

**WOKING
CORE STRATEGY DPD
EXAMINATION**

**HEARING 2:
Environmental Considerations**

CS6 – Green Belt

HEARING DATE:

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STATEMENT

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For

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Executive Summary: Test of Soundness

PPS12 sets out the principal components to be included in local spatial plans.

Paragraph 4.42 of the PPS requires that in order to be “sound” a core strategy should be justified, effective and consistent with national policy.

PPS3 sets out the specific outcomes that the planning system should deliver. It also sets out a requirement for development plans to take into account evidence of current and future levels of need and demand for housing and affordability levels based upon, inter alia, local and sub-regional evidence of need and demand as set out in SHMAs. This duty to cooperate is carried forward under Part 6 (Sec.110) of the Localism Act 2011, the requirements of which are relevant to the examination of the soundness of the Core Strategy.

In order to be justified the Core Strategy (CS) must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives. Effective means that the document must be deliverable, flexible and able to be monitored.

For the reasons set out in our submissions, we are of the view that the Core Strategy fails the following PPS12 tests of soundness:

Justified

The suggested approach to (i) housing delivery; and (ii) distribution does not represent the most appropriate strategy when considered against the reasonable alternatives.

Effective

The approach to addressing housing growth and delivery has not been demonstrated to be either deliverable or flexible.

Consistent

The proposals are not consistent with national policy in that they fail to provide a sufficient supply of deliverable/developable housing land.

The draft CS should be amended in accordance with our detailed representations.

In accordance with our recommendations we are of the view that additional technical work is required to be undertaken in relation to the Green Belt. This would need to be followed by a further round of public consultation and re-examination of the changes before the plan could be found sound.

MATTER 2:

Does the CS take a justified and effective approach to issues relating to the Green Belt (GB) and the natural environment which is consistent with national planning policy?

Summary

- 1.1. As set out in our Matter 1 and 7 Statements, the Council's approach to the planned delivery of the overall quantum of housing to be met during the plan period (2010 to 2027) is neither justified nor effective in so far as it fails to represent the most appropriate strategy when considered against the reasonable alternatives and nor does it provide either a deliverable or flexible strategy.
- 1.2. Even at the level of housing growth proposed in the submission draft CS (which is lower than the housing need identified in the evidence base) the Council has failed to demonstrate that the components of housing supply on which they rely are deliverable (within five years) and/or developable at the point envisaged. Accordingly, there is a demonstrable need to undertake a review of the Green Belt now and provide for strategic allocations, including as part of the baseline supply, in order to:
 - i. Ensure the delivery of the requisite number of dwellings in helping to meet the 4,694 dwelling requirement identified by the Council as being the appropriate level of growth in the period to 2027.
 - ii. Ensure that both the quantitative and qualitative housing needs are met in a timely manner.

Statement of Case

Q1

Is the Council's approach to GB consistent with the advice of PPG2?

- 1.3. No. The Council's approach is not consistent with the advice in PPG2.
- 1.4. When assessing the need or otherwise for a review of the Green Belt, the starting point is the content of PPG2 (Green Belts) and the South East Plan ("SEP").
- 1.5. PPG2 includes at paragraph 2.12, text setting out an appropriate strategy in relation to Green Belt policy to be applied by local planning authorities when preparing new or revised structure and local plans.
- 1.6. This requires that, inter alia, any proposals affecting Green Belts should be related to a timescale which is longer than that normally adopted for other aspects of the plan and that authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period.
- 1.7. The requirements of PPG2 have not been met by Woking Borough Council in the preparation of their Core Strategy.
- 1.8. The Core Strategy only covers the period to 2027, which, whilst meeting the "at least" requirement in PPS12 terms, fails the requirements of PPG2. The Green Belt boundary should endure for a longer period than the timescale of the Core Strategy.

What evidence underpins the approach advocated within Policy CS6?

- 1.9. Policy CS6 sets out a need to review the Green Belt in order to meet identified housing needs during the plan period. However, the Policy restricts release of land from the Green Belt until post 2022.
- 1.10. The LPA has failed to substantiate and/or justify that there is no such requirement for a local Green Belt review now.

