

Local Development Framework

Research Report

Woking Strategic Housing Land Availability Assessment

(SHLAA)

April 2014 Update



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Summary

This is the fourth Strategic Housing Land Availability Assessment (SHLAA) for Woking Borough. It supersedes the SHLAA dated October 2011. It has been prepared to inform the preparation of Local Development Documents and is a key part of the evidence base for delivery of the adopted Core Strategy (2012) and the forthcoming Site Allocations Development Plan Document (DPD).

The main role of the SHLAA is to provide information on the opportunities available to the Council to meet the Borough's housing requirement. Specifically, the SHLAA must identify specific deliverable sites for the first five years of the plan period and identify specific developable sites for years 6 - 10 of the plan, and ideally years 11 – 15, to enable the five year supply to be 'topped up' and to ensure an additional five per cent flexibility in supply through sites brought forward from later in the plan period (National Planning Policy Framework (NPPF), paragraph 47). The NPPF requires preparation of a Strategic Housing Land Availability Assessment (SHLAA) as evidence to inform realistic assumptions about the availability, suitability and likely economic viability of land to meet the need for housing over the plan period). This SHLAA has been undertaken in accordance with the National Planning Practice Guidance (March 2014) and in light of previous SHLAA assessments, which were carried out in accordance with the Government's earlier SHLAA Practice Guidance.

The housing requirement tested in this assessment is the figure of 4,964 net additional dwellings to be provided over the period 2010-2027 (an annual average of 292 dwellings a year). This is the housing requirement set out in the adopted Core Strategy (see Policy CS10 Housing provision and distribution).

The results of the SHLAA are summarised in Table 1 below. Housing delivery within the first four years of the Core Strategy period, from monitoring years 2010/11 to 2013/14 reflects the gradual recovery from economic recession. Viewed solely against the Core Strategy average annual housing requirement, there is a current 'under delivery' of 204 dwellings to 1 April 2014, the base date of this SHLAA. Table 1 takes into account this shortfall.

This Assessment has found that there are a sufficient number of specific sites that are deliverable in the next five years of the plan period (2014/15-2018/19). In addition, specific sites that are considered to be developable in the longer-term have been identified to meet the requirement during years 6-10. Sites are to be identified through the Site Allocations DPD process to meet the requirement in the last five years.

Table 1 clearly demonstrates the supply of land for housing over the full life of the Core Strategy, as Green Belt site(s) are released between 2002 and 2027 to enable the delivery of 550 dwellings in accordance with Core Strategy Policies CS6 and CS10. The Core Strategy identifies broad locations for development including Woking Town Centre and the Green Belt. A Green Belt boundary review has been prepared to inform the identification of sustainable sites to accommodate this growth, through the Site Allocations DPD.

Table 1: Summary of results of the Woking Borough SHLAA (2014)

Core Strategy period		(2	0-5 years 2012/13 – 2017/18)	(6-10 years (2018/19 - 2022/23)		1-15 years (2023/24 - 2027/28)						
Policy CS10 period		2010/11- 2027/28							Total: 4,964 (292 pa)				
SHLAA period	Pre SHLAA 2010/11 – 2013/2014		0 – 5 years 2014/15 – 2018/19		6 - 10 years 2019/20 – 2023/24		11 – 15 years 2024/25 – 2028/29 ¹		(- 1 - /				
Source of supply/ potential									Total				
Dwelling completions 2010/11 – 2013/14 ²	964		0		0		0		964				
Units on sites under construction/ unimplemented planning permission ³	0		1,089		0		0		0		0		1,089
Sites with potential for residential development	0		567		1,545	,545 617 (adjuste from 664) ⁴			2,729				
Total	964		1,656		1,545		617		4,782				
Core Strategy housing requirement (292 pa)	1,168		1,460		1,460		1,460		5,548				
Surplus/ deficit against annual average requirement (excluding Green Belt)	-204		+196		+85		-843		-766				
Broad location in the Green Belt ⁵	0		0		275		275		275		550		
Total including Green Belt ⁶	964		1,656		1,820		892		5,332				
Surplus/ deficit against annual average requirement (including Green Belt	-204	-204 +			+360	-568			-216				
Small sites delivery (estimate 40 pa) ⁷	(counted actual delivabove)		0		0		0 600		600		600		
Total including Green Belt and small sites	964		1,656		1,820 89		892		5,932				
Surplus/ deficit against annual average requirement (including Green Belt and small sites)	-204		+196		+360		-568		384				

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¹ Assuming continuation of average annual housing requirement 292 pa

² Source: Annual Monitoring Report 2013/14

³ Source: SHLAA 2014. Includes those with a resolution to grant planning permission subject to legal agreements and prior approvals.

⁴ To avoid double-counting of potential residential yield, an adjustment has been made to the total 11-15 year figure (of minus 47 units), to take into account that the anticipated yields of Roxburghe House (SHLAAWB078), Globe House (SHLAAWB081) and Steward House (SHLAAGE059) counted earlier in this table are considered to contribute to the estimated yields of the larger sites in which these lie that are written up separately in this SHLAA.

⁵ Excludes previously allocated / safeguarded land at Moor Lane, Westfield and Brookwood Farm, Brookwood.

⁶ Assumes half of 550 Green Belt development in years 6-10 of SHLAA period and remainder in years 11-15 of SHLAA period

⁷ Assumes half of 550 Green Belt development in years 6-10 of SHLAA period and remainder in years 11-15 of SHLAA period, plus small sites delivery counted in years 11-15

Disclaimer

In relation to the information contained within this report and any other report relating to the Strategic Housing Land Availability Assessment (SHLAA), the Council makes the following disclaimer:

- The identification of land with potential for housing in the SHLAA does not imply that the Council will necessarily grant planning permission for residential development on that land or allocate land for residential development through the Site Allocations Development Plan Document (DPD). All planning applications will continue to be determined against the development plan and material planning considerations. For example, some land is identified in the SHLAA which is currently in employment use; any planning application would be assessed against current planning policy that seeks to protect important employment land, and other material planning considerations. We are likely to seek mixed-use development through which the employment floorspace would be protected.
- The inclusion of land for residential development in the SHLAA does not preclude it being developed for uses other than residential. For example, the redevelopment of land currently in employment use for further employment related development meeting modern business needs would generally be considered appropriate (Policy CS15 - Sustainable Economic Development).
- The site boundaries included in the SHLAA are based on the best information reasonably available at the time. The SHLAA does not limit an expansion or contraction of these boundaries for the purposes of a planning application or for any site allocation through the Site Allocations DPD process.
- The exclusion of sites from the SHLAA (either because they were discounted or never identified) does not preclude the possibility of planning permission being granted on them for residential development. The Council acknowledges that sites will continue to come forward through the planning system that have not been identified in this SHLAA. Such proposals will be considered against the development plan and other material considerations.
- The determination of whether a site is considered to be deliverable or developable and the timescales for development of sites set out in the SHLAA are based on the information available to the Council at the time of preparation of the assessment. Assumptions made in the SHLAA will not prevent planning applications being submitted on any site at any time.
- The Council does not accept liability for any factual inaccuracies or omissions in the SHLAA. The information within the SHLAA represents the information that was available to the Council at the time of publication. Users of the assessment should acknowledge that there may be additional constraints on sites that are not included within this document and that planning applications will continue to be determined on their own merits rather than on the information contained within this document. Issues may arise during the planning application process that could not be/which were not foreseen at the time of preparation of this SHLAA. For example, the SHLAA may not have been able to identify contamination; however, detailed ground investigations may reveal the presence of contamination. Applicants are therefore advised to carry out their own analysis of site constraints for the purposes of the planning application and should not rely on the information contained within this SHLAA.
- The estimation of capacity of sites is based on the information available to the Council at the time of the assessment and takes into account a number of sustainability and locational factors, including the indicative density range set out in Policy CS10 Housing Provision and Distribution of the Core Strategy. The capacities indicated in this report do not preclude densities being increased or decreased on sites, subject to further information being made available to the Council through a planning application.

- The SHLAA has a base date of 1 April 2014 and therefore represents a 'snap shot' of information held at that time. The Council intends to consider the SHLAA as a living document that will be updated annually.
- It should be noted that since 1 April 2011 (the base date of the previous SHLAA), the Council has reassessed all of the SHLAA sites based on the latest available evidence. This has resulted in some changes to the monitoring of sites through the planning process and as such there may be some differences in the way in which the Council has reported on sites through previous versions of the SHLAA and this one.

1.0 Introduction and Methodology

1.1 This Strategic Housing Land Availability Assessment (SHLAA) has been prepared in support of Woking Borough Council's Local Development Documents. In particular, the SHLAA is a key part of the evidence base for delivery of the adopted Core Strategy and preparation of the forthcoming Site Allocations Development Plan Document (DPD). It demonstrates that the Council has identified sufficient sites to bring forward the delivery of the proposals of the Core Strategy.

What is a SHLAA?

- 1.2 The main role of the SHLAA is to provide information on the opportunities available to the Council to meet the Borough's housing requirement.
- 1.3 The requirement to undertake a SHLAA is set out in the National Planning Policy Framework (NPPF, 2012). This SHLAA has been prepared in accordance with the National Planning Practice Guidance (March 2014) and in light of previous SHLAA studies. Where the Council has deviated from any of the guidance, justification for this has been provided in this document.
- 1.4 During the preparation of this Assessment, the Council made reference to a number of other Council's assessments which have assisted in the development of the methodology used in Woking.
- 1.5 The purpose of the SHLAA is to assist the Council in meeting the requirements set out in the NPPF regarding future housing delivery, namely:
 - to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against the housing requirements with an additional buffer of five per cent (moved forward from later in the plan period) to ensure choice and competition in the market for land;
 - to identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
 - to make an allowance for windfall sites in the five-year supply only if there
 is compelling evidence that such sites have consistently become available
 in the local area and will continue to provide a reliable source of supply.
 Any allowance should be realistic having regard to the SHLAA, historic
 windfall delivery rates and expected future trends, and should not include
 residential gardens.
- 1.6 The national Planning Practice Guidance (2014) requires the following set of standard outputs to ensure consistency, accessibility and transparency:
 - a list of all sites or broad locations considered, cross-referenced to their locations on maps;
 - an assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when;

- contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
- the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
- an indicative trajectory of anticipated development and consideration of associated risks.
- 1.7 Appendix 5 of this report provides a core outputs and process checklist.

