

LOCAL DEVELOPMENT FRAMEWORK

Research Methodology

STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

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CONTENTS

		Page
1.0	Introduction	3
2.0	Policy context	3
3.0	Planning the assessment	5
4.0	Determining which sources of sites will be included in the Assessment and desktop review of existing information	7
5.0	Determining which sites and areas will be surveyed	8
6.0	carrying out the survey	8
7.0	Estimating the potential of each site	9
8.0	Assessing when and whether sites are likely to be developed	9
9.0	Review of the Assessment	10
10.0	Identifying and assessing the potential for broad locations and windfall allowances	11
11.0	Monitoring and review	11
Appendix 1a	Site assessment sheet	12
Appendix 1b	List of constraints	13
Appendix 2	Intended approach to specific issues/ constraints	14
Appendix 3	List of SHLAA consultees	17
Appendix 4	Responses to draft methodology	18
Appendix 5	Consistencies and differences between the Woking, Guildford and Waverley SHLAAs	63
Appendix 6	Estimating housing potential	69

WOKING STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

METHODOLOGY

1.0 Introduction

- 1.1 This paper sets out the approach to be used by Woking Borough Council in the production of the Strategic Housing Land Availability Assessment (SHLAA) for Woking Borough.
- 1.2 The Council's methodology follows that proposed in the Government's guidance on SHLAAs which was published in July 2007¹. Regard has also been had to additional guidance on SHLAAs published by the Planning Advisory Service and Planning Officers' Society in January 2008² and July 2008.
- 1.3 The Council consulted on a draft SHLAA methodology between 12 February and 4 March 2008. Comments on the draft methodology were received from a number of interested parties. All comments received have been considered in the preparation of this final methodology, full details of which can be found in Appendix 4 of this document.
- 1.4 It should be noted that the SHLAA itself will not determine whether a site will be allocated for housing development. Sites for housing will be allocated in the Site Allocations Development Plan Document. This will be prepared using the evidence in the SHLAA and other studies as a starting point and will involve the community in the choices to be made from the outset through wide reaching public consultation, and will be subject to independent Examination. It is also stressed that although the study must include the assessment of greenfield sites, any future strategy for housing delivery in Woking Borough will only consider greenfield development if there are insufficient suitable brownfield sites available in line with national policy. Any conclusions reached in the study will be made without prejudice to the determination of any subsequent planning applications in respect of sites assessed.

2.0 Policy Context

- 2.1 Woking Borough Council is in the process of preparing a new Local Development Framework (LDF) which will guide future development in the Borough. The LDF will comprise a number of planning policy documents, including:
 - Core Strategy – this will set out the vision, objectives and spatial strategy for the area. All other LDF documents must be in conformity with the Core Strategy. The Core Strategy will set out how the Borough Council will meet known and anticipated development requirements to 2026, including the number of dwellings required. It will also set out policies against which planning applications will be determined.
 - Site Allocations - this will identify and allocate specific locations in the Borough where major development will take place in accordance with the vision and spatial strategy set out in the Core Strategy.
 - Supplementary Planning Documents (SPD) – a number of SPDs will be produced which will 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, infrastructure, design, climate change and affordable housing.

¹ 'Strategic Housing Land Availability Assessments: Practice Guidance' (CLG, July 2007)

² 'Strategic Housing Land Availability Assessment and Development Plan Document Preparation' (PAS/POS, January 2008)

- 2.2 LDF documents must be based on a robust and credible evidence base. The Council is therefore undertaking a number of research studies to inform these documents. One of the studies is the Strategic Housing Land Availability Assessment (SHLAA).
- 2.3 National policy set out in Planning Policy Statement 3: Housing (PPS3) requires local authorities to set out policies and strategies for delivering the level of housing provision determined by the Regional Spatial Strategy, including the identification of broad locations and specific sites that will enable continuous delivery of housing for at least 15 years. In order to achieve these requirements, PPS3 requires that a SHLAA be undertaken.
- 2.4 The SHLAA should enable the Council to demonstrate:
- Specific, deliverable sites for the first five years of a plan that are ready for development and keep this topped up over time in response to market information.
 - Specific deliverable sites for years 6 – 10 and ideally years 11 – 15, in plans to enable the five year supply to be topped up.
 - Broad locations for future growth where it is not possible to identify specific sites for years 11 – 15 of the plan.
 - No allowance for windfalls in the first 10 years of the plan unless there are justifiable local circumstances that prevent specific sites being identified.
- 2.5 Annex C of the practice guidance states that a SHLAA should:
- Assess the likely level of housing that could be provided if unimplemented planning permissions were brought into development.
 - Assess land availability by identifying buildings or areas of land (including previously developed land and greenfield) that have development potential for housing, including within mixed use developments.
 - Assess the potential level of housing that can be provided on identified land.
 - Where appropriate, evaluate past trends in windfall land coming forward for development and estimate the likely future implementation rate.
 - Identify constraints that might make a particular site unavailable and/or unviable for development.
 - Identify sustainability issues and physical constraints that might make a site unsuitable for development.
 - Identify what action could be taken to overcome constraints on particular sites.
- 2.6 The SHLAA has strong links with the Strategic Housing Market Assessment (SHMA). The SHMA is being prepared by consultants jointly commissioned by Woking, Guildford and Waverley Borough Councils. The SHMA provides local and sub-regional evidence of housing need and demand in accordance with Government requirements set out in PPS3. The SHMA is due for publication in the autumn of 2008. More information on the SHMA is available on the Council's website. The need and demand for particular types of housing in Woking will be matched with potential housing sites in the Borough, which are being identified through the SHLAA.

The Woking Context

- 2.7 Currently, the Development Plan for Woking comprises the Surrey Structure Plan 2004 and the Woking Borough Local Plan 1999. The housing target for the Borough is set in the Structure Plan which requires the Council to accommodate an additional 3,340 homes between 2001 and 2016 (223 dwellings per annum).

- 2.8 When it is adopted, the South East Plan will replace the Surrey Structure Plan and will contain a new housing allocation for Woking. The draft South East Plan allocated 4,840 new dwellings for Woking between 2006 and 2026 (242 dwellings per annum). The South East Plan Panel Report recommended that the allocation for Woking be increased by an additional 1,000 dwellings over the plan period, equivalent to 292 new dwellings per annum. This higher allocation of 292 new dwellings has also been carried forward into the Secretary of States Proposed Changes to the draft South East Plan – *as a minimum* - which are subject to public consultation between 17 July 2008 and 24 October 2008.
- 2.9 Table 1 below sets out that between 1 April 2001 and 31 March 2008, 2,269 net additional dwellings were completed in Woking leaving a residual requirement of 1,071 (133 dwellings per annum) to 2016 against the Structure Plan allocation.
- 2.10 During the first two years of the allocation set out in the South East Plan Proposed Changes, 694 net additional dwellings were completed in Woking, leaving a minimum residual requirement of 5,146 dwellings to 2026 (286 per annum).

	Allocation	Net Completions in period	Residual Requirement	Residual Requirement per annum
Surrey Structure Plan 2004	3,340 dwellings 2001-2016	2,269	1,071	134
Draft South East Plan	4,840 dwellings 2006-2026	694	4,146	230
Inspectors Report on the Draft South East Plan	5,840 dwellings 2006-2026	694	5,146	286
Proposed Changes to the Draft South East Plan	5,840 dwellings 2006-2026 (Minimum)	694	5,146 (Minimum)	286 (Minimum)

Table 1: Dwelling completions against allocation.

Woking's Approach

- 2.11 The remainder of this document describes in detail the Council's intended approach to undertaking the SHLAA for Woking Borough.

3.0 Planning the Assessment

- 3.1 The practice guidance recommends that local authorities should work in partnership with all interested parties in the production of the SHLAA. It is recognised that a number of organisations and people can provide valuable information and input at all levels of the process.
- 3.2 It is recommended in the guidance that the SHLAA is undertaken jointly with other local authorities within the Housing Market Area, and preferably through a Housing Market

Partnership where one has been established. Woking Borough Council does not consider it practical to undertake a joint study at this time, particularly as no Housing Market Partnership as such has been established, although the Council is undertaking a Strategic Housing Market Assessment (SHMA) jointly with Guildford and Waverley Borough Councils. The main reason for this is that the three authorities have different timetables for the production of Local Development Documents and undertaking a joint study would delay the production of Woking's Local Development Framework. However, every effort will be made to ensure that the methodology and SHLAA information is shared with Guildford and Waverley to ensure that the Assessments can be aggregated to the Housing Market Area level. Appendix 5 provides a summary of the consistencies and differences between the SHLAA methodologies of these three local authorities.

- 3.3 The guidance also recommends that key stakeholders such as house builders and local property agents should be involved in the SHLAA from the outset. 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 proposed approach at an early stage. The views of the stakeholders were taken in to consideration and used to inform the draft methodology. It is proposed to continue to involve these stakeholders throughout the SHLAA process (see section 9, Review of the Assessment, and Appendix 3).
- 3.4 It is also essential that key stakeholders such as the Environment Agency, Natural England, English Heritage and Surrey Wildlife Trust are involved in the SHLAA. In November 2007, the Council consulted these organisations 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 results of these discussions are outlined in Appendix 2. The Council will continue to engage with these organisations throughout the SHLAA process in order to gain specialist advice.
- 3.5 It is not normal practice to involve residents in preparing technical research studies. The Council has, however, 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 have been used to inform the general public of the study. Residents Associations have also been asked to put forward sites for consideration in the SHLAA and asked to comment on the proposed methodology. It is not the Council's intention to involve 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 LDF documents.

Management and Scrutiny Arrangements

- 3.6 In accordance with the SHLAA practice guidance, an officer level Project Team has been set up to undertake the SHLAA. The members of the project team bring a wide range of expertise from a variety of disciplines:
 - Planning Strategy Manager
 - Senior Policy Officer (Planning)
 - Development Control Manager
 - Senior Planning Officer (Development Control)
- 3.7 The following will join the Project Team to provide advice on their specific areas of expertise:

- Scientific Officer (Contaminated Land)
 - Housing Officer
 - Arboricultural Officer
 - Highways Engineer (Surrey County Council).
- 3.8 As set out in paragraph 1.3, the SHLAA methodology has been subject to public consultation. In particular, the methodology has been subject to the scrutiny of the Home Builders Federation.
- 3.9 The SHLAA will be subject to the scrutiny of the Council's Local Development Framework (LDF) Members Working Group. The Assessment will also be background to the considerations of the Council's Executive Committee and Full Council at the relevant stages of the adoption of the Core Strategy and Site Allocations Development Plan Documents.
- 3.10 The Council currently employs an independent planning consultant to act as a 'critical friend' for the preparation of the Local Development Framework (LDF). It is proposed to commission the consultant to evaluate the SHLAA at key stages to ensure that it is being prepared in accordance with Government guidance and is a robust study and evidence base for Woking Borough.

4.0 Determining which sources of sites will be included in the Assessment and desktop review of existing information

- 4.1 The Council, with key stakeholders, has identified the following sources of sites for inclusion in the Assessment:
- Sites allocated in the Local Plan (including safeguarded sites)
 - Secondary employment sites (as identified in the Employment Needs Assessment 2005)
 - Unimplemented planning permissions
 - Sites where there has been a previous planning refusal
 - Sites of previous development interest/ sites where there is an undetermined planning application
 - National Land Use Database
 - Sites considered as part of PFI
 - Previous Housing Potential Study sites
 - Sites for which unimplemented planning briefs have been prepared
 - Sites put forward by stakeholders.
- 4.2 Between 1 April 2003 and 31 March 2008, 89% of residential completions within the Borough were on sites of 6 or more units, and 78% of completions were on developments of 15 or more units. Therefore, as a basis for the assessment, the Council only intends to include sites that are capable of accommodating six or more residential units. This is primarily to keep the number of sites assessed to a manageable level and in recognition of the requirement not to include a windfall allowance for the first ten years of housing land supply unless there are specific and justifiable local circumstances.
- 4.3 Once the list of sites has been collated, they will be mapped on the Council's GIS system and checked for potential constraints such as flooding and environmental designations.

