RESEARCH REPORT

LOCAL DEVELOPMENT FRAMEWORK

Research Report

WOKING STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

(SHLAA)

Appendix 10 Critical Friend review – John Silvester Associates

July 2009

WOKING
BOROUGH COUNCIL

Produced by the Planning Policy Team. For further information please contact Planning Policy, Woking Borough Council, Civic Offices, Gloucester Square, Woking, Surrey, GU21 6YL. Tel: 01483 743871. Email: planning.policy@woking.gov.uk

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WOKING STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

AN INDEPENDENT REVIEW

Abstract: whilst in the main the Council's Report is found to adequately cover the essential requirements of the Government's Practice Guidance and of the identified independent review requirements there remain a few areas of weakness that it is recommended should be remedied before publication. The Report is also found to contain a number of examples of good practice which the Council is to be complemented on.

John Silvester Associates
6th March 2009
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1. FOREWORD

1.1 JSA is retained as Woking Borough Council's LDF Critical Friend; the Council's Planning Policy Manager tasked JSA with undertaking an independent review of the Woking Strategic Housing Land Availability Assessment (SHLAA) approach and findings in October 2008.

1.2 The review requirements were set for the Council by JSA on 9th December 2008 (see Annex A).

1.3 Following receipt of a draft SHLAA Report JSA made some initial comments which were sent to the Council on 2nd February 2009; the Council's final report was received on 20th February 2009 – this is referred to as the "Report".

1.4 A complete commentary on the Independent Review Findings is contained at Annex B. In some instances additional requirements to those originally identified (Annex A) have been included.

1.5 The Review Findings are summarised in the main body of this report; whilst in the main the Council's Report is found to adequately cover the essential requirements of the Guidance and of the independent review requirements there remain a few areas of weakness that it is recommended should be remedied before publication. The Report is also found to contain a number of examples of good practice which the Council is to be complemented on.

1.6 The Council is to be commended in commissioning an independent review of its SHLAA and it is trusted that it will take these findings on board; if it does so it is considered that this should contribute towards a robust evidence base for the preparation of the Council's housing land supply assessment and LDF. Whilst every effort has been made to assess the soundness of the approach taken and the practical reality of its findings no guarantee is given by JSA that the SHLAA results will prove to be fully effective.

1.7 John Silvester, the Principal of John Silvester Associates, participated in the CLG Steering Group that established the brief for consultants, managed the process and reviewed the output of the Practice Guidance on the preparation of SHLAAs; this was issued in July 2007[1]. John Silvester has continued to advise the CLG on their review of policy and practice regarding housing land availability.

1.8 For the avoidance of doubt John Silvester Associates (of Fleet, Hampshire) are independent planning and management consultants and it has no relationship whatsoever with JSA Architects (of Maidenhead, Berkshire) who made a number of representations to the Council on the SHLAA methodology.

[1] This is hosted on the CLG website at http://www.communities.gov.uk/documents/planningandbuilding/pdf/399267.pdf

2. ASSESSMENT OF THE WOKING SHLAA[2]

2.1 BACKGROUND RESEARCH

2.1.1 The identified requirement is to show evidence of any analysis of best practice guidance, other SHLAAs, etc. Following action taken by the Council as a result of the initial appraisal by JSA, the Report, whilst not fulsome, is considered to adequately cover this requirement.

2.2 PARTNERSHIP APPROACH

2.2.1 The identified requirements fall into three parts. First, a list of stakeholders invited to participate; the Report is considered to adequately cover this requirement.

2.2.2 Second, identification of those who did take part at different stages and summary of expertise brought to the process. It is judged that the Council has taken all reasonable steps to involve stakeholders throughout the process, from the outset, apart from one stage. However, it is clear that the partner stakeholders should undertake a final assessment of the robustness of the SHLAA findings to enable a final housing trajectory to be prepared and the SHLAA study finalised. **Without a firm commitment to consultation with partner stakeholders being undertaken prior to the finalisation of the study the Report is not considered to adequately cover this requirement.**

2.2.3 Third, whether there is any commitment to further stakeholder involvement; the Report is considered to adequately cover this requirement.

2.3 STUDY AREA

2.3.1 The identified requirement falls into three parts. First, identifying the reasons for choosing the area if not the same as the Strategic Housing Market Assessment (SHMA); the Report adequately covers the requirement and the ongoing practice of joint officer working is to be commended.

2.3.2 Second, the response of SHMA partners to any different area; whilst no direct evidence has been made available I am satisfied that the Report adequately covers the requirement. Indeed the Council is to be complemented on the best practice approach of employing joint authority working to enable coordination of approach.