How much new housing must Woking deliver?

- 1.8 The NPPF requires the Council through its Local Development Documents to plan for at least 15 years of housing delivery from the date of adoption of the Core Strategy. In accordance with the NPPF, the Woking Core Strategy identifies the level and broad distribution of housing provision in the Borough.
- 1.9 Core Strategy Policy CS10: *Housing provision and distribution* makes provision for at least 4,964 net additional dwellings in the Borough between 2010 and 2027. This is an annual average provision of 292 homes.
- 1.10 It should be noted that the latest full assessment of housing needs is the Strategic Housing Market Assessment (SHMA) (2009) highlights a need for an additional 499 new affordable homes every year in the Borough, and a total of 594 new homes every year when also taking into account the demand for market housing. This is around double the Core Strategy's planned housing provision. The Core Strategy Examination Inspector found the level of housing provision set out in the Core Strategy to be sound, deliverable and justified by evidence to address the objectively assessed housing need for the area.
- The reasoned justification supporting Policy CS10 explains that there are 1.11 sufficient specific deliverable and developable sites in the urban area to meet the housing requirement for around the first 13 years of the Plan. Additional housing potential in Woking Town Centre will arise in the latter part of the Plan period from sites that have not yet been specifically identified, contributing in years 11-15. It is important that any residual unmet need arising from 'under delivery' against the Borough's average annual housing requirement (292 pa) during the first four years of the Core Strategy Policy CS10 - Housing provision and distribution monitoring period (monitoring years 2010/11 to 2013/14) is met in subsequent years to avoid adding this to the existing unmet need. The Core Strategy acknowledges there is a need to identify sites in the Green Belt for development later in the plan period (between 2002 and 2027), to meet both the national requirement for housing land supply and the nature of housing that the area A Green Belt boundary review has been carried out to meet this requirement and work has begun to prepare the Site Allocations development plan document (DPD) to identify both Urban Area and Green Belt sites to facilitate delivery of the Core Strategy.
- 1.12 The Borough is planning for the provision of 4,964 net additional dwellings between 2010/11 and 2027/28, as required by the Core Strategy. Delivery is currently behind the annual average housing requirement of 292 pa by a total of 204 dwellings.

1.13 In line with the requirements of the NPPF, this SHLAA identifies sites which are considered to be deliverable and developable over the plan period and beyond (to ensure a 15 year supply period).

Relationship to other evidence base studies

- 1.14 Alongside the SHLAA, which is solely concerned with identifying land available for housing development, the Council has also undertaken a number of other research studies in order to inform the preparation of Local Development Documents (LDDs). These include:
 - Strategic Housing Market Assessment (SHMA) 2009. The SHMA was prepared by consultants jointly commissioned by Woking, Guildford and Waverley Councils. The SHMA provides local and sub-regional evidence of housing need and demand in terms of housing type, size and tenure within the West Surrey Housing Market Area (HMA). A new joint SHMA for the West Surrey SHMA will be finalised in 2015. A draft of this has already been published by Guildford Borough Council.
 - Housing Land Supply Position Statement 2014 (base date 1 April 2014).
 This paper sets out the Council's housing land supply position in accordance with the requirement of the NPPF to maintain a five year supply of deliverable sites. The paper demonstrates that sufficient land has been identified to enable the delivery of 6.5 years of housing.
 - Economic Viability Assessment (EVA) 2010. The EVA was prepared by consultants Adams Integra. The report considers the economic viability of the provision of affordable housing in the Borough, taking into account a number of factors including land values, build costs and infrastructure requirements for example.
 - Community Infrastructure Levy (CIL) Viability Study 2013 which reviews the development viability scope for a range of development types (residential and commercial / non-residential) to support CIL funding in the Borough.
 - Employment Land Review (ELR) 2010. The ELR was undertaken to inform policies regarding employment land supply and land use in the Borough, and includes an assessment of the suitability of existing employment land. The ELR comprises two reports: a Market Appraisal which was prepared by consultants Lambert Smith Hampton and an Employment Position Paper which was prepared by the Council, which contains information about employment forecasts.
 - The Town, District and Local Centres Study 2009. The study was undertaken by consultants Roger Tym and Partners and provides an assessment of the vitality and viability of Woking Town Centre, and produces quantitative retail capacity forecasts for the Town Centre and West Byfleet.
 - Audit of Open Space, Sports and Recreation Facilities 2008. This is also known as the PPG17 Audit. This Audit establishes the quantity and quality of open spaces, sports and recreation facilities in the Borough. The Audit has identified that there is not a surplus of open space in Woking. A

- broader piece of research, a Green Infrastructure Strategy for the Borough, is currently being prepared.
- Draft Infrastructure Capacity Study and Delivery Plan (IDP). The Draft IDP was published in July 2011 and assesses the existing capacity of infrastructure services and facilities and considers what provision is required in the future, and where, related to future development. The IDP covers transport, housing, education, health, social infrastructure, green infrastructure, public services, utility services and flood defences. As far as the information was available for the draft report, the IDP includes a schedule of what new infrastructure is required, when, where, how it is to be provided and will identify the responsible agency. An Infrastructure Delivery Requirements Schedule has since been published (in 2012). Preparations for introducing a Community Infrastructure Levy (CIL) for the Borough have included 'Regulation 123 list' which sets out an indicative list of the infrastructure CIL will be spent on (see Appendix C of the adopted Charging Schedule).
- Strategic Flood Risk Assessment (SFRA) 2009. The SFRA provides information on the significance of flood risk across the Borough, where flood risk is likely to be important, how much of the Borough is defended, where new development is likely to add risk and where flood risk needs to be considered in more detail. Where available, updated information on flood risk published by the Environment Agency has also been taken into account. An update of the SFRA is currently being prepared.
- Transport Assessment for Woking (2010) was undertaken to consider the impacts of future development in the Borough. The Assessment assisted in assessing the sensitivity of both the Strategic Route Network (SRN) and Local Road Network (LRN), including classified A and B roads, to the likely additional traffic generated by committed and non-committed residential and commercial development as proposed in the emerging Core Strategy of the Local Development Framework (LDF). A Transport Assessment has been prepared to inform the Site Allocations DPD.
- Woking Local Transport Strategy and Forward Programme aims to support the growth set out within the Core Strategy and provide a programme of transport schemes required to mitigate the transport impacts of the Core Strategy proposals to ensure sustainable development. It also provides an evidence base for future funding bids. It is part of the Surrey Transport Plan. The main document provides a commentary on the transport provision and transport problems in the Borough and possible solutions to the identified problems. The annex contains a forward programme of transport infrastructure that would be implemented, when funding is secured. The programme is costed and sources of funding are also identified.
- The Character Assessment 2010. The key objective of this study was to identify, analyse and describe in a systematic and objective way the form and character of each main settlement as a whole, and each distinct subarea within it. The Assessment:
 - o Provides a legible analysis of the street and space environment
 - Notes the mix of uses and activities
 - Analyses the residential density ranges across the urban area

- Analyses residential form, character and layout, including representative plot characteristics, and
- ldentifies areas of potential/ future change.
- The Design SPD (2015) also provides useful contextual analysis on the built nature of key centres of the Borough.
- The Traveller Accommodation Assessment (2013) assesses the particular accommodation needs of the Gypsy and Traveller community.
- An Employment Topic Paper is currently being prepared which considers the future employment development potential of sites in Woking Borough (recognising the national planning practice guidance requirement to also assess the availability of economic land).
- 1.15 Further information about the evidence base underpinning the local plan-making process can be found on the Council's website at: http://www.woking.gov.uk/planning/policy/ldfresearch

Status of this document

- 1.16 The SHLAA replaces the Council's previous Housing Potential Assessment 2006 and the first three SHLAA studies, which were published in July 2009, November 2010 and October 2011 respectively, as well as housing land supply evidence prepared for the information of the Core Strategy Examination Inspector in 2012.
- 1.17 The SHLAA forms a key element of the evidence base for the Council's LDDs, particularly for delivery of the adopted Core Strategy and to inform preparation of the Site Allocations Development Plan Document (which will comprise site allocations and development management policies).
- 1.18 The SHLAA has been prepared by officers of the Council in conjunction with key stakeholders. The SHLAA is based on the best information reasonably available at the time of writing and using the professional judgement of those involved.
 - Woking Borough Council considers the SHLAA a living document. As such, the Council welcomes comments on this document, in addition to the Call for Sites which the Council runs each year in Spring/early Summer. Any comments should be sent by email to planning.policy@woking.gov.uk or in writing to: The Planning Policy Team, Woking Borough Council, Civic Offices, Gloucester Square, Woking, Surrey, GU21 6YL.
- 1.19 The SHLAA is an important evidence source to inform plan making, but that it does not in itself allocate land for development. The information contained in this report should not be construed as committing the Council to allocate land for any particular use. Any conclusions reached in the assessment are made without prejudice to the determination of any subsequent planning applications in respect of the sites assessed.

Methodology

- 1.20 The Council's original SHLAA methodology has followed that set out in the Government's <u>guidance on SHLAAs</u>, published in July 2007⁸. Regard has been given in this SHLAA to the more recent <u>National Planning Practice Guidance</u>.
- 1.21 Figure 1 next is taken from the original practice guidance and shows the ten stages that form the SHLAA methodology as well as the core outputs. Each of the ten stages is discussed in detail in the following sections of this report.