4.4 The Council will draw on a number of sources of information to undertake the desktop review and selection of sites:

- Undeveloped allocations in the Woking Borough Local Plan 1999
- Planning permissions/ sites under construction
- Planning application refusals
- Dwelling starts and completions
- Sites put forward by landowners/ developers through a call for sites
- Urban Capacity Study 2004
- Empty property register
- National Land Use Database (NLUD)
- Register of surplus public sector land
- Employment Needs Assessment 2005 and Employment Land Review
- Open Space, Sports and Recreation Audit
- Valuation Office database
- Vacant property register
- OS Maps
- Aerial photography
- Information from Development Control Officers
- Planning decision monitoring database and planning application registration database.

5.0 Determining which sites and areas will be surveyed

5.1 In addition to the sites identified in Section 4 above, the Council will undertake a detailed survey of broad locations in the Borough that are considered likely to contain development opportunities. The SHLAA guidance suggests that these should include town and district centres and their surrounding pedestrian catchments, principal public transport corridors and their walking catchment areas, development hotspots and other specific locations within or outside settlements where there might be potential due to regeneration, redevelopment, intensification of development or significant infrastructure provision nearby. With this in mind the Council will carry out a detailed street-by-street survey of the following areas:

- The town and district centres (Byfleet, Goldsworth Park, Horsell, Knaphill, St. Johns, Sheerwater, West Byfleet).
- The pedestrian catchments of the town and district centres (i.e. the area within 800m of the centre boundaries).
- The pedestrian catchments of the Borough's railway stations (i.e. the area within 1,250m of the railway station).

5.2 This street-by-street search for potential sites will be undertaken by the Project Team.

6.0 Carrying out the survey

6.1 The sites identified in sections 4 and 5 above will be visited by Council officers. The characteristics will be recorded for each site as follows:

- Site size.
- Site boundaries.
- Current use(s).

- Surrounding land use(s).
- Character of surrounding area.
- Physical constraints (e.g. access, topography, location of pylons).
- Development progress (e.g. any ground works completed, number of homes started and completed).

6.2 A copy of the site survey form and a full list of constraints that will be checked are located at Appendix 1. Appendix 2 sets out the Council's intended approach to specific issues and constraints such as flood risk and the Thames Basin Heaths Special Protection Area.

7.0 Estimating the housing potential of each site

7.1 Assessing the housing potential of sites will involve making estimations of housing densities. In line with the SHLAA practice guidance, the Council intends to use an exemplar scheme approach.

7.2 The Council has selected 25 exemplar schemes which reflect the form of development considered desirable in different parts of the Borough.

7.3 When assessing the housing potential of each site, regard will be had to a number of factors including the character of the area, the type of housing desirable on the site, information available from landowners/ developers and density aspirations set out in the emerging Core Strategy. Regard will also be had to a number of other factors which will affect density including the consideration of issues such as the shape of and access to the site which will influence capacity, as well as the effect of flood risk and topography, for example.

7.4 As stated above, the character of an area will be taken in to consideration when assessing potential for residential development. 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 will involve a qualitative assessment of how an area performs in terms of urban design objectives. The characteristics of an area will be assessed with regard to constraints (the presence of mature trees and listed buildings, for example) and opportunities and capacity for development. Regard will also be had to national policy and guidance as well as local character appraisals that have been adopted by the Council.

7.5 Appendix 6 contains detailed information about the Council's approach to estimating housing potential.

8.0 Assessing when and whether sites are likely to be developed

8.1 In line with PPS3, when judging whether or not a site is deliverable and developable, that is, whether or not it will come forward for development, the Council will consider the availability, suitability and the achievability of the site for residential development.

8.2 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. If problems are identified, a judgement will need to be made about how and

when these problems can be overcome. Specifically, the Council will consider the following questions:

- 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?
- Has there been an expression of interest from a landowner?
- Are there any possible legal or ownership problems associated with the site (e.g. ransom strips, tenancies, operational requirements)?
- Has there been an expression of interest from a developer?
- Can any identified problems be overcome?

8.3 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. Specifically, the Council will consider the following questions:

- Are there any policy restrictions on the site (e.g. protected areas, nature conservation designations)?
- Are there any physical problems/ limitations affecting the site (e.g. access, infrastructure, flood risk, etc.)?
- Are there any significant potential impacts likely to arise from developing the site (e.g. on landscape features and conservation)?
- Are there likely to be any negative environmental conditions experienced by prospective residents should the site come forward for residential development (e.g. noise vibration)?
- Are there any over-riding positive benefits associated with the development of the site for residential use (e.g. regeneration, provision of affordable family housing)?

8.4 The assessment of the **achievability** of the site involves making a judgement about whether development of the site is economically viable, including a judgement about the need for section 106 contributions and affordable housing. This stage will involve specialist input on economic viability from a consultancy. The key questions to be addressed are:

- Does the density considered desirable for the site exceed the density at which development of the site for residential use becomes economically viable?
- Are there any 'abnormal' costs that are likely to reduce the economic viability of the site (e.g. the cost of basement parking, remediation of contaminated land)?

8.5 This part of the Assessment will also involve a consideration of whether any constraints that have been identified can be overcome. This might 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 LDF process which is subject to public consultation and independent examination.

9.0 Review of the Assessment

9.1 Following the initial survey of sites and the assessment of their suitability, achievability and deliverability, sites will be collated to inform a housing trajectory covering the period to 2026 that sets out how much housing can be provided, and at what point in the future.

9.2 Details of the site surveys and assessments will be recorded in a database. In the event of a shortfall of sites, further sites may need to be brought forward. In the event of a surplus of sites, consideration will have to be given to prioritising and delaying the development of some sites given the type of constraints on site. Following the review, if there are insufficient sites identified to meet the targets, it will be necessary to investigate how this shortfall should best be planned for. The two options recommended in the guidance are:

- the identification of broad areas for future housing growth, within and outside settlements.
- the use of a windfall allowance.

10.0 Identifying and assessing the potential of broad locations and windfall allowance

10.1 Following the review of the assessment, it will be possible for the Council to determine whether or not a sufficient number of deliverable and developable sites to meet the housing target over the required 15-year period are available. Should the review of the Assessment not identify a sufficient number of specific sites for years 10-15 then it may be necessary for the Council to identify broad locations with housing potential. Broad locations are defined as areas where housing development is feasible but where specific sites cannot as yet be identified. Should it be necessary to identify broad locations, the SHLAA will identify the options and assess the housing potential of those options with regard to physical and environmental constraints.

10.2 The Council will only consider a windfall allowance if, following review of the Assessment and identification of broad locations, it is still not possible to identify sufficient future housing supply, for years 10 – 15 of the Plan. A windfall allowance will be considered with input from the Government Office and, in line with national policy, if the Council can identify genuine local circumstances.

11.0 Monitoring and Review

11.1 It is proposed that the SHLAA is updated by officers annually through the Annual Monitoring Report (AMR) in order to ensure that a 5 year supply of deliverable sites is maintained as required by PPS3. The progress of the sites through the planning and development process will be monitored as well as any changes in circumstances regarding deliverability constraints.

APPENDIX 1a: WOKING SHLAA – SITE ASSESSMENT SHEET

1. UNIQUE SITE REF:	2. OFFICER:	3. DATE OF SITE VISIT:
4. SITE ADDRESS:		5. CURRENT USE:
6. SITE DESCRIPTION:		
7. DETAILS OF NEIGHBOURING USES/CHARACTER OF SURROUNDING AREA:		
8. ISSUES TO CHECK ON SITE: Are there any mature trees on site? Describe the topography of the site Are there any visible contamination issues Are there any obvious issues relating to suitability of existing access to the site?		
9. ANY OTHER ISSUES/INITIAL COMMENTS ON SUITABILITY:		
(Map of site overleaf)		

APPENDIX 1b: LIST OF CONSTRAINTS

The following constraints will be checked for each site through the desktop review and site surveys.

General background information

1. Unique Ref.
2. Site Address
3. Current site use
4. Site Area
5. Existing units
6. Details of site owner(s)
7. Details of Stakeholder / Agent
8. Relevant planning history
9. Known developer interest
10. Existing use value

Development Plan designation/planning issues

11. Woking Borough Local Plan sites allocated for particular purpose
12. Within Woking Town Centre?
13. Within other district/village centre?
14. Public Transport Accessibility Level
15. Green Belt
16. Urban open space
17. SPA zone
18. SAC zone
19. SSSI Consultation
20. Listed/locally listed buildings/impact on setting of listed building
21. Flood risk zone
22. Existence of significant trees
23. Contamination issues
24. Highways assessment
25. Compatibility of neighbouring uses
26. Any other issues (e.g. topography of the site, Scheduled Ancient Monument)
27. Urban Area of Special Residential Character
28. Conservation area
29. Environmental designation (e.g. archaeology potential; LNR; SSSI; SNCI)
30. Other designations (e.g. Common Land; Public Open Space; escarpments; canal/river corridor);
31. Accessibility (e.g. by foot; by bike; to GP, primary and secondary schools and to the town centre)
32. Site survey notes

APPENDIX 2: INTENDED APPROACH TO SPECIFIC ISSUES/ CONSTRAINTS

Areas at risk of flooding

- A2.1 The Council will assess sites with regard to all forms of flooding in accordance with the Strategic Flood Risk Assessment.
The Council intend to:
1. Initially only consider sites in Zone 1 (less than a 1 in 1000 year flood event probability)
 2. If necessary, the Council will then look at sites in Zone 2 (between a 1 in 100 and 1 in 1000 year flood event probability) in line with the sequential test prescribed by PPS25: Development and Flood Risk.
- A2.2 The Zones are defined in the Council's Strategic Flood Risk Assessment. This approach has been agreed by the Environment Agency.

Canal and River Corridors

- A2.3 The Council will have regard to the Environment Agency's policy that requires a minimum buffer between any proposed development and a watercourse (5m for non-main watercourses and 8m for main rivers). These buffer zones should be managed for their nature conservation interests. This approach has been agreed by the Environment Agency.

Special Protection Area

- A2.4 The whole of Woking Borough falls within 5km of the Thames Basin Heaths SPA. It is the Council's intention to discount any sites that come forward within 400m of the SPA on the basis that Natural England has advised that within this zone harm to the SPA cannot be avoided.
- A2.5 The Council's SPA Interim Strategy currently sets out avoidance measures which will allow sites in the rest of the Borough to be mitigated against the impacts of residential development on the SPA. The Council do not therefore intend to discount sites that fall between 400m and 5km of the SPA for the purpose of this study. This approach has been agreed by Natural England.

Special Area of Conservation

- A2.6 A part of the Thursley, Ash, Pirbright and Chobham SAC lies within the Borough boundary. The Council does not currently have a procedure for dealing with sites that come forward in close proximity, however would propose that Natural England should be consulted on any sites that may come forward within 500m of this SAC.
- A2.7 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.

SSSIs

- A2.8 There are also a number of SSSIs within the Borough. It is the Council's intention to consult with Natural England on any sites that may be 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

- A2.9 It is not the Council's intention to consider sites that fall within a SNCI. Surrey Wildlife Trust will be consulted on sites that fall within 500m of an SNCI.

Listed Buildings, Ancient Monuments & Conservation Areas

- A2.10 The following approach has been agreed with English Heritage:

1. Sites that are within the curtilage or adjacent to Listed Buildings and Scheduled Ancient Monuments will be subject to appraisal by the Council's Design and Conservation Consultant.
2. Sites that come forward within or adjacent to Conservation Areas will be subject to appraisal by the Council's Design and Conservation Consultant.

Urban Areas of Special Residential Character (UASRC)

- A2.11 The Council does not intend to exclude sites within UASRCs from the SHLAA. Excluding these areas would not accord with Government guidance set out in PPS3: Housing. Estimates of the housing potential of these sites would have regard to the guidance set out in existing SPG on UASRCs and the character of the area.

Green Belt / Greenfield

- A2.12 Sites that are in the Green Belt or that are greenfield will not be excluded from the SHLAA. In light of the South East Plan Panel Report and the Proposed Changes to the South East Plan, the Council will undertake a comprehensive assessment of housing potential in Woking to include consideration of Green Belt/ greenfield sites. It should be noted however, that the SHLAA is a technical document and cannot itself change policy. Any review of the Green Belt boundary would be subject to the LDF process.

