in which each of the constrained sites would fall. A summary of the site constraint rule used to determine site phasing can be seen in table 4.6.

Table 4.6: Site Constraints Rule

<table>
<thead>
<tr>
<th>Delivery Phase</th>
<th>Site Constraint Rule</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deliverable Sites (PHASE 2 Years 6-10)</td>
<td>Sites with &lt;25% of its overall site area affected by constraints</td>
</tr>
<tr>
<td>Not Currently Developable Sites (PHASE 3 years 11-15)</td>
<td>Sites with &gt;25% of its overall site area affected by constraints</td>
</tr>
</tbody>
</table>

A summary of the constraints affecting capacity sources can be found in appendix L.

Plans showing how the policy constraints relate to each of the wards in the study area can be found in appendix F of this report.

4.4.3.3 Survey Constraints

Site specific constraint information identified during the street-by-street survey was also collated. The information included an assessment of vehicular access, details of vacant and
derelict sites, and areas of green open space. It was agreed with the Council however, that due to
the nature of the data collation, i.e. no formal boundary information was available; the inclusion
of the data within the constraint analysis could potentially affect the accuracy of the findings.
Consequently, no survey information was included within the constraint analysis.

The site information continues, however, to form an important tool for investigating individual
survey sites and abstracting specific site constraint information at survey level. Further
information on the constraint data found during the site survey can be found in appendix L.

4.4.4 Sample sites
In accordance with best practice as prescribed by the SHLAA practice guidance, an
investigation into the economic viability of selected sites within the study area was also
undertaken. The assessment, consisting of residual valuation models, looked at a representative
sample of sites from across the Borough, and examined the extent to which economic viability
might affect the deliverability of individual sites. The subject of economic viability is addressed
in more detail in chapter 6. A copy of the baseline market report for Waltham Forest can be
found in appendix G.

An illustrative design analysis was also undertaken on the same identified sample sites. The
purpose of the analysis was to provide the Council with contextual examples of indicative
design layouts to provide an example of the scale of development achievable at particular
locations. The assessment of design sites is addressed further in chapter 5.

Both assessments have played an important role in helping to formulate the assumptions
reached within the delivery and phasing elements of the study.

4.4.5 Future review
It is important to realise however, that the status of sites identified by the assessment, as well as
the overall level of potential capacity within the three phases of delivery, will be subject to
constant change, as sites become either complete or new potential housing sites materialise. The
Assessment therefore, provides an important baseline for future monitoring, and as such it is
imperative that the local planning authority ensure that site information is constantly updated to
reflect the development status of individual sites. The three phases of delivery will require
regular review to ensure sites are accurately tracked and deposited within the appropriate
delivery phase as more information on site delivery comes to light. More information regarding
the review and monitoring of sites can be found in chapter 7.
INSERT FIG 4.1 DENSITY CONTOURS
5. Assessment of Sample Sites

5.1 Design led analysis

Following discussions with the Council at the inception stage of the HLAA, it was agreed that a sample of 12 sites would be selected for design analysis. The sites were chosen from a mix of northern, central and southern locations within the Borough.

5.1.1 Purpose

The purpose of the illustrative design analysis was to provide the Council with contextual examples of indicative design layouts that could, potentially, be achievable given the characteristics of a particular locality. The examples of development illustrated on the sample sites do not indicate what may be permitted at the particular locations, but do provide an illustration of possible forms of development at particular densities that could be, in theory, achieved on these and similar sites in the Borough.

5.1.2 Sample Sites

The sample sites were selected from the three place shaping zones – ‘northern’, ‘southern’ and ‘central’. The samples represent a broad variation of sites, based on location, size of site and likely density and mix.

Each of the sample sites were assessed in terms of their existing constraints, surrounding context (uses, built form and massing) and the site’s location in terms of key services and facilities including public transport accessibility. Illustrative designs were produced for each site including an appropriate mix of dwelling types and sizes in order to determine a realistic density. The illustrative designs for each site can be found at appendix H of this report.

The result of the design led analysis, including the development densities deemed appropriate for, the capacity of each site in terms of dwelling units and the approximate number of storeys can be found on table 5.1.

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Street</th>
<th>Density (dph)</th>
<th>No. Units</th>
<th>No. Storeys</th>
<th>Parking</th>
</tr>
</thead>
<tbody>
<tr>
<td>G401</td>
<td>Kings Head Hill</td>
<td>32</td>
<td>10 Houses</td>
<td>2</td>
<td>18 @ 1.75 per unit</td>
</tr>
<tr>
<td>F705</td>
<td>Cherrydown Avenue</td>
<td>100</td>
<td>4 Apartments</td>
<td>2</td>
<td>4 @ 1 per unit</td>
</tr>
<tr>
<td>I401</td>
<td>Cart Lane</td>
<td>60</td>
<td>3 Apartments</td>
<td>3</td>
<td>3 @ 1 per unit</td>
</tr>
<tr>
<td>H901</td>
<td>Richmond Avenue</td>
<td>57</td>
<td>8 Apartments</td>
<td>2</td>
<td>10 @ 1.25 per unit</td>
</tr>
<tr>
<td>Site ID</td>
<td>Street</td>
<td>Density (dph)</td>
<td>No. Units</td>
<td>No. Storeys</td>
<td>Parking</td>
</tr>
<tr>
<td>--------</td>
<td>----------------------</td>
<td>---------------</td>
<td>----------------------------</td>
<td>-------------</td>
<td>------------------------------</td>
</tr>
<tr>
<td>E1304</td>
<td>Higham Hill Road</td>
<td>68</td>
<td>4 Apartments / 9 Houses</td>
<td>2</td>
<td>4 @ 1 per unit / 13 @ 1.5 per unit</td>
</tr>
<tr>
<td>D1201</td>
<td>St. Andrews Road</td>
<td>58</td>
<td>6 Apartments / 12 Houses</td>
<td>2</td>
<td>6 @ 1.25 per unit / 23 @ 1.75 per unit</td>
</tr>
<tr>
<td>D1603</td>
<td>Markhouse Avenue</td>
<td>60</td>
<td>8 Apartments / 17 Houses</td>
<td>2-3</td>
<td>14 @ 1.25 per unit / 24 @ 1.75 per unit</td>
</tr>
<tr>
<td>F1105</td>
<td>Cecil Road</td>
<td>61</td>
<td>20 Apartments</td>
<td>2</td>
<td>20 @ 1 per unit</td>
</tr>
<tr>
<td>G1909</td>
<td>Grange Park Road</td>
<td>63</td>
<td>5 Houses</td>
<td>2</td>
<td>8 @ 1.5 per unit</td>
</tr>
<tr>
<td>J2004</td>
<td>Matcham Road</td>
<td>68</td>
<td>8 Apartments / 4 Houses</td>
<td>2</td>
<td>10 @ 1.25 per unit / 7 @ 1.75 per unit</td>
</tr>
<tr>
<td>4062</td>
<td>Joseph Ray Road</td>
<td>44</td>
<td>26 Apartments / 41 Houses</td>
<td>2-3</td>
<td>30 @ 1 per unit / 56 @ 1.5 per unit</td>
</tr>
<tr>
<td>4046</td>
<td>Church Road</td>
<td>65</td>
<td>24 Apartments / 41 Houses</td>
<td>2-3</td>
<td>30 @ 1.25 per unit / 72 @ 1.75 per unit</td>
</tr>
</tbody>
</table>
6. Assessment of Economic Viability

6.1 Economic Viability Spreadsheet Analysis

6.1.1 Purpose
The Economic Viability Spreadsheet Analysis looks at a representative sample of sites from across the Borough and examines, via a number of spreadsheet examples, the extent to which economic viability might affect the deliverability of individual sites.

In agreement with the Council, it was decided that, for continuity purposes, the sample sites should be the same as those identified for the design led analysis.

The spreadsheet analysis has several functions. It aims to inform:

- Whether sites are commercially viable for housing development;
- How location, and sub markets, affect the viability of housing development;
- How location, combined with housing mix, impact on the likelihood of sites coming forward; and
- How, and where relevant (according to policy parameters), affordable housing looks achievable in viability terms.