2.3.3 Third, any evidence of cross –boundary working where “cross-sites” have been identified by whatever partner LPA; the Report adequately covers the requirement. Indeed the Council is to be complemented on the best practice approach of seeking information from adjoining authorities to identify potential cross-boundary sites.

2.4 PROCESS

2.4.1 The identified requirement falls into five parts. First, the methods, assumptions, judgements and findings together with stakeholders’ opinions thereon. The Report is considered to

[2] This section is a summary of the Review; the full assessment is contained at Annex B. Recommended action is shown in bold type.

adequately cover this requirement; and the Council is to be commended for its explanation as to how stakeholders have influenced the methodology employed.

2.4.2 Second, an analysis of the Woking BC approach compared to that in figure 3 of SHLAA Practice Guidance. The Report is considered to adequately cover this requirement.

2.4.3 Third, the resources identified for carrying out the assessment; analysis of skill requirements of the project team compared to those of the team members. The Report is considered to adequately cover this requirement.

2.4.4 Fourth, the work programme and project milestones; and timings of other related assessments. The Report is considered to adequately cover this requirement.

2.4.5 Fifth, the Management and scrutiny arrangements; and evidence of independent examination of the process. The Report adequately covers the requirement; and the Council is to be commended in commissioning an independent review of its SHLAA.

2.5 SOURCES OF SITES

2.5.1 The identified requirement falls into four parts. First List of areas or types of land excluded from the assessment together with reasoned justification. **The Report inadequately covers this requirement. It is recommended that Appendix 6 and para 4.7 of the Report be revised. It is suggested that it is made clear that residential area "back gardens" were included in the assessment, and that some feature in the identified sites as being deliverable or developable. Where any were discounted due to being assessed as undeliverable or undevelopable they should still feature in the maps/proformas in Appendix 6.**

2.5.2 Second, a map(s) showing excluded areas; the Report is considered to adequately cover this requirement.

2.5.3 Third, whether there is any commitment to reconsider excluded sites if and when necessary; the Report is considered to adequately cover this requirement.

2.5.4 Fourth, correlation with the Practice Guidance list of sources of sites with potential for housing. The Council is to be commended for identifying possible types of sites in addition to those listed in the Practice Guidance; **however, because one Practice Guidance type has not been specifically included it is possible that some potential sites have been omitted by the process – as such the Report does not adequately deal with this requirement; this needs to be rectified. It is suggested the Council either undertakes an assessment of large scale redevelopment and re-design of existing residential areas within defined settlement areas, or if it has already done so suitably amends/qualifies the Report.**

2.6 DESKTOP REVIEW

2.6.1 The identified requirement falls into two parts. First, sources of information used to identify sites and areas for survey. The Report adequately covers the requirement; and the Council is to be commended in utilising additional sources to those identified in the Practice Guidance.

2.6.2 Second, determination of which sites and areas will be surveyed. The Report adequately covers the requirement.

2.7 ON SITE ANALYSIS

2.7.1 The identified requirement falls into three parts. First, site survey criteria; the Report adequately covers the requirement.

2.7.2 Second, evidence of team briefings; the Report adequately covers the requirement.

2.7.3 Third, samples of site survey records for each type of site. The overall conclusion is that the assessments conform to the identified criteria and approach. On the basis of review of the selected site appraisals there is no reason to doubt the findings. The Report adequately covers the requirement.

2.8 ESTIMATING THE HOUSING POTENTIAL

2.8.1 The identified requirement falls into five parts. First, the estimating methodology and details of any exemplar schemes used. The Report adequately covers the requirement.

2.8.2 Second, this falls into two sub-sections:

(i) Policy restrictions, physical limitations, potential impacts and environmental conditions. The Report adequately covers the requirement; and the Council is to be commended in utilising additional factors to those identified in the Practice Guidance.

(ii) Justification for any scoring system; the Report adequately covers the requirement.

2.8.3 Third, evidence of information sought to assess availability of sites and criteria and justification for site size thresholds. The Report adequately covers the requirement.

2.8.4 Fourth, this has five sub-sections:

(i) Market; cost; delivery. The Report adequately covers the requirement.

(ii) Assumptions/justification for any formulaic approach used. The Report adequately covers the requirement.

(iii) Approach used to reflect changing economic circumstances. The Report adequately covers the requirement.

(iv) Approach used towards potential mixed use sites. The Report adequately covers the requirement.

(v) Any commitment to further review mechanisms? The Report adequately covers the requirement.