Areas of Public Open Space

- A2.13 The Council's audit of open spaces which was carried out in 2005, as required by PPG17, concluded that there was not a surplus of open space in the Borough. The audit has been reviewed and it is clear that the Council still cannot afford to lose any identified urban open space to development. For this reason, the Council does not intend to comprehensively review the potential of all its identified and protected open spaces for housing development as part of the SHLAA, but will not exclude 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. Again, it should be noted that the SHLAA is a technical document and cannot itself change policy. Any change in policy regarding development of public open space for residential development would be subject to the LDF process.

Areas of Ancient Woodland

A2.14 It is not the Council's intention to consider any sites that fall within areas of Ancient Woodland.

Site Assembly

A2.15 For the purpose of the SHLAA, the Council will generally discount sites that have more than 6 landowners/ occupiers, due to difficulties with site assembly.

Gypsy and Traveller Accommodation

A2.16 In line with Government guidance, the SHLAA will assess the potential of sites for all types of housing including Gypsy and Traveller accommodation. The Council will consult with Surrey County Council and Gypsy and Traveller groups to identify potential sites.

APPENDIX 3 - LIST OF SHLAA CONSULTEES

Attendance at the SHLAA Planning Workshops (10 & 14 January 2008):

1. Elinor Savage, London & Quadrant Housing Association
2. Pete Errington, HBF
3. Rob Phillips, Barratt Southern Counties
4. Mark Carter, Carter Planning
5. Ray Freeland, BBF Fielding.

Organisations consulted on the draft SHLAA methodology, included:

- Government Office for the South East
- South East England Regional Assembly (SEERA)
- South East England Development Agency (SEEDA)
- Natural England
- Environment Agency
- English Heritage
- Surrey Wildlife Trust
- 474 no. residents associations, community interest groups, local businesses, developers, landowners, infrastructure providers.

APPENDIX 4 – RESPONSES TO DRAFT METHODOLOGY

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
General Comments					
DMSHLAA-005-01	Mrs. J. Dare, Hook Heath Residents Association		Hook Heath Residents Association (HHRA) note that the methodology does not identify who the principal beneficiary of the exercise is and express concern that the study has commenced without the involvement of local residents. HHRA request that local residents are invited to a similar workshop as was held for developers/ landowners in January 2008.	Government housing targets are set at the regional level through the South East Plan and it is for Woking Borough Council to demonstrate how these targets will be met, in partnership with local residents and other interested parties. The SHLAA is a technical document which will form part of the evidence base to inform the Council's decision making. The Council must identify sites that are both deliverable and developable which means it has been essential to gain the advice from developers/ landowners/ etc in developing the SHLAA methodology. The SHLAA will conclude with a number of options available to the Council in order to meet the housing target. These options will be subject to significant public consultation and policy decisions that arise from this consultation will be subject to independent examination through the LDF process.	Paragraph added at 3.5 to explain the involvement of local residents in the decision making process.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-005-02	Mrs. J. Dare, Hook Heath Residents Association		HHRA is concerned that the draft methodology does not include details of how the development of sites for housing in the Borough will impact on climate change. HHRA suggests a number of actions that the Council should include in the methodology to address climate issues.	The sustainability of sites (e.g. accessibility to public transport and other local services) is an important factor in site selection which is addressed in the appendices to the draft methodology. Issues relating to how the sites are built out in relation to renewable energy and energy efficiency etc. are addressed through application of policy at a later stage in the planning process and not a concern of the SHLAA which is concerned with identifying deliverable and developable land for housing.	No changes to methodology required.
DMSHLAA-005-03	Mrs. J. Dare, Hook Heath Residents Association		HHRA considers that Woking is currently being penalised for having over supplied in terms of housing numbers in previous years and that the surplus should be carried over to future allocations.	It is true that over the last five years there has been an over-supply of housing against the annual allocation. This is generally true for Surrey as a whole. The additional dwellings that were completed prior to 2006 cannot be carried forward in to the new allocation. This issue is a matter for higher level decision making and is outside of the remit of the SHLAA which is solely concerned with identifying enough suitable land to meet the allocation.	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-005-04	Mrs. J. Dare, Hook Heath Residents Association		HHRA considers that the Council should consider phasing the delivery of housing over the plan period to match the level of demand prevailing at the time.	<p>Government policy and guidance does not support phasing Woking's housing allocation over the plan period.</p> <p>This issue is a matter for higher level decision making and is outside of the remit of the SHLAA which is solely concerned with identifying enough suitable land to meet the allocation over the plan period.</p> <p>(Do we want to get in to HMA findings re. no. of immigrants and their demand for housing? How much of the demand comes from existing residents?)</p>	No changes to methodology required.
DMSHLAA-016-01	Mr. R. J. Evans, Surrey County Council		Surrey County Council recommends considering the approach to housing delivery advocated by Tandridge District Council in their current Submission Draft Core Strategy since there will be a similarities with the position in Woking.	Surrey County Council's advice to consider Tandridge's approach to housing delivery as set out in the current Submission Draft Core Strategy as an example of good practice is noted.	No changes to methodology required.
DMSHLAA-017-03	Mr. C. Moon, Woking Sports Council		Woking Sports Council considers that the draft methodology does not give sufficient weight to balancing development with enhancing community facilities, space, recreation etc. The balance	The need to provide infrastructure to meet the additional demand created from new development in the Borough is recognised. The Council is currently undertaking an Infrastructure Capacity Study which will identify the specific	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
			needs to be restored through consultation and inclusion of these factors through the SHLAA process.	infrastructure requirements related to new development over the plan period. The findings of this research will enable the Council to develop planning policies to ensure the delivery of the necessary infrastructure. It is not within the remit of the SHLAA to consider the specific requirements for 'green' infrastructure in the Borough; its focus is on potential housing sites alone.	
DMSHLAA-018-01	Mr. A. Bowen, Surrey County Playing Fields Association		SCPFA agrees with all points of the proposed methodology and has no further suggestions to make.	It is noted that SCPFA has no objections to the proposed methodology.	No changes to methodology required.
DMSHLAA-022-01	Rose Freeman, The Theatres Trust		The Theatres Trust has no specific comments to make regarding the SHLAA methodology.	Noted.	No changes to methodology required.
Section 1: Introduction					
DMSHLAA-001-01	Ms. S. Janota, South East England Regional Assembly		The Council should have regard to the PAS/POS guidance: "Strategic Housing Land Availability Assessments and Development Plan Document Preparation", which should be read alongside the CLG guidance.	The methodology has been informed by the additional guidance on undertaking SHLAAs as set out in the PAS/POS guidance.	No changes to methodology required.
Section 2: Policy Context					

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-005-05	Mrs. J. Dare, Hook Heath Residents Association		HHRA considers that the SHLAA methodology should identify the social character of the proposed housing so that the Borough can extrapolate the related residential needs and costs and allow it to plan for future services.	The need to provide the right type of housing to meet the needs of the population is currently being addressed through the Housing Market Assessment, as set out in paragraphs 2.4 and 2.5 of the draft methodology. The Council is also undertaking an Infrastructure Capacity Study which will identify the specific infrastructure requirements related to new development over the plan period.	No changes to methodology required.
DMSHLAA-010-01	Mr. T. Dell, Rydens Way Action Group		The Rydens Way Action Group (RWAG) considers that the methodology paper could set out more clearly how many houses are actually due to be built per annum, as there could be some confusion between the requirements of the Structure Plan and South East Plan.	The Council appreciates that the situation regarding the number of new dwellings to be built in the Borough is confusing whilst the adoption of the South East Plan is awaited and will endeavour to state this more clearly in the final methodology and SHLAA report.	The situation regarding the Boroughs housing allocation has been clarified at paragraph 2.11.
DMSHLAA-014-01	Mr. R. Shatwell (local resident)		Mr. Shatwell disputes the figures quoted in the paper regarding the Council's residual housing allocation (as set out at Section 2.6 of the draft methodology).	It is true that over the last five years there has been an over-supply of housing against the annual allocation. The additional dwellings that were completed prior to 2006 cannot be carried forward into the new allocation. This issue is a matter for higher level decision making and is	The situation regarding the Borough's housing allocation has been clarified at paragraph 2.11.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
				outside of the remit of the SHLAA which is solely concerned with identifying enough suitable land to meet the allocation.	
DMSHLAA-016-02	Mr. R. J. Evans, Surrey County Council		Surrey County Council highlights that the SHLAA should seek to identify land available for housing to suit local needs and also, should the need be indicated by SEERA, be potentially available for further Gypsy and Traveller site accommodation. The question of need will be informed by the North Surrey GTAA submitted to SEERA.	<p>Strong links exist between the Housing Market Assessment (HMA - which looks at the need and demand for different types of housing) and the SHLAA as set out at paragraphs 2.4 and 2.5. It is the intention of the Council to undertake a 'matching' exercise to provide the Council with the evidence that there is enough suitable land not only to meet the overall housing target but also to meet the requirements for different types of housing as evidenced in the HMA.</p> <p>SEERA is currently consulting on four options for the level of provision of Gypsy and Traveller accommodation across the South East. For Woking, the options will mean providing between 9 and 11 new pitches between 2006-2016. The options have been informed by the North Surrey Gypsy and Traveller Accommodations Assessment (GTAA) and local authority advice to SEERA. The</p>	Paragraph added to Appendix 2 to explain approach to Gypsy and Traveller accommodation.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
				requirement for Woking will be set in a revision to the South East Plan in 2009-10.	
DMSHLAA-016-03	Mr. R. J. Evans, Surrey County Council		Surrey County Council highlights that any conclusions drawn will not actually determine whether or not a site is allocated for housing.	Surrey County Council is correct in highlighting this matter. It is acknowledged that the draft methodology is not explicit about this point.	A new paragraph is included (para 1.4) to clarify this matter.
DMSHLAA-021-01	The Chairman, Woking Chamber of Commerce		The paper should make reference to the assessment and determination of affordable housing.	The need to provide the right type of housing to meet the needs of the population is currently being addressed through the Strategic Housing Market Assessment, as set out in paragraphs 2.4 and 2.5 of the draft methodology.	No changes to methodology required.
DMSHLAA-021-04	The Chairman, Woking Chamber		Approvals are being given to developments of less than 15 homes which are below the affordable housing trigger.	The affordable housing threshold will be examined as part of the review of policy following completion of the Strategic Housing Market Assessment. Permission for housing developments of less than 15 units cannot be withheld simply because they are below the threshold.	No changes to methodology required.
DMSHLAA-021-07	The Chairman, Woking Chamber		Units of affordable family accommodation could be developed in some town and out of town office blocks.	The Council will consider sites with potential for mixed use development as part of the SHLAA.	No changes to methodology required.
DMSHLAA-021-12	The Chairman, Woking Chamber		Sites for new business and employment must also be	Alongside the SHLAA, the Council is undertaking an Employment	No changes to methodology