The analysis supports the requirement in the new guidance (July 2007) on Strategic Housing Land Availability Assessments that sites shall be ‘achievable’ (para 40), which means making a judgement about economic viability and the ability of the developer to complete and successfully market the site.

The analysis also draws on information from the Waltham Forest Housing Market Baseline Study which was undertaken prior to commencement of the site survey stage. The study provides a statement of the current position of the housing market, considering both supply and demand, as well as providing useful background information on development trends, selling prices, market change and sub market performance. The Baseline Study can be found at appendix G.

The findings of the HLAA should be seen also in the light of the recommendations of the Housing Needs and Market Survey 2008 (Final Draft Report 2007) produced by DCA. This is especially the case with respect to the delivery of affordable housing.

The Housing Needs report states that (Paragraph 17.5.3) 'the scale of need could justify the whole allocation [on all new sites] as social rented units' but states that a 'balanced approach is now the core of Government strategy although the majority of units are still required for social rent'. Indeed, paragraph 17.4.2 of the London Plan Policy 3A.7, requires Local Development Frameworks to have regard to an overall target of 50% of new housing provision to be affordable when setting targets.

The (DCA) report states that the Council should set a 'target' for each sites taking into account existing supply, survey demand and other regeneration, planning, sustainability and economic factors. The affordable housing solution on each site will vary, but the report suggests that the
balance will shift further towards Social Rented housing and away from Intermediate affordable (although the latter will continue to play an important role).

The implications for the supply of land and the results of the HLAA are significant. The findings of the HLAA are that, particularly in weaker housing markets of the Borough that sites will not be economically viable where affordable housing is not supported by grant. This is likely to be the case even in higher density apartment schemes because density benefits will be offset by the very tight revenue-cost relationship. In some cases higher density even works negatively (because affordable units often 'lose' the land owner money).

Whilst smaller sites, per se, are not necessarily less viable, they often have some kind of existing use value (rather than for example being vacant or green field), and hence, from a policy perspective, it may be best to focus grant in on these schemes to ensure they are 'levered forward'.

6.1.2 Theoretical underpinning

The spreadsheets are based on a residual development appraisal. This makes the fundamental assumption that site value is based on the difference between the revenue generated by the scheme and its non-land related costs:

\[ R^S = R^V - NLC \]

Where:

\( R^S \) = Site Residual Value;

\( R^V \) = Scheme revenue;

\( NLC \) = Non land related costs associated with the scheme.

In practice, policy impacts make the equation slightly more complex. Figure 6.1 below sets out how this works:

**Figure 6.1:** Net residual value equation
The gross residual value is the value before the local authority has taken its affordable housing and other Section 106 contributions. The net residual value is what is left after the Section 106 obligations have been taken into account.

6.1.3 Spreadsheet mechanics

To explain how the spreadsheets work, an example is included in this section. The spreadsheet has five main sections:

- Input variables; Market values, Costs, and Development details;
- Development appraisal;
- Base site information;
- Marketability and developability of the site;
- Commercial viability of the site.

The screenshot below shows the Input variable section.

<table>
<thead>
<tr>
<th>SITE Ref: 4062</th>
<th>DESCRIPTION: Large, existing employment site with car park - Joseph Ray Road</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) INPUT VARIABLES: MARKET VALUES, COSTS AND DEVELOPMENT DETAILS</td>
<td></td>
</tr>
<tr>
<td>(a)</td>
<td>(b)</td>
</tr>
<tr>
<td>Dwelling &amp; Bedroom(s)</td>
<td>Construction</td>
</tr>
<tr>
<td>----------------------</td>
<td>---------------</td>
</tr>
<tr>
<td>1 Bed Flats</td>
<td>2</td>
</tr>
<tr>
<td>2 Bed Flats</td>
<td>2</td>
</tr>
<tr>
<td>2 Bed Town houses</td>
<td>2</td>
</tr>
<tr>
<td>3 Bed Town houses</td>
<td>2</td>
</tr>
<tr>
<td>3 Bed Semi</td>
<td>2</td>
</tr>
<tr>
<td>4 Bed Semi</td>
<td>2</td>
</tr>
<tr>
<td>5 Bed Detached</td>
<td>2</td>
</tr>
<tr>
<td>5 Bed Detached</td>
<td>2</td>
</tr>
</tbody>
</table>

In this section, anticipated selling prices are inputted. This data comes from HM Land Registry, based on postcode sectors. The prices are thus robust for the sub markets within Waltham Forest, and hence for making broader judgements about site capacity and potential, but would need further verification to check whether the site specifics reflected the broader sub market in so far as site negotiations with developers are concerned.

Further key inputs on this page include build costs and unit sizes. Build costs are taken as standards from the RICS’ Building Cost Information Service. These are price per square metre (Gross Internal) costs. The unit sizes are taken as benchmark developer unit sizes; for flats, there is an additional adjustment from net to gross measurements to take account of common areas which, in theory, add cost but do not accrue value.

Section 2 of the spreadsheet takes forward the base build costs and develops a number of additional costs that a builder would normally expect to incur with a housing development. These include professional fees, finance costs, marketing or disposal fees and a margin for profit. The default information in this section is based on industry norms or standards. In addition, an allowance is made for the cost of financing land over the period of the development.
It should be noted that there is a section for abnormal costs to be added where relevant. Within the scope of a HLAA however, it is usually not practical to have this information to hand; where a site is brownfield (rather than greenfield) it is likely that remedial costs will be higher and thus within the constraints of the study, a marginal site which is brownfield is more likely to be discounted than a greenfield one.

Sections 3, 4 and 5 of the spreadsheet set out the base site data, comment on the marketability and developability of the site and conclude on the viability issues. An example is shown in the screenshot below.
The base site information box is self explanatory. The information included in the Marketability and Developability section (4) is normally taken from site survey work and an impression formed from the local neighbourhood.

The final box (5) provides a conclusion on the site’s viability and propensity to come forward. The conclusions are made in the light of what developers and agents, told us represented benchmark land values for the Waltham Forest BC area. For outer London (of which Waltham Forest is a part) there is a price range of between £6 and £8 million per hectare. The findings from interviews held with local developers and agents can be found at appendix I.

6.1.4 Interpreting results

The results of the analyses provide an indication of the likely site value under the full range of assumptions made. It is important to stress that it is not only location that determines site viability, but also the development mix and density.

Some locations maximise site value better than others according to the specific mix and density adopted. The best example of this is with flats. Flats in weaker market areas can struggle to cover sales revenue. Where they do not, increasing density will simply make the scheme less, rather than more, viable. By contrast, where flats are marginally viable, increasing density will normally increase the residual value of schemes.

One starting point in considering whether a site is viable or not is to consider ‘benchmark’ land values for residential schemes. We think that these will be in the region £6 to £8 million per hectare. However, the true viability of any site will be gauged by whether, once the developer has received a margin for building the scheme, the land value increase given by the scheme is sufficient to encourage the site to come forward.

There are no hard and fast rules, although values for residential land in outer London should be sufficient to ‘out-compete’ employment land values in most cases. Where land is vacant or green field, the case for viability being shown may be even more easily made.

In terms of whether sites are considered viable, two benchmarks can be used – land value on a unit basis (eg value per hectare), or absolute value (the value in pound notes). On smaller sites the absolute return to the land owner may be more significant (rather than eg a ‘relatively good deal’ on a unit sales basis). We do not believe that, in these respects, small sites are necessarily less viable; rather that the development issues on small sites tend to be different – how to fit development to a smaller footprint and how to accommodate affordable housing for example.