- 1.11. The Council's approach is based upon the findings of the SHLAA, with paragraph 5.55 of the Core Strategy stating that the SHLAA identifies sufficient specific deliverable and developable sites in the urban area to meet the housing target for "around" the first 13 years of the Plan.
- 1.12. For the reasons set out in our Matter 7 Statement, we do not accept that Policy CS10, the content of which is predicated upon the findings of the SHLAA, will deliver either the quantitative or qualitative supply of housing to meet identified needs.
- 1.13. There is a clear need to review the Green Belt in order to meet identified housing needs. However, the extent of the "need" is likely to be greater than that set out in the CS6 and CS10.

Should the GB be an area of potential growth?

- 1.14. Yes. It is clear from the evidence base to preparation of the Core Strategy that the Council is unable to identify sufficient sources of housing land supply without recourse to a review of the Green Belt.

Q2

Is the planned release of GB land for residential development justified by robust evidence and consistent with PPS12 and PPG2?

- 2.1. For the reasons set out in response to Question 1 above, there is a clear and demonstrable need to undertake a review of the Green Belt now in order to help meet both the quantitative and qualitative housing need during the plan period.
- 2.2. As set out in the SHLAA, the Council is unable to meet its housing target without the release of Green Belt land.
- 2.3. We have addressed the lack of consistency with PPG2 above and consider that the Green Belt boundary should be reviewed as an integral part of the Core Strategy and endure beyond the end of the plan period.
- 2.4. The Council's approach in seeking to defer a decision on the extent and location of releases from the Green Belt also fails to be consistent with PPS12, particularly paragraph 4.5 where it is stated as follows:

“It is essential that the core strategy makes clear spatial choices about where developments should go in broad terms. This strong direction will mean that the work involved in the preparation of any subsequent DPDs is reduced. It also means that decisions on planning applications can be given a street immediately.”
(Our emphasis underlined)

- 2.5. Further guidance is set out the PINS document “Examining Development Plan Documents: Learning from Experience” (Sept 2009). The publication provides advice to LPAs in the preparation of their DPDs.
- 2.6. The document states that the identification of the “critical issues” is the starting point for preparation of a core strategy. It adds that *“in some instances there is a tendency to leave the critical questions to be answered in subsequent DPDs or SPDs. Such an approach is likely to lead to the fining of unsoundness as the core strategy is the place for these difficult issues to be addressed.”*
- 2.7. Paragraph 20 concerns housing delivery and notes that despite its critical importance, this is an area where many plans are notably weak.
- 2.8. Paragraph 21 relates to the approach to land identification in Core Strategy, stating:

“In some instances the weakness derives from a failure to identify sufficient and/or appropriate land for development. Sometimes this appears to derive from a reluctance to accept that unpopular decisions about allocating land, possibly green field land, for development have to be made. Simply claiming that development needs will be met within the urban areas and that the position will be reviewed if necessary in the future is not likely to be acceptable unless there is a evidence that the “urban areas only” approach is likely to be realistic. Where the scale of land needed for development is such that greenfield allocations are likely to be required the strategy should make this clear. In this example if the DPD is a core strategy it should either make strategic allocations or give adequate guidance for a subsequent site allocations DPD to readily identify the land needed without having to re-visit strategic considerations.” (Our emphasis underlined)

- 2.9. Paragraph 44 of the document adds that Green Belt reviews “*should be dealt with as one of the tough decisions that need to be taken and justified in the Council’s core strategy.*”
- 2.10. Against the above background, there is a clear need for a review of the Green Belt within the Borough and, for the reasons set out below, this should be on land to the south of Woking. However, whilst the Council identify a need for a review of the Green Belt, the suggested timing of the review in 2016/17 is contrary to the provisions set out in PPS12 and is not the most appropriate strategy when considered against the reasonable alternatives.

Why is the Green Belt review planned for 2016/17; should this be earlier?

- 2.11. Paragraph 5.55 explains that the SHLAA identifies sufficient specific deliverable and developable sites for the period to 2022/23. Thereafter the Council identify the Green Belt (550 dwellings) and Woking town centre (200 dwellings) as broad locations in helping to meet the housing target.
- 2.12. PPS3, paragraph 55 states that LPAs should identify specific deliverable sites for years 1-5, specific developable sites for years 6-15 and, importantly, where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated.
- 2.13. The second bullet point to paragraph 33 states that LPAs should identify those strategic sites that are critical to the delivery of the housing strategy over the plan period. The third bullet points states that they should show broad locations on a key diagram and locations of specific sites on a proposals map.
- 2.14. Stage 8 of the Strategic Housing Land Availability Assessments Practice Guidance (July 2007) states that if insufficient sites have been identified then it will be necessary to identify broad locations and/or use a windfall allowance.
- 2.15. In Woking’s case, there is clear direction in the SEP that the Green Belt review should focus on the area to the south of the Woking urban area.
- 2.16. Appendix 4 to Woking Borough Council’s SHLAA identifies specific sites that could come forward for development subject to a review of the Green Belt. Accordingly, if the Council had undertaken a review of the Green Belt to inform preparation of the Core Strategy, as was envisaged at paragraph 5.5

