

RESEARCH REPORT

LOCAL DEVELOPMENT FRAMEWORK

Research Report

**WOKING
STRATEGIC HOUSING LAND
AVAILABILITY ASSESSMENT
(SHLAA)**

July 2009



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Summary

This is the first Strategic Housing Land Availability Assessment (SHLAA) for Woking Borough. It has been prepared to inform the Council's Local Development Framework and is a key part of the evidence base for the Core Strategy and Site Allocations Development Plan Documents.

The main role of the SHLAA is to provide information on the opportunities available to the Council to meet the Borough's housing requirement to 2026. Specifically, the SHLAA must identify specific deliverable sites for the first 5 years of the plan period and identify specific developable sites for years 6 – 15 of the plan to enable the 5 year supply to be 'topped up'. The requirement to undertake a SHLAA is set out in 'Planning Policy Statement 3: Housing' (PPS3). This SHLAA has been undertaken in accordance with the Government's SHLAA Practice Guidance.

The housing allocation tested in this Assessment is the figure of 5,840 net additional dwellings as set out in the South East Plan (2009).

This Assessment has found that there is a deliverable supply of land for housing in the Borough to achieve the housing requirement for the first 5 years of the Plan. In addition, specific sites that are considered to be developable in the longer term have been identified which will enable the housing allocation to be met by 2026. The results of the SHLAA are summarised in the table below.

Source of supply/potential	Timescale				Total
	Pre-Plan 09/10 – 10/11	0 – 5 years 11/12 – 15/16	6 -10 years 16/17 – 20/21	11 – 15 years 21/22 – 25/26	
Units on sites under construction	197	584	0	0	781
Units on sites with unimplemented planning permission*	12	551	426**	0	989
Sites with potential for residential development	0	886	1,306	1,568	3,760
Total	209 (375 units deficit against annual average requirement)	2,021 (561 units surplus against annual average requirement)	1,732 (272 units surplus against annual average requirement)	1,568 (108 units surplus against annual average requirement)	5,530 (566 units surplus against annual average requirement)
Small sites estimate	0	64	160	160	384
Total including small sites estimate	209 (375 units deficit against annual average requirement)	2,085 (625 units surplus against annual average requirement)	1,892 (432 units surplus against annual average requirement)	1,728 (268 units surplus)	5,914 (950 units surplus against annual average requirement)

*includes those with a resolution to grant planning permission subject to legal agreements

**assumes that planning applications will be granted again on sites where planning permissions expire but where principle has been set.

Disclaimer

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

- The identification of land with potential for housing in the SHLAA does not imply that the Council will necessarily grant planning permission for residential development on that land or allocate land for residential development through the Local Development Framework. All planning applications will continue to be determined against the development plan and material planning considerations. For example, some land is identified in the SHLAA which is currently in employment use; any planning application would be assessed against current policy that seeks to protect employment land, and other material planning considerations.
- The inclusion of land for residential development in the SHLAA does not preclude it being developed for uses other than residential. For example, the redevelopment of land currently in employment use for further employment related development would generally be considered appropriate.
- The site boundaries included in the SHLAA are based on the best information reasonably available at the time. The SHLAA does not limit an expansion or contraction of these boundaries for the purpose of a planning application or future allocation through the Local Development Framework process.
- The exclusion of sites from the SHLAA (either because they were discounted or never identified) does not preclude the possibility of planning permission being granted on them for residential development. The Council acknowledges that sites will continue to come forward through the planning system that have not been identified in this SHLAA. Proposals will be considered against the development plan and other material considerations.
- The determination of whether a site is considered to be deliverable or developable and the timescales for development of sites set out in the SHLAA are based on the information available to the Council at the time of publication. Assumptions made in the SHLAA will not prevent planning applications being submitted on any site at any time.
- The Council does not accept liability for any factual inaccuracies or omissions in the SHLAA. The information within the SHLAA represents the information that was available to the Council at the time of publication. Users of the study should acknowledge that there may be additional constraints on sites that are not included within this document and that planning applications will continue to be determined on their own merits rather than on the information contained within this document. Issues may arise during the planning application process that could not be / were not foreseen at the time of publication of this SHLAA. For example, the SHLAA may not have been able to identify contamination; however, detailed ground investigations may reveal the presence of contamination. Applicants are therefore advised to carry out their own analysis of site constraints for the purpose of the planning application and should not rely on the information contained within this SHLAA.
- The estimation of capacity of sites is based on the information available to the Council at the time of the study and takes in to account a number of sustainability

and locational factors. The capacities indicated in this report do not preclude densities being increased or decreased on sites, subject to further information being made available to the Council through a planning application.