6.1.5 The sampling process

The sites are selected from the three ‘place shaping zones’ – ‘northern’, ‘southern’ and ‘central’. Sites are then taken from different postcode sectors. Sites also vary according to size across the main place shaping zones.
Table 6.1 Sample Sites

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Street</th>
<th>Postcode</th>
<th>Place Shaping Zone</th>
<th>Area (ha)</th>
<th>Density (dph)</th>
</tr>
</thead>
<tbody>
<tr>
<td>G401</td>
<td>Kings Head Hill</td>
<td>E4 7</td>
<td>Northern</td>
<td>0.31</td>
<td>32</td>
</tr>
<tr>
<td>F705</td>
<td>Cherrydown Avenue</td>
<td>E4 8</td>
<td>Northern</td>
<td>0.04</td>
<td>100</td>
</tr>
<tr>
<td>I401</td>
<td>Cart Lane</td>
<td>E4 7</td>
<td>Northern</td>
<td>0.05</td>
<td>60</td>
</tr>
<tr>
<td>H901</td>
<td>Richmond Avenue</td>
<td>E4 9</td>
<td>Northern</td>
<td>0.14</td>
<td>57</td>
</tr>
<tr>
<td>E1304</td>
<td>Higham Hill Road</td>
<td>E17 5</td>
<td>Central</td>
<td>0.19</td>
<td>68</td>
</tr>
<tr>
<td>D1201</td>
<td>St. Andrews Road</td>
<td>E17 5</td>
<td>Central</td>
<td>0.31</td>
<td>58</td>
</tr>
<tr>
<td>D1603</td>
<td>Markhouse Avenue</td>
<td>E17 8</td>
<td>Central</td>
<td>0.42</td>
<td>62</td>
</tr>
<tr>
<td>F1105</td>
<td>Cecil Road</td>
<td>E17 5</td>
<td>Central</td>
<td>0.33</td>
<td>61</td>
</tr>
<tr>
<td>G1909</td>
<td>Grange Park Road</td>
<td>E10 5</td>
<td>Southern</td>
<td>0.08</td>
<td>63</td>
</tr>
<tr>
<td>J2004</td>
<td>Matcham Road</td>
<td>E11 4</td>
<td>Southern</td>
<td>0.19</td>
<td>63</td>
</tr>
<tr>
<td>4062</td>
<td>Joseph Ray Road</td>
<td>E11 4</td>
<td>Southern</td>
<td>1.51</td>
<td>44</td>
</tr>
<tr>
<td>4046</td>
<td>Church Road</td>
<td>E10 7</td>
<td>Southern</td>
<td>1.00</td>
<td>65</td>
</tr>
</tbody>
</table>

The sample is for 12 sites as shown in table above. Site size ranges from 0.04 hectare to 1.5 hectares.

Inevitably it is difficult to have a perfectly representative sample, although we believe that the sites chosen provide the necessary generic lessons and conclusions. The findings from the economic viability assessment of the sample sites can be found in detail at appendix J.

6.1.6 Findings

The sample spreadsheets indicate that most sites, where development is permitted for residential, will be brought forward. Site values range from £6 million per hectare to £8 million per hectare. The sample of sites indicates that current use value (prior to planning consent for housing being given) will be low. The best examples are low density development or infill plots in vacant land use.

Some sites in the sample have current industrial use. Land owners with industrial sites (as shown in the table below) would expect a return of around £1.3 million per hectare in a location such as Walthamstow. All the sites analysed here show a land value for residential significantly in excess of this. Even where an additional margin is allowed over and above the going rate for industrial land, owners of industrial sites are likely to bring them forward for housing.
Table 6.2  London Boroughs - typical land cost per hectare

<table>
<thead>
<tr>
<th>London Borough</th>
<th>From £s per ha</th>
<th>To £s per ha</th>
<th>Typical £s per ha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stratford E15</td>
<td>1,850,000</td>
<td>3,100,000</td>
<td>2,470,000</td>
</tr>
<tr>
<td>Islington / Hackney</td>
<td>1,850,000</td>
<td>2,700,000</td>
<td>2,470,000</td>
</tr>
<tr>
<td>Greenwich</td>
<td>1,400,000</td>
<td>2,900,000</td>
<td>2,100,000</td>
</tr>
<tr>
<td>Southwark</td>
<td>1,500,000</td>
<td>2,900,000</td>
<td>2,250,000</td>
</tr>
<tr>
<td>Barking and Dagenham</td>
<td>850,000</td>
<td>2,000,000</td>
<td>1,300,000</td>
</tr>
<tr>
<td>Walthamstow</td>
<td>850,000</td>
<td>1,700,000</td>
<td>1,300,000</td>
</tr>
<tr>
<td>North / East Enfield and Haringey</td>
<td>1,200,000</td>
<td>2,200,000</td>
<td>2,000,000</td>
</tr>
<tr>
<td>Park Royal</td>
<td>4,500,000</td>
<td>5,100,000</td>
<td>4,750,000</td>
</tr>
<tr>
<td>Hayes</td>
<td>2,300,000</td>
<td>2,800,000</td>
<td>2,500,000</td>
</tr>
<tr>
<td>Croydon</td>
<td>1,500,000</td>
<td>2,500,000</td>
<td>2,000,000</td>
</tr>
<tr>
<td>Merton / Mitcham</td>
<td>1,000,000</td>
<td>3,750,000</td>
<td>2,000,000</td>
</tr>
</tbody>
</table>

One key consideration with respect to sites which change use from industrial to housing is size of site. Where sites are very small (eg less than 0.1 hectare) the absolute increase in site value (this means the return to the land owner in pound notes – not in terms of return per hectare) may be very small. It is unlikely that these small sites will be brought forward if there are additional burdens on the site – clearance costs, any Section 106 etc.

The analysis shows that although there is some variance in house prices between locations, this variance does not reflect dramatically in site values such that it could be said that certain locations are viable, and others not. What will make the difference will be Section 106 obligations on qualifying sites (see section below).

In a borough like Waltham Forest, where the pattern of prices is relatively even, what will tend to impact on viability will be density and development mix. The spreadsheet examples which give the highest values on a pro-rata (per hectare) basis are the sites at Grange Park Road and at Cart Lane. Whilst the latter is a high value area, the former is not, although site value is high for both sites.

There are two appraisals for larger sites: Joseph Ray Road (1.5 hectares) and Church Road (1 hectare). These sites, assuming a broad mix of housing, generate values of £6 million per hectare and £7.2 million per hectare respectively. These would normally be sufficient to bring these sites forward. An important consideration is, however, the level of Section 106 contribution that might be sought. In weaker local sub markets, affordable housing that is not supported by housing association grant may, in some circumstances, hold back the development of a site. This point is commented on in more detail below.

Another point which the spreadsheet analysis demonstrates is that, in a borough like Waltham Forest, schemes with a high proportion of apartments may not always maximize land values. Although the southern end of the Borough has emerging regeneration proposals and is the type of place where apartment schemes may flourish, medium to high density housing schemes elsewhere in the Borough may give land owners a better return. This is primarily because the
relationship between revenues and costs for flats in weaker market locations is narrow and hence the land value per plot is correspondingly low. Increasing density under these circumstances often cannot mitigate an unfavourable cost-revenue equation. This principle is perhaps best illustrated in the Cecil Road scheme which provides a site value towards the lower end of the scale.

6.2 Site Viability and the impacts of Affordable Housing

6.2.1 Overview – impacts on theory

Whilst we are testing a sample of sites as part of the study, it is important to consider, as a key issue affecting land supply, the impact of affordable housing on site viability.

Affordable housing will normally impact negatively on site value for three main reasons:

a) Affordable housing takes the place of market housing (i.e. a substitution effect of more valuable uses for less valuable uses).

b) Affordable housing policies generally assume ‘free’ land for Social Rented and Intermediate units.

c) Affordable housing and Social Rented housing nearly always require a grant in order to cover development costs.

6.2.2 Testing process

The Greater London Authority (GLA) has just released the 2007-8 version of the Three Dragons Toolkit. This is available to Waltham Forest BC (as it is to all the other London boroughs). Previous versions of the model have been in use since 2000 for the purposes of policy testing and development control (negotiation) purposes.

The use and application of the model is explained in appendix K, which is taken directly from the Guidance Notes to the Toolkit.

Three affordable housing scenarios in three sub markets of Waltham Forest BC have been tested and these are referred to as ‘Upper’, ‘Middle’ and ‘Lower’ markets. Specifically:-

- We have tested a notional one hectare site, developed for apartments at 150 dwellings per hectare. The mix includes (for all test) 40% 1 bed flats, 50% 2 bed flats and 10% 3 bed flats.