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
			identified and encouraged under the SHLAA.	Land Review which looks at employment land use and supply in the Borough to 2026. The SHLAA itself looks only at potential housing land.	required.
Section 3: Planning the Assessment					
DMSHLAA-010-02	Mr. T. Dell, Rydens Way Action Group	S3, Para. 3.3	The RWAG is concerned that developers who are perhaps better set up to respond to these complex methodologies than the general public will have a greater weight placed on their response. Concern is raised regarding how the Council intend to deal with what is clearly to the lay-person a conflict of interest. The RWAG request that the Council clearly states in the finalised document the checks and procedures that will be in place to demonstrate to the public a process of clear accountability, integrity and impartiality in the decisions made during these assessments. It is considered that this type of assessment does not fully attempt to engage the public, who have become resigned to these assessments being a foregone conclusion.	Section 3 of the draft methodology sets out how the Council proposes to involve key stakeholders in the SHLAA process. It should be noted that the SHLAA is a technical research paper and that it is not a requirement for the Council to undertake full public consultation. Essentially, the SHLAA forms the evidence base for the Council's Local Development Framework which will be subject to wide ranging public consultation and independent examination. The Council has, however, undertaken to involve residents in the SHLAA from the outset, firstly by informing residents associations of the project back in December 2007 and inviting them to suggest potential housing sites, and secondly by consulting with them on the draft methodology. It is by no means the case that developers' views will be given	Paragraph added at 3.5 to explain the involvement of local residents in the decision making process. Explanation of validation, scrutiny and audit of decisions taken added at Section 9.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-010-02 (cont.)				<p>more weight than residents. However, it is essential that developers and landowners are fully engaged in the SHLAA process to enable us to determine whether or not there is sufficient land for housing – this land, as set out in Section 8 of the methodology, must be demonstrated to be <i>both deliverable and developable</i> in order to be included in the potential housing land supply, and the input of these stakeholders is therefore vital to this stage of the assessment. The issue regarding ensuring that the Council demonstrates how decisions have been reached is acknowledged, and the final methodology clearly sets out how the Council may seek to a) better involve residents in the SHLAA and b) explain how any conclusions have been reached in a clear way.</p>	
DMSHLAA-011-01	Ms. C. Saunders (local resident)	S3, Para. 3.3	Ms. Saunders notes that it is likely that stakeholders who are house builders will have a direct interest in at least some of the sites and raises the issue of how the Council will deal with the conflict of interest that may arise. Ms. Saunders requests	See response above to DSHLAA-010-01.	See response above to DSHLAA-010-01.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
			that the final document sets out the checks and procedures that will be in place to demonstrate to the public clear accountability, integrity and impartiality in the decisions that will be made in these Assessments.		
DMSHLAA-014-02	Mr. R. Shatwell (local resident)	S3, Para. 3.4	Mr. Shatwell raises a concern that the Council is undertaking assessments jointly with adjoining local authorities when nothing done in Guildford and Waverley concerns anything done in Woking.	Paragraph 3.2 of the draft methodology explains that the SHLAA is not being undertaken jointly with neighbouring authorities. This is primarily due to differing LDF timetables. The Council is, however, undertaking the Housing Market Assessment with Guildford and Waverley Councils in line with national planning policy guidance, which sets out the need to take a strategic view of housing markets whilst providing a great deal of borough level information.	No changes to methodology required.
DMSHLAA-014-03	Mr. R. Shatwell (local resident)	S3, Para. 3.3	Mr. Shatwell raises a concern regarding why local residents have not been involved in the SHLAA.	See response above to DSHLAA-010-02.	See response above to DSHLAA-010-02.
DMSHLAA-014-04	Mr. R. Shatwell (local resident)	S3, Para. 3.4 & 3.5	Mr. Shatwell objects to the number of Council officers on the Project Team.	The number of officers on the project team reflects the complex nature of the SHLAA which requires specialist expertise on a number of issues, such as design and conservation and contamination. This requires the	The role of the Project Team has been clarified at para 3.6

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
				involvement of officers holding the right level of expertise.	
DMSHLAA-017-01	Mr. C. Moon, Woking Sports Council	S3, Para. 3.3	Woking Sports Council considers that in light of the importance of open spaces and the provision of recreational land as a consideration in the SHLAA, stakeholders representing this sector should be included. It is considered that those that represent the community in a broader sense should be included in the SHLAA process, not just developers.	See response above to DSHLAA-010-02.	See response above to DSHLAA-010-02.
DMSHLAA-019-01	JSA Architects on behalf of West Estates Ltd.	S3, Para. 3.3	JSA Architects note that the Council will make 'every effort' to ensure that the methodology and subsequent information of the SHLAA is shared with the other LPA's. If the SHMA is going to apply to all three local authorities, we would expect that their respective SHLAA should also need to be prepared using the same methodology. This would ensure that there is continuity in the SHLAA results and increase certainty that the identified sites could address the needs identified by the SHMA	The Council has shared its draft methodology and related information with both Guildford and Waverley Councils and the Council's are endeavouring to work together to ensure that information from the individual SHLAAs can be aggregated.	Paragraph 3.2 explains the reasons for not having undertaken a joint study. Appendix 5 provides an analysis of the consistencies and differences between the SHLAAs and concludes on the extent to which the SHLAAs can be aggregated to the housing market area.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
			and other housing needs assessments.		
DMSHLAA-019-15	JSA Architects on behalf of West Estates Ltd.	S3, Paras. 3.4 & 3.5	<p>JSA Architects state that the extent of matters proposed to be considered by the Council is welcomed. However, they consider that the nature of many of these matters is by their nature a specialist topic for which a high level of expertise is required to ensure full and proper assessments are made available to the Council for decisions to be taken. Any falling below such standards will tragically reflect in the quality of any decisions made on such topics to the loss of the residents of Woking, and perhaps beyond. It would be irresponsible for non-specialist personnel to be placed in the position of making decisions on specialist topics. The proposed Methodology does just that. As examples, assessment of access, viability, flooding and review of Green Belt should only be dealt with by those trained, qualified and experienced in such topics. The Council, whilst employing a number of experts in some areas, will not have enough in</p>	<p>The multi-disciplinary nature of the SHLAA is recognised. The SHLAA is being carried out by a multi-disciplinary Project Team as set out in para 3.4 of the draft methodology. The Council's Project Team includes officers who have expertise in a number of relevant areas. The methodology acknowledges that the Project Team will not always have the expertise required to conduct certain elements of the SHLAA and provision has been made for obtaining such expertise through the use of specialist consultants and for working with specialist organisations such as Natural England and the Environment Agency.</p>	<p>The role of the Project Team has been clarified at para 3.6.</p>

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
			numbers or range of topics to ensure proper assessments are made. In this context, the Methodology is defective.		
DMSHLAA-020-01	Natural England	S3	Natural England supports the Council's approach to partnership working and key stakeholder involvement.	The support of Natural England with regards to the Council's intended approach to partnership working and key stakeholder involvement is noted and welcomed.	No changes to methodology required.
Section 4: Determining the sources of sites and desktop review of existing information					
DMSHLAA-002-01	Mr. I. Davie, Environment Agency	S4, Para. 4.2	With reference to the proposed site size threshold of 6 units, the Environment Agency recommend that for sequential test purposes broad areas suitable for smaller developments are identified. These areas should be sequentially tested with regards to flood risk before being allocated in a policy document.	The threshold of 6 units has been set for purpose of the SHLAA in order that the number of sites assessed is manageable. The SHLAA will not be used for allocation of land; it is purely a technical document. Any conclusions reached in the study will be made without prejudice to the determination of any subsequent planning applications in respect of sites assessed/ not assessed. Any general areas as well as specific sites identified for development through the LDF would be sequentially tested for flood risk before inclusion.	No changes to methodology required.
DMSHLAA-006-01	Mr. M. Emmett, CALA Homes	S4, Para. 4.1	CALA Homes considers that the list of sources of sites should be broadened and/or elaborated to include safeguarded sites. Given	The safeguarded sites have been included in the SHLAA.	Para 4.1 has been amended to be explicit that safeguarded sites are

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
			that the very purpose of such land is to meet potential longer term development needs this would seem to be an entirely appropriate and indeed high priority, source.		included in the SHLAA.
DMSHLAA-010-03	Mr. T. Dell, Rydens Way Action Group	S4, Para. 4.1	RWAG consider that the methodology is set up to take suggestions of sites from the stakeholder (developers), who have a vested interest in getting their proposals for sites put forward. It is of concern that residents may successfully fight off planning applications that are totally unsuitable, only to have watered-down versions thrust upon them once again. This totally disregards the needs and requirements of existing residents. Is the aim basically to over time weaken opposition by "death by a thousand cuts"?	It is inevitable that sites would be put forward for consideration in the SHLAA by landowners and developers. In December 2007 when the Council put out the 'call for sites', all residents associations were informed of the project and asked to suggest sites to the Council. Residents were also informed of this call for sites through a press-release, information on the Council's website and via a LDF Newsletter which is sent to over 2,000 local residents, businesses, and statutory consultees. Paragraph 4.1 of the methodology sets out the different sources of sites under consideration in the SHLAA and it can be noted that sites put forward by private landowners/ developers make up only a small percentage of sites under consideration. Any conclusions reached in this study will be made without prejudice to the	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
				determination of any subsequent planning applications in respect of the sites assessed.	
DMSHLAA-012-01	Mr. H. Courtley, Courtley Consultants Ltd.	S4, Para. 4.1	Courtley Consultants Ltd object to the consideration of secondary employment sites which is not consistent with the Government's thinking on the economy as drafted in PPS4. There is no assessment as to whether consideration of such sites will impact on the employment opportunities in Woking, nor affect on employment mix or profile if these sites are lost to housing. This is therefore unsound if carried out in isolation.	Alongside the SHLAA, the Council is also undertaking an Employment Land Review in line with national policy. The SHLAA practice guide specifically states that sites allocated for employment use which may no longer be required for that use should be included in the SHLAA and as such, the Council has included its 'secondary' employment sites. It is stressed that the SHLAA itself cannot allocate employment land for housing. Any loss of employment land to housing would constitute a change in policy which can only be achieved through the LDF process.	No changes to methodology required.
DMSHLAA-012-02	Mr. H. Courtley, Courtley Consultants Ltd.	S4, Para. 4.1	Courtley Consultants Ltd requests that greenfield and Green Belt urban fringe sites are included in the SHLAA in light of the South East Plan Panel Report.	The Council has included Green Belt/ greenfield sites that have been put forward by developers/ landowners as well as those which have previously been identified through the Local Plan process.	No changes to methodology required.
DMSHLAA-012-03	Mr. H. Courtley, Courtley Consultants Ltd.	S4, Para. 4.2	Courtley Consultants Ltd objects to the site size threshold. It is considered that the threshold should be at least 10-15	The lower threshold of 6 units reflects the fact that, in accordance with national policy set out in PPS3: Housing, the	Further explanation of the site size threshold provided at para 4.2 of the final

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
			<p>dwelling to avoid the risk of double counting any windfall sites. Plus it erodes certainty in delivery of a minimum 5 year supply due to the difficulty in monitoring supply which would be extrapolated over a 15 year period.</p>	<p>Council should not make a windfall allowance as part of its housing land supply unless there are justifiable local circumstances. As a windfall allowance is not included, it could be argued that there should be greater certainty in delivering a five year supply if all sites are identified. Windfall sites will continue to come forward in any case.</p>	<p>methodology.</p>
DMSHLAA-014-05	Mr. R. Shatwell (local resident)	S4	<p>Mr. Shatwell suggests that sites with potential for residential development could be identified through a desktop survey using a map of the Borough.</p>	<p>The sites identified in the SHLAA have come from a number of sources. Officers have undertaken a street by street survey of the most accessible areas of the Borough in order to identify land that may have potential for development. This is addressed in sections 4 and 5 of the draft methodology.</p>	<p>No changes to methodology required.</p>
DMSHLAA-014-06	Mr. R. Shatwell (local resident)	S4, Para. 4.2	<p>Mr Shatwell is not clear what the threshold is.</p>	<p>The SHLAA will assess sites that are capable of accommodating 6 or more units. The threshold is clearly stated in Para. 4.2.</p>	<p>No changes to methodology required.</p>
DMSHLAA-015-01	Mr. A. Wilson, Bays Curry McCowen LLP	S4, Para. 4.2	<p>Bays Curry McCowen LLP considers that the threshold of 6 dwellings is too low and consideration should be given to raising this.</p>	<p>The lower threshold of 6 units reflects the fact that the Council should not make a windfall allowance as part of its housing land supply unless there are justifiable local circumstances,</p>	<p>Further explanation of the site size threshold provided at para 4.2 of the final methodology.</p>