2.8.5 Fifth, an indicative housing trajectory. **Without a firm commitment to consultation with partner stakeholders being undertaken prior to the finalisation of the trajectory the Report is not considered to adequately cover this requirement.**

2.9 CORE OUPUT 1

2.9.1 The identified requirement is for a list of sites cross referenced to maps. **The Council's assessment at Appendix 7 is not considered to fully meet the Core Output requirement; each site in Appendices 1 – 3 needs to have a unique SHLAA site reference to accord with that of the maps in Appendix 4.**

2.10 CORE OUPUT 2

2.10.1 The identified requirement is for an assessment of deliverability/developability of each identified site. The Report adequately covers the requirement; indeed the Council is to be complemented on the clarity demonstrated in the appendices which conform to emerging good practice by other local authorities.

2.11 CORE OUPUT 3

2.11.1 The identified requirement is for the identification of potential quantity of housing that could be delivered on each identified site. The Report adequately covers the requirement.

2.12 CORE OUPUT 4

2.12.1 The identified requirement is the identification of constraints on the delivery of identified sites. The Report adequately covers the requirement.

2.13 CORE OUTPUT 5

2.13.1 The identified requirement is in two parts. First, recommendations as to how constraints could be overcome and when; the Report adequately covers the requirement.

2.13.2 Second, the approach used towards need for planning obligations; the Report adequately covers the requirement.

2.14 ASSESSING BROAD LOCATIONS WHERE NECESSARY

2.14.1 The identified requirement is the approach to identification of and justification for broad areas where specific sites cannot be identified. The Report adequately covers the requirement.

2.15 POTENTIAL OF WINDFALLS

2.15.1 The identified requirement is whether there are there local circumstances to justify identification of a windfall allowance; the Report adequately covers the requirement.

2.16 GYPSIES AND TRAVELLERS

2.16.1 The identified requirement is the approach used towards identification and assessment of potential sites for Gypsy and Traveller use. **The Council's reports make conflicting statements about the approach towards the identification of Gypsy and Traveller accommodation; this needs to be rectified. Ideally this should be undertaken by incorporating an assessment of the potential for Gypsy and Traveller accommodation for each identified site; or by simply correcting the contradictory statements.**

3 CONCLUSIONS

3.1 Whilst in the main the Council's Report is found to adequately cover the essential requirements of the Government's Practice Guidance and of the identified independent review requirements there remain a few areas of weakness that it is recommended should be remedied before publication. These are identified in bold type in section 2 and Annex B of this report.

3.2 The Report is also found to contain a number of examples of good practice which the Council is to be complemented on.

3.3 Once the Report is completed it is recommended that the Council makes all the information utilised in its preparation publicly available on its website; uses the information gained to form an up-to-date assessment of housing land supply; uses it as part of its evidence base for LDF preparation; and maintains a regular review, including liaison with stakeholders, and updates the SHLAA through its Annual Monitoring Report process.

3.4 It is further recommended that the Council takes cognisance of good practice guidance when published by CLG and others.

John Silvester DipP(Dist), MRTPI, MISPAL, MCMI

John Silvester Associates

Annex A: Independent Review Requirements

Issue	*Requirement*
1. Background research	Evidence of any analysis of best practice guidance, other SHLAAs, etc.
2. Partnership approach	a. List of stakeholders invited to participate;
	b. those who did take part at different stages and summary of expertise brought to the process;
	c. any commitment to further stakeholder involvement?
3. Study area	a. Reasons for choosing the area if not as SHMA;
	b. response of SHMA partners to different area;
	c. evidence of cross –boundary working where "cross-sites" have been identified by whatever partner LPA
4. Process	a. The methods, assumptions, judgements and findings together with stakeholders opinions thereon
	b. Analysis of Woking BC approach compared to that in figure 3 of SHLAA Practice Guidance
	c. Resources identified for carrying out the assessment; analysis of skill requirements of the project team compared to those of the team members
	d. Work programme and project milestones; timings of other related assessments
	e. Management and scrutiny arrangements; evidence of independent examination of the process
5. Sources of sites	a. List of areas or types of land excluded from the assessment together with reasoned justification;
	b. map showing excluded areas;
	c. any commitment to reconsider excluded sites if and when necessary?
6. Desktop review	Sources of information used to identify sites and areas for survey
7. On site analysis	a. Site survey criteria;
	b. evidence of team briefings
	c. 3 samples of site survey records for each type of site
8. Estimating the housing potential	a. Estimating methodology; details of any exemplar schemes used
	b. Factors used to assess suitability: (i) Policy restrictions; physical limitations; potential impacts; and environmental conditions; (ii) Justification for any scoring system
	c. Evidence of information sought to: (i) assess availability of sites; (ii) criteria and justification for site size thresholds
	(iii) Factors used to assess achievability: (i) Market; cost; delivery ;