- The SHLAA has a base date of 1 April 2009 and therefore represents a 'snap shot' of information held at that time. The Council intends to consider the SHLAA as a 'living document' that will be updated annually through the Annual Monitoring Report process.
- It should be noted that since 1 April 2009, the Council has undertaken a data cleansing exercise. This has resulted in some changes to the monitoring of sites through the planning process and as such there may be some differences in the way in which the Council has reported on sites through the SHLAA and in the 5 Year Housing Land Supply Position Statement.

1.0 Introduction and Methodology

1.1 This Strategic Housing Land Availability Assessment (SHLAA) has been prepared in support of Woking Borough Council's Local Development Framework. In particular, the SHLAA is a key part of the evidence base for the Core Strategy and the Site Allocations Development Plan Documents.

What is a SHLAA?

1.2 The main role of the SHLAA is to provide information on the opportunities available to the Council to meet the Borough's housing allocation.

1.3 The requirement to undertake a SHLAA is set out in 'Planning Policy Statement 3: Housing' (PPS3). This SHLAA has been prepared in accordance with the methodology set out in the Government's SHLAA Practice Guidance (DCLG, July 2007). Where the Council has deviated from the Practice Guidance, justification for this has been provided in this document.

1.4 This Assessment has also had regard to the additional guidance on SHLAAs produced by the Planning Advisory Service¹. During the preparation of this Assessment, the Council made reference to a number of other Council's Assessments which has assisted in the development of the methodology used in Woking.

1.5 The purpose of the SHLAA is to assist the Council in meeting the requirements set out in PPS3 regarding future housing delivery, namely:

- To identify 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.
- To identify specific developable sites for years 6 – 10, and ideally years 11 – 15, in plans to enable the five year supply to be topped up.
- To indicate broad locations for future growth where it is not possible to identify specific sites for years 11 – 15 of the plan.
- To not include an allowance for windfalls in the first 10 years of the plan unless there are justifiable local circumstances that prevent specific sites being identified.

1.6 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.

¹ <http://www.pas.gov.uk/pas/core/page.do?pagelid=54317>

- 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.

1.7 Appendix 5 of this report provides a core outputs and process checklist.

How much new housing must Woking deliver?

1.8 The Development Plan for Woking comprises the South East Plan 2009 and the saved policies of the Woking Borough Local Plan 1999. The housing requirement for Woking is set in the South East Plan which requires the Council to accommodate an additional 5,840 homes between 2006 and 2026 (292 dwellings per annum).

1.9 Table 1, below, shows that during the first three years of the allocation set out in the South East Plan, 1,088 net additional dwellings were completed in Woking, which equates to an over supply of 212 units. There is therefore a residual requirement of 4,752 dwellings to 2026 (equivalent to 279.5 per annum).

Table 1: Dwelling completions against allocation.

	Allocation	Net Completions in Plan period	Residual Requirement	Residual Requirement per annum
South East Plan 2009	5,840 dwellings 2006-2026	1,088	4,752	279.5

1.10 Woking Borough Council must therefore deliver **4,752** net additional dwellings between 2009 and 2026. There is currently unimplemented planning permission for 2,252 dwellings (including sites where there is a resolution to grant planning permission subject to the signing of a legal agreement and dwellings that are currently under construction). 1,494 of these have been shown to be deliverable by 2013. This leaves a residual requirement of **3,258** dwellings to 2026.

1.11 In line with the requirements of PPS3: Housing, this SHLAA identifies deliverable and developable sites in order to meet the residual housing requirement.