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-015-01 (cont.)				therefore the Council must include as many feasible sites as possible as part of its assessment of potential.	
DMSHLAA-019-02	JSA Architects on behalf of West Estates Ltd.	S4, Para. 4.1	JSA Architects consider that the Council should also include sites arising from the implied review of the Green Belt (See Appendix 2) should be added.	The Council has not undertaken to review the Borough's Green Belt boundary at this stage. Such a review is outside the remit of the SHLAA. Appendix 2 of the methodology does, however, state that any sites put forward by stakeholders external to the Council will be considered along with sites in the urban area.	No changes to methodology required.
DMSHLAA-019-03	JSA Architects on behalf of West Estates Ltd.	S4, Para. 4.1	JSA Architects have no knowledge of any additional sources of sites that should be included in the Council's SHLAA.	Noted.	No changes to methodology required.
DMSHLAA-019-04	JSA Architects on behalf of West Estates Ltd.	S4, Para. 4.2	JSA Architects acknowledge that windfall sites have previously formed an important part of the Borough's housing supply. However, PPS3 states that allowances for windfalls should not be included in the first 10 years of land supply unless 'robust evidence can be provided of genuine local circumstances that prevent specific sites being identified'. It is therefore considered that the site size threshold is very	SHLAA to identify deliverable and developable sites. The SHLAA itself will not determine which sites will be allocated for future development. The results of the SHLAA will be matched with the results of the HMA.	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-019-04 (cont.)			<p>low and is clearly intended to catch all of these sites to demonstrate that this windfall rate will continue. Whilst this threshold is similar to that adopted by other local authorities, there is concern that an over reliance on smaller sites could prejudice some of the Council's other objectives (e.g. delivering affordable housing). The potential contribution of smaller sites over 6 units could be significant, however, it is suggested that the threshold should better reflect the Council's wider objectives and a threshold of 15 or more units should be adopted. This would also better reflect the indicative national minimum site size threshold outlined in Para 29 of PPS3.</p>		
DMSHLAA-020-02	Natural England	S.4	<p>Natural England considers that sites previously allocated in the Local Plan need to be assessed and reviewed with regard to any changes in planning policy and guidance including relevant appeal decisions.</p>	<p>Unimplemented Local Plan proposals sites that are included in the SHLAA will be subject to the same policy considerations as all SHLAA sites.</p>	<p>No changes to methodology required.</p>

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-021-05	The Chairman, Woking Chamber of Commerce.	S4, Para 4.2	Planning applications below 6 houses in number should still be assessed under the ambit of the SHLAA.	The threshold of 6 units has been set for purpose of the SHLAA in order that the number of sites assessed is manageable. The SHLAA will not be used for allocation of land; it is purely a technical document. Any conclusions reached in the study will be made without prejudice to the determination of any subsequent planning applications in respect of sites assessed/ not assessed.	No changes to methodology required.
Section 5: Determining which areas will be surveyed					
DMSHLAA-012-04	Mr. H. Courtley, Courtley Consultants Ltd.	S5, Para. 5.1	Courtley Consultants Ltd suggests that all locations within the Borough with good or improved public transport or cycle/pedestrian access to facilities should be considered.	Section 5 of the draft methodology explains that the Council will conduct a detailed search of the most accessible parts of the Borough in order to identify potential SHLAA sites.	No changes to methodology required.
DMSHLAA-019-05	JSA Architects on behalf of West Estates Ltd.	S5, Para. 5.1	JSA Architects are not aware of any other areas that should be considered for specific survey. However, we suggest that as part of the street-by-street analysis, all sites put forward that fall within the proposed pedestrian catchments for town/district centres and railway stations should also be included.	Section 5 of the draft methodology explains that the Council will conduct a detailed search of the most accessible parts of the Borough in order to identify potential SHLAA sites.	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-021-06	The Chairman, Woking Chamber of Commerce	S5, Para 5.1	There are more district centres than those listed.	There are seven District centres listed in the Local Plan, and these are the ones that have been assessed in detail for the purposes of the SHLAA. There are several smaller local centres across the borough. These have not been assessed in detail for their housing potential; however, they have not been excluded from the SHLAA.	No changes to methodology required.
DMSHLAA-021-11	The Chairman, Woking Chamber of Commerce	S5	Industrial sites, parks and recreational grounds and school sites could include individual units for security, ground staff and janitorial employees.	Such sites may provide a source of land for this type of housing. However, it is not likely that such sites could accommodate 6 or more units and therefore fall outside of the remit of the SHLAA.	No changes to methodology required.
Section 6: Carrying out the survey					
DMSHLAA-010-04	Mr. T. Dell, Rydens Way Action Group	S6, Para. 6.1	Mr. Dell raises a concern that certain parameters (such as use) cannot be established by Council officers during site visits and that this can only be achieved through a genuine local knowledge, probably only gained by engaging with local inhabitants.	Council officers undertaking visits are all qualified town planners with good local knowledge, supported by the members of the SHLAA project team. The purpose of the site visits is to make an initial assessment of the suitability of sites. A number of other sources of information will also be used.	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-015-02	Mr. A. Wilson, Bays Curry McCowen LLP	S6, Para. 6.1	With regard to the site survey assessment criteria, BCM request that the Council considers part-sites as submitted to the SHLAA. As a whole the land put forward may not be acceptable, but part of the site might be.	The Council will consider including part-sites in the SHLAA if it is deemed appropriate having undertaken the site visits.	No changes to methodology required.
DMSHLAA-017-02	Mr. C. Moon, Woking Sports Council	S6, Para. 6.1	The site assessment should give more emphasis than is apparent so far to not diminishing, and in fact enhancing, the amenity value to existing and new communities, in particular, ensuring there is open space nearby, and recreational facilities such as sports pitches and pavilions. Changing rooms – which we are already very short of, and would become more so proportionately, if development either takes away such facilities or does not provide for new additional ones. In extremis – all flats and houses and nowhere to play.	The Council's policy is to protect open space, sports and recreation facilities. The loss of any of these facilities would therefore be contrary to policy. The SHLAA itself cannot change Council policy. This can only be done through the LDF process. The Council is undertaking separate studies to inform these issues (which will in turn inform future planning policies alongside the SHLAA) in the form of an open space, sports and recreation facilities audit (PPG17) and an Infrastructure Capacity Study.	No changes to methodology required.
DMSHLAA-019-06	JSA Architects on behalf of West Estates Ltd.	S6, Para. 6.1	Additional criteria should also be considered during site surveys including: <ul style="list-style-type: none"> • Specific characteristics of site in relation to deemed 	All SHLAA sites have been assessed for constraints (Appendix 1 of the draft methodology contains a full list). The issue of how these	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-019-06 (cont.)			<p>constraints and possible action that could be taken to overcome such constraints;</p> <ul style="list-style-type: none"> • Suitability of site for withdrawal from Metropolitan Green Belt if currently within this designation; • Whether the site is within or has direct access to a sustainable town or district centre; • Proximity to existing public transport facilities. 	<p>constraints may be overcome is addressed later in the SHLAA process as described in Para 8.2 of the draft methodology. The Council is including Green Belt sites in the SHLAA. It is not within the remit of the SHLAA to review the Green Belt boundary. All SHLAA sites have been assessed for their accessibility to key local services (such as the Town Centre, schools, GPs and public transport).</p>	
DMSHLAA-019-07	JSA Architects on behalf of West Estates Ltd.	S6, Para. 6.1	<p>JSA Architects have concerns about the site survey assessment criteria which relate to elements which require a degree of subjectivity (e.g. landscape value, character of surrounding area) or where further technical advice may be required (e.g. highways impact, suitability of access). It is requested that any judgements/ assessments that made by officers are subsequently made available as part of the development of the SHLAA.</p>	<p>Some elements of the site assessment (e.g. character) are subjective. The assessments have, however, been undertaken by qualified town planners. Where appropriate, sites have been assessed in detail by officers with specialist knowledge and skills, for example in highways and access issues. When the SHLAA is published, it will include sufficient information about the technical assessment of sites to support its findings.</p>	

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
Section 7: Estimating the potential of each site					
DMSHLAA-002-02	Mr. I. Davie, Environment Agency	S7, Para. 7.1	The Environment Agency considers that the housing potential of sites should be referred back to the SFRA, as increases in vulnerability or density through redevelopment will need to be sequentially tested.	Flood risk will be considered as a constraint when estimating potential in accordance with the SFRA.	Appendix 2 is amended to clarify this point.
DMSHLAA-003-02	Drivers Jonas Chartered Surveyors on behalf of Burhill Golf & Leisure Limited	S7, Para. 7.1	Assessments of housing potential should be carried out on a site by site basis, rather than just on exemplar schemes. Depending on the constraints of certain sites, it may be acceptable to provide a higher/lower density of development than on other sites.	Exemplar schemes will be used together with knowledge of the sites constraints (such as access and character of the area). Site constraints such as tree coverage etc. will also be taken in to consideration.	Detailed information regarding the estimation of potential has been included in Section 7 and at Appendix 6.
DMSHLAA-003-03	Drivers Jonas Chartered Surveyors on behalf of Burhill Golf & Leisure Limited	S7, Para. 7.1	The results of SHMA should also be considered when assessing the suitability of sites to accommodate a certain type of housing, such as family homes.	The SHLAA Project Team has considered what type of housing the sites are suitable for (i.e. flats or houses or a mix of both). This is being used to determine appropriate densities for the sites along with information from exemplar schemes and knowledge of site constraints. The findings of the SHLAA and the SHMA will be brought together for public consultation on the preparation of the Core Strategy.	Detailed information regarding the estimation of potential has been included in Section 7 and at Appendix 6.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-005-09	Mrs. J. Dare, Hook Heath Residents Association	S7, Para. 7.1	The document frequently uses terms such as 'considered desirable' or 'an aspiration', but the question must be answered as to who is the authoritative arbiter of what is desirable or allowable. Local residents and politicians should be involved in this process.	The SHLAA is a technical research document. It does not propose or set new policy. The SHLAA will inform the documents comprising the LDF which involves significant public engagement. It should be noted that any conclusions drawn in the SHLAA are without prejudice to the determination of subsequent planning applications.	Paragraph added at 3.5 to explain the involvement of local residents in the decision making process.
DMSHLAA-005-06	Mrs. J. Dare, Hook Heath Residents Association	S7, Para. 7.1	The phrase 'area character' is used frequently within the methodology implying that this term is well established and understood with some degree of certainty. The experience of the HHRA is that despite its ubiquitous use in planning documents most recent planning decisions ignore the conventional understanding of the term, permitting grossly out of character developments based on compliance to often inappropriate detailed guidance. If the methodology wishes to continue to use this phrase it should provide an authoritative definition which people can rely upon.	It is appreciated that the term 'character' is a subjective one and that no firm definition exists in either national or local policy/ guidance. It is agreed that there is a need to provide further clarification.	A more detailed explanation of the definition of 'character' is provided in section 7 of the final methodology.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-007-02	Mr. P. Ford (local resident)	S7, Para. 7.1	There is no mention in the text of the consideration of issues such as infrastructure (e.g. roads, sewerage, water, gas and electricity) and the possibility of flooding (e.g. removal of soakaways, decreased rainwater runoff) which would affect the housing potential of a site.	A wide variety of constraints including accessibility and flood risk are being considered as part of the SHLAA, as set out in the Appendices. These constraints will all be taken in to consideration when estimating housing potential.	No changes to methodology required.
DMSHLAA-010-05	Mr. T. Dell, Rydens Way Action Group	S7, Para. 7.1	The methodology is very subjective, and a more quantitative approach should be considered. "Character" of the area is a classic example. Who actually defines and quantifies this?	See response above to DMSHLAA-005-06.	See response above to DMSHLAA-005-06.
DMSHLAA-012-05	Mr. H. Courtley, Courtley Consultants Ltd.	S7, Para. 7.1	Capacity of housing sites should take into account the findings of the SHMA to ensure allocated sites will meet these needs.	Section 2 of the draft methodology explains links between SHLAA and SHMA. The SHLAA can only provide indication of suitability for houses or flats and the likely density. It is outside of the remit of the SHLAA to determine exactly how the Boroughs housing need will be met – this is a matter for policy development through the Local Development Framework.	No changes to methodology required.