	(ii) assumptions/justification for any formulaic approach used; (iii) approach used to reflect changing economic circumstances; (iv) approach used towards potential mixed use sites; (v) any commitment to further review mechanisms?
	(iv) Indicative housing trajectory
9. Core output 1	List of sites cross referenced to maps
10. Core output 2	Assessment of deliverability/developability of each identified site
11. Core output 3	Schedule of quantity of housing that could be delivered on each identified site
12. Core output 4	Schedule of constraints on the delivery of identified sites
13. Core output 5	a. Schedule of recommendations as to how constraints could be overcome and when;
	b. approach used towards need for planning obligations
14. Assessing broad locations where necessary	Approach to identification of and justification for broad areas where specific sites cannot be identified
15. Potential of windfalls	a. Are there local circumstances to justify identification of a windfall allowance?
	b. If so; evidence of the information/approach used.
16. Gypsies and travellers	Approach used towards identification and assessment of potential sites for G&T use

Annex B: Review Commentary Pertaining to the Independent Review Requirements

Issue	*Requirement*	*Review Commentary[3] with critical comments and recommended action in BOLD*
1. Background research	Evidence of any analysis of best practice guidance, other SHLAAs, etc.	Initial Review: Para 1.3 - this could be amended to inform the reader how the practice guidance has influenced the SHLAA; could also include reference to other SHLAA studies which have been used for reference purposes; if there were none, it is suggested that several could be examined and any lessons incorporated. The Alnwick DC SHLAA is being identified by some as a good practice example: http://www.alnwick.gov.uk/environment_and_planning/Planning/shlaa/Pages/default.aspx However, this is a largely rural area which does not compare well with Woking BC, therefore it is suggested that you may refer to that of a more similar authority, e.g. Dacorum BC: http://www.dacorum.gov.uk/default.aspx?page=1884#SHLAA
		Follow Up Review: Para 1.3 now refers to how the Practice Guidance has shaped the methodology and that justification is include where the Council has deviated from that Guidance. Para 1.4 also refers to the regard that has been had to the PAS additional guidance and the SHLAAs of a number of other (unnamed) authorities.
		Whilst not fulsome, the Report is considered to adequately cover this requirement.
2. Partnership approach	a. List of stakeholders invited to participate;	Initial Review: Para 3.7, 8th bullet – it is suggested that you include your source for the statement "it is not normal practice to involve residents".
		Follow Up review: This statement has been removed from the final Report and a suitable alternative qualifying statement included. The Report is considered to adequately cover this requirement.
	b. Those who did take part at different stages and summary of expertise brought to the process;	Appendix 8 and the separate Research Methodology report lists all the stakeholders consulted and involved in the process; this is summarised in para 3.8 of the final report. The list is considered to cover all likely stakeholders; and it is judged that the Council has taken all reasonable steps to involve stakeholders throughout the process, from the outset, apart from one stage. However, it is clear (see PAS guidance at para 29) that the partner stakeholders should undertake a final assessment of the robustness of the SHLAA findings to enable a final housing trajectory to be prepared and the SHLAA study finalised.
		Without a firm commitment to consultation with partner stakeholders being undertaken prior to the finalisation of the study the Report is not considered to adequately cover this requirement.