- We have looked at scenarios of no affordable housing; 30% affordable housing; and 40% affordable housing. The affordable housing element has been split 75% Social Rent and 25% Shared Ownership (with a 40% Equity Share).

- It has been assumed for this exercise that there is no grant and no other forms of Section 106 obligation (e.g. education, open space contribution, etc) has been sought.
6.2.3 Results

Figure 6.2 shows the impact of affordable housing contributions in different market circumstances.

Figure 6.2: Affordable Housing Impacts

The figure shows that, in the higher value areas with no affordable housing, site values appear around £8 million per hectare for this type of scheme. However, with 30% affordable housing, values fall to less than £3 million per hectare.

In the lower market areas, the impact is potentially greater, where, at 100% market housing (i.e. no affordable), the value is around £6 million per hectare. At 30% affordable housing, the value is less than £1 million per hectare, whilst, at 40% affordable housing, the value would appear to result in a negative value.

6.2.4 Implications

- Sites with a negative value will not come forward and sites which are marginal against other uses will also not come forward.

- The impact of affordable housing policies is very significant as land values are highly sensitive to house prices.
• In a borough like Waltham Forest, it will be difficult to deliver affordable housing in weaker market areas on sites with existing use values without grant if Social Rent comprises a high percentage of the affordable element.

• Land supply is potentially affected by affordable housing policies.
7. Land Availability and Housing Potential

7.1 Purpose

The findings of the Waltham Forest Housing Land Availability Assessment provide an important evidence source to inform the preparation of the Waltham Forest Local Development Framework.

The HLAA is not a policy document and does not allocate land for development.

The capacity figures presented in this report provide a snapshot in time of the theoretical number of potential housing sites, including outstanding planning permissions, which are estimated to be available in the Borough, as of October 2007.

The HLAA does not in itself determine whether a site should be allocated for housing development, however, its evidence will be of particular relevance at the issues and options stage of development plan preparation by helping the planning authority to identify the choices available in meeting the need and demand for more housing in the plan area.

The report provides an indicative fifteen year housing trajectory based on three phases of development. In determining the timeframe for when individual sites are likely to be developed, each capacity sources has been tested against an agreed methodology as outlined in chapter 4.

It is important to recognise that the figures are based on assumptions which are inherently judgemental, and it is unlikely that all of the capacity identified by the HLAA will come forward for residential development.

Whilst the HLAA identifies sites with potential for future housing development, the sites may also be considered for other land uses. In particular, the study has inevitably, in a place like Waltham Forest, identified previously developed (brownfield) sites with potential for redevelopment across the Borough as a whole. As such, the study provides a valuable database for a variety of potential uses and not just necessarily housing.

The assessment also provides the Council with a useful tool to aid in the identification of subsequent action required to ensure sites become deliverable, such as new infrastructure investment and review of local plan policy.

The land identified in this study and on any illustrative drawings is for the purposes of a borough wide land availability study only and does not imply any acceptance of a housing scheme, save that which has first obtained planning permission through the planning application process.

In common with all housing land availability studies, the estimated capacity figure for Waltham Forest will continue to change and evolve as existing sites are completed and new sites materialise. The HLAA will therefore need to be updated regularly by the Council as part of its annual monitoring report. More information regarding monitoring and review of the Assessment can be found at end of this chapter.
7.2 Findings

The assessment indicated in October 2007 that the Borough had 1,212 sites that may have the potential for residential (or other) development, and which, in total, would theoretically be capable of supporting an estimated 10,595 dwellings over a 15 year period.

7.2.1 Summary of Entec results

The following tables provide a summary of the estimated housing potential figure for Waltham Forest. The tables provide a detailed breakdown of the main sources of capacity, by phase, type, ward, site size and estimated dwelling yield. Details of the findings of the constraint analysis at individual site level can be found in appendix L.

Table 7.1 shows the estimated capacity for the Borough, broken down into the 5-year time periods, based on the assumptions contained in chapter 4 of the report.

**Table 7.1 Summary of Entec Survey Results**

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Number/Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of sites</td>
<td>1212 sites</td>
</tr>
<tr>
<td>Total areas of sites</td>
<td>179.77 hectares</td>
</tr>
<tr>
<td>Average size of site</td>
<td>0.15 hectares</td>
</tr>
<tr>
<td>Average capacity</td>
<td>8 to 9 dwellings per site</td>
</tr>
<tr>
<td>No. sites &lt;5 units</td>
<td>958 sites (79%)</td>
</tr>
<tr>
<td>No. sites 6-10 units</td>
<td>114 sites (9%)</td>
</tr>
<tr>
<td>No. sites &gt;10 units</td>
<td>140 sites (12%)</td>
</tr>
<tr>
<td>Average density</td>
<td>54 dwellings per hectare</td>
</tr>
<tr>
<td>Total outstanding planning permissions</td>
<td>2798 dwellings</td>
</tr>
<tr>
<td>Total outstanding planning permissions from conversions</td>
<td>791 dwellings (28%)</td>
</tr>
<tr>
<td>No. of sites &lt;0.5 Ha</td>
<td>1156 sites (95%)</td>
</tr>
<tr>
<td>No. of sites 0.5 – 2.0 Ha</td>
<td>39 sites (3%)</td>
</tr>
<tr>
<td>No. of sites &gt;2.0 Ha</td>
<td>17 sites (2%)</td>
</tr>
<tr>
<td>Total capacity</td>
<td>10595 dwellings</td>
</tr>
<tr>
<td>Phase 1 (years 1-5)</td>
<td>2922 dwellings</td>
</tr>
<tr>
<td>Phase 2 (years 6-10)</td>
<td>2894 dwellings</td>
</tr>
<tr>
<td>Phase 3 (years 11-15)</td>
<td>4779 dwellings</td>
</tr>
</tbody>
</table>

The assessment findings indicated in October 2007 that the Borough had 1,212 sites that may have the potential for residential (or other) development, and which, in total, would theoretically be capable of supporting an estimated 10,595 dwellings.
The HLAA survey only identified physical sites that were able to be identified on the ground as having potential for residential development. Assessments are unable to identify certain sources of future housing sites, such as residential conversions, although it should be noted that conversions with outstanding planning permission at October 2007 (which provide 791 additional dwellings) are included in the total figure of 10,595 dwellings.

The overall estimate of 10,595 dwellings as the Borough’s capacity should be sufficient to meet likely future housing development plan targets. At the moment, the London Plan has an annual average housing target of 665 dwellings, which, if applied to the capacity figure of 10,595 dwellings, would provide for almost a 16-year supply. This would correspond to the need to prepare Local Development Frameworks that look at least 15 years ahead. A comparison of the capacity findings of the Waltham Forest HLAA with the London Plan’s housing target for Waltham Forest is set out in **table 7.3**.

The 10,595 dwellings is based not only on the outstanding planning permissions and identified sites, but also assumed densities.

It should be noted that with regard to the phase 1 (years 1-5) capacity figure in particular, the local planning authority may need to include an additional allowance for likely ‘windfalls’ arising from conversions and other possible sources. More detail regarding the phasing of sites is addressed in paragraph 7.2.2. The location of each of the identified sources of potential capacity can be found in **figure 7.1**.

Further information regarding specific sites can be found in **appendix F**. **Table 7.2** provides information regarding the number of sites and potential yield by capacity source.