of the Autumn 2009 Issues and Options Core Strategy consultation paper, and which has now been deferred until 2016/17, the sites or at the very least a broad location comprising an “area of search” to the south of Woking could and should have been identified on the Key Diagram.

- 2.17. SHLAA Site SHLAAMSG016 located to the west of Saunders Lane, Mayford is controlled by our client and could come forward for approximately 200+ dwellings together with supporting infrastructure, including, and if required, a primary school. Our clients also control some 10ha of land to the north of Saunders Lane, Mayford which could be made available as SANG/open space.
- 2.18. The merits and suitability of the sites in helping to meet identified housing needs in the area of search to the south of the Woking urban area, as required by the SEP, are set out in Annex A.
- 2.19. The land is not subject to any land ownership or known physical constraints and could come forward for development earlier than 2022 provided provisions are made for site releases as an integral part of the Core Strategy.
- 2.20. For all of the reasons set out in our accompanying representations (see also Annex A – site specific considerations) our client’s land to the south of Woking provides an opportunity to provide for a sustainable urban extension to provide for a minimum of around 200 dwellings together with associated infrastructure provision, open space and sustainable linkages to the town centre without serious conflict with the overall purpose of the Green Belt (PPG2, paragraphs 1.5).
- 2.21. Appendix 2b to the SHLAA identifies sites that are said to be “deliverable” in years 0-5, meaning that they can be built out by 2017 (5yrs post anticipated adoption of the Core Strategy). However, and for the reasons set out in our Matter 7 Statement we do not accept that Woking is able to demonstrate a five year supply of deliverable sites.
- 2.22. Appendix 3 identifies sites that are said to be “developable” in years 6-10 and 11-15. This means that there should be a reasonable prospect that the site is available for and could be developed at the point envisaged (PPS3, para 56).

- 2.23. As set out in our Matter 7 Statement, the site specific assessments identify a number of constraints to the delivery of certain of the sites relied upon by the Council to come forward in the years 6-15.
- 2.24. Annex B includes a summary of constraints to delivering certain of the sites relied upon by the Council to be delivered in years 6-10 and 11-15.
- 2.25. The SHLAA sites summarised in Annex B are relied upon by the Council to deliver a total of 1,677 dwellings. However, and for the reasons set out in the Annex, there are a number of significant constraints to be addressed before it is possible to state that there is a reasonable prospect that the sites are available for and could be developed at the point envisaged.
- 2.26. The Council's reliance on the delivery of the above sites is the only reason for delaying the release of land from the Green Belt. In addition, and as shown, these sites are expected to be developed at high densities. As set out at paragraph 5.56 of the Core Strategy, these "urban" sites are only likely to be suitable for high density flatted developments. The implication on the reliance on the delivery of such forms of development is that the Council would be unable to achieve an appropriate mix of housing types and tenures to meet needs identified in the SHMA.
- 2.27. There are long-lead times in planning for strategic site allocations. Accordingly, and for the reasons set out in PPS12 and PPG2 (see above) the Core Strategy should plan for a review of the Green Belt now. It is quite clear that the release of Green Belt sites are critical to the delivery of a balanced housing strategy.
- 2.28. Evident from the content of PPS12 is that the role of Core Strategies is to provide an overall vision which sets out how the area and the places within it should develop. The spatial approach should set out how much development is intended and where, when and by what means it will be delivered.
- 2.29. As to planning for site allocations, paragraph 4.1 is quite clear in that locations for strategic development should be indicated on a key diagram
- 2.30. As set out at paragraph 4.5, it is essential that Core Strategies make clear spatial choices about where developments should go in broad terms. As stated, this strong direction will mean that the work involved in preparing any

subsequent DPDs is reduced. It also means that decisions on planning applications can be given a clear steer immediately.