	c. Any commitment to further stakeholder involvement?	A statement to the effect that it is the Council's intention to involve stakeholders in future updates of the SHLAA on an annual basis through the AMR process is contained in Appendix 8 at para A8.15.
		The Report is considered to adequately cover this requirement.
3. Study area	a. Reasons for choosing the area if not as SHMA;	The issues log contained at Appendix 17 clearly indicates that the Council was not part of a Housing Market Partnership and the reasoning for not pursuing a joint SHLAA. Despite this shortcoming the Council continued with joint officer working.
		The Report adequately covers the requirement; the ongoing practice of joint officer working is to be commended.
	b. Response of SHMA partners to different area;	Initial Review: Para 3.6 – the footnote reference has been noted; I would welcome sight of any responses from Guildford and Waverley Councils regarding not undertaking a combined SHLAA
		Follow Up Review: Whilst I have not seen any correspondence from Waverley or Guildford councils in this regard I have noted the analysis made in the separate Research Methodology report of the similarities and differences between the three SHLAA approaches and that of Surrey Heath BC. I have also noted the reference in para 3.6 of the Report to the ongoing practice of joint officer meetings between the authorities.
		Whilst no direct evidence has been made available I am satisfied that the Report adequately covers the requirement. Indeed the Council is to be complemented on the best practice approach of employing joint authority working to enable coordination of approach.
	c. Evidence of cross – boundary working where "cross-sites" have been identified by whatever partner LPA	Para 3.7 of the Report has been included to refer to two cross-boundary sites; these were the only ones that have been identified by the Council and five adjoining Councils.
		The Report adequately covers the requirement. Indeed the Council is to be complemented on the best practice approach of seeking information from adjoining authorities to identify potential cross-boundary sites.
4. Process	a. The methods, assumptions, judgements and findings together with stakeholders opinions thereon	Sections 3 – 11 of the Report outline the methodology used. In addition the methodology, assumptions and judgements are explained in full in the separate Research Methodology report; these accord with the SHLAA Practice Guidance. This separate report also contains summaries of comments made by stakeholders when consulted, the Council's response and an indication as to how this has informed the methodology.

		The Report is considered to adequately cover this requirement; and the Council is to be commended for its explanation as to how stakeholders have influenced the methodology employed.
	b. Analysis of Woking BC approach compared to that in figure 3 of SHLAA Practice Guidance	A copy of the SHLAA Guidance process diagram is included in the Report at Figure 1 (page 12); the Council has closely followed this process (para 1.20) in carrying out its SHLAA. This is evidenced by its separate Research methodology report.
		The Report is considered to adequately cover this requirement.
	c. Resources identified for carrying out the assessment; analysis of skill requirements of the project team compared to those of the team members	Initial Review: Para 3.9 – this could usefully include (i) reference to Appendix 17 project plan and milestones; (ii) a list of the resources identified for carrying out the assessment; and (iii) an assessment of the project team's expertise against a set of identified skill requirements, this should then justify the need to bring in additional officers (as referenced in para 3.10)
		Follow Up Review: Para 3.12 has been included in the Report to outline the skills audit arrangements undertaken. Appendix 17 details these activities.
		The Report adequately covers the requirement.
	d. Work programme and project milestones; timings of other related assessments	Para 3.12 has been included in the Report to outline the risk analysis and project planning arrangements undertaken. Appendix 17 details these activities. The relationships with, and timing of, other assessments undertaken by and for the Council are listed in para 1.14.
		The Report adequately covers the requirement.
	e. Management and scrutiny arrangements; evidence of independent examination of the process	Management and scrutiny arrangements are outlined in the Report at paras 3.10 – 3.16; these are considered satisfactory. Para 3.15 of the Report summaries the commissioning of John Silvester Associates to carry out an independent assessment of the SHLAA processes and findings; the intended task by JSA was discussed with and endorsed by stakeholders at a workshop in November 2008
		The Report adequately covers the requirement; and the Council is to be commended in commissioning an independent review of its SHLAA.
5. Sources of sites	a. List of areas or types of land excluded from the	Initial Review: Para 4.7 – if I understand correctly the approach taken, it would be useful to include a statement to the

	assessment together with reasoned justification;	effect that whilst existing residential land ("back gardens") was included in the site assessment process it was subsequently discounted (for the reason cited)
		Follow Up Review: Para 4.7 in the Report has been amended to indicate that back garden land has been subsequently discounted. It is clear that some of the sites identified for assessment included existing residential properties and their "back gardens" and also some conjoined "back garden" areas; thus it is not factually correct to say that back garden land has been discounted from the process as this conveys the impression that it has been excluded. This needs rectification.
		Section 4 of the Report sets out how the Council has determined the sources of sites for inclusion within, and exclusion from, the SHLAA. Table 2 (pages 19 and 20) provides reasoned justification for the selection of policy areas to be excluded, including the consultations undertaken to support this approach.
		The Report inadequately covers this requirement. It is recommended that Appendix 6 and para 4.7 of the Report be revised. It is suggested that it is made clear that residential area "back gardens" were included in the assessment, and that some feature in the identified sites as being deliverable or developable. Where any were discounted due to being assessed as undeliverable or undevelopable they should still feature in the maps/proformas in Appendix 6.
	b. Map showing excluded areas;	Nine detailed maps are included by the Council at Appendix 9 to t e Report delineating the policy exclusion areas.
		The Report adequately covers the requirement.
	c. Any commitment to reconsider excluded sites if and when necessary?	The Council has specifically highlighted that land within flood zone 3 will be kept under review in accordance with any advice received from the Environment Agency; furthermore the Council recognises (para 3.16) that the SHLAA will be updated annually (as part of the AMR process). A specific reference to the review of excluded sites is also contained at paras 10.5 to 10.7.
		The Report adequately covers the requirement.
	d. Correlation with the Practice Guidance list of sources of sites with potential for housing	The Report at para 4.18 lists the types of sites that have been included by the Council in the SHLAA; this includes those already within the planning process and those without. The Council has identified two types of site within the planning process in addition to those listed in the Practice Guidance (i.e. sites where permission has been previously refused and those where an application has been submitted but not yet determined or subject to pre-application enquiries). Regarding sites not currently within the planning process once again the Council has identified two types of site in addition to those listed in the Practice Guidance (i.e. major developed sites outside of settlements and sites put forward by stakeholders through the 'call for sites'). The Council has, however, not included the Practice Guidance requirement of identifying large scale redevelopment and re-design of existing