### Table 7.2  Housing potential by source of site

<table>
<thead>
<tr>
<th>Housing potential sites</th>
<th>Number of sites</th>
<th>Capacity sum (number of dwellings)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning permissions</td>
<td>672</td>
<td>2798</td>
</tr>
<tr>
<td>UDP proposed housing sites</td>
<td>8</td>
<td>84</td>
</tr>
<tr>
<td>Regeneration areas</td>
<td>9</td>
<td>3793</td>
</tr>
<tr>
<td>GLA sites</td>
<td>26</td>
<td>1214</td>
</tr>
<tr>
<td>De-designed employment sites</td>
<td>4</td>
<td>179</td>
</tr>
<tr>
<td>Garage sites</td>
<td>17</td>
<td>60</td>
</tr>
<tr>
<td>Housing estate sites</td>
<td>14</td>
<td>710</td>
</tr>
<tr>
<td>Survey sites</td>
<td>462</td>
<td>1757</td>
</tr>
</tbody>
</table>

[Generic diagram or table]
The main categories of sites contributing to the total potential housing capacity can be summarised as follows:

- 26% (2,798) of the total capacity of 10,595 dwellings already had outstanding planning permission as at October 2007;
- 26% (2,766) of the 10,595 dwellings were associated with the Walthamstow Regeneration Area;
- 17% (1,757) of the 10,595 dwellings were identified survey sites;
- 11% (1,214) of the 10,595 dwellings were GLA housing sites; and
- 10% (1,027) of the 10,595 dwellings were associated with the Black Horse Lane Regeneration Area.

Outstanding planning permissions will cover numerous small sites, which is also the case with the survey sites. However, the Walthamstow and Black Horse Lane Regeneration Areas account for 36% of the Borough’s total capacity and have a potential for about 3,800 additional dwellings. Add in the GLA housing sites, and 47% of the Borough’s total capacity, approximately 5,000 additional dwellings, are locked up in these three types of site.

The significance of these regeneration and housing sites is even greater if the outstanding planning permissions are taken out of the equation (on the basis that the outstanding planning permissions have already been permitted and are awaiting implementation). The regeneration and housing sites then account for almost two-thirds of the potential housing capacity in the Borough awaiting planning permission.

### 7.2.2 Phasing

The total HLAA capacity for Waltham Forest per phase is summarised in table 7.3. The figures provide an indicative fifteen year housing trajectory based on three phases of development. As discussed previously, determination of the timeframe within which individual sites are likely to be developed was calculated using an agreed methodology, as detailed in chapter 4.

The findings of the constraints analysis which determined the deliverability of capacity sources can be found in appendix L.

<table>
<thead>
<tr>
<th>Phase</th>
<th>Total</th>
<th>Equivalent London Plan Target (2006-2016)</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase 1 (Years 1 -5)</td>
<td>2922</td>
<td>3325</td>
<td>-403</td>
</tr>
<tr>
<td>Phase 2 (Years 6 – 10)</td>
<td>2894</td>
<td>3325</td>
<td>-431</td>
</tr>
<tr>
<td>Phase 3 (Years 11 – 15)</td>
<td>4779</td>
<td>3325 (assumed)</td>
<td>1454</td>
</tr>
<tr>
<td>Total</td>
<td>10595</td>
<td>9975</td>
<td>620</td>
</tr>
</tbody>
</table>
It is apparent from the table that the HLAA figures represent an uneven distribution of capacity throughout the three phases. The analysis shows that phases 1 and 2 account for 28% and 27% respectively of the overall potential capacity, whereas phase 3 accounts for 45%.

When comparing the HLAA capacity figures with the housing target identified in the London Plan, it is evident that the HLAA’s first 5 year capacity figure falls considerably short of the London Plan’s housing target for the same 5 year period.

The HLAA findings indicate a phase 1 total capacity of 2,922 potential dwellings (consisting of existing planning permissions and sites identified by the Council), whereas the London Plan’s housing target totals 3,325 dwellings.

### 7.2.3 The Five-Year Land Supply

An important element of the assessment is also to inform the Council whether it is able to demonstrate a 5-year housing supply.

- The Borough is required to provide for an additional 3,325 dwellings over any 5-year period (in accordance with the London Plan).

- The study has identified 2,922 dwellings on identified sites that could be provided in the first 5 years (October 2007 to 2012), which includes all the outstanding permissions for conversions (791 additional dwellings), all the rest of the current outstanding planning permissions (2,007), an allocated UDP housing site (80 dwellings) and 44 dwellings on Council garage sites.

- This shows that the Council has a shortfall of 403 dwellings on its required 5-year supply of housing land.

- If some of the outstanding planning permissions fail to be implemented (a situation that may well occur with at least a small proportion of permissions), then the Council’s 5-year shortfall will be larger than that indicated. Although such a shortfall may be off-set by new permissions coming forward, there could be a problem if the Council were to rely on this happening.

- Whilst any calculation will vary over time (as outstanding permissions get implemented and new permissions get granted), there is a real danger that this shortfall will grow in size, especially if some larger sites get developed while only smaller sites come forward for permission.

- With so much of the Borough’s capacity locked up in the larger regeneration and housing sites, any delays in these areas coming forward with planning permissions that can be implemented could push the Council’s 5-year supply towards a far larger shortfall.

- The consequence would be that the planning authority will be put under pressure to permit more dwellings (on both more sites and at higher densities), including possibly being faced with more planning appeals.

In addition, it is important to recognise that the HLAA figures are based on assumptions, and it is unlikely that all of the phase 1 capacity sources identified by the HLAA will come forward for residential development. In response, the Council may wish to further investigate the potential to expedite sites in later phases, in order to address the current imbalance.
Tables 7.4 and 7.5 provide a further breakdown of capacity figures by Phase and capacity type.

### Table 7.4 Housing potential of Capacity Sources by Category of Site

<table>
<thead>
<tr>
<th>Type of Capacity Sources *</th>
<th>Phase1</th>
<th>Phase2</th>
<th>Phase3</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Sites</td>
<td>Dwellings</td>
<td>Sites</td>
<td>Dwellings</td>
</tr>
<tr>
<td>Survey Sites</td>
<td>375</td>
<td>1368</td>
<td>87</td>
<td>389</td>
</tr>
<tr>
<td>Planning Permission Sites</td>
<td>672</td>
<td>2798</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GLA Housing Sites</td>
<td>10</td>
<td>461</td>
<td>16</td>
<td>753</td>
</tr>
<tr>
<td>UDP Sites</td>
<td>7</td>
<td>80</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>Walthamstow Regeneration Area</td>
<td>1</td>
<td>227</td>
<td>3</td>
<td>2539</td>
</tr>
<tr>
<td>Blackhorse Lane Regeneration Area</td>
<td>2</td>
<td>159</td>
<td>3</td>
<td>868</td>
</tr>
<tr>
<td>Garage Sites</td>
<td>9</td>
<td>44</td>
<td>8</td>
<td>16</td>
</tr>
<tr>
<td>Housing Estate Sites</td>
<td>10</td>
<td>663</td>
<td>4</td>
<td>47</td>
</tr>
<tr>
<td>De-Designated Employment Sites</td>
<td>4</td>
<td>179</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Phase Totals</td>
<td>688</td>
<td>2922</td>
<td>406</td>
<td>2894</td>
</tr>
</tbody>
</table>

* A detailed description of each capacity sources can be found in Chapter 3.

It is clear from the breakdown of capacity sources shown above, that the street-by-street survey has been of particular value in identifying and categorising additional potential capacity sources that supplement those identified in the desktop review. The Entec street-by-street survey identified 462 additional sites (with a potential capacity of 1,757 dwellings) over and above the other categories of sites. These additionally identified capacity sources represent 17% of the overall HLAA capacity figure.

Further detail regarding the type and number of sites identified during the Entec survey, including phasing information, can be found in table 7.5 below.
Table 7.5 Housing potential of Survey Sites by Category of Site

<table>
<thead>
<tr>
<th>Type of survey site*</th>
<th>Number of survey sites</th>
<th>Number of dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Phase 2</td>
<td>Phase 3</td>
</tr>
<tr>
<td>Conversion of commercial buildings</td>
<td>8</td>
<td>4</td>
</tr>
<tr>
<td>Redevelopment of commercial buildings</td>
<td>12</td>
<td>6</td>
</tr>
<tr>
<td>Intensification of existing areas</td>
<td>190</td>
<td>49</td>
</tr>
<tr>
<td>Redevelopment of existing housing</td>
<td>22</td>
<td>1</td>
</tr>
<tr>
<td>Redevelopment of car parks</td>
<td>35</td>
<td>4</td>
</tr>
<tr>
<td>Redevelopment of previously developed vacant and derelict land and buildings currently in non-residential use</td>
<td>69</td>
<td>18</td>
</tr>
<tr>
<td>Vacant land not previously developed</td>
<td>35</td>
<td>3</td>
</tr>
<tr>
<td>Other capacity source not identified above</td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>Total</td>
<td>375</td>
<td>87</td>
</tr>
</tbody>
</table>

A detailed description of the types of survey sites can be found in Chapter 3.