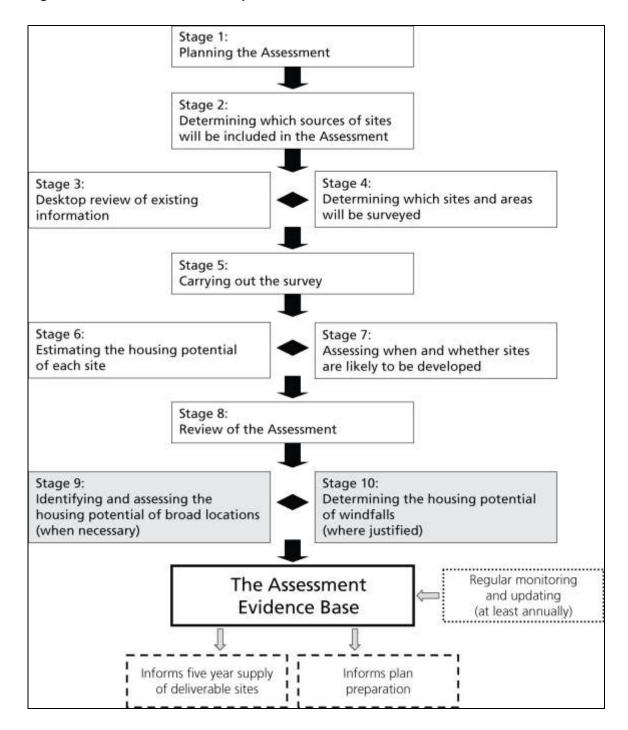
Structure of this report

- 1.22 This report presents the findings of the SHLAA and the methodology employed to arrive at these findings. The report is in compliance with the various sources of guidance.
- 1.23 Section 2 of this report describes the policy context for the SHLAA. Sections 3 12 outline the methodology used to carry out Woking's SHLAA and the key findings. Section 13 concludes on the capacity of deliverable and developable sites available to meet the Borough's housing requirement.

⁸ 'Strategic Housing Land Availability Assessments: Practice Guidance' (CLG, July 2007)

1.24 This report is supplemented by a number of technical appendices which provide detailed information on specific elements of the methodology and data on individual sites.

Figure 1: SHLAA Process and outputs



2.0 Policy context

2.1 This section sets out the planning policy context that underpins many of the assumptions contained within this Assessment and also provides a wider context within which the results of this SHLAA should be considered. The following policy and related guidance at the national and local levels are particularly relevant to the preparation of the SHLAA.

National policy

- 2.2 The Department of Communities and Local Government in March 2012 published the National Planning Policy Framework (NPPF). The NPPF replaced all Planning Policy Statements, Planning Policy Guidance Notes and Circulars.
- 2.3 The NPPF centres on the presumption in favour of sustainable development, providing guidance on a series of key issues to support plan-makers to deliver this:
 - Building a strong, competitive economy
 - Ensuring the vitality of town centres
 - Supporting a prosperous rural economy
 - Promoting sustainable transport
 - Supporting high quality communications infrastructure
 - Delivering a wide choice of high quality homes
 - Requiring good design
 - Promoting healthy communities
 - Protecting Green Belt land
 - Meeting the challenge of climate change, flooding and coastal change
 - Conserving and enhancing the natural environment
 - Conserving and enhancing the historic environment
 - Facilitating the sustainable use of minerals
- 2.4 The need for high quality design, making effective use of land through higher densities in locations most accessible to facilities and services, and the reuse of previously developed land are all emphasised, mirroring in a distilled form the content of earlier national policy documents.
- 2.5 Mitigation and adaptation to climate change and the need for development to make the most efficient use of resources including land and infrastructure, as well as seeking to secure the use of sustainable forms of transport, are also emphasised and are relevant to the SHLAA as these all have a bearing on the Core Strategy and the location, form and density of future development in the Borough.

- 2.6 The NPPF particularly stresses the need to deliver a wide choice of high quality homes, to widen opportunities for home ownership and create sustainable, inclusive and mixed communities. The key requirements are for Local Planning Authorities (councils) to:
 - boost significantly the supply of housing by using their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period
 - identifying and updating annually a five year housing land supply of specific deliverable sites, with an additional buffer of 5% moved forward from later in the plan period to ensure choice and competition in the market for land (20% where persistent past under delivery of housing)
 - identifying a supply of specific, developable sites or broad locations for market and affordable housing (illustrated through a housing trajectory)
 - set out a housing implementation strategy for the full range of housing to meet the housing target
 - set an approach to housing density reflecting local circumstances
 - justify any reliance upon windfall sites within the five year supply with compelling local evidence
 - consider housing applications in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date in the absence of a demonstrable five year supply of deliverable housing sites
 - plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, including families with children, older people, people with disabilities, service families and people wishing to build their own homes)
 - identify the size, type, tenure and range of housing required, reflecting local demand, and set flexible policies to meet identified needs for affordable housing
 - identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers
 - normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for housing and no strong economic reasons why such development would be inappropriate
 - consider whether larger scale development opportunities provide the best way of achieving sustainable development

- consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.
- 2.7 This SHLAA has followed a methodology informed by the national Planning Practice Guidance.

Local Policy

2.8 Woking Borough Council is preparing its Local Development Documents (LDD) to guide future development in the Borough. The LDD comprise a number of adopted or forthcoming planning policy documents, including:

Core Strategy (adopted October 2012) – this sets out the vision, objectives and spatial strategy for the area. All other LDD must be in general conformity with the Core Strategy. The Core Strategy explains how the Borough Council will meet known and anticipated development requirements to 2027, including the number of dwellings required. It also sets out strategic policies against which planning applications are determined (in conjunction with the saved policies of the Woking Borough Local Plan 1999). For the purposes of the SHLAA, it requires the Council to make provision for 4,964 net additional homes between 2010 and 2027.

Site Allocations Development Plan Document (DPD) - this will identify and allocate specific sites in the Borough where development will take place in accordance with the vision and spatial strategy set out in the Core Strategy. This process has begun and a draft is expected to be published by Summer 2015.

- Development Management Development Plan Document (DPD) this will provide a set of up to date development management policies addressing more detailed development matters, which will replace the remaining Local Plan policies. A draft was published for consultation between February and April 2015.
- Supplementary Planning Documents (SPD) a number of SPDs are being produced to supplement the policies in the Core Strategy and Site Allocations documents. These SPDs will provide details of how the Council will implement policies and cover issues such as parking standards, design, affordable housing and hot food takeaways. The Climate Change SPD was adopted in 2013, the Affordable Housing Delivery and Hot Food Takeaway SPDs in 2014 and the Design SPD in 2015.
- In accordance with Section 6 of the Core Strategy, a Community Infrastructure Levy (CIL) has been adopted by the Council to be implemented from 1 April 2015. The Charging Schedule has been set at a level to enable sites to come forward without undermining viability.

3.0 Planning the Assessment

3.1 This section of the report sets out the Council's approach to planning the SHLAA in terms of establishing the geographical scope of the Assessment, partnership working and management and scrutiny arrangements.

Identifying the scope of the assessment

- 3.2 Spatial planning should not be constrained by administrative boundaries, and in light of this SHLAA best practice recommends that SHLAAs should preferably be undertaken jointly in cooperation with other local authorities within the Housing Market Area, and if possible through a Housing Market Partnership where one has been established.
- Woking Borough sits within the West Surrey Housing Market Area along with the boroughs of Guildford and Waverley. This Housing Market Area (HMA) was originally defined by the South East Regional Housing Board in 2004. This has been confirmed by the draft SHMA. The three authorities commissioned a joint Strategic Housing Market Assessment (SHMA, published 2009). councils have commissioned a new SHMA assessment, which we anticipate publishing in 2015. No formal Housing Market Partnership currently exists, and there are no plans at this stage to carry out a joint SHLAA.
- It is recognised that the types of sites identified for the rolling five year housing land supply are generally those that are some way through the planning process (for example those that are allocated or have planning permission). Such sites would be within local authority boundaries and only rarely cross boundaries.
- 3.5 In addition, undertaking a SHLAA with Guildford and Waverley Borough Councils would be logistically difficult as all three authorities are at different stages in producing their Local Development Documents. Undertaking a joint Assessment would cause a delay in the production of the Woking LDDs. For these reasons, this is an assessment of housing potential within Woking Borough. However the Council has been and will continue to cooperate with other local authorities including Waverley and Guildford on strategic cross-boundary planning matters including housing delivery, in line with the NPPF.
- In respect of specifically housing land supply evidence, provided that each local 3.6 authority generally follows the methodology advocated in the latest guidance, it should be possible to ensure that each of the three assessments can be aggregated to the Housing Market Area level at a later date if required. Every effort has been made by Woking Borough Council to ensure that the original methodology employed, as well as other relevant SHLAA information, was shared with Guildford and Waverley councils, particularly through regular meetings of the West Surrey Local Development Framework (now Local Plan) Officer Group. A summary of the consistencies and differences between the SHLAA methodologies of these three local authorities can be found in the Council's SHLAA methodology paper.9 Guildford Borough Council's Assessment methodology can be found on

⁹ SHLAA Methodology: http://www.woking.gov.uk/planning/policy/ldfresearch/shlaa/shlaafinalmeth

- their website, its most recent SHLAA is dated 2014¹⁰. Waverley Borough Council's most recent SHLAA is dated 2012¹¹.
- 3.7 At the time of writing, neither Surrey Heath, Runnymede, Elmbridge, Guildford or Waverley councils have identified any sites with housing potential which cross into Woking's administrative area.
- 3.8 Guildford Waverley and Woking Borough Councils are engaged in cooperation on strategic matters within the West Surrey Housing Market Area (HMA). A Memorandum of Understanding exists to ensure evidence of housing need in the HMA is updated at regular intervals. Woking Borough Council does not require any land within Guildford or Waverley Boroughs to meet its adopted housing requirement. To date Guildford and Waverley councils have not yet set a housing requirement through their respective Core Strategy processes.