- 2.31. The above comments cut-through the themes set out in the consultation paper and form the basis against which the CS should be prepared.
- 2.32. The Core Strategy should not defer important strategic decisions about possible Green Belt site releases to a subsequent DPD. That is not the role of Core Strategies.
- 2.33. For the above reasons, the Core Strategy does not represent the most appropriate strategy when considered against the alternatives.

Will the Core Strategy be effective over the plan period (how will the housing trajectory be managed in relation to Green Belt land release)?

- 2.34. For the reasons set out above, we do not accept that the Core Strategy will be effective over the plan period. Modifications should be made to the plan in accordance with our suggested change(s) set out below.
- 2.35. Core Strategy paragraphs 5.68 and 6.20 will do not represent satisfactory contingencies. The Council's evidence base identifies a need to review the Green Belt to help meet identified housing needs, whilst it is our view that the Green Belt review should be undertaken now or, as a minimum, directional guidance provided to require the release(s) in the subsequent DPD to be located to the south of the Woking urban area.

Q3

Does the CS approach follow the provisions of SEP Policy LF3? IS the CS consistent with the SEP? Is Woking departing from the intention of potential sustainable urban extensions? Is CS6 sufficiently precise so as to be effective? Does the available evidence support a reference to land availability to the south of Woking?

- 3.1. In R (CALA Homes South Limited) v Secretary of State for Communities and Local Government (No. 2) the Court of Appeal concluded that whilst the Government's intention to abolish Regional Strategies through primary legislation could be a material planning consideration in making development

control decisions, it is not capable of being a material consideration in plan-making decisions.

- 3.2. The CALA Homes judgements have established that as matters now stand, and in relation to plan making, LPAs must work within the current framework of the SEP.
- 3.3. SEP Policy SP2 identifies a total of 22 Regional Hubs as dynamic “hubs of activity” – logical areas within the South East within which the various components of growth will need to be accommodated. Woking is included as one of these Hubs, where significant change is expected.
- 3.4. Policy SP2 requires Local Development Documents to include policies and proposals that support and develop the role of the regional hubs through, inter alia, focusing new housing development and economic activity in locations close to or accessible by public transport to hubs.
- 3.5. SEP Policy SP5 sets out the case for a selective review of Green Belt boundaries across the South East, referring to only 5 locations, including to the south of Woking, focusing on the area to the south of the town.
- 3.6. The merits of providing for a Green Belt release on land to the south of the Woking urban area were considered in the SEP Panel’s Report. Details are set out in Annex A.
- 3.7. The lack of directional guidance in the Core Strategy is contrary to advice contained in PPS12.
- 3.8. Policy CS6 is not sufficiently precise so as to be effective.
- 3.9. To be in conformity with the SEP, the Core Strategy should identify land to the south of Woking as the location for a review of the Green Belt in helping to meet identified housing needs.
- 3.10. In order to make the plan sound, the Inspector could recommend one of two modifications to the Core Strategy as follows:
 - (i) For the LPA to undertake a review of the Green Belt on land to the south of Woking, and thereafter consult on specific sites/areas of

search and changes to the Core Strategy followed by a further examination session to consider the soundness of the changes; or

- (ii) Revise the wording of the Core Strategy to require the subsequent Site Allocations DPD to undertake a review of the Green Belt to the south of Woking and for specific sites to be allocated in the DPD and released prior to 2022.

3.11. Consequential changes are also required to be made to Policy CS1. As drafted, CS1 does not refer to the importance and need for a review of the Green Belt in order to help deliver the requisite number and type of dwellings during the plan period (and beyond).

Q4

How will sites within the GB be identified for release for residential development? Before or after the GB Review and the Sites Allocation SPD?

4.1. The Core Strategy intends for a review of the Green Belt to be carried out and thereafter for sites to be allocated in the Site Allocations DPD.

4.2. The approach could be considered to be satisfactory if

- (i) the Core Strategy is revised, in accordance with the SEP, to provide for a review of the Green Belt to the south of Woking. This could provide the “strong direction” required by PPS12 so that the work in the preparation of subsequent DPDs is reduced; and
- (ii) The Core Strategy is amended with the removal of the limitation of Green Belt releases until after 2022.

Q5

Should the areas identified for growth specifically exclude Conservation Areas, flood plains etc?