A detailed breakdown of capacity sources by type, size and Ward location can be found in appendix L.

7.2.4 Windfall capacity

Whilst the assessment has provided an estimate of 10,595 dwellings in terms of future potential housing capacity, this figure does not include all future “windfall” sites.

As defined by PPS3, windfall sites are those which have not been specifically identified as available in the local plan process. They comprise previously-developed sites that have unexpectedly become available. These could include, for example, a factory closure or small sites such as a residential conversion or a new flat over a shop.

In accordance with the SHLAA practice guidance, the figures presented within the assessment have not accounted for windfall sites. However, it has been evident throughout the course of the assessment, that the potential additional housing capacity from windfall sites within the Borough is significant. The inclusion of windfalls sites, and in particular, those from residential conversions and empty homes, would provide the Council with a significant addition to the housing capacity.

Residential conversions with outstanding planning permission at October 2007 are already included in the HLAA and amount to 791 additional dwellings. However, no account can be taken in the assessment of additional dwellings arising from conversions in the future as the precise location of such future planning applications cannot be predicted. As the Borough has seen a steady and consistent supply of additional dwellings from this source, it is inevitable that further planning permissions for residential conversions will come forward in the future and will therefore add to, and increase, the current assessment’s 10,595 dwellings estimate.
However, the inclusion of a “windfall” allowance from this, or any other potential source, is not a matter for this assessment and will need to be left to the Council’s housing calculations in conjunction with the preparation of the Local Development Framework.

7.2.4.1 Conversions
The Council provided Entec with a schedule of planning permissions that had resulted from building conversions from 2000 to 2006. The figures, shown in table 7.6, indicate a steady increase of conversions during the period, with the number of dwellings granted increasing from a low of 29 dwellings per annum (dpa) in 2001-02 to a peak of 173 dpa in 2006.

The figures indicate an average net increase of 99 dwellings per annum as a result of planning permissions. Further analysis and monitoring would be required to confirm this underlying trend, given the relatively short period over which the figures have increased.

It is considered however, that on present evidence, a figure of 99 dpa might reasonably be expected as a net additional source of housing from conversions for future years (in the form of ‘windfall’ development).

An investigation into the level of conversions present within the HLAA first 5 year housing figure further evidences this assumption, with conversions accounting for 791 dwellings, or 28% of the overall first 5 year supply (see table 7.1)

<table>
<thead>
<tr>
<th>Year</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006 – 2007</td>
<td>173</td>
</tr>
<tr>
<td>2005 – 2006</td>
<td>156</td>
</tr>
<tr>
<td>2004 – 2005</td>
<td>146</td>
</tr>
<tr>
<td>2003 – 2004</td>
<td>92</td>
</tr>
<tr>
<td>2002 – 2003</td>
<td>57</td>
</tr>
<tr>
<td>2001 – 2002</td>
<td>29</td>
</tr>
<tr>
<td>2000 – 2001</td>
<td>38</td>
</tr>
<tr>
<td>Total</td>
<td>691</td>
</tr>
</tbody>
</table>

7.2.4.2 Empty Homes
The stock of empty homes in England varies around the figure of 750,000 dwellings, approximately 3.7% of the total housing stock. Data obtained from the publication ‘Empty Homes in London’ GLA (March 2006) indicates that there are currently 3,128 vacant private sector properties in Waltham Forest, in addition to 407 public sector vacancies. The total number of vacancies represent 3.8% of the overall housing stock within the Borough, and constitute a significant potential capacity source.
7.2.5 Monitoring and Review

The figures presented within the Waltham Forest HLAA provide a snapshot in time of theoretical level of housing land availability within the Borough. The Assessment provides an important evidence base to assist the Council in the formulation of policy decisions, that in turn, will assist the Council in meeting their housing provision obligations, as set out in PPS3 (Housing), and the housing delivery target as set by the Regional Spatial Strategy (London Plan 2006).

As its title suggests, the Housing Land Availability Assessment also plays an important role in all policy decisions concerning the competing range of land availability uses required to develop a sustainable community. Given the scale of land availability, policy formulation will also be subject to sustainability appraisal and habitats directive assessment.

The status of sites identified by the assessment, as well as the overall level of potential capacity within the three phases of delivery, will be subject to constant change, as sites become either complete or new potential housing sites materialise. The Assessment therefore, provides an important baseline for future monitoring, and as such it is imperative that the local planning authority ensure that site information is constantly updated to reflect the development status of individual sites. The three phases of delivery will require regular review to ensure sites are accurately tracked and deposited within the appropriate delivery phase as more information on site delivery comes to light. The subsequent Phase 1, five-year supply of deliverable sites is also required to be published annually as part of the Council’s Annual Monitoring Report (AMR).

To aid the Council in its monitoring and review of individual sites, Entec have provided the Council with a comprehensive GIS package, including digital mapping of individual capacity sources, an access database of sites with density and capacity information, and a detailed site specific constraint analysis of each capacity source.

The HLAA has been subjected to early consultation with stakeholders from inception of the study, and has resulted in the adaptation and evolution of the assessment from an UCS to a HLAA. Additional consultation by the local authority as part of the Local Strategic Partnership (LSP) and further Community Strategy work has assisted in giving a strong spatial planning context to the study. It is recommended that the momentum of consultation is continued through the preparation of the Sustainable Community Strategy and Local Development Framework.
INSERT FIG 7.1 ALL CAPACITY SOURCES
INSERT FIG 7.2 CAPACITY SOURCES BY PHASE
INSERT FIG 7.3 CAPACITY SOURCES BY WARD
8. Scenarios

In consultation with the Council, a series of scenarios were examined to illustrate how the HLAA housing capacity figure could be altered if density assumptions were increased and/or additional areas were considered for development. The six scenarios, as detailed below, have been produced as examples of variations in the density figures for different areas within the Borough. The scenarios illustrate the extent of any additional capacity that in theory could be achieved if densities were stretched to significantly higher figures, or certain excluded areas were in fact included for development.

Where an increase in densities has been applied in the scenarios, a variation of the London Plan range of densities has been applied by utilising the figure at the top end of each density range. This means that maximum density figures were applied to the identified sites without planning permission, which of course could well be unrealistic in terms of what might be both proposed and permitted on individual sites.

As discussed in chapter 4, the density assumptions used within the capacity analysis have been based on a variation of the London Plan density matrix. The matrix shows a range of densities within each PTAL range. The scenarios (with the exception of scenarios 3 and 4) have utilised the density figure at the top end of each density range and then applied the calculation to each capacity source. For instance, as can be seen from table 8.1, PTAL 2 sites within the assessment have been based on a density assumption of 50 dph (within the 30-80 dph range), whereas the scenario figure has been based on the maximum density figure of 80 dph.

The methodology used for calculating the capacity figures for scenarios 3 and 4, differs to that prescribed in table 8.1. Scenario 3 for instance, calculates its theoretical capacity figure by applying a density generator based on the Borough’s average density of 54 dpa. The application of this particular methodology was perceived to be more appropriate than using a variation of the London Plan density matrix because of the undeveloped nature of the existing land.

Scenario 4, calculates its theoretical capacity figure by applying the same density generator as was originally applied to the other capacity sources (with the exception of planning permission and GLA sites) to achieve the final HLAA capacity figure. More information regarding the methodology used for calculating the capacity of GLA sites can be found in chapter 4.