Relationship to other evidence base studies

1.12 Alongside the SHLAA, which is solely concerned with identifying land available for housing development, the Council is also undertaking a number of other research studies in order to inform the Local Development Framework (LDF). These include:

- Strategic Housing Market Assessment (SHMA). The SHMA has been prepared by consultants jointly commissioned by Woking, Guildford and Waverley Councils. The SHMA provides local and sub-regional evidence of housing need and demand in terms of housing type, size and tenure. The Council will use the information from the SHMA and the SHLAA to consider

options for meeting housing need and market demand across the Borough. The SHMA was published in May 2009.

- Employment Land Review (ELR). The ELR has been undertaken in order to inform future policies regarding employment land supply and land use in the Borough, which includes an assessment of the suitability of existing employment land. The ELR has provided a source of potential housing sites for consideration in the SHLAA. An updated ELR will be published in autumn 2009.
- Retail and Commercial Leisure Study. This study provides an assessment of the vitality and viability of Woking Town Centre, and produces quantitative retail and leisure capacity forecasts for the Town Centre and West Byfleet. The study is being updated and will look at the Town Centre and all of the District and Local Centres in the Borough.
- Audit of Open Space, Sports and Recreation Facilities. This is also known as the PPG17 Audit. This study establishes the quantity and quality of open spaces, sports and recreation facilities in the Borough. The study has identified that there is not a surplus of open space in Woking and so, generally, the Council has not considered open spaces as land with potential for residential development in this SHLAA.
- Infrastructure Delivery Plan (IDP). The IDP will assess the existing capacity of infrastructure services and facilities and assess what provision is required in the future, and where, related to future development. The IDP will cover transport, housing, education, health, social infrastructure, green infrastructure, public services, utility services and flood defences. The IDP will include a schedule of what new infrastructure is required, when, where, how it is to be provided and will identify the responsible agency.
- Strategic Flood Risk Assessment (SFRA). The SFRA provides information on the significance of flood risk across the Borough, where flood risk is likely to be important, how much of the Borough is defended, where new development is likely to add risk and where flood risk needs to be considered in more detail.
- A Transport Statement, led by Surrey County Council, will develop a multi-modal model of the transport network to enable the implications of development options (particularly housing) to be tested for their impact on the network. The study is due to be published in late 2009.
- The Character Assessment, due for publication in autumn 2009, considers the principal social, environmental and economic conditions and constraints in the Borough together with their underlying physiographic conditions (geology, soil, and topography, drainage patterns) to provide a description of what makes Woking distinctive and to help identify the features that give a sense of place. Analysis involves identifying character zones based on current activity and prevailing former uses; prevalent materials and building styles; the public realm; habitats, landscapes and other natural features; and the general condition and pressures. The Character Assessment will help to identify the capacity for and sensitivity to change through development.

- Green Belt Study, due for publication by the end of 2009, considers the contribution of urban fringe sites to the purpose, role and function of the Metropolitan Green Belt.
- The requirement to provide additional Gypsy and Traveller accommodation is set at the regional level through the Regional Spatial Strategy. At the time of publication, the allocation for Woking was not confirmed at the regional level and so this Assessment has not generally considered sites with potential for additional Gypsy and Traveller accommodation other than those sites with established use. The Council will consider additional sites in future reviews of the SHLAA.

1.13 Further information about the LDF evidence base can be found on the Council's website at: <http://www.woking.gov.uk/planning/policy/ldfresearch>

Status of this document

- 1.14 The SHLAA replaces the Council's previous Housing Potential Study.
- 1.15 The SHLAA forms a key element of the evidence base for the Council's Local Development Framework, particularly the Core Strategy and Site Allocations Development Plan Documents.
- 1.16 The SHLAA has been prepared by officers of the Council in conjunction with key stakeholders and with specialist input from consultants where necessary. The SHLAA is based on the best information reasonably available at the time of writing and using the professional judgement of those involved.
- 1.17 Woking Borough Council intends to consider the SHLAA a 'living document' which will be updated annually, and as such, welcomes comments on this document. Any comments should be sent in writing to:

The Planning Policy Team
Woking Borough Council
Civic Offices
Gloucester Square
Woking
Surrey
GU21 6YL

Or by emailing: planning.policy@woking.gov.uk

- 1.18 Paragraph 8 of the Government's SHLAA practice guidance makes it clear that the SHLAA is an important evidence source to inform plan making, but that it does not in itself allocate land for development. The information contained in this report should not be construed as committing the Council to allocate land for any particular use and any conclusions reached in the study will be made without prejudice to the determination of any subsequent planning applications in respect of sites assessed.