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DMSHLAA-019-10	JSA Architects on behalf of West Estates Ltd.	S7, Para. 7.1	<p>JSA Architects acknowledge that the character of the local area can give a clear indication of possible future densities. However, para 50 of PPS3 states that 'The density of existing development should not dictate that of new housing by stifling change or requiring replication of existing style or form'. We note that the Council will need to make some assumptions whilst the Core Strategy is developed, however, these should be flexible and not preclude innovative design and an alternatives responses to individual sites. PPS3 makes states that '30 dwellings per hectare (dph) net should be used as a national indicative minimum to guide policy development and decision-making, until local density policies are in place'. We therefore suggest that 30dph be used as a minimal density unless site specific constraints or until local density policies are in place.</p>	<p>Para. 7.1 of the draft methodology states that when estimating potential, the Council will consider a number of factors, including the aspirations set out in the Core Strategy First Submission. It should be noted that since the draft methodology was published, the Council has further developed its approach to estimating potential (see appendix 6 of the final methodology). The lowest density being applied to sites in the SHLAA is 30dph, in line with PPS3.</p> <p>The SHLAA is a technical research document which will provide the evidence base for the Core Strategy. It is outside the remit of the SHLAA to draw up detailed planning briefs for each of the sites under consideration. It should be noted that any conclusions drawn in the SHLAA are without prejudice to the determination of subsequent planning applications</p>	<p>A more detailed explanation of the definition of 'character' is provided in section 7 of the final methodology.</p>

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-019-11	JSA Architects on behalf of West Estates Ltd.	S7, Para. 7.1	The impact of the results of the SHMA should be considered in relation to any density requirements.	See response above to DMSHLAA-012-05.	See response above to DMSHLAA-012-05.
DMSHLAA-019-12	JSA Architects on behalf of West Estates Ltd.	S7	<p>Whilst this assessment will require officers to use their professional expertise to assess the potential for each site, this must be a transparent process which is open to comment and public consultation.</p> <p>Having regard to the severe restrictions on the level of expertise available to the Council concerning specialist topics para 8.2 should be extended to provide for officers to have regard to any reports prepared by appropriately qualified specialists submitted by landowners/ stakeholders in support of their promotion of a site where such reports put forward ways of overcoming deemed constraints.</p>	When considering the housing potential of a site, the Council will have regard to a number of factors, including information from developers/ landowners.	Further explanation and clarification provided in S7.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
Section 8: Assessing when and whether sites are likely to be developed					
DMSHLAA-002-03	Mr. I. Davie, Environment Agency	S8, Para. 8.2	The Environment Agency expresses concern that the Council would consider amending planning policy to achieve development. The Agency wish to be consulted on the policy amendments so the environmental effects can be assessed and representations be made.	The SHLAA is a technical document which will highlight what could be done to make sites deliverable which may include changes to policy. Any changes to policy will be subject to the LDF process for which the EA is a statutory consultee. No changes to policy can be made through the SHLAA.	Further explanation and clarification provided at para 1.4 and 8.5 of the final methodology.
DMSHLAA-004-01	Mr. P. Errington, Home Builders Federation	S8, Para. 8.1	In relation to the issue of deliverability and developability, a key determinant of this is often a local authority's planning policies. They can have a significant impact on the nature and form of development and the cost of bringing it forward. Woking is renowned for its approach to climate change policies but there are also very costly (for developers/ landowners) policies on affordable housing provision and the delivery of planning obligations. The methodology should be clear that the impact of these policies will be factored into assessments of developability and viability.	The financial viability of the potential sites at the first stage is based on general land values, which themselves are based on knowledge of the Woking market. Hence the values take account of the planning policies currently in place. Any site which appears to be viable, or marginally viable after the first stage assessment will be subjected to closer scrutiny and a more individual approach and hence any site specific costs of development will be considered.	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-019-09	JSA Architects on behalf of West Estates Ltd.	S8, Para. 8.1	JSA Architects request clarification on the 'Existing Use Value' constraints listed in Appendix 1b. Whilst it is important to note the 'value' of existing land, this could be a subjective judgement by officers and can therefore be down to individual interpretation. Furthermore, any financial value attributed to a site should not be attributed at this stage due to the complexity of ownership and other obligations which may apply to the land. We would also ask that other judgements are supported by appropriate evidence where appropriate (e.g. accessibility).	The valuation of the existing use values of sites has been based on formula based on publicly available data. It is accepted that this data may be flawed. The first stage analysis will however, identify those sites which clearly are or are not viable. A review of these sites by an experienced consultant should highlight any fundamental flaws in data. Any marginal sites will be subjected to further analysis. A cost allowance for site assembly has been included in the assessment to help overcome complexities of ownership.	The valuation consultant will review all data collected by administration staff to ensure that it reasonable reflects the existing use values of the site. 20% has been added to calculated existing use values assist in overcoming complexity if ownership.
<i>Section 9: Identifying and assessing the potential of broad locations and windfall allowance</i>					
DMSHLAA-001-02	Ms. S. Janota, South East England Regional Assembly		All sources of supply should be properly tested. If at the end of the exercise windfalls contribute any more than a modest fraction of forecast supply, the Council should discuss the matter with GOSE in order that the evidence on particular local circumstances that might justify exceptional reliance on windfalls is understood and supported.	It is the Council's intention to discuss the need to include a windfall allowance with GOSE should the need arise.	Clarification of this point is provided at section 10 of the final methodology.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-002-04	Mr. I. Davie, Environment Agency		The Environment Agency will require the sequential assessment of any broad locations for development in conjunction with the SFRA.	Flood risk will be identified as a constraint should broad locations need to be identified.	Clarification of this point is provided in section 10 of the final methodology.
DMSHLAA-003-04	Drivers Jonas Chartered Surveyors on behalf of Burhill Golf & Leisure Limited	S9, Para. 9.2	The draft methodology states that following the assessment of deliverability and developability, it will be possible for the Council to determine whether or not there are a sufficient number of sites to meet the housing target over the required 15-year period, and if this is not possible, the Council will consider a windfall allowance. Windfalls should not be included in the first 10 years of the Plan. Given the Panel's Report, the Council should consider sites in the Green Belt for residential development in the first 10 years.	It is not the Council's intention at this stage to include a windfall allowance. Any such allowance will be subject to discussions with GOSE. The Council is including a number of Green Belt sites in the SHLAA. It should be noted that the SHLAA itself cannot allocate sites for development or amend Green Belt policy. The SHLAA is a technical study that will provide the evidence base for the relevant LDF documents.	No change required to methodology.
DMSHLAA-003-05	Drivers Jonas Chartered Surveyors on behalf of Burhill Golf & Leisure Limited	S9	Overall, it would be wholly wrong for the Council to seek to rely on windfall sites coming forward in the period of year 10-15 because to do so would go against the purpose of the guidance in PPS3.	It is not the Council's intention at this stage to include a windfall allowance. Any such allowance will be subject to discussions with GOSE.	Clarify use of windfalls in para 9.2.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-004-02	Mr. P. Errington, Home Builders Federation	S9	The HBF considers that this misinterprets PPS3 guidance on how windfalls should be treated. They are not there as a fallback to be included in cases where windfalls have formed a significant component of supply in the past. Para 59 of PPS3 makes it clear that windfalls should only be included where there are genuine local circumstances which prevent the identification of specific sites for development. If it is ultimately deemed appropriate and necessary to incorporate a windfall allowance the SHLAA should set out what are those genuine local circumstances and how they have been factored into the assessment based on a transparent interpretation of the available evidence.	Para 9.2 of the draft methodology sets out that windfalls will only be considered for years 10 – 15 if there are insufficient individual sites and insufficient capacity within broad locations. It is agreed that Para 9.2 should be expanded to clarify that a windfall allowance would have to be justified by genuine local circumstances. It should be noted that it is the Council's intention to discuss any proposals for a windfall allowance with GOSE at an early stage.	Further explanation and clarification provided at section 10.
DMSHLAA-012-06	Mr. H. Courtley, Courtley Consultants Ltd.	S9	Courtley Consultants object to the use of windfall assessments. PPS3 clearly suggests a move away from this process to ensure certainty in housing supply over the plan period. Indeed the SEP suggests a green belt review specifically.	Para 9.2 of the draft methodology sets out that windfalls will only be considered for years 10 – 15 if there are insufficient individual sites and insufficient capacity within broad locations. It is agreed that Para 9.2 should be expanded to clarify that a windfall allowance would have to be justified by genuine local circumstances. It	Further explanation and clarification provided at section 10.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-012-06 (cont.)				should be noted that it is the Council's intention to discuss any proposals for a windfall allowance with GOSE at an early stage. The South East Plan suggests that Woking Borough Council may need to review the Green Belt if sufficient land cannot be identified within built-up areas but it is not prescriptive on this matter.	
Section 10: Validation					
DMSHLAA-002-05	Mr. I. Davie, Environment Agency	S10	The Environment Agency would like to be consulted on the key stages of the SHLAA, including its validation.	It is the Council's intention to consult with the Environment Agency at all appropriate stages.	Clarification provided in section 3 that the Environment Agency and other relevant consultees will be involved in the SHLAA at key stages.
DMSHLAA-005-08	Mrs. J. Dare, Hook Heath Residents Association	S10	The Council welcomes the participation of the house building industry in the validation process, but makes no such profession of faith about the involvement of residents. Many residents will have equally valid experience and knowledge to contribute to the process there being many lawyers, financiers and other professional people living locally. Additionally it would also make sense to include other interested parties	It is not normal practice to involve residents in preparing technical research studies. The Council has, however, sought to involve residents in the SHLAA where appropriate. A press release, information of the Council's website and articles in the Council's regular LDF Newsletter have been used to inform the general public of the study. Residents Associations have also been asked to put forward sites for consideration in the SHLAA	Role of stakeholder involvement explained in section 3 of the final methodology.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-005-08 (cont.)			such as CPRE & the Open Spaces Society from the outset. Therefore we do not agree with the current validation approach.	and asked to comment on the proposed methodology. It is not the Council's intention to involve residents in detailed discussions about individual SHLAA sites. Residents and all other interested parties will have the opportunity to comment on the findings of the SHLAA through consultation on the LDF documents.	
DMSHLAA-007-01	Mr. P. Ford (local resident)	S3, Para 3.3 & S10	It seems only builders and estate agents have been involved to-date as key stakeholders. The residents of Woking very clearly have a stake in their urban environment and should be included as stakeholders in the form of resident associations and action groups together with a councillor representation. The list of participating stakeholders should be published. Otherwise it might be perceived as a secretive 'cosy club'.	The SHLAA is a technical document which will form part of the evidence base to inform the Council's decision making. The Council must identify sites that are both deliverable and developable which means it has been essential to gain the advice from developers/ landowners/ etc in developing the SHLAA methodology. The public have been informed of the SHLAA through a news release, information on the Council's website and through an LDF newsletter. Through these means, the public were also invited to suggest suitable sites for inclusion in the SHLAA. The SHLAA will conclude with a number of options available to the Council in order to meet the housing target. These options will	Role of stakeholder involvement explained in section 3 of the final methodology. Consultees listed at Appendix 3.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-007-01 (cont.)				be subject to significant public consultation and policy decisions that arise from this consultation will be subject to independent examination through the LDF.	
DMSHLAA-014-07	Mr. R. Shatwell (local resident)	S10, Para 10.1	Residents must also be involved at every stage.	See response above to DMSHLAA-007-01.	See response above to DMSHLAA-007-01.
DMSHLAA-014-08	Mr. R. Shatwell (local resident)	S10, Para 10.2	Mr Shatwell questions the necessity for commissioning planning consultant to assist in the validation of a SHLAA.	It is essential that the SHLAA is independently validated and employing an independent consultant will facilitate this process.	The arrangements for the validation and scrutiny of the SHLAA are set out in section 3 of the final methodology.
DMSHLAA-019-13	JSA Architects on behalf of West Estates Ltd.	S10	JSA Architects welcome the continuing involvement of the House Builders Federation and its members as part of the ongoing review of the SHLAA, but we would also ask that this process also includes other interested stakeholders and landowners.	It is the intention to involve other interested parties and landowners in the validation process.	The arrangements for the validation and scrutiny of the SHLAA are set out in section 3 of the final methodology.
Section 11: Monitoring and review					
DMSHLAA-015-03	Mr. A. Wilson, Bays Curry McCowen LLP	S11	Does the annual monitoring and review include sites already submitted and put forward to the SHLAA, but initially dismissed? Or do dismissed sites need to be re-submitted each year?	It is not the intention of the Council to request that sites be re-submitted each year. However, it may be necessary for the Council to contact the relevant landowners/ developers to ensure that the most up to date information is available.	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
Appendix 1a: Site Assessment Sheet					
No comments received.					
Appendix 1b: List of Constraints					
DMSHLAA-002-06	Mr. I. Davie, Environment Agency	A1b	The Environment Agency is generally happy with the list of constraints to be checked by desktop review.	Noted.	No changes to methodology required.
DMSHLAA-007-03	Mr. P. Ford (local resident)	A1b	Village Greens should be included in the list of constraints.	Village greens are included in definition of open space as set out in Appendix 2.	No changes to methodology required.
DMSHLAA-008-01	Mr. B. E. Wilson, Byfleet, West Byfleet & Pyrford Residents Association	A1b	Rain water run off must be taken into account. The existing storm water drains do not always cope and the water comes off the land and goes down the roads in quantity. Additional roofs and hard features, including driveways, will only increase the problem.	Sustainability of sites (e.g. flooding) is an important factor in site selection. However, issues regarding how the sites are built out in relation to sustainable drainage etc. are addressed through application of policy at a later stage.	No changes to methodology required.
DMSHLAA-008-02	Mr. B. E. Wilson, Byfleet, West Byfleet & Pyrford Residents Association	A1b	Congestion from traffic heading to or coming off the M25 should be considered.	The SHLAA is a technical study that looks at potential sites for housing development across the Borough. The Council will consider the impacts of potential development on the transport network through a Transport Assessment in 2009.	No changes to methodology required.