The scenario figures have not altered the housing figures relating to existing planning permissions. Entec has taken the view that capacity totals for existing planning permissions are unlikely to significantly change, and therefore, their capacity total remains unchanged in the scenarios from the main assessment. The planning permission sites account in total for 2,798 dwellings. A summary of the scenario results can be found in table 8.2.
Table 8.1 Scenario Density Matrix

<table>
<thead>
<tr>
<th>PTAL</th>
<th>Existing Density zone (dph)</th>
<th>Range within Density Matrix (dph)</th>
<th>Suggested scenario increases (dph)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1a</td>
<td>40</td>
<td>30 - 50</td>
<td>50</td>
</tr>
<tr>
<td>1b</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>50</td>
<td>30 - 80</td>
<td>80</td>
</tr>
<tr>
<td>3</td>
<td>70</td>
<td>50 - 150</td>
<td>120</td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>180</td>
<td>55 - 275</td>
<td>275</td>
</tr>
<tr>
<td>6a</td>
<td>240</td>
<td>240 – 435</td>
<td>435</td>
</tr>
<tr>
<td>6b</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

dph = dwellings per hectare

Table 8.2 Scenario results overview

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Site</th>
<th>Existing calculated capacity (units)</th>
<th>Scenario Capacity (units)</th>
<th>Increase (units)</th>
<th>Area size (ha)</th>
<th>New Scenario total capacity for the borough (units)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scenario 1</td>
<td>De-Designated Employment Sites</td>
<td>179 units</td>
<td>252</td>
<td>73 units</td>
<td>-</td>
<td>10668</td>
</tr>
<tr>
<td>Scenario 2</td>
<td>Housing Estate Sites</td>
<td>710 units</td>
<td>1035</td>
<td>325 units</td>
<td>-</td>
<td>10920</td>
</tr>
<tr>
<td>Scenario 3</td>
<td>Metropolitan Open Land</td>
<td>0 units</td>
<td>2332</td>
<td>2332 units</td>
<td>43.18 ha</td>
<td>12927</td>
</tr>
<tr>
<td>Scenario 4</td>
<td>GLA Sites</td>
<td>1214 units</td>
<td>3574</td>
<td>2360 units</td>
<td>-</td>
<td>12955</td>
</tr>
<tr>
<td>Scenario 5</td>
<td>Regeneration Area Sites</td>
<td>3793 units</td>
<td>6461</td>
<td>2668 units</td>
<td>-</td>
<td>13263</td>
</tr>
<tr>
<td>Scenario 6</td>
<td>All Capacity Sources</td>
<td>10595 units</td>
<td>17187</td>
<td>6592 units</td>
<td>-</td>
<td>17187</td>
</tr>
</tbody>
</table>

8.1 Scenario 1: De-Designated Employment Sites

As discussed in chapter 3, the Council provided Entec with a list of employment sites identified within the recent Waltham Forest Employment Land Study, as having the potential for de-designation.

The purpose of scenario 1 therefore, was to investigate the impact of changing the density assumptions currently applied to de-designated employment sites. As can be seen in table 8.3, the application of the scenario methodology increases the potential capacity of the de-designated

Entec
employment sites from 179 to 252 dwellings. In turn, the additional 73 dwellings increase the HLLA housing total from 10,595 to 10,668.

This is not a significant increase for the overall assessment and clearly the future use and capacity of these sites can be left to consideration by the Council at the time of the development plan and/or any planning applications.

### Table 8.3 Scenario 1 De-Designated Employment Sites

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Existing Capacity</th>
<th>Scenario Capacity</th>
<th>Increase in Capacity</th>
<th>Existing Density</th>
<th>Scenario Density</th>
</tr>
</thead>
<tbody>
<tr>
<td>De-designated employment sites</td>
<td>179</td>
<td>252</td>
<td>73 (41%)</td>
<td>40 – 56 dph</td>
<td>50 – 91 dph</td>
</tr>
<tr>
<td>All other sites without planning permission</td>
<td>7618</td>
<td>7618</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Outstanding planning permissions</td>
<td>2798</td>
<td>2798</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total capacity for the Borough (excl. any windfalls)</td>
<td>10595</td>
<td>10668</td>
<td>73 (0.6%)</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

### 8.2 Scenario 2: Housing Estate Sites

Scenario 2 investigated the impact of changing the density assumptions applied to the Council’s Housing Estate Sites. As can be seen in table 8.4, the Council’s housing estate sites provide 710 additional dwellings in the current capacity assessment. By increasing the range of densities applied to this source from a range of 40-240 to 50-435 dwellings per hectare, the capacity of the Council’s housing estate sites could be increased by 325 dwellings (i.e. to provide a total of 1,035 dwellings). Again, this is not a significant increase for the overall assessment and clearly the future use and capacity of these sites can be left to consideration by the Council at the time of the development plan and/or any planning applications. Indeed, because these sites are by definition already within residential areas and that new development will impact on the amenities of existing residents, the particular circumstances of each site would first have to be taken into account and would inevitably influence the actual densities that could be achieved.
Table 8.4 Scenario 2 Housing Estate Sites

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Existing Capacity</th>
<th>Scenario Capacity</th>
<th>Increase in Capacity</th>
<th>Existing Density</th>
<th>Scenario Density</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Estate Sites</td>
<td>710</td>
<td>1035</td>
<td>325 (46%)</td>
<td>40 – 240 dph</td>
<td>50 – 435 dph</td>
</tr>
<tr>
<td>All other sites without planning permit</td>
<td>7087</td>
<td>7087</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Outstanding planning permissions</td>
<td>2798</td>
<td>2798</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total capacity for the Borough (excl. any windfalls)</td>
<td>10595</td>
<td>10920</td>
<td>325 (3%)</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

8.3 Scenario 3: Metropolitan Open Land

Scenario 3 looked at the potential for utilising an element of the Council’s designated 'Metropolitan Open Land' for residential development. In agreement with the Council, the scenario removed SSSI and SNCI designations, but retained the Metropolitan Open Land Designation.

The scenario calculated the total area (in hectares) of land, after the existing land designations were filtered out, and then calculated potential capacity based on the average density for the Borough, which stands at 54 dph. As illustrated by table 8.5 and figure 8.3, the result produced seven identifiable areas of new ‘non-designated’ white land totalling 43.18 hectares (from a total of 147.76 hectares), which could theoretically, accommodate an additional 2,332 dwellings.

The theoretical scenario provides a useful tool to aid in the identification of new potential housing sites within existing designated areas. However, considering the sensitive nature of the land in question, and the potential for local or political objection, it is unlikely that all areas identified through application of the scenario would be developable. Furthermore, the loss of such open space and “greenfield” areas for housing, or any other development, would need a major policy change at both the strategic and local levels, which at the moment would appear unlikely. Notwithstanding the advantages of accommodating an additional 2-3,000 dwellings within the Borough, the role and benefits of the present Metropolitan Open Land sites would need to be carefully considered before they could be permanently lost to development. The scenario would therefore depend on any review of open space provision in this part of London before and in advance of any assumptions about future development and housing capacity.
Table 8.5  Scenario 3 Metropolitan Open Land

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Existing Capacity</th>
<th>Scenario Capacity</th>
<th>Increase in Capacity</th>
<th>Area before scenario (ha)</th>
<th>Area after scenario (ha)</th>
<th>Potential additional developable land (ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metropolitan Open Land</td>
<td>-</td>
<td>2332</td>
<td>2332</td>
<td>147.76</td>
<td>104.58</td>
<td>43.18</td>
</tr>
<tr>
<td>All other sites without planning permission</td>
<td>7797</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Outstanding planning permissions</td>
<td>2798</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total capacity for the Borough (excl. any windfalls)</td>
<td>10595</td>
<td>12927</td>
<td>2332</td>
<td>179.77*</td>
<td>222.95</td>
<td>-</td>
</tr>
</tbody>
</table>

*Total area of identified capacity sites

8.4  Scenario 4: GLA Sites

As mentioned above, the methodology for calculating the capacity for GLA sites differs to the methods used for calculating other capacity sources. The GLA capacity figures have been based on information provided to Entec by Waltham Forest Council, and as such, the sites have not been subjected to the site density calculations applied to all other capacity sources, save planning permissions.