Methodology

- 1.19 The Council's methodology follows that proposed in the Government's guidance on SHLAAs which was published in July 2007². Regard has also been had to additional guidance notes on SHLAAs published by the Planning Advisory Service in 2008³.
- 1.20 Figure 1, overleaf, is taken from the practice guidance and shows the ten stages that form the SHLAA methodology as well as the core outputs. Each of the ten stages is discussed in detail in the following sections of this report.

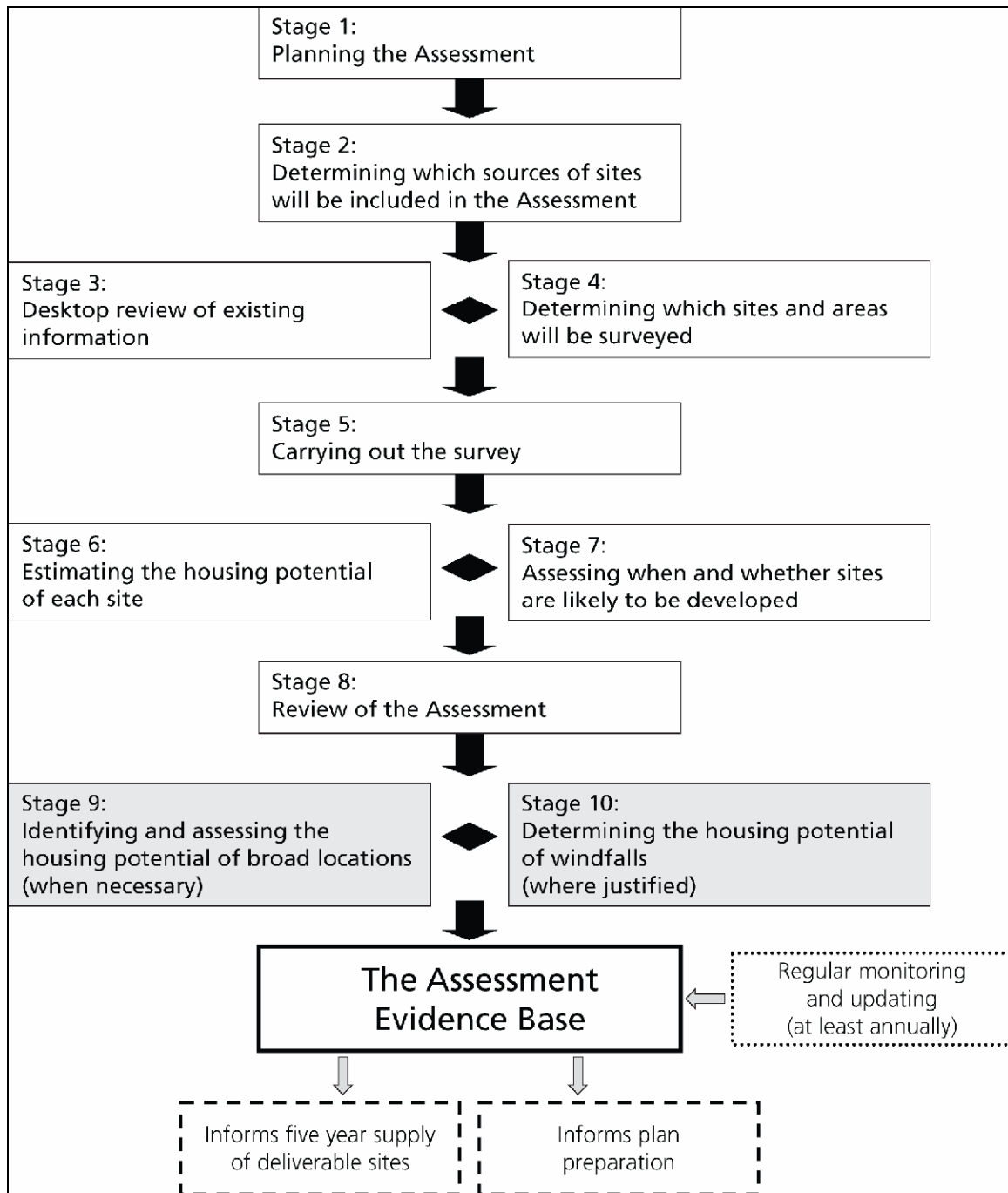
Structure of this report

- 1.21 This report presents the findings of the SHLAA and the methodology employed to arrive at these findings and therefore its compliance with PPS3 and the practice guidance.
- 1.22 Section 2 of this report describes the policy context for the SHLAA. Sections 3 – 11 outline the methodology used to carry out Woking's SHLAA and the key findings. Section 12 concludes on the capacity of deliverable and developable sites available to meet the Borough's housing allocation.
- 1.23 This report is supplemented by a number of technical appendices which provide detailed information on specific elements of the methodology and data on individual sites.

² 'Strategic Housing Land Availability Assessments: Practice Guidance' (CLG, July 2007)
<http://www.communities.gov.uk>

³ <http://www.pas.gov.uk/pas/core/page.do?pagelD=54317>

Figure 1: SHLAA Process and Outputs



2.0 Policy Context

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

National Policy

- 2.2 Planning Policy Statement 1: Delivering Sustainable Development (PPS1) was published in 2005 and sets out the overarching planning policies for the delivery of sustainable development through the planning system. The need for high quality design and efficient use of land through higher density mixed use development on suitably located previously developed land is emphasised.