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DMSHLAA-008-03	Mr. B. E. Wilson, Byfleet, West Byfleet & Pyrford Residents Association	A1b	Many local schools are currently over subscribed, forcing children to make longer journeys with the inevitable increase in car movements.	The SHLAA is a technical study that looks at the capacity for housing development across the Borough. The Council is considering the impacts of development on all forms of infrastructure including schools, through an Infrastructure Capacity Study which will be published in 2009.	No changes to methodology required.
DMSHLAA-009-01	D. A. Reeve, The Grove Area Ltd.	A1b	The reference to Green Belt use should be deleted.	The SHLAA must consider all options for housing potential in the Borough. The SHLAA in itself cannot change the Green Belt boundary. Any changes to the Green Belt would be subject to wide ranging public consultation through the LDF and independent examination.	No changes to methodology required.
DMSHLAA-019-08	JSA Architects on behalf of West Estates Ltd.	A1b	JSA Architects broadly agree with the list of constraints. But there is little point in considering such constraints unless the comments regarding representation number DMSHLAA-019-15 are addressed and the Methodology amended appropriately.	Comment responded to above at DMSHLAA-019-15.	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-020-03	Natural England	A1b	Areas of Ancient Woodland should not be allocated for development. This is in line with PPS9. PPS9 advocates the identification of areas of Ancient Woodland in order to prevent loss or deterioration.	It is not the Council's intention to consider any sites within areas of Ancient Woodland for the purposes of the SHLAA.	Clarification provided at Appendix 2.
DMSHLAA-021-02	The Chairman, Woking Chamber of Commerce	A1b	Areas for development should preferably be within the easy reach and access to the town centre to obviate the need for use of motor vehicles and town parking.	The Council has undertaken a street-by-street search for sites with housing potential in the most accessible areas of the Borough. Accessibility is a key consideration as set out in Appendix 1b.	No changes to methodology required.
DMSHLAA-021-03	The Chairman, Woking Chamber of Commerce	A1b	Provision of parking should be an integral part of all developments.	The likely level of parking required on a site will be taken in to consideration when assessing housing potential.	No changes to methodology required.
Appendix 2: Intended approach to specific issues/ constraints					
DMSHLAA-002-07	Mr. I. Davie, Environment Agency	A2	The Environment Agency requests that it should be noted that areas suffering from drainage problems, surface water flooding and groundwater flooding should also be considered. These issues should also be covered in the SFRA.	Appendix 2 sets out that the sites will be considered with regard to the Council's SFRA. The Council's SFRA addresses the issues of drainage, surface water and groundwater flooding.	Clarification provided at Appendix 2.

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DMSHLAA-002-08	Mr. I. Davie, Environment Agency	A2	Canal/River Corridors – The Environment Agency will require a minimum buffer between any development (including hardstanding and fences) and a watercourse. This varies between 5m for non-main watercourses and 8m for main rivers. These zones will need to be managed for nature conservation interests, and may also double up as essential access for river maintenance.	Noted.	Appendix 2 amended to include this constraint.
DMSHLAA-003-01	Drivers Jonas Chartered Surveyors on behalf of Burhill Golf & Leisure Limited	A2	The Panel's Report on the draft South East Plan acknowledges the possible opportunity for land to have to be released from the Green Belt on the south side of Woking (Para 20.64). It may be necessary to undertake a review of the Green Belt boundary. Burhill support the inclusion of sites put forward by stakeholders to be included in the assessment but wishes to ensure that these sites include those located within the Green Belt.	Appendix 2 states that the SHLAA will include Green Belt sites. It should be noted that the SHLAA is a technical document forming part of the evidence base for the LDF. Sites can only be allocated for development and Green Belt boundaries altered through a Development Plan Document. The sites put forward on behalf of Burhill have been included in the SHLAA.	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-007-04	Mr. P. Ford (local resident)	A2	<p>With reference to Appendix 2:</p> <p>a) Village Greens should be covered;</p> <p>b) Areas of Public Open Space: This provision is already embedded in PPG17 (Para 13) and therefore does not need to be mentioned any more than the strict constraints applying under PPG17. To include it might imply a weakening of PPG17 and encourage opportunistic applications.</p>	<p>a) Village greens are included in definition of open space.</p> <p>b) Appendix 2 of the document explains that the Council's PPG17 audit is currently being reviewed, and that early indications show that there is not a surplus of open space in the Borough. For this reason, the Council is not comprehensively reviewing the Borough's open spaces as part of the SHLAA. Areas of open space put forward by stakeholders will be considered through the SHLAA. However, it should be noted that these sites will be subject to the same constraint checks as all other SHLAA sites. If a site is public open space this fact will be highlighted as a constraint. Planning policies cannot be changed through the SHLAA. Changes to policy can only be made through the LDF process which will be subject to independent examination.</p>	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-010-06	Mr. T. Dell, Rydens Way Action Group	A2	<p>The PPG17 Audit found that there is not a surplus of public open space. Mr Dell is interested to know which sites have been covered in the PPG17 audit and how the scoring system has been derived. I am keen to find out how you justify the subsequent statement that you will include such spaces for possible development if suggested by stakeholders? I can only conclude from this that the methodology is seriously flawed, as I have previously stated, and biased in favour of developers, undermining much of the methodology used in carrying out your SHLAA.</p>	<p>The Council is required to consider all sites with potential for housing development in accordance with para 21 of SHLAA Guidance which states: “the scope of the Assessment should not be narrowed down by existing policies designed to constrain development, so that the local planning authority is in the best possible position when it comes to decide its strategy for delivering its housing objectives” In light of the findings of the PPG17 Audit, the Council will only consider open spaces through the SHLAA that are suggested by stakeholders “where there may be the potential to provide alternative or additional open space as part of potential housing development”. The PPG17 Audit is available on the Council’s website. It should be noted that development on land which is designated Public Open Space would be contrary to policy. Any changes to policy would be subject to wide ranging public consultation through the LDF including independent examination.</p>	<p>No changes to methodology required.</p>

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-011-02	Ms. C. Saunders (local resident)	A2	Areas of Public Open Space; this states that the Council's audit of open spaces as required by PPG17 concluded that there was not a surplus of open space in the Borough. Further, that the audit is currently being reviewed and early indications suggest that the Council still cannot afford to lose any identified urban space to development. How then do you justify the subsequent statement that you will include such spaces for possible development if suggested by stakeholders? I would suggest that to do so can only confirm my disquiet, expressed above, and seriously undermine the integrity of these Assessments.	See response above to DMSHLAA-010-06.	No changes to methodology required.
DMSHLAA-014-09	Mr. R. Shatwell (local resident)	A2	Sites within UASRCs should not be excluded. If we have to find land for houses then these areas should be included. Any development anywhere should be in keeping with the surrounding local area.	Appendix 2 explains that UASRCs will not be excluded from the SHLAA. Section 7 sets out the Council's approach to assessing housing potential in relation to the character of the local area.	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-019-14	JSA Architects on behalf of West Estates Ltd.	A2	JSA Architects welcome the reference in Appendix 2 that sites in the Green Belt or greenfield land will not be excluded from the SHLAA. Furthermore, we are encouraged that in light of the South East Plan Panel Report, the Council will undertake a comprehensive assessment of housing potential which will include Green Belt/greenfield sites. Whilst this intention to consider Green Belt/ greenfield sites is clearly stated in Appendix 2, the methodology gives no indication of any investigative or formal action to review the boundaries of the Metropolitan Green Belt. We therefore consider that the Methodology is inconclusive and thereby defective.	Whilst the SHLAA must include consideration of Green Belt and greenfield sites, it must be noted that the Metropolitan Green Belt is a strategic planning tool. Its primary purpose is to contain London's growth and to provide a degree of separation between surrounding settlements. It is therefore considered that any review of the Green Belt will need to be more strategic than a piecemeal review of the boundaries at the local level. To some extent, the need to review the Green Belt or not will be dictated by the findings of the SHLAA.	No changes to methodology required.
DMSHLAA-020-04	Natural England	A2	With regard to the detailed methodology set out in Appendix 2, Natural England supports the methodology as outlined for the SPA and SAC.	Noted and welcomed. .	No changes to the methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-020-05	Natural England	A2	Sites outside of these zones which would have an adverse effect upon the hydrology of the SAC should be discounted. Hydrological impacts on wetland features of SACs outside of the borough due to the development within the borough should also be considered.	Noted and welcomed.	The Council's position regarding such areas is clarified at Appendix 2 of the final methodology.
DMSHLAA-020-06	Natural England		Natural England should be consulted on any sites within 500m of a SSSI. In addition we should be consulted on any development which is upstream of a wetland or aquatic SSSI and could have water quality or hydrological impacts on the downstream SSSI.	Noted and welcomed.	The Council's position regarding such areas is clarified at Appendix 2 of the final methodology.
DMSHLAA-020-07	Natural England		Natural England would like to be consulted on sites identified for development adjacent to the undesignated section of the Basingstoke Canal especially within the Woking urban area. This is because of its importance as an ecological link between the two sections of Basingstoke Canal SSSI and its importance as a wildlife corridor for bat species.	Noted and welcomed.	The Council's position regarding such areas is clarified at Appendix 2 of the final methodology.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-021-08	The Chairman, Woking Chamber of Commerce	A2	All brownfield sites should be considered for approval before approving greenfield and flood plain sites.	The SHLAA must consider all sources of housing potential. National, regional and local policy promotes the use of brownfield sites particularly within built up areas, before greenfield sites. Any change to the Green Belt boundary would be subject to the requirements of PPG2: Green Belts and the LDF, including independent examination. With regard to sites within flood zones, it is the Council's intention to initially only consider sites within flood zone 1. Sites within flood zones 2 and 3 will only be considered following consultation with the Environment Agency.	No changes to methodology required.
DMSHLAA-021-09	The Chairman, Woking Chamber of Commerce	A2	All major housing schemes should include a transport impact analysis and plan for alleviation of further transport congestion.	The SHLAA is solely concerned with identifying land with potential for housing development. The Council is undertaking a number of other evidence base studies to inform the LDF alongside the SHLAA, including a Transport Assessment which will examine the impacts of potential development on the transport network. The impact of individual developments on the transport network is not a matter for the SHLAA, but a matter for individual planning applications.	No changes to methodology required.

Respondent Reference Number	Respondent	Section/ Para. Number	Summary of Comment	Officer Response to Comment	How has this informed SHLAA methodology?
DMSHLAA-021-10	The Chairman, Woking Chamber and Commerce	A2	Areas of community use should be excluded from the SHLAA.	Community facilities have not been excluded from the SHLAA. However, it should be noted that the SHLAA itself cannot allocate land for development. Any proposal for the loss of a community facility would have to be justified at planning application stage.	No changes to methodology required.

APPENDIX 5 –CONSISTENCIES AND DIFFERENCES OF THE WOKING, GUILDFORD AND WAVERLEY SHLAAS

Stage 1: Planning the Assessment

Joint Working Opportunities

Woking commissioned the Strategic Housing Market Assessment jointly with Guildford and Waverley Borough Council's and looked first to these authorities for potential joint working opportunities.