		residential areas; nevertheless, some sites of this nature have been assessed since they were either sites with planning permission but as yet not implemented or sites identified by stakeholders. Without a thorough assessment of such a type it is not possible to identify whether or not such potential has been omitted.
		The Council is to be commended for identifying possible types of sites in addition to those listed in the Practice Guidance; however, because one Practice Guidance type has not been specifically included it is possible that some potential sites have been omitted by the process – as such the Report does not adequately deal with this requirement; this needs to be rectified. It is suggested the Council either undertakes an assessment of large scale redevelopment and re-design of existing residential areas within defined settlement areas, or if it has already done so suitably amends/qualifies the Report.
6. Desktop review	a. Sources of information used to identify sites and areas for survey	A desktop review has been undertaken by the Council (section 5) in accordance with the Practice Guidance; it is noted that in addition to the sources identified in the practice guidance the Council has also used sites put forward by landowners/developers through a call for sites and those identified by Council staff.
		The Report adequately covers the requirement; and the Council is to be commended in utilising additional sources to those identified in the Practice Guidance.
	b. Determination of which sites and areas will be surveyed	The Practice Guidance advises that four key factors need to taken into account in determining how comprehensive and intensive the survey element of the assessment should be. The Council provides a thorough explanation (section 6) of its approach to this requirement, which it is considered to be entirely in accord with the Guidance.
		The Report adequately covers the requirement.
7. On site analysis	a. Site survey criteria;	The site survey criteria identified by the Council (para 7.4) are entirely in accord with the Practice Guidance; a sample copy of the Council's site survey proforma is also usefully included (Appendix 16).
		The Report adequately covers the requirement.
	b. Evidence of team briefings	A summary of the team briefings undertaken is contained at para 7.2.
		The Report adequately covers the requirement.
	c. Samples of site survey records for each type of site	Follow Up review: A random selection of site appraisals was chosen by JSA; these are listed below, together with commentary following JSA site visit and review. The overall conclusion is that the assessments conform to the identified criteria and approach. On the basis of the review undertaken of the selected site appraisals there is no reason to doubt the findings.
		• SHLAABR019 BT Telephone Exchange, Bagshot Road: the site assessment accords with the Council's

		site survey criteria; the conclusions are reasonable.
		• SHLAAGE011 Albion House, High Street, Woking: the site assessment accords with the Council's site survey criteria; the conclusions are reasonable.
		• SHLAAKW001 Westfield Tip, Westfield Avenue, Woking: the site assessment accords with the Council's site survey criteria; the conclusions are reasonable.
		• SHLAAKN030 land adj. Littlewick Cottages, Littlewick Common: the site assessment accords with the Council's site survey criteria; query whether the entire site is suitable; therefore potential yield may be less than estimated. Nevertheless, the conclusions are reasonable.
		• SHLAAMS006 83 – 86 Maybury Road: the site assessment accords with the Council's site survey criteria; the conclusions are reasonable. An additional conclusion might be that the site is considered to be developable in the longer term subject to an upturn in market conditions.
		• SHLAAMHW014 Coal yard Site adj. Railway, Guildford Road and Bradfield Close: the site assessment accords with the Council's site survey criteria; the conclusions are reasonable.
		• SHLAAWB014 Car park east of Enterprise House, Station Approach: the site assessment accords with the Council's site survey criteria; the conclusions are reasonable.
		• SHLAAMSG018 land between Homespun & Little Yarrows, Guildford: the site assessment accords with the Council's site survey criteria; the conclusions are reasonable.
		The Report adequately covers the requirement.
8. Estimating the housing potential	a. Estimating methodology; details of any exemplar schemes used	Section 9 of the Report clearly sets out the approach used by the Council compared with the Practice Guidance; this is entirely in accord with the Guidance. The exemplar schemes used to determine indicative densities on potential sites are clearly identified in Table 4 with full details contained at Appendix 18.
		The Report adequately covers the requirement.
	b. Factors used to assess suitability: (i) Policy restrictions; physical limitations; potential impacts; and environmental conditions;	The Council identifies at paras 9.5 to 9.7 the factors utilised to assess suitability; these are in accord with the Practice Guidance. The Council has identified two further factors in addition to those in the Practice Guidance: accessibility and over-riding positive benefits; these contribute towards a robust assessment.
		The Report adequately covers the requirement; and the Council is to be commended in utilising additional factors to those identified in the Practice Guidance.
	(ii) Justification for any	It is not apparent that a scoring system has been used by the Council.