Working with partners

- 3.9 The guidance recommends that the SHLAA should be prepared with the involvement of key stakeholders, including house builders, registered social landlords, local property agents, local communities and other agencies that have a recognised interest. The Council has involved relevant stakeholders in the preparation of SHLAA documents from the outset:
 - In November 2007, the Council consulted the Environment Agency, Natural England, English Heritage and Surrey Wildlife Trust in order to seek advice on the way in which the Council should assess sites with potential for housing development which were, for example, within close proximity of a Natura 2000 site or within areas at risk of flooding. The Council has continued to engage with these organisations throughout the SHLAA process in order to gain specialist advice. More recently this dialogue has been supplemented by parallel engagement with key consultees regarding the parallel work on the Site Allocations DPD in particular in respect of the site allocations Site Assessment Methodology¹².
 - In December 2007 and January 2008, the Council contacted a large number of landowners and other interested parties in order to identify sites that may become available for housing development to 2026.
 - The involvement of land owners, developers and agents in the SHLAA is
 essential in order to demonstrate deliverability and developability of the sites.
 In January 2008, the Council invited a number of stakeholders, including the
 Home Builders Federation, to attend two workshops which were intended to
 seek views on the Council's approach to the SHLAA at an early stage. The
 views of the stakeholders were taken in to consideration and used to inform
 the draft methodology.
 - In March 2008 the Council consulted on the draft SHLAA methodology. Almost 500 residents associations, community interest groups, local businesses, developers, landowners, infrastructure providers and statutory consultees were specifically invited to comment on the methodology. A press release, information of the Council's website and articles in the Council's regular LDF Newsletter were used to inform the general public of the

¹⁰ See http://www.guildford.gov.uk/shlaa

¹¹ See http://www.waverley.gov.uk/downloads/1004/planning_policy

¹² See http://www.woking2027.info/allocations/httpwwwwoking2027infoallocationsdddpdsam

- Assessment. The results of that consultation are located in the Council's final SHLAA methodology¹³.
- In October 2008 the Council consulted the Environment Agency, Natural England and Surrey Wildlife Trust on sites that had been identified in the SHLAA that are in close proximity to nature conservation designations or in areas most at risk from flooding in order to gain a clearer understanding of the constraints on those sites.
- In November 2008, the Council ran a workshop attended by representatives from the development industry as well as local landowners. The workshop was facilitated by John Silvester Associates. The aim of the workshop was to seek views on the SHLAA methodology in order to ensure a robust assessment had been undertaken.
- Between November 2008 and January 2009, the Council contacted landowners in order to gain detailed information about the availability of sites for development.
- In April 2009, the Council undertook an informal consultation on the draft housing trajectory. Consulted were those stakeholders who had previously attended SHLAA workshops as well as Natural England, the Environment Agency, English Heritage, the South East England Partnership Board, the Surrey County Council.
- The Council has sought to involve residents in the SHLAA where appropriate. A press release, information on the Council's website and articles in the Council's regular LDF Newsletter was used to inform the general public of the Assessment. Residents Associations were also asked to put forward sites for consideration in the SHLAA and asked to comment on the proposed methodology. The Council has not, however, involved residents in detailed discussions about individual SHLAA sites. Residents will have the opportunity to comment on the findings of the SHLAA through consultation on the LDD documents such as the Site Allocations DPD.
- In April 2010 and April 2011 the Council contacted all applicants/ landowners/ agents that had a site with unimplemented planning permission or a site identified in the SHLAA to determine the suitability, availability and achievability of sites for residential developments.
- In May / June 2014 the Council repeated this exercise, to inform this 2014 update of the SHLAA. Specific targeted availability checks were additionally made in respect of key sites.
- This is in addition to a well-publicised annual Call for Sites request, which was sent to all statutory consultees and interested parties whose details are registered on the Council's LDD consultees database, was published on the Council's website, and was the subject of a press release. The 2013 Call for Sites took place 24 May-5 July 2013. The 2014 Call for Sites ran 27 March- 8 May 2014.
- 3.10 Further details of consultation and engagement can be found at Appendix 6.

Management and scrutiny arrangements

3.11 The original assessment was undertaken by an officer level Project Team. The members of the project team brought a wide range of expertise from a variety of disciplines: Head of the Planning Service, Planning Policy Manager, Senior Policy

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¹³ See http://www.woking.gov.uk/planning/policy/ldfresearch/shlaa

- Officer (Planning), Development Management Manager, Senior Planning Officers (Development Management), , and Valuation Services Manager. The following officers joined the Project Team to provide advice on their specific areas of expertise: Scientific Officer (Contaminated Land), Housing Officer, Arboricultural Officer, and Highways Engineer (Surrey County Council).
- 3.12 A project plan setting out the timetable for key project milestones was developed by the Project Team to assist in undertaking the original SHLAA (2009). The project plan and additional information about the skills of the Project Team and key issues and risks identified during the early stages of planning the assessment are set out at Appendix 13.
- 3.13 As explained above, the SHLAA methodology has been subject to public consultation. In particular, the methodology has been subject to the scrutiny of the Home Builders Federation.
- 3.14 The methodology and process for undertaking the SHLAA was subject to the scrutiny of the Council's LDF Members' Working Group, which is tasked with overseeing the production of the LDDs. Subsequently the evidence base which underpins the Core Strategy was scrutinised by the Working Group. The SHLAA was particularly highlighted for Members attention as a key piece of the evidence base. Members have been aware of the 2014 update and the information within it will be made available to them when completed. Previous SHLAA studies were background to the considerations of the Council's Executive Committee and Full Council at the relevant stages of the production of the Core Strategy and will be so for the production of the Site Allocations Development Plan Document.
- 3.15 The Council employed an independent planning consultant, John Silvester Associates, to act as a 'critical friend' for the preparation of the Core Strategy LDD. John Silvester Associates evaluated key stages of the original SHLAA (2009) process to ensure that it has been prepared in accordance with the guidance and was a robust assessment and evidence base to support the LDD. The results of this exercise can be found at Appendix 10. The same process was applied to the 2010 and 2011 updates.
- 3.16 This SHLAA update has been led by a Principal Planning Officer with the assistance of Planning Policy Officers, specialist input as necessary, and overview provided by the Planning Policy Manager. There has also been corporate input by other service areas to establish the suitability of sites, in parallel with the Site Allocations DPD process.
- 3.17 The SHLAA will be monitored and updated by the Planning Policy team annually through the Annual Monitoring Report (AMR) to ensure that a five year supply of deliverable sites is maintained as required by the NPPF. The progress of the sites through the planning and development process will be monitored as well as any changes in circumstances regarding deliverability constraints.

Determining the sources of sites

4.1 With the exception of clear cut policy designations (such as sites within a Site of Special Scientific Interest or the Thames Basin Heaths Special Protection Area) which represent an absolute constraint on development, the guidance states that the SHLAA should not be narrowed down by existing policies designed to constrain development so that local authorities are in the best possible position to decide its strategy for delivering its housing objectives. This section of the report explains how the Council has determined the sources of sites for inclusion within this updated SHLAA.

Policy exclusions

4.2 Table 2 below sets out the land that has been excluded from the SHLAA and the reasons for those exclusions. Appendix 7 contains a series of maps showing the geographical location of these designations. The Core Strategy Proposals Map provides a collated overview of the designations influencing residential development potential in the Borough¹⁴

Table 2: Policy exclusions

Special Protection Area (SPA)

The whole of Woking Borough falls within 5km of the Thames Basin Heaths SPA. The Council has excluded any sites that come forward within 400m of the SPA on the basis that Natural England advises that within this zone harm to the SPA cannot be avoided where residential development is proposed.

The Council's Thames Basin Heaths SPA Avoidance Strategy 2010-2015¹⁵ currently sets out avoidance measures which will allow sites in the rest of the Borough to militate against the impacts of residential development on the SPA. The Council have not therefore excluded sites that fall between 400m and 5km of the SPA for the purpose of this Assessment. This approach has been agreed by Natural England.

Special Area of Conservation (SAC)

A part of the Thursley, Ash, Pirbright and Chobham SAC lies within the Borough boundary. The Council has excluded from the SHLAA sites that may come forward which lie within the SAC. The Council does not currently have a procedure for dealing with sites that come forward in close proximity, however Natural England are consulted on any sites that fall within 500m of this SAC. Should Natural England deem it appropriate, sites outside of this zone which may have an adverse impact on the hydrology of the SAC may be discounted. This approach has been agreed by Natural England. A Habitat Regulations Assessment (HRA) of the Core Strategy was carried out to assess the overall impacts of the development proposals on the SACs. It concludes that Appropriate Assessment will not be required. A HRA of the Site Allocations DPD will be carried out to ensure that no

¹⁴ See http://www.woking2027.info/map

¹⁵ See http://www.woking.gov.uk/planning/policy/ldf/tbhspa

	harm is caused to the integrity of the sites.
Sites of Special Scientific Interest (SSSI)	There are a number of SSSIs within the Borough. All have been excluded from the SHLAA. The Council has consulted with Natural England on any sites that have been identified within 500m of a SSSI. The Council will also consult Natural England on any sites which may be upstream of a wetland or an aquatic SSSI. Natural England will also be consulted on sites adjacent to the undesignated section of the Basingstoke Canal in recognition of the important link between the two sections of the Basingstoke Canal SSSI and its importance as a wildlife corridor. This approach has been agreed by Natural England.
Sites of Nature Conservation Importance (SNCI)	There are a number of SNCIs within the Borough. All have been excluded from the SHLAA. The Council has consulted Surrey Wildlife Trust on any sites that fall within 500m of an SNCI.
Local Nature Reserves (LNR)	Local Nature Reserves have been excluded from the SHLAA.
Public Open Space (POS)	The Council's PPG17 audit of open spaces concluded that there was not a surplus of open space in the Borough. For this reason, the Council has not comprehensively reviewed the potential of identified and protected open space for housing development as part of the SHLAA, but has not excluded from the SHLAA any open spaces suggested by stakeholders where there may be the potential to provide alternative or additional open space as part of potential housing development. Core Strategy Policy CS17 seeks to prevent the loss of open spaces.
Ancient Woodland	Areas of Ancient Woodland have been excluded from the SHLAA.
Flood Zones 3a and 3b	In accordance with the NPPF, the Technical Guidance to the National Planning Policy Framework ¹⁶ and the Council's Strategic Flood Risk Assessment, flood zones 3a and 3b have been excluded from the SHLAA. The exclusion of land within flood zone 3 will be kept under review in accordance with any advice given by the Environment Agency.