- 2.3 PPS1 Supplement: Planning and Climate Change was published in 2007. It states that climate change factors should be taken in to consideration when allocating land for development. Development should enable the most efficient use of resources including land and infrastructure as well as seeking to secure the use of sustainable forms of transport. The PPS1 supplement does not have direct implications for the SHLAA, however, it does have a bearing on urban form and density.
- 2.4 Planning Policy Statement 3: Housing (PPS3) was published in 2006 in response to the recommendations in the Barker Review of Housing Supply in 2004. The aim of PPS3 is to underpin a step change in housing delivery, through a more responsive approach to land supply at the local level, and reinforcing the Government's commitment to improving the supply of housing and affordable housing. The requirement to undertake a SHLAA to inform the preparation of Local Development Documents is set out in PPS3. This PPS, and the related guidance, provide the framework within which this study has been prepared.
- 2.5 The SHLAA Practice Guidance which accompanies PPS3 was published in July 2007 and gives practical advice on how to carry out a SHLAA, including guidance on identifying land and assessing the deliverability and developability of sites.

Regional and Local Policy

- 2.6 As outlined in paragraph 1.8 of this report, the South East Plan forms part of the Development Plan for Woking. The South East Plan provides a framework for the region to 2026. It includes policies for development and addresses issues such as housing, transport, health, social issues, the economy, culture, skills and the environment.
- 2.7 The South East Plan allocates 5,840 new dwellings for Woking between 2006 and 2026 (292 dwellings per annum).
- 2.8 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.