	scoring system	
		The Report adequately covers the requirement.
	c. Evidence of information sought to assess availability of sites; criteria and justification for site size thresholds	The Report at paras 9.8 to 9.11 sets out the Council's approach to assessing the availability of sites, including the endeavours to solicit landowner information. It is noted that the Council has identified a minimum site size threshold of the potential of accommodating 6 or more units; this is in line with past residential completions (para 6.13). This limitation was also the subject of discussion with and support by stakeholders.
		The Report adequately covers the requirement.
	d. Factors used to assess achievability: (i) Market; cost; delivery ;	The Report summarises the Practice Guidance at para 9.12 and summarises the use of consultants to advise on economic viability at para 9.13. Appendix 15 identifies the methodology used by the consultants, Elder Associates. Appendix 15 sets out in full how market, cost and delivery factors were taken into account.
		The Report adequately covers the requirement.
	(ii) assumptions/ justification for any formulaic approach used;	Appendix 15 sets out in full the assumptions and justification for the formulaic approach used by Elder Associates, and relied on by the Council.
		The Report adequately covers the requirement.
	(iii) approach used to reflect changing economic circumstances;	Appendix 15 sets out in full the approach used by Elder Associates to update market data and intelligence.
		The Report adequately covers the requirement.
	(iv) approach used towards potential mixed use sites;	Appendix 15 sets out in full the Elder Associates approach used towards potential mixed use sites.
		The Report adequately covers the requirement.
	(v) any commitment to further review mechanisms?	Initial Review: Para 9.13 and Appendix 15 (page 77) – this could be usefully supplemented by a statement to the effect that the Council is committed to review the viability assessment as and when economic circumstances change
		Follow Up review: Appendix 15 to the report includes a statement that "In view of the continuing uncertainty on the property market, values will be kept under review and revisions made as appropriate". This is dated November 2008 being an update of the June 2008 position; these statements are made by independent consultants Elder Associates.

		The Council makes it clear at para 3.16 of the Report that the SHLAA will be updated annually through the AMR process and it specifically commits itself at para 10.9 to reviewing the viability assessments as and when economic circumstances change.
		The Report is considered to adequately cover this requirement.
	e. Indicative housing trajectory	A housing trajectory is included in the Report (pages 37 and 39) reflecting the information and data from the assessment. However, it is not labelled that this is indicative pending a review by the partner stakeholders – see JSA comments at 2b above.
		Without a firm commitment to consultation with partner stakeholders being undertaken prior to the finalisation of the trajectory the Report is not considered to adequately cover this requirement.
9. Core output 1	List of sites cross referenced to maps	Compliance with the Practice Guidance Core Outputs, as assessed by the Council, is listed in Appendix 7; this is not considered to be accurate: List of deliverable sites with planning permission – table contained at Appendix 1, maps provided but without cross referencing to the table in Appendix 1. List of deliverable sites with a resolution to grant planning permission subject to a legal agreement being signed – – table contained at Appendix 2, maps provided but without cross referencing to the table in Appendix 2. List of deliverable sites currently under construction – table contained at Appendix 3, maps provided but without cross referencing to the table in Appendix 3.
		The Council's assessment at Appendix 7 is not considered to fully meet the Core Output requirement; each site in Appendices 1 – 3 needs to have a unique SHLAA site reference to accord with that of the maps in Appendix 4.
10. Core output 2	Assessment of deliverability/developability of each identified site	Compliance with the Practice Guidance Core Outputs, as assessed by the Council, is listed in Appendix 7. Appendices 5 and 6 contain records of each identified site; each of which includes a clear assessment of deliverability/developability in terms of its suitability, availability and achievability.
		The Report is considered to adequately cover this requirement; indeed the Council is to be complemented on the clarity demonstrated in the appendices which conform to emerging good practice by other local authorities.
11. Core output 3	Identification of potential quantity of housing that could be delivered on each identified site	Compliance with the Practice Guidance Core Outputs, as assessed by the Council, is listed in Appendix 7. Appendices 5 and 6 contain records of each identified site; each of which includes an estimate of the housing potential for each site. Appendices 1, 2 and 3 provide schedules of the identified sites and include the assessed housing potential for each site.
		The Report is considered to adequately cover this requirement.