¹⁶ Sec

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6000/2115548.pdf

Policy inclusions

4.3 Table 3 next sets out the land that has been included within the SHLAA and the reasons for that inclusion. Appendix 8 contains a series of maps showing the geographical location of these policy designations.

Table 2: Policy Inclusions

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Green Belt	Sites that are in the Green Belt have not been excluded from the SHLAA. The adopted Core Strategy commits the Council to undertaking a comprehensive assessment of Green Belt/greenfield sites to inform the site allocations element of the Site Allocations DPD. The Green Belt Boundary Review has been completed, with the objectives of identifying sufficient land to accommodate 550 additional homes between 2022/23 and 2027/28, and identifying additional land for safeguarding for residential development 2028-2040 (to ensure enduring Green Belt boundaries).
Safeguarded land	Safeguarded land, as shown on the Core Strategy Proposals Map, is land that was previously kept aside to fulfil long term development needs within the Borough and which the Core Strategy identified for development within the plan period. The safeguarded sites - Moor Land, in Westfield, and Brookwood Farm, in Knaphill ward - have therefore been included within this SHLAA.
Core Strategy housing distributions	The SHLAA also reflects the indicative development capacities set out in Core Strategy Policy HS10 - Housing Provision and Distribution. This includes sites within Woking Town Centre, West Byfleet District Centre and infill development in Local Centres, in the Poole Road / Butts Road employment area.
Flood Plain (Zones 1 and 2)	More vulnerable uses (which include residential development) are permitted within Zones 1 and 2 (subject to Flood Risk Assessment where relevant) therefore sites within Zones 1 and 2 have not been excluded from the SHLAA. The Environment Agency has been consulted on sites that have been identified in Zone 2.
Employment Land	Land identified as 'secondary' employment land in the Council's Employment Land Review has been included in the SHLAA.
Conservation Areas	Sites that come forward within or adjacent to Conservation Areas have been subject to appraisal by officers with design expertise. This approach has been agreed by English Heritage.

The nature of supply and the site size threshold

- 4.4 The annual monitoring of residential completion trends identifies the nature of housing land supply in the Borough. The general trend has been for large, high density flatted development in and around Woking Town Centre with a number of smaller schemes across the rest of the urban area.
- 4.5 In the five year period between 1 April 2009 and 31 March 2014 14.8% of residential completions were on sites accommodating five or fewer units, and 85.2% were on sites accommodating six or more units. Looking at large sites, 67% of completions were for schemes of 15 or more units. It is anticipated that this trend will continue and so, for the purposes of the SHLAA, only sites capable of accommodating six or more net additional residential units have been included in the assessment.
- 4.6 This site size threshold keeps the number of sites assessed through the SHLAA to a manageable level and also recognises that windfall sites should not be allowed for in the first five years of housing land supply unless backed by compelling local evidence (NPPF, para. 48). This threshold was previously discussed and agreed as a reasonable level for the Assessment at the Stakeholder Workshops held in January and November 2008.
- 4.7 Small sites will continue to deliver over the plan period. This is reflected in summary Table 1, which records delivery from small sites at the back end of the plan period (years 11-15).

Subdivision/conversion of existing housing

- 4.8 During the 5 year period between 1 April 2009 and 31 March 2014 a total of 24 additional units were created through the conversion of larger properties into flats (0.16% of the total supply of 1227). It is therefore considered that the capacity for conversion of larger dwellings to flats is not significant and hence this source of supply has been excluded from the SHLAA.
- 4.9 In addition to this, it is not possible to predict which of the Borough's larger houses may come forward for conversion. Further, a site size threshold of six has been set for the purpose of the SHLAA and it is considered rare that such development would yield six or more units.

Flats above shops

4.10 The conversion of upper floors above shops (and offices) is a potential source of housing. The Council's trend data, however, shows that only a modest number of units have been created in recent years (a maximum of 9 new units between 2009 and 2014 which is equivalent to less than 0.7% of total supply). It is also difficult to gather reliable information on the numbers of units created through this means in light of permitted development opportunities. Whilst it is recognised that the development of flats above shops is a source of supply, it is not considered that such capacity is significant and hence this source of supply has been excluded from the SHLAA. Further, a site size threshold of six has been set for the purpose of the SHLAA and it is considered unlikely that such development would yield six or more units.

Land in existing residential use

- 4.11 In the past, there has been some redevelopment of existing housing in the Borough, as well as some building on back garden land. During the course of the SHLAA, a number of sites were identified that were either wholly or partly in existing residential use. These sites have subsequently been excluded from the SHLAA for the following reasons:
 - Market viability SHLAA sites must be deliverable and developable and previous Assessments have therefore involved an evaluation of the costs of acquiring the site in relation to the developable value (as explained in detail in Section 9 of this report). This valuation exercise effectively discounted the majority of the potential sites identified.
 - Following the assessment of availability (outlined in Section 9 of this report) it
 was recognised that for the remaining sites there was no way of effectively
 knowing, in the absence of developer interest i.e. pre application enquiries or
 a submitted planning application, whether these sites would come forward.
 - It was considered that, if one of the identified sites did come forward, there was no certainty that this would reflect the site that had been identified in the Assessment as the majority of the sites appeared to be in multiple ownership and therefore their development would be dependent on all owners agreeing to make their land available. If this were to happen, a risk was identified that the subsequent site may be less than six units. Given that the Assessment has included an estimate of capacity for sites of less than six units it was considered that identification of such sites could result in double counting.

Types of sites included

4.12 Notwithstanding the exclusions and inclusions above, the following types of sites have been included in the SHLAA.

Land allocated (or with permission) for employment or other land uses which are no longer required for those uses

Existing housing allocations and development briefs

Unimplemented/ outstanding planning permissions for housing

Planning permissions for housing that are under construction

Sites where planning permission has previously been refused for residential development

Sites where a planning application has been submitted but not yet determined or that are subject to pre-application advice

Vacant and derelict land and buildings

Surplus public sector land

Land in non-residential use which may be suitable for redevelopment for housing

Housing opportunities in existing residential areas

Sites in rural settlements

Greenfield sites adjacent to settlements

Major Developed Sites outside of settlements (MDS)

Sites put forward by stakeholders through a 'call for sites'

5.0 Desktop review of existing information

- 5.1 The Council has used a number of sources of information to undertake the desktop review and selection of sites:
 - Locations identified in the Core Strategy 2012
 - Undeveloped allocations in the Woking Borough Local Plan 1999
 - Unimplemented planning permissions
 - Planning application refusals
 - Dwelling starts and completions
 - Sites put forward by landowners/ developers through a call for sites
 - Urban Capacity Study/ Housing Potential Study
 - Empty property register
 - National Land Use Database (NLUD)
 - Register of surplus public sector land
 - Employment Land Review
 - Open Space, Sports and Recreation Audit
 - Valuation Office database
 - Vacant property register
 - OS maps
 - Aerial photography
 - Information from Development Management officers
 - Planning decision monitoring database and planning application registration database.
- 5.2 Having identified land that may have potential for housing development, all sites were mapped on the Council's Geographical Information System (GIS).

6.0 Determining which sites and areas will be surveyed

- 6.1 The original SHLAA guidance identified that, as a minimum, all sites identified through the desk-top review (Section 5 of this report) should be visited and that the site survey should be used to identify further sites with potential for housing development, which were not identified through the desktop review.
- 6.2 The guidance identified the factors that should be taken into account in determining how comprehensive (in geographic terms) and intensive (in terms of the minimum size of site to be surveyed) the survey element of the assessment needs to be. These include:
 - the nature of the housing challenge assessments will need to be more comprehensive and intensive where housing provision targets in the Assessment area are high and/or where housing market conditions signal worsening affordability, reflecting the need to identify more sites for housing;
 - the nature of the area in areas dominated by smaller rural settlements, it may be necessary to identify all of the sites with potential for housing, whereas this may not be necessary or feasible in more urbanised areas;
 - the nature of land supply where a large proportion of housing is expected to be delivered on small sites this may mean that the survey needs to identify smaller sites than would be necessary in an area where larger sites are likely to make up the bulk of supply; and,
 - the resources available which can be brought together for best effect and, should reflect the scale of the task.
- 6.3 The guidance also stated that mapping the following areas will help to identify which geographic areas could be covered by the survey:
 - *development hotspots* that are the focus of planning permissions and give an indication of current market demand;
 - town and district centres and their surrounding pedestrian catchments. These are often characterised by more frequent land use changes and are most likely to contain development opportunities;
 - principal public transport corridors and their walking catchment areas. These
 areas are not necessarily more likely to contain development opportunities,
 other than where they are part of a town centre; nonetheless, they are more
 sustainable locations which merit survey. The extent of the catchment area
 surveyed could depend on the level of accessibility of the transport stop or
 interchange;
 - specific locations within settlements where regeneration strategies, market renewal initiatives, or housing development intensification or redevelopment strategies are actively pursued; and
 - specific locations outside settlements some sites for further investigation
 may be readily identifiable from existing data sources, such as the Register of
 Surplus Public Sector Land. For other sites, it may be useful to set criteria for
 the search, such as areas where significant infrastructure exists or is planned.
 It may not be possible to identify individual sites, but only broad locations
 where there is housing potential.
- 6.4 The guidance stated that where the survey is to be focused on certain geographic areas, the aim should be to carry out a street-by-street survey in these areas. For the remainder of the assessment area, a general examination should be carried

out; reflecting the decisions taken on how comprehensive and intensive the survey needs to be.