2.9 The new LDF policies will eventually replace saved policies of the Woking Borough Local Plan 1999.

3.0 Planning the Assessment

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

Identifying the scope of the study

- 3.2 Spatial planning should not be constrained by administrative boundaries, and in light of this the SHLAA guidance recommends that SHLAAs should preferably be undertaken jointly with other local authorities within the Housing Market Area, and if possible through a Housing Market Partnership where one has been established.
- 3.3 Woking Borough sits within the West Surrey Housing Market Area along with the boroughs of Guildford and Waverley, as defined by the South East Regional Housing Board (2004). The three authorities have undertaken a joint Strategic Housing Market Assessment (SHMA). No Housing Market Partnership currently exists.
- 3.4 PPS3: Housing recognises that the types of sites that are identified for the rolling five year housing land supply are generally those that are some way through the planning process (e.g. those that are allocated or have planning permission). Such sites would be within local authority boundaries and would very rarely cross such boundaries.
- 3.5 In addition to this, undertaking a SHLAA with Guildford and Waverley Councils would be a difficult logistical exercise, not least because all three authorities are at different stages in producing Local Development Framework (LDF) documents. Undertaking a joint study would have caused a delay in the production of Woking's LDF. For these reasons, this is an Assessment of housing potential within Woking Borough.
- 3.6 Provided that each local authority generally follows the methodology advocated in the practice guidance, it should be possible to ensure that each of the three Assessments can be aggregated to the Housing Market Area level at a later date if required. Every effort has been made by Woking Borough Council to ensure that the methodology employed, as well as other relevant SHLAA information, has been shared with Guildford and Waverley Councils, particularly through regular meetings of the West Surrey LDF officer group. A summary of the consistencies and differences between the SHLAA methodologies of these three local authorities can be found in the Council's SHLAA methodology paper.⁴ Guildford Borough Council's Assessment methodology can be found on their website⁵. At the time of publication, Waverley Borough Council had not published a SHLAA methodology paper.

⁴ SHLAA Methodology:
<http://www.woking.gov.uk/planning/policy/ldfresearch/shlaa/shlaafinalmeth>

⁵ Guildford Borough Council SHLAA Methodology:
<http://www.woking.gov.uk/planning/policy/ldfresearch/shlaa/shlaamethod.pdf>

- 3.7 At the time of publication, neither Surrey Heath, Runnymede, Elmbridge nor Waverley Councils had identified any sites with housing potential that crossed in to Wokings administrative boundary. Guildford Borough Council has identified 2 sites that cross in to Woking Borough. These sites have been included in the Woking Assessment.

Working with Partners

- 3.8 The guidance recommends that the SHLAA should be prepared with the involvement of key stakeholders, including house builders, registered social landlords, local property agents, local communities and other agencies that have a recognised interest. The Council has involved relevant stakeholders in the preparation of this SHLAA from the outset:

- In November 2007, the Council consulted the Environment Agency, Natural England, English Heritage and Surrey Wildlife Trust in order to seek advice on the way in which the Council should assess sites with potential for housing development which were, for example, within close proximity of a Natura 2000 site or within areas at risk of flooding. The Council has continued to engage with these organisations throughout the SHLAA process in order to gain specialist advice.
- In December 2007 and January 2008, the Council contacted a large number of landowners and other interested parties in order to identify sites that may become available for housing development to 2026.
- The involvement of land owners, developers and agents in the SHLAA is essential in order to demonstrate deliverability and developability of the sites. In January 2008, the Council invited a number of stakeholders, including the Home Builders Federation, to attend two workshops which were intended to seek views on the Council's approach to the SHLAA at an early stage. The views of the stakeholders were taken in to consideration and used to inform the draft methodology.
- In March 2008 the Council consulted on the draft SHLAA methodology. Almost 500 residents associations, community interest groups, local businesses, developers, landowners, infrastructure providers and statutory consultees were specifically invited to comment on the methodology. A press release, information on the Council's website and articles in the Council's regular LDF Newsletter were used to inform the general public of the study. The results of that consultation are located in the Council's final SHLAA methodology: <http://www.woking.gov.uk/planning/policy/ldfresearch/shlaa>
- In October 2008 the Council consulted the Environment Agency, Natural England and Surrey Wildlife Trust on sites that had been identified in the SHLAA that are in close proximity to nature conservation designations or in areas most at risk from flooding in order to gain a clearer understanding of the constraints on those sites.
- In November 2008, the Council ran a workshop attended by representatives from the development industry as well as local landowners. The workshop was facilitated by John Silvester Associates. The aim of the workshop was to seek views on the SHLAA methodology in order to ensure a robust assessment had been undertaken.
- Between November 2008 and January 2009, the Council contacted landowners in order to gain detailed information about the availability of sites for development.

- In April 2009, the Council undertook an informal consultation on the draft housing trajectory. Consulted were those stakeholders who had previously attended SHLAA workshops as well as Natural England, the Environment Agency, English Heritage, the South East England Partnership Board, the Surrey County Council.
- The Council has sought to involve residents in the SHLAA where appropriate. A press release, information on the Council's website and articles in the Council's regular LDF Newsletter 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. The Council has not, however, involved