12. Core output 4	Identification of constraints on the delivery of identified sites	Compliance with the Practice Guidance Core Outputs, as assessed by the Council, is listed in Appendix 7. Appendices 5 and 6 contain records of each identified site; each of which includes an assessment of constraints that may affect the deliverability/developability of the site.
		The Report is considered to adequately cover this requirement.
13. Core output 5	a. Recommendations as to how constraints could be overcome and when;	Compliance with the Practice Guidance Core Outputs, as assessed by the Council, is listed in Appendix 7. Appendices 5 and 6 contain records of each identified site; where significant constraints were identified the Council has included an indication as to what actions may be required to overcome such constraints for each relevant site.
		The Report is considered to adequately cover this requirement.
	b. Approach used towards need for planning obligations	Appendix 15 by Elder Associates includes an outline of the approach taken by the consultant and the Council towards assessing the potential implications of requiring s106 contributions on the deliverability of sites.
		The Report is considered to adequately cover this requirement.
14. Assessing broad locations where necessary	Approach to identification of and justification for broad areas where specific sites cannot be identified	The Practice Guidance and the PAS guidance makes it clear that an assessment of potential from broad locations is only necessary where the need to do so is demonstrated following the assessment made of the potential from specific sites. Given that the Council has identified a sufficient number of specific deliverable and/or developable sites to meet the housing allocation to 2026 (para 11.1 of the Report) it has not seen the need to identify and justify broad areas.
		The Report is considered to adequately cover this requirement.
15. Potential of windfalls	a. Are there local circumstances to justify identification of a windfall allowance?	It is noted (paras 10.11 and 11.1 of the Report) that the Council has made no allowance for windfall provision, in compliance with the Practice Guidance. It is inherent in the Practice Guidance (para 25) that a minimum size of site can be determined for survey purposes, thus a number of small sites may not be surveyed. In light of this approach the Council has recognised that it was necessary to make a small sites assessment based on historic data on housing delivered on such sized sites. It might be assumed by some that the small sites estimate made by the Council is in effect a windfall allowance since such an approach is recognised in the Practice Guidance (at para 51). Nevertheless, as the potential from small sites is the only assessment of this type and given the exclusion of small sites from the survey and that other authorities have adopted a similar approach I do not see any contradiction or problem with this approach.
		The Report is considered to adequately cover this requirement.
	b. If so; evidence of the	Not applicable; see comments above.

	information/approach used.	
		The Report is considered to adequately cover this requirement.
16. Gypsies and Travellers	Approach used towards identification and assessment of potential sites for G&T use	The separate Research Methodology makes it clear (para A2.16) that the Council intends that its SHLAA will assess the potential of sites for all types of housing including Gypsy and Traveller accommodation in line with Government guidance. The Report, however, at para 1.14 (last bullet point) indicates that the Assessment undertaken has not considered sites with potential for Gypsy and Traveller accommodation other than those sites with established use. Whist Government guidance on the preparation of Strategic Housing Land Availability Assessments (SHLAA) makes no specific reference to the inclusion of sites with potential for Gypsy and Traveller accommodation the 2004 Housing Act requires local authorities to assess the need for Gypsy and Traveller accommodation in their areas when they assess the housing requirements of the rest of the population. Thus local planning authorities in their SHLAA should consider sites with the potential for all types of housing. The Council is advised to consider whether or not the SHLAA should be amended by the assessment of all sites, not just those with established Gypsy and Traveller use, for the potential for Gypsy and Traveller accommodation and may care to access the Planning Officers Society draft Position Statement on Gypsy and Traveller Allocations, at http://www.planningofficers.org.uk/article.cp/articleid/329, which gives advice on the recommended approach to adopt.
		The Council's reports make conflicting statements about the approach towards the identification of Gypsy and Traveller accommodation; this needs to be rectified. Ideally this should be undertaken by incorporating an assessment of the potential for Gypsy and Traveller accommodation for each identified site; or by simply correcting the contradictory statements.