Sites and areas to be assessed within Woking Borough

- 6.5 As outlined in Section 4 of this report, the scope of this assessment has not been narrowed down by existing policies designed to constrain development, such as Green Belt policy. However, as stated in the Planning Advisory Service (PAS) 'Strategic Housing Land Availability Assessment and Development Plan Document Preparation' paper (January, 2008) 'there is no expectation that every possible greenfield site should be assessed within the SHLAA'. PAS recognises that in many rural areas there will be large numbers of theoretically possible sites, many of which are patently unsuitable for housing because of their isolation from settlements or for others reasons. The PAS concludes that 'the important thing is that all greenfield sites which are reasonable candidates for housing should be identified and assessed from the outset, even where there may be opposition to them'.
- 6.6 Based on the advice from the PAS and contained within the various guidance, the scope of the assessment has been limited to all potential sites within the urban areas and those greenfield sites which lie just outside of or adjoin these areas or that have been proposed to the Council by a third party.
- 6.7 The specific factors in determining the comprehensiveness of the assessment are identified below.

The nature of the housing challenge

- 6.8 The Core Strategy plans for an additional 4,964 dwellings over the period 2010 to 2027.
- 6.9 Affordability of housing is a borough-wide issue and the provision of affordable housing is the Council's number one priority. The Council's Strategic Housing Market Assessment (SHMA 2009), prepared by Fordhams Research for Woking, Guildford and Waverley Borough Councils, informed preparation of the Core Strategy and the revision of the Housing Strategy. The West Surrey SHMA Report looks at the need for affordable housing and the market demand for housing at a strategic level, with a Housing Needs and Market Assessment Survey for each borough providing a snapshot of the profile of local households and their dwellings, and the number, size, type and tenure of new homes required to meet both need and demand.
- 6.10 The assessment of housing need takes account of both the need for and the supply of affordable housing, essentially for those who cannot afford market housing. The assessment of housing demand refers to expressed demand for market housing, essentially from those who can actually afford the type of housing in question.

Key findings of the SHMA

- An estimated total net annual need for affordable housing of 499 units of accommodation.
- Around 70% of the need for affordable housing is for social rented housing and 30% for intermediate housing.
- Most of the net demand for social rented housing is for three bedroom units.
- In terms of intermediate housing, there are shortages of one, two and three bedroom homes.
- The majority of the shortfall in the market sector is for three bedroom homes although there are notable shortages for all other sizes of accommodation.

The nature of the area

- 6.11 The built up area of Woking Borough comprises the urban area of Woking town itself and a number of villages which extend from Byfleet in the East to Brookwood in the West and Kingfield and Old Woking in the South. The built up area is almost entirely surrounded by Green Belt land, which comprises 60% of the Borough's total land area. Figure 2, next, is a Key Diagram that shows the key land uses and constraints in the Borough.
- 6.12 Due to the geographic composition of the Borough, described above and in Section 4 of this report, this SHLAA has considered a number of sites with potential for housing across the urban area as well as a number of Green Belt sites put forward by stakeholders. The Green Belt boundary review required by the Core Strategy has been prepared (published July 2014) but the Council has not yet taken any decisions in respect of its preferred Green Belt land allocations for the 2022 2027 period and beyond. Whilst individual site commentaries therefore refer to the content of the Green Belt boundary review, the review has not informed the consideration of likely timescales for future residential development sites on any greenfield land.

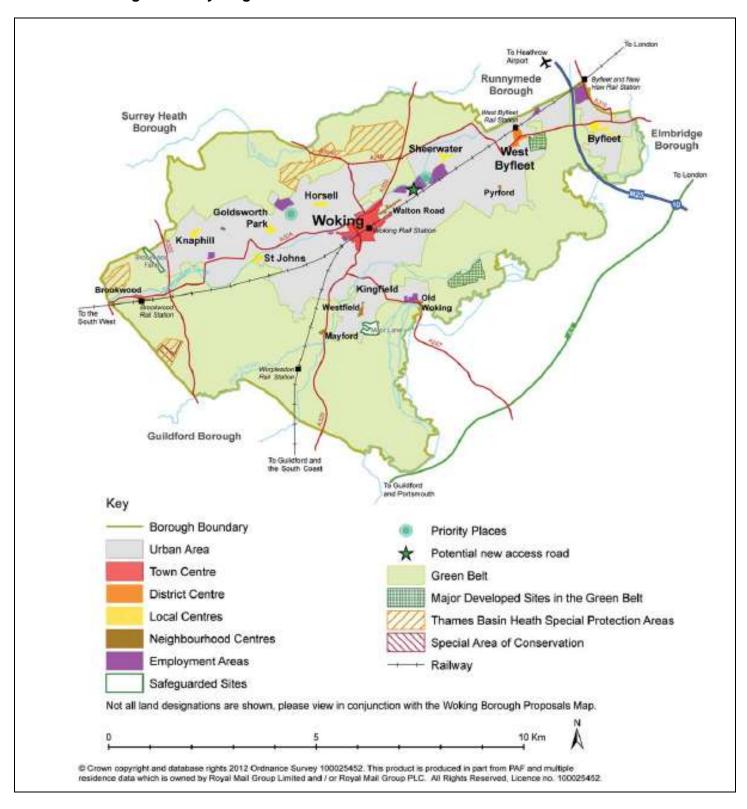
Development hotspots

6.13 Woking Town Centre, West Byfleet District Centre and the Local Centres (Byfleet, Goldsworth Park, Horsell, Knaphill, St Johns and Sheerwater) were assessed in detail through the SHLAA process as these are areas that have historically been subject to the most frequent land use changes and are now highlighted as key locations for development by the Core Strategy. They are also the most sustainable because of their accessibility to services and facilities. It should be noted, however, that there are competing demands in these areas and that the identification of such sites in the SHLAA does not necessarily mean that they will be allocated for residential development through the Site Allocations DPD process. The map in Appendix 9 shows the location of these areas.

The pedestrian catchments

6.14 The pedestrian catchments of the Town Centre, District and Local Centres as well as the Borough's railway stations have also been assessed in detail as they are the most accessible and sustainable locations in the Borough. The map in Appendix 9 shows the location of these areas.

Figure 2: Key Diagram



source: Woking 2027 Core Strategy (2012)

7.0 Carrying out the survey

- 7.1 The majority of site visits were carried out in March 2008 but the new sites in the 2010, 2011 and 2014 updates were surveyed in Spring/Summer each year. For the 2014 update, each site was visited by officers' from the Council's Planning Policy team. Where beneficial, a view was also sought from the Development Management officers.
- 7.2 Prior to the site surveys being undertaken, a consistent approach was established to recording information and identifying sites. All participating officers were made aware of the key issues surrounding the SHLAA and were briefed on how to handle questions from members of the public or property owners.

Recording the characteristics of each site

- 7.3 In order that officers could effectively and consistently record site characteristics, a site survey proforma was developed by the Project Team and refined at the stakeholder workshop in January 2008. This was proven to be effective and consistent in assessing sites and was used in the 2010 and 2011 surveys. This was refined further for the 2014 update.
- 7.4 A number of characteristics were recorded on site, including:
 - Site size
 - Site boundaries
 - Current use(s)
 - Surrounding land use(s)
 - Character of surrounding area
 - Physical constraints e.g. access, steep slopes, potential for flooding, natural features of significance, location of pylons
 - Development progress e.g. ground works completed, number of homes started and completed
 - Initial assessment of whether the site is suitable for housing as part of a mixed use development.
- 7.5 The full site survey proforma can be found at Appendix 12.

8.0 Estimating the housing potential of each site

- 8.1 SHLAA best practice states that the housing potential of each site should be guided by existing or emerging plan policy, particularly the approach to housing densities at the local level. Where the plan policy is out-of-date or does not provide a sufficient basis to make a local judgement, one approach to estimating potential is by sketching a scheme from scratch, or by using relevant existing schemes as the basis for an outline scheme, adjusted for any individual site characteristics and physical constraints.
- 8.2 An alternative and less resource intensive approach is to compare the site with a sample scheme which represents the form of development considered desirable in a particular area. Sample schemes selected should be exemplars (not necessarily from the Assessment area) and represent the range of site sizes and locations where housing development is anticipated. Comparison with the sample schemes can then be used in assessing the housing potential of individual sites, adjusted for any individual site characteristics and physical constraints. Using real schemes as comparators has the additional advantage that the form of development on a site can be visualised.
- 8.3 Woking Borough Council has used a combination of the approaches outlined above in order to estimate the housing potential of SHLAA sites. As a starting point, 25 exemplar schemes that reflect the form of development considered desirable in different parts of the Borough were selected by the Project Team. These exemplar schemes were used to determine the indicative densities that would be considered desirable across the Borough.
- 8.4 When assessing the housing potential of each site, regard was had to a number of factors including the character of the area, the type of housing desirable on the site and information available from landowners/developers. It should be emphasised that the densities of the exemplar sites also reflect the indicative densities of the Core Strategy (Policy CS10). Regard was also had to site specific 'reality checks', for example where other factors would affect the density of development, such as the shape of the site and access to it or the effect of flood risk and topography. The Council's methodology, set out in Table 4 next, employs a density range, enabling officers to increase or decrease the density to be applied to a site depending on the factors outline above. Where site specific factors are not an issue, the general principle of densities in line with Policy CS10 applies.
- 8.5 During consultation with key stakeholders on the proposed methodology, concern was raised about how the character of an area would be assessed by officers. For the purpose of the SHLAA, character has been defined as the features of a place that contribute to its unique identity, including: location and setting, landscape, the inter-relationship of spaces within an area, the area's historic development, as well as building traditions and materials. Character appraisal involved a qualitative assessment of how an area performs in terms of urban design objectives. The characteristics of an area were assessed with regard to constraints (the presence of mature trees and listed buildings, for example) and opportunities and capacity for development. Regard was also had to national policy and guidance as well as local Conservation Area Character Appraisals and the Character Study that have been adopted by the Council. This 2014 update has also had regard to the draft and adopted Design SPD which provides contextual analysis on the townscape character of key centres of the Borough.