5.1. Yes. There are sequentially preferable sites available to accommodate housing allocations following a review of the Green Belt that are not within floodplains and/or subject to other physical and technical constraints. However, this should be set within the context of the need for the review of

the Green Belt to be undertaken on land to the south of the Woking urban area.

Q8

Should major development within greenbelt designation of Carters Lane Sewage works be more tightly identified?

6.1. Yes.

6.2. The last line of paragraph two to Policy CS6 states that “*The policy is not intended to change the existing use of the sites.*”

6.3. The wording should be changed to make it clear that “*The policy does not allow for a change of use of the sites.*”

Recommendation

7.1. For the reasons set out above, there is a clear and overriding need to provide for sensible, sustainable and deliverable proposals to ensure the timely provision of new housing in order to meet identified needs.

7.2. In the context of the evidence base to the Core Strategy, including the policy position set out in the SEP, this includes the need to plan for Green Belt releases to the south of Woking.

7.3. To conclude, we are of the view that additional technical work is required to be undertaken in relation to the Green Belt. If our option (i) approach is deemed appropriate in the circumstances, then this would need to be followed by a further round of public consultation and re-examination of the changes before the plan could be found sound.

ANNEX A

**LAND WEST OF SAUNDERS
LANE, MAYFORD**

SOUTH WOKING

**GREEN BELT
CONSIDERATIONS
&
SITE CHARACTERISTICS**

Background

A1 The merits of providing for a Green Belt release on land to the south of the Woking urban area were considered in the SEP Panel's Report.

A2 Paragraph 20.59 states as follows:

“Woking is only 7km to the north of Guildford but is a very strong commercial centre with a burgeoning office market and excellent rail connections with London. The proposed Airtrack scheme will further enhance its connectivity, especially to Heathrow. On-going investment in town centre redevelopment boosts its potential as an employment location and we consider that this should continue to bring forward high-quality, high-density development in the most accessible areas of the town. The scope for further sustainable growth at Woking should be maximised, and its growth could in our view be complementary to expansion of Guildford, given the scope to improve interconnectivity between the two centres whilst maintaining their separate identity.”

A3 Para 20.60 adds:

“We recognise that the combination of Thames Basin Heaths SPA, other protective designations and flood constraints limits the opportunities for physical expansion of the town beyond its existing boundaries. This is reflected in our recommendation for more limited growth here compared with Guildford. Further intensification of development within the urban area and the use of reserve sites will help to meet the housing requirement but new greenfield allocations may be necessary. In these circumstances we consider that the existing MGB boundary which wraps tightly around the urban area should not be regarded as fixed in perpetuity. It may be necessary to undertake a review of the boundary in order to ensure that the most sustainable options to accommodate increased growth are identified. The scale of the review will need to be tested through the LDD process but it may be justified to make more than minor boundary adjustments. The work undertaken for the Surrey Structure Plan referred to above indicated that south of Woking offered the most potential in this regard and the evidence at the EiP supports this. For these reasons we consider if selective review of the MGB is necessary around Woking it should focus on this location.”

A4 Paragraph 20.83 concludes:

“We have considered the potential of the Woking regional hub in more detail above. As we have concluded, the opportunities for sustainable growth at Woking should be maximised and, if required, this should entail the review of the MGB boundary. We would expect that sites that have already been reserved or safeguarded to meet future needs would be taken into account (we understand that these total 600 dwellings). Nonetheless, the focus should remain on urban intensification in order to make best use of the most accessible locations within the borough. Balancing the environmental and other constraints, the economic potential and the housing need, we consider that the district apportionment should be increased by 1,000 dwellings in the Plan period. The extent to which this could be accommodated within the existing urban area should be tested through LDDs.”

A5 The Panel’s recommendations were endorsed in the adopted South East Plan (Policies SP5 and LF5).

Case Study: Windsor & Maidenhead

A6 The preparation of a Green Belt study is vital to providing for a “sound” CS.

A7 Windsor and Maidenhead Borough Council, in preparation of their Core Strategy, was not supportive of a Green Belt review at their respective regional hub (Maidenhead), preferring instead to maintain the Green Belt boundaries and rely instead upon housing delivery from sites from within the urban area – including through windfall. The Inspector reported upon Windsor and Maidenhead’s CS in October 2007 – finding the DPD unsound.

A8 Paragraph 11.6 of the Inspector’s report sets out his concerns with an urban capacity led approach in meeting the strategic housing requirement, whilst paragraph 11.7 considers that the CS should “adopt a more pro-active stance towards a review of Green Belt boundaries”.

A9 Paragraph 11.8 of the Inspector’s report states quite clearly that:

“To my mind the preparation of the Core Strategy is an opportune time to consider possible revisions to the defined Green Belt boundary in order to ensure a better and more sustainable spatial strategy up to 2026 and indeed beyond (PPG2, ¶2.12). The Core Strategy would

retain its focus on previously developed land but would embrace the possibility of some development on peripheral sites beyond existing settlement boundaries.” (Our emphasis)

- A10 The above considerations are of relevance in seeking to plan for a sound strategy to deliver the requisite amount of housing in Woking during the plan period and beyond.

Green Belt Review: Land South of Woking

- A11 As set out above, the SEP states in Policy SP5 that Woking should undertake a selective review of the Green Belt boundary to the south of Woking.
- A12 Our clients have a controlling interest in land to the south of the Woking urban area (with land either owned outright or under option).
- A13 The site proposed for development is located to the west of Saunders Lane (SHLAA Ref: SHLAAMSG016) and is capable of delivering in the order of at least 200 dwellings at a minimum of 30dph. In addition, they also own land to the north of Saunders Lane (SHLAA Ref: SHLAAMSG017) which extends to approximately 10.3ha and has the potential to provide open space and/or SPA mitigation as part of the development of site SHLAAMSG016.
- A14 The land is available for development and can come forward in helping to meet identified housing needs in a sustainable location during the plan period.
- A15 A Transport Statement prepared in support of the site and submitted to the LPA with our SHLAA representations in June 2011 confirms the suitability of the site for development in transport terms. Section 6 concludes in relation to the suitability of the site for development as follows:
- The site can be accessed satisfactorily off Saunders Lane;
 - The traffic generated by the proposals can be accommodated on the surrounding road network; and
 - The site has good accessibility to a range of facilities and services.
- A16 It is therefore concluded that there are no highways or transport constraints that prevent the site from being allocated for residential uses.

- A17 In addition to the above highway considerations, and as assessed in the SHLAA, there are no land ownership or known physical or technical constraints that could otherwise prevent the development of the site for housing.
- A18 Identifying the site for development following a review of the Green Belt would be in accordance with the requirements at PPS12, PPG2 and the SEP.

ANNEX B

SHLAA ASSESSMENT

A1 The SHLAA sites summarised in the below table are relied upon by the Council to deliver a total of 1,677 dwellings. However, and as identified, there are a number of significant constraints to be addressed before it is possible to state that there is a reasonable prospect that the sites are available for and could be developed at the point envisaged.

SHLAA Ref	Existing Use	Proposed Dwellings/Density	Issues
SHLAAGE003	Commercial	67; 250dph	Land in multiple ownership and not known to be available for development
SHLAAGE006	Commercial	50; 400dph	Land in multiple ownership and whole site not currently available for development
SHLAAGE019a	Retail	67; 75dph	Site contaminated and remediation required. Land not known to be available for development.
SHLAAGE029	Commercial	200; 400dph	Land in multiple ownership. Site has a high existing use value and requires a detailed evaluation.
SHLAAGE30	Commercial	160; 200+dph	Land in multiple ownership. Abnormal costs associated with access and tall building which may affect economic viability. Needs up-turn in market conditions to make scheme viable.
SHLAAGE031	Commercial	149; 400dph	Land in multiple ownership. High existing use value and detailed valuation required.
SHLAAMHE014	Employment	88; 315dph	Redevelopment for housing dependent on relocation of sorting office.
SHLAAMHW031	Community/Employment	100; 400dph	Land in multiple ownership, site not known to be available. Site assembly may be complex.
SHLAAGE010	Industrial	320; 200dph	Land in multiple ownership. Land allocated for employment purposes.
SHLAAMHE011	Car park	250; 200dph	Detailed valuation required. Options for alternative parking provision to be considered and a solution/alternative found. Economic viability uncertain. Site assembly issues.
SHLAAMHW029	Retail/commercial	135; 400dph	Land in multiple ownership. Site assembly may be complex. Impact on locally listed buildings to be considered.
SHLAAWB023	Retail/office	91; 160dph	Land is in multiple ownership and owner intentions unknown. Viability uncertain.