The purpose of scenario 4 therefore, is to recalculate the capacity of GLA sites using the same density calculation methods as applied to the other sites. As can be seen from table 8.6, the recalculated scenario figure, shows a significant increase in housing capacity for the GLA sites, from 1,124 dwellings to 3,574 dwellings.

It should be noted however, that whilst application of this scenario would significantly increase the GLA capacity by 2,360 dwellings, many of the GLA sites, as identified by the LHCS, were identified for mixed use development and are unlikely to come forward for purely residential development schemes.

However, bearing in mind that the characteristics of the GLA housing sites are similar to the other identified sites in the Borough, it would not appear unreasonable to apply the higher densities to these sites, either universally or on a site by site basis. The result of this would be to raise the housing land assessment figure of 10,595 dwellings for the Borough as a whole to a figure of 12,955 additional dwellings.
### Scenario 4 GLA Sites

<table>
<thead>
<tr>
<th>Capacity Source</th>
<th>Existing Capacity</th>
<th>Scenario Capacity</th>
<th>Increase in Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>GLA sites</td>
<td>1214</td>
<td>3574</td>
<td>2360 (194%)</td>
</tr>
<tr>
<td>All other sites without planning</td>
<td>6583</td>
<td>6583</td>
<td>-</td>
</tr>
<tr>
<td>permission</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Outstanding planning permissions</td>
<td>2798</td>
<td>2798</td>
<td>-</td>
</tr>
<tr>
<td>Total capacity for the Borough (excl.</td>
<td>10595</td>
<td>12955</td>
<td>2360 (22%)</td>
</tr>
<tr>
<td>any windfalls)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 8.5 Scenario 5: Regeneration Areas

The purpose of scenario 3 was to investigate the impact of changing the density assumptions applied to potential housing sites within the Council’s regeneration areas. The regeneration areas of Blackhorse Land and Walthamstow provide a significant proportion of the Borough’s estimated capacity figures, some 3,793 dwellings or 32% of the total capacity.

As can be seen in table 8.7, application of the scenario methodology to the regeneration sites increased the density range from 48-217 to 74-376 dwellings per hectare. The result was a further significant increase in capacity from 3,793 dwellings under the current capacity estimate to a figure of 6,461 dwellings. Subsequently, the total capacity figure also rose from the HLAA figure of 10,595 dwellings to 13,263; an increase of 2,668 dwellings from the assessment figure.

Given the fact that a large majority of regeneration sites are not considered to be available for development until the latter stages of the HLAA period, it provides the Council with an opportunity, should they require it, to further investigate the density levels achievable on each of the regeneration sites.

This scenario capacity increase coupled with the Scenario 4 GLA site increase, represents an additional **5,028 dwellings** and increases the Borough’s capacity by almost 50%.

However, applying maximum London Plan densities to these areas in total could be both unrealistic and unacceptable. However, what can be drawn from these figures is that current London Plan policies may allow more housing capacity to be realised in these key areas, which is useful to know when considering the vision that the Council has for new schemes in these areas.
Table 8.7  Scenario 5 Regeneration Areas

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Existing Capacity</th>
<th>Scenario Capacity</th>
<th>Increase in Capacity</th>
<th>Existing Density</th>
<th>Scenario Density</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regeneration Area Sites</td>
<td>3793</td>
<td>6461</td>
<td>2668 (70%)</td>
<td>48 – 217 dph</td>
<td>74 – 376 dph</td>
</tr>
<tr>
<td>All other sites without planning permission</td>
<td>4004</td>
<td>4004</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Outstanding planning permissions</td>
<td>2798</td>
<td>2798</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total capacity for the Borough (excl. any windfalls)</td>
<td>10595</td>
<td>13263</td>
<td>2668 (25%)</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

8.6  Scenario 6: Capacity Sources

The final scenario looked at all identified capacity sources without planning permission and applied the maximum London Plan density figure within each PTAL range. This would increase the potential capacity within the Borough, on those sites without planning permission, from 7,797 dwellings to 14,389 dwellings, an increase of 6,592 dwellings.

Whilst this theoretical scenario would allow for a very significant increase (62%) in the housing capacity for the Borough, the uniform application of the maximum London Plan density figures would appear unlikely, given other planning and development considerations, particularly bearing in mind the very significant increased densities that would apply to PTAL Sites 5 and 6 in particular.

As the GLA housing sites and the regeneration sites fall within this calculation, it can be seen that applying maximum densities to all sites without planning permission only produces an additional 1,564 dwellings over and above applying the same maximum densities to solely the key housing and regeneration sites. Bearing in mind that it would be difficult to envisage that all 540 sites without planning permission would, or could, be built to maximum densities in each and every case, it would appear more realistic and more fruitful for the Council to consider the upper capacity figure as relating to the key housing and regeneration sites only, and assume that all other sites in the Borough would be built to the original assumed densities.

Table 8.8  Scenario 6 Capacity Sources

<table>
<thead>
<tr>
<th>Capacity Source</th>
<th>Existing Capacity</th>
<th>Scenario Capacity</th>
<th>Increase in Capacity</th>
<th>Existing Density</th>
<th>Scenario Density</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites without planning permission</td>
<td>7797</td>
<td>14389</td>
<td>6592 (84%)</td>
<td>0 – 240 dph</td>
<td>50 – 435 dph</td>
</tr>
<tr>
<td>Outstanding planning permissions</td>
<td>2798</td>
<td>2798</td>
<td>-</td>
<td>No. dwellings permitted</td>
<td>No. dwellings permitted</td>
</tr>
<tr>
<td>Total capacity for the Borough (excl. any windfalls)</td>
<td>10595</td>
<td>17187</td>
<td>6592 (62%)</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>
8.7 Conclusion

The application of scenarios can provide a useful tool when determining the implementation or direction, of future policy decisions. The scenario figures present a theoretical illustration of the level of density that could, potentially, be achievable on a given site, through a density increment. The theoretical scenarios are unable to take into consideration site specific constraints that may be applicable to individual sites, and, it is therefore, unlikely that all scenario figures would be achievable.

The scenarios provide evidence that an overall housing land availability assessment for the Borough as a whole could be considered to be within a range from 10,595 to 15,623 dwellings, depending upon the actual densities that could be achieved on these sites. The upper figure of 15,623 dwellings is the additional 5,028 dwellings from the key housing and regeneration sites added to the assessment’s baseline figure of 10,595 dwellings. In other words, the housing capacity range broadly reflects average to maximum density assumptions, which in turn probably reflects densities and total capacities ranging from “likely” to “less likely” in terms of outcomes.

Notwithstanding this increase in the original assessment and the assessment’s expression as a range, the Council is still in the position of not being able to demonstrate a 5-year housing land supply.

8.8 What To Do?

- The Council clearly will be under pressure to increase the number of outstanding planning permissions in the Borough in the first instance;
- It would sensible to concentrate on those sites and developments that could provide the most significant gain to increasing the Borough’s housing supply;
- It would therefore appear to more appropriate to look at a few large sites, rather than spread attention across numerous small sites, in order to seek more planning permissions;
- The Council could, for example, quickly review the position on certain larger sites and areas with a view to establishing the realistic timescales and priorities for obtaining planning permissions;
- It should be recognised that such a process could identify possible options for local authority intervention (e.g. land assembly, infrastructure improvements, etc) which may have financial implications; and
- The Council could also consider prioritising some larger sites and certain areas on the basis of agreeing clear objectives to move forward planning applications on certain sites.

In summary, the aim would be to use the regeneration and housing area schemes that are already in the pipeline in order to support the provision of additional housing in the Borough, including addressing what appears to be a short-term shortfall in the amount of housing and land that should be coming forward for development over the next 5 or so years.
INSERT FIG 8.2 SCENARIO 2
INSERT FIG 8.3 SCENARIO 3
INSERT FIG 8.4 SCENARIO 4
INSERT FIG 8.5 SCENARIO 5
INSERT FIG 8.6 SCENARIO 6
Appendix L
Breakdown of Housing Potential and Land Availability Sources
Appendix M
List of Housing Potential Sites (by ward)

7 Pages