At the time that work was due to start on Woking's SHLAA in July 2007, Guildford Borough Council had decided not to undertake a comprehensive SHLAA but to update its Housing Potential Study. Guildford Council started work on a SHLAA in summer 2008, when Woking's SHLAA was already well under way.

Waverley Borough Council had already commissioned consultants to undertake a SHLAA.

Surrey Heath tends to work with Blackwater Valley authorities not Woking, Guildford and Waverley but it is included in this commentary as a neighbour of Woking with working links through the North West Surrey LDF officer group and on previous research such as the SFRA.

Stage 2: Determining the sources of sites

The following table sets out the sources being used by each local authority to identify sites for the SHLAAs.

Source of site	Woking	Waverley	Guildford
<i>Sites in the planning process</i>			
Land allocated (or with permission) for employment or other land uses which are no longer required for those uses	ü	ü	ü
Existing housing allocations and development briefs	ü	ü	ü
Unimplemented/ outstanding planning permissions for housing	ü	ü	ü
Planning permissions for housing that are under construction	ü	ü	ü
Sites where planning permission has previously been refused for residential development	ü	x	ü
Sites where a planning application has been submitted but not yet determined or that are subject to pre-application advice	ü	ü	ü
<i>Sites not currently in the planning process</i>			
Vacant and derelict land and buildings	ü	ü	ü
Surplus public sector land	ü	ü	ü
Land in non-residential use which may be suitable for redevelopment for housing	ü	ü	ü
Housing opportunities in existing residential areas	ü	ü	ü
Large scale redevelopment/ redesign of existing residential areas	x	x	ü
Sites in rural settlements and rural exception sites	ü	ü	ü
Greenfield sites adjacent to settlements	ü	ü+	ü
Major developed sites outside of settlements	ü	ü++	ü

Source of site	Woking	Waverley	Guildford
New free standing settlements	x	x*	x
Sites put forward by stakeholders through a 'call for sites'	ü	ü	ü
Sites suggested through Site Allocations DPD	x	x**	ü

+ Greenfield sites adjacent to the four main settlements, and also the larger, more sustainable, rural settlements are considered

++ The principal major developed sites outside of settlements are considered. Identification of appropriate sites was undertaken by Council Officers

* An assessment of Dunsfold Park will be undertaken as part of the SHLAA

** Promoters who have put forward sites for consideration through work on previous DPD preparation have been contacted as part of a 'call for sites'.

The SHLAA practice guide states that the assessment should not be narrowed down by existing policies to constrain development. However, the Councils have determined that particular types of land or area inappropriate for housing as set out in the table below.

	Woking	Waverley	Guildford	Surrey Heath
Thames Basin Heath SPA	ü	TBC	ü	ü
Sites within 400m of the SPA	ü	TBC	ü	ü
Special Areas of Conservation (SAC)	ü	TBC	ü	ü
Sites within 500m of a SAC – consult Natural England	ü	TBC	ü	x
Sites of Special Scientific Interest (SSSI)	ü	TBC	ü	ü
Sites within 500m of a SSSI – consult Natural England	ü	TBC	ü	x
Sites of Nature Conservation Importance (SNCI)	ü	TBC	ü	x
Sites within 500m of an SNCI – consult Surrey Wildlife Trust	ü	TBC	ü	x
Local Nature Reserve (LNR)	ü	TBC	x	x
National Nature Reserve (NNR)	n/a	TBC	n/a	ü
Flood Zone 2	ü*	TBC	ü*	x
Flood Zone 3a	ü*	TBC	ü	x
Flood Zone 3b	ü	TBC	ü	x
Public Open Space	ü	TBC	ü	x
Green Belt	x	TBC	x	ü

*Only to be introduced in to the assessment if there are not sufficient sites in flood zone 1

Site size/ unit thresholds are set in order to keep the number of sites assessed to a manageable level and in recognition of the requirement not to include a windfall allowance for the first ten years of housing land supply unless there are specific and justifiable local circumstances. The following table sets out the site size/ unit threshold being applied by each local authority for the purpose of the SHLAA.

	Site size/ unit threshold	Site assembly threshold
Woking	Sites with potential for 6 or more dwellings assessed	Generally, sites with more than 6 landowners will not be considered
Waverley	Sites with potential for 6 or more dwellings assessed	Assessed on a site-by-site basis taking account of available information and making an informed judgement
Guildford	Consider all sites with housing potential	Generally, sites with more than 6 landowners will not be considered
Surrey Heath	Consider all sites with housing potential	TBC

Stage 3: Desktop review of existing information

The table below shows the sources of information that each local authority will use in order to undertake the desktop review and selection of sites.

	Woking	Waverley	Guildford	Surrey Heath
Plan allocations	ü	ü	ü	ü
Planning permissions/ sites under construction	ü	ü	ü	ü
Site specific development briefs	n/a	ü	ü	ü
Planning application refusals	ü	ü	ü	x
Dwelling starts and completions	ü	ü	ü	ü
Urban Capacity Study	ü	ü	ü	ü
Empty property register	ü	ü	ü	x
English house condition survey	x	x	x	x
NLUD	ü	ü	ü	x
Register of surplus public sector land	ü	x	ü	x
Employment Land Review	ü	ü	ü	x
Valuation Office database	ü	x	X	x
Vacant property register	ü	x	ü	x
Commercial property databases	x	ü	ü	x
OS Maps	ü	ü	ü	x
Aerial photography	ü	ü	ü	x
Development Control Officers	ü	ü	ü	ü

Stage 4: Determining which sites and areas will be surveyed

The following table sets out which sites and areas will be surveyed by each local authority in addition to those identified in Stage 3 above.

	Woking	Waverley	Guildford	Surrey Heath
Sites identified in the desktop survey	ü	ü	ü	n/a
Sites identified through a call for sites	ü	ü	ü	n/a
Sites within town and district centres and their pedestrian catchments	ü	TBC	ü	n/a
Principal public transport corridors and their walking catchments	ü	TBC	ü	n/a

Other areas with known development pressure	ü	TBC	ü	n/a
Sites put forward by stakeholders through Site Allocation DPD	x	ü	ü	n/a

Stage 5: Carrying out the survey

The following table sets out the characteristics that will be recorded for each site during the site surveys.

	Woking	Waverley	Guildford	Surrey Heath
Clarify site boundaries	ü	ü	ü	n/a
Current use(s)	ü	ü	ü	n/a
Surrounding land use(s)	ü	ü	ü	n/a
Character of surrounding area	ü	ü	ü	n/a
Physical constraints	ü	ü	ü	n/a
Development progress	ü	ü	ü	n/a
Initial assessment about suitability	ü	ü	ü	n/a

N.b. Surrey Heath is not conducting site surveys as part of the SHLAA at this stage.

Stage 6: Estimating the housing potential of each site

The approaches to estimating housing potential for each local authority are as follows:

- Woking – Housing potential will be estimated through an exemplar scheme approach having regard to the character of the area, the type of housing desirable on the site and density aspirations set out in the emerging Core Strategy. Regard will also be had to a number of other factors which will affect density including the consideration of issues such as the shape of and access to the site which will influence capacity, as well as the effect of flood risk and topography, for example.
- Waverley – Housing potential will be estimated through the use of density multipliers while having regard to the character of an area, and in consultation with site promoters and Council Officers as to the realistic potential for individual sites. A selection of sites will be considered by a panel of stakeholders.
- Guildford – Housing potential will be estimated using a combination of existing information about the capacity of sites, density multipliers, example schemes and an urban design approach for larger schemes.
- Surrey Heath – All sites included in the SHLAA are already in the planning process where there is some certainty about potential yield.

Stage 7: Assessing when and whether sites are likely to be developed

The approaches to assessing deliverability and developability for each local authority are as follows:

- Woking – Assessments of achievability, suitability and availability undertaken by officer level project team with verification from stakeholder representatives.
- Waverley – Assessments of achievability, suitability and availability undertaken by officer level project team with verification from stakeholder representatives.
- Guildford – Assessments of achievability, suitability and availability undertaken by officer level project team with verification from stakeholder representatives.

- Surrey Heath - All sites included in the SHLAA are already in the planning process where there is some certainty deliverability/ developability.

Stage 8: Review of the Assessment

The approaches to reviewing the assessment for each local authority are as follows:

- Woking – The assessment will be reviewed by the Council’s Critical Friend.
- Waverley – TBC
- Guildford – TBC
- Surrey Heath - TBC

Stage 9: Broad locations

The approaches to broad locations for each local authority are as follows:

- Woking – Should the review of the Assessment not identify a sufficient number of specific sites for years 10-15 then it may be necessary for the Council to identify broad locations with housing potential. Should it be necessary to identify broad locations, the SHLAA will identify the options and assess the housing potential of those options with regard to physical and environmental constraints.
- Waverley – Approach TBC.
- Guildford – Identification of broad locations at Slyfield and North East Guildford.
- Surrey Heath – Approach TBC.

Stage 10: Windfalls

The following table sets out the proposed approaches to windfall allowances for each local authority.

	Woking	Waverley	Guildford	Surrey Heath*
Windfall allowance included in years 1 – 5	x	x	x	ü
Windfall allowance included in years 5 – 10	x	x	x	ü
Windfall allowance included in years 10 - 15	x	ü	x	ü

* Problems with the SPA constitute justifiable local circumstances.

- Woking – It is not the intention of the Council to include a windfall allowance.
- Waverley - it is the intention that the SHLAA will include details of potential supply that could come forward through windfall sites. However, this element of supply will not be counted within the first 10 years of supply for the purposes of the assessment. Any judgement on the principal of incorporating a so-called ‘windfall allowance’ in relation to the Local Development Framework will be taken outside of the scope of the SHLAA.

Stage 11: Monitoring and review

All four local authorities have committed to monitoring and reviewing the SHLAAs through the Annual Monitoring Report process.

Conclusion

It is considered that the methodologies employed to undertake the Woking, Guildford and Waverley SHLAAs are sufficiently consistent to enable results to be aggregated to the Housing Market Area level at a later date.

In light of the evolving nature of SHLAAs and emerging good practice, it is intended that this commentary of consistencies and differences in approach be updated in future updates of Woking's SHLAA.

APPENDIX 6 – ESTIMATING HOUSING POTENTIAL

Application: In line with the SHLAA methodology, housing potential for each of the SHLAA sites will be 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 etc. Where the site is significantly constrained, the lower range density will be applied (and vice versa).

Note: indicative densities for family housing are set at the national indicative minimum of 30dph (as set out in PPS3). 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.

	Exemplars	Indicative density (dph)	Upper range density (dph)	Lower range density (dph)
Town Centre Flats	<ul style="list-style-type: none"> Land at Guildford Road/ Bradfield Close Centrium, Victoria Road Waterside, Victoria Way Former Salvation Army, Walton Road 	315	400	250
Village Centre Flats	<ul style="list-style-type: none"> Laurel Grange, High Road Highclere Road Station Approach, W. B. Modo House & RLC House, Pyrford Road and Rosemount Parade 	160	210	90
High Density Residential Area	<ul style="list-style-type: none"> Park Heights, Constitution Hill Bracken Hill, Heathside Avenue The Clock Tower, Maybury Road Claremont Avenue 	105	240	80
Village Centre Fringe Flats	<ul style="list-style-type: none"> 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 	35	75	National indicative minimum of 30
Housing in urban areas	<ul style="list-style-type: none"> Former Hoebridge Works Chertsey Road, Byfleet Vale Farm Road The Maples, Hook Heath Avenue Former Rowley Bristow Hospital 	National indicative minimum of 30	75	National indicative minimum of 30
Lower density housing	<ul style="list-style-type: none"> Pyrian Close Parvis Road St Peters Convent 	National indicative minimum of 30	45	National indicative minimum of 30
Mixed use developments	<ul style="list-style-type: none"> Land adj. Holiday Inn Kings Court, Church Street East 	Case by case basis.		

Indicative density: average of exemplars (rounded)

Upper range density: Highest exemplar density (rounded)

Lower range density: Lowest exemplar density (rounded)

(Average density of all exemplars = 70.9dph which compares to 72.5dph for 2007/08 completed schemes)