- 8.6 The requirement to provide on site open space, particularly on large sites in locations where a deficit has been identified, will affect the housing potential of a number of sites assessed. The Council has endeavoured to take this into account as a part of this assessment and so indications of potential yield should be viewed in this context.
- 8.7 No assumption has been made about the potential yield of any Green Belt sites considered in this Assessment, except where the Green Belt boundary review has provided an assessment of potential residential capacity.
- 8.8 Housing potential is a significant factor that affects economic viability. For this reason this stage of the assessment was carried out at the same time as the assessment of when and whether a site is likely to be developed (see Section 9 of this report). This helped to ensure that the housing potential for each site was guided both by planning policies and by economic viability.

Table 4: Methodology for estimating development potential

	Exemplars	Upper range density (dph)	Lower range density (dph)
Town Centre Flats	 Land at Guildford Road/ Bradfield Close Centrium, Victoria Road Waterside, Victoria Way Former Salvation Army, Walton Road 	400	250
Village Centre Flats	 Laurel Grange, High Road Highclere Road Station Approach, W. B. Modo House & RLC House, Pyrford Road and Rosemount Parade 	210	90
High Density Residential Area	 Park Heights, Constitution Hill Bracken Hill, Heathside Avenue The Clock Tower, Maybury Road Claremont Avenue 	240	80
Village Centre Fringe Flats	 Clock House, High Road St Johns Lodge, St Johns Hill Road Tattenhall, Sheerwater Road Woodhayes, Old Woking Road Shuna, Sheerwater Road Camphill Court, Camphill Road 	75	Core Strategy indicative minimum of 30
Housing in urban areas	 Former Hoebridge Works Chertsey Road, Byfleet Vale Farm Road The Maples, Hook Heath Avenue Former Rowley Bristow Hospital 	75	Core Strategy indicative minimum of 30
Lower density housing	Pyrian CloseParvis RoadSt Peters Convent	45	Core Strategy indicative minimum of 30
Mixed use developments	Land adj. Holiday InnKings Court, Church Street East	Case by	case basis

Notes on application of exemplar sites:

- 1) In line with the SHLAA methodology, housing potential for each of the SHLAA sites was based on the use of exemplar schemes taking in to consideration constraints on the site such as the shape of the site, access, tree coverage and listed buildings and so on. Where the site is significantly constrained, the lower range density will be applied (and vice versa).
- 2) Indicative densities for family housing are set at 30 dwellings per hectare (dph). This was previously the national policy indicative minimum, now superseded by the NPPF, but 30dph also reflects the lower figure in many of the indicative density ranges set out in Core Strategy Policy CS10). Density was constrained for many of the exemplar schemes due to issues such as the presence of listed buildings and mature trees, for example, which took the average density slightly below 30dph.
- 3) Upper range density: Highest exemplar density (rounded)
 Lower range density: Lowest exemplar density (rounded)
 (Average density of all exemplars = 70.9dph which compares to 58.4dph for 2013/14 completed schemes)
- 4) Full details of the exemplar schemes can be found at Appendix 14.

9.0 Assessing when and whether sites are likely to be developed

- 9.1 In line with the NPPF and national practice guidance, assessing the suitability, availability and achievability of a site provides the information on which the judgement can be made as to whether a site can be considered deliverable, developable or not currently developable for housing:
 - deliverable a 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; 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.
- 9.2 The guidance states that where it is not known when a site could be developed, then it should be regarded as not currently developable. This may be, for example, because one of the constraints to development is severe, and it is not known when this might be overcome.
- 9.3 In practice the considerations to be taken into account when deciding whether a site is deliverable, developable or not currently developable, will be the same. It is the *degree* of availability and achievability, and, in particular, when any known constraints can realistically be overcome. The assessment of deliverability/developability of specific sites should be made irrespective of the level of housing provision that is actually needed over the plan period.
- 9.4 The remainder of this section sets out how the team has assessed the deliverability and developability of land for residential development.

Suitability

- 9.5 The assessment of whether or not a site is in a suitable location for housing development involves a consideration of both policy and physical constraints of the site.
- 9.6 Generally, sites allocated for residential development in a Local Plan or those with planning permission are considered to be suitable. However, all sites were assessed against the criteria set out below as circumstances can change after allocation or granting of permission which may affect suitability.
- 9.7 The Council considered the following criteria when determining the suitability of a site for residential development.
 - Policy restrictions as outlined in Section 4 of this report, land within certain
 areas of the Borough (such as nature conservation designations) has been
 excluded from the SHLAA from the outset. Other policy restrictions that might
 exist for a site, such as the loss of important employment land or a community
 facility, for example, were assessed in terms of the likelihood of a policy
 objection and the severity of that risk.
 - Physical problems/limitations physical problems and limitations on a site
 which include issues such as topography, access, infrastructure and flood risk

were identified and assessed in terms of the likelihood of a policy objection and the severity of that risk.

- **Potential impacts** likely impacts on landscape features and conservation that may arise from developing a site were identified and assessed in terms of the likelihood of a policy objection and the severity of that risk.
- **Environmental conditions** the potential negative environmental conditions which might be experienced by prospective residents should the site come forward for residential development (e.g. noise vibration) were assessed in terms of the likelihood of a policy objection and the severity of that risk.
- Accessibility the accessibility of sites to public transport and key services such as schools and GP surgeries was assessed.
- Over-riding positive benefits in addition to assessing the suitability of a
 site in accordance with the criteria set out in the guidance, the Project Team
 also took into consideration whether there were any potential over-riding
 positive benefits associated with the development of the site for residential
 use. This might, for example, include opportunities for regeneration or the
 provision of affordable family housing.

Availability

- 9.8 The assessment of whether or not a site is available for residential development involves a consideration of whether there are any legal or ownership problems with the site, for example.
- 9.9 Therefore the determination of whether or not a site is available for development is dependent on information from a developer who has expressed an intention to develop a site or from a landowner who has expressed an intention to sell. The existence of planning permission on a site does not necessarily mean that a site is available for development as applications can be made by third parties. If problems of this kind were identified, a judgement was made about how and when these problems could be overcome.
- 9.10 Specifically, the team considered the following questions when determining availability:
 - Has the site already got planning permission (or a resolution to grant planning permission subject to the completion of a legal agreement) for residential development?
 - Does the site have less than six landowners? (note the figure of six was discussed and agreed as a reasonable guide for the purpose of this assessment at the Stakeholder workshop in January 2008, but it is stressed that this figure was used as a guide only and not a threshold beyond which sites would be rejected).
 - Has there been an expression of interest from a landowner?
 - Are there any possible legal or ownership problems associated with the site (for example ransom strips, tenancies, operational requirements)?
 - Has there been an expression of interest from a developer?
 - Can any identified problems be overcome?

9.11 As set out above, information from landowners is essential to the determination of whether a site is available for development. The Council therefore contacted landowners in order to gain a clear understanding of the status of sites and to ensure a robust assessment.¹⁷ Where a landowner was unknown to the Council, a Land Registry search was undertaken.

Achievability

- 9.12 A site is considered to be achievable when 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 whether development of the site is economically viable, including a judgement about the need for Section 106 contributions (and/or in the future Community Infrastructure Levy (CIL) charges) and affordable housing, the likelihood of abnormal development costs, as well as the ability of the developer to complete and sell the housing.
- 9.13 The team sought specialist expertise from Elder Associates in order to develop a methodology for determining the economic viability of sites for earlier iterations of the SHLAA. The full methodology used at that time is attached at Appendix 11. Having regard to rising land and development values since 2011, sites considered viable in the previous SHLAA have generally been assumed to have continued viability.
- 9.14 The viability assessment informing the Community Infrastructure Levy (CIL) Charging Schedule has also been helpful, which is based on typical development sites and realistic development scenarios. This evidence was considered by the CIL Examination Inspector who supported that the typical development scenarios identified in the SHLAA remain typical of those likely to come forward in the Borough and that these would be viable.
- 9.15 In addition, Peter Brett Associates undertook a Broad Viability Assessment of Green Belt sites as part of the Green Belt boundary review. For details, please see section 4.4 'Achievability Viability Assessments' of the GBBR main report.

Overcoming constraints

9.16 The assessment of deliverability/developability has also involved a consideration of whether any constraints identified can be overcome. This might for example involve securing investment in infrastructure or amending planning policies, for example. It should be noted that the SHLAA itself cannot amend planning policies; this can only be done through the LDD process which is subject to public consultation and independent Examination.

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¹⁷ A copy of the letter and form can be found at Appendix 15

10.0 Review of the Assessment

- 10.1 Following the assessment of deliverability and developability as described in the previous sections of this report, it has been found that:
 - There are sufficient sites that are considered to be deliverable can be identified to meet the housing requirement for the period 2014/15 – 2018/19 (the next five years)
 - Sufficient sites that are considered to be developable can be identified for years 6-10 (the following five year period, 2019/20 - 2023/24)
 - There continues to be an insufficient number of sites that are considered to be *developable* for years 11-15 (2024/25 2028/29) if land in the Green Belt is not released for development, as required by the Core Strategy.
- 10.2 Table 7 in Section 12 provides a summary of this housing land supply and shows that specific deliverable/ developable sites to provide 3,842 new dwellings during the period 2014/5-2028/29 can be identified, representing a potential under-supply of -538 units, excluding Green Belt sites.
- 10.3 In light of the findings of the SHLAA, the Council is strongly recommended to follow the requirements of Core Strategy Policies CS6 *Green Belt* and CS10 *Housing provision and distribution*, to release Green Belt in order to meet the shortfall identified in the latter years of this assessment.

Broad distribution of growth

- 10.4 The National Planning Policy Framework (NPPF) and SHLAA best practice and guidance allow for the identification of sites from broad if it is not possible to identify sufficient land that is developable over the lifetime of a Core Strategy. Core Strategy Policy CS10 has followed this approach.
- 10.5 Table 5 below shows the broad distribution of growth in the Core Strategy plan period, as set out in Policy CS10 *Housing provision and distribution*.

Table 5: Broad distribution of growth over the Core Strategy plan period (Policy CS10)

Location	Indicative number of dwellings (rounded)					
Woking Town Centre	1,980					
West Byfleet District Centre	170					
Infill development in the Local Centres	250					
Poole Road/ Butts Road employment area	320					
Infill development in the rest of the urban area	750					
Moor Lane site, Westfield	440					
Brookwood Farm, Brookwood	300					
Green Belt sites(s) to be released after	550					
2021/22 – as a broad location						
Woking Town Centre – as a broad location	200					

10.6 Broad locations are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. Policy CS10

- identifies two broad locations for development, Woking Town Centre and the Green Belt.
- 10.7 Woking Town Centre the SHLAA has identified a number of specific sites that are likely to come forward for residential/mixed use development over the lifetime of the Core Strategy and beyond. However, there are also a number of other potential sites within the Town Centre boundary which may come forward over the lifetime of the Plan, subject to availability and achievability considerations such as site assembly and economic viability. These sites may be new sites or extensions to sites already identified.
- 10.8 However, that sites identified in the Town Centre are likely to only be suitable for flatted developments and that the SHMA highlights a significant need for family (and affordable family) homes. These facts were recognised in the Core Strategy, in particular in Policy CS10 Housing Provision and Distribution.
- 10.9 The Green Belt the principle of a review of the Green Belt boundary in Woking Borough was set through the Core Strategy, which recognised that a review would be necessary to accommodate housing growth in the latter years of the plan period.
- 10.10 The Core Strategy acknowledges that a key challenge for Woking is ensuring the provision of the right type of homes in terms of size, type and tenure. Much of the identified supply is in Woking Town Centre, which will largely yield flatted schemes. There is a significant need for family (and affordable family) homes in the Borough. The Green Belt was therefore identified as a broad location for future housing growth to address this, in conjunction with the Council's two safeguarded sites at Moor Lane and Brookwood Farm. A specific site or sites for housing development in the Green Belt has not been identified through this SHLAA update. A comprehensive review of the Green Belt boundary has been prepared on the Council's behalf to identify the most suitable and sustainable land and was published in July 2014. This Green Belt boundary review will inform preparation of the Site Allocations DPD, which will recommend a site or sites for this purpose.

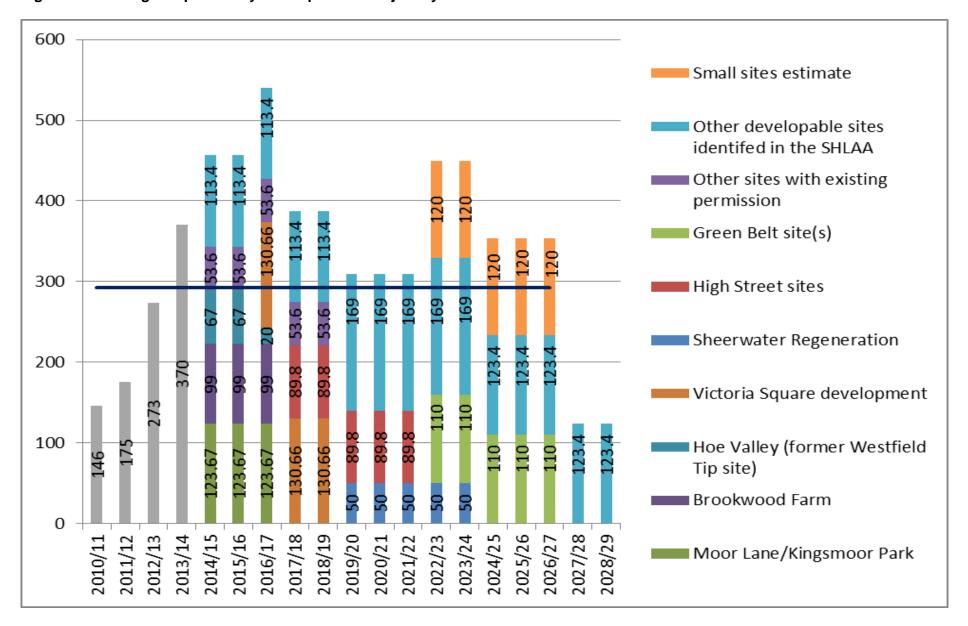
Small sites estimate

- 10.11 This SHLAA update has used a site size threshold of six units; only sites that are capable of accommodating six or more dwellings have been considered for the purposes of this SHLAA. Table 6 shows that around 14% of the Borough's new housing is completed on schemes of five units or fewer, an average of 40 units per annum. This is an update of the average assumed in the previous SHLAA (42 units per annum), which informed the Core Strategy.
- 10.12It can therefore be seen that small sites have been a significant source of housing land supply in the Borough. Although it has not been possible for practical reasons to identify such small sites through this SHLAA, this supply source should not be ignored in the future due to the implications that these additional dwellings will have on, for example, the demand for infrastructure.
- 10.13For this reason, the Council recognises the likely contribution of 40 units per annum from small sites will continue to make over the plan period. This is reflected in summary Table 7 (see Section 11), which takes into account delivery from small sites at the back end of the plan period (years 11-15).
- 10.14An up to date housing trajectory is provided at Figure 3.

Table 6: Completions on small sites since 2001 (based on gross dwelling completions)

	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	Total	Average since 2001/02
Schemes of 5 units or fewer	21	47	71	29	44	38	43	49	42	35	36	29	33	517	39.8
Schemes of 6 units and greater	135	174	278	250	592	425	266	315	221	127	139	244	337	3503	269.5
Total units	156	221	349	279	636	463	309	364	263	162	175	273	370	4020	309
% of total on schemes of 5 units or fewer	14%	21%	20%	10%	7%	8%	14%	14%	16%	22%	21%	11%	9%	n/a	14.4%

Figure 3: Housing and previously developed land trajectory



11.0 Conclusions

- 11.1 This Strategic Housing Land Availability Assessment (SHLAA) has been carried out in accordance with the National Planning Policy Framework, guidance and best practice.
- 11.2 The results of the SHLAA are summarised in Table 7 next. The housing requirement tested in this assessment is the figure of 5,548 net additional dwelling units¹⁸. The SHLAA has found specific deliverable/developable sites to provide 4,782 new dwellings between 2010/11 (the beginning of the Core Strategy Policy CS10 monitoring period) and 2028/29 (15 years from the baseline date of the SHLAA).
- 11.3 This represents a deficit of 766 dwellings during that period, until allocation(s) of Green Belt land totalling 550 homes (following Core Strategy Policies CS6 and CS10) is taken into account, giving a deficit of 216 units in the same period.
- 11.4 Small site are not counted in the first 10 year period to ensure that there is sufficient cushion to compensate for non-implementation. Nevertheless, the whole supply chain clearly demonstrates that overall the annual average housing delivery in Woking Borough is just similar to the housing requirement in the Core Strategy. Historical evidence also demonstrates the likelihood of small sites coming forward and this is likely to continue throughout the plan period (see Table 6). In this regard, it is reasonable to count delivery from small sites at the back end of the plan period (in years 11-15) and this is estimated at 600 dwellings. Taking into account an allowance for small site delivery gives a surplus of 384 dwellings in the same period (to 2028/29, one year beyond the Core Strategy plan period).

Table 7: Summary of the Woking Borough SHLAA (2014)

See next page (this is the same as Table 1 in the Summary).

¹⁸ That part of the Core Strategy Policy CS10 period preceding the base date of this SHLAA (2010/11 – 2013/14 = 1,168) plus the requirement for the 15 years of the SHLAA (2013/14 – 2028/29 = 4,380)

Core Strategy period		0-5 years (2012/13 – 2017/18)	6-10 years (2018/19 - 2022/23)	11-15 years (2023/24 - 2027/28)	
Policy CS10 period		Total: 4,964 (292 pa)			
SHLAA period	Pre SHLA 2010/11 - 2013/201	– 2014/15 –		- 2024/25 –	rs
Source of supply/ potential					Total
Dwelling completions 2010/11 – 2013/14 ²⁰	964	0	0	0	964
Units on sites under construction/ unimplemented planning permission ²¹	0	1,089	0	0	1,089
Sites with potential for residential development	0	567	1,545	617 (adjuste from 664) ²²	
Total	964	1,656	1,545	617	4,782
Core Strategy housing requirement (292 pa)	1,168	1,460	1,460	1,460	5,548
Surplus/ deficit against annual average requirement (excluding Green Belt)	-204	+196	+85	-843	-766
Broad location in the Green Belt ²³	0	0	275	275	550
Total including Green Belt ²⁴	964	1,656	1,820	892	5,332
Surplus/ deficit against annual average requirement (including Green Belt	-204	+196	+360	-568	-216
Small sites delivery (estimate 40 pa) ²⁵	(counted actual delivabove)		0	600	600
Total including Green Belt and small sites	964	1,656	1,820	892	5,932
Surplus/ deficit against annual average requirement (including Green Belt and small sites)	-204	+196	+360	-568	384

¹⁹ Assuming continuation of average annual housing requirement 292 pa

²⁰ Source: Annual Monitoring Report 2013/14

²¹ Source: SHLAA 2014. Includes those with a resolution to grant planning permission subject to legal agreements and prior approvals.

To avoid double-counting of potential residential yield, an adjustment has been made to the total 11-15 year figure (of minus 47 units), to take into account that the anticipated yields of Roxburghe House (SHLAAWB078), Globe House (SHLAAWB081) and Steward House (SHLAAGE059) counted earlier in this table are considered to contribute to the estimated yields of the larger sites in which these lie that are written up separately in this SHLAA.

²³ Excludes previously allocated / safeguarded land at Moor Lane, Westfield and Brookwood Farm, Brookwood.

²⁴ Assumes half of 550 Green Belt development in years 6-10 of SHLAA period and remainder in years 11-15 of SHLAA period

²⁵ Assumes half of 550 Green Belt development in years 6-10 of SHLAA period and remainder in years 11-15 of SHLAA period, plus small sites delivery counted in years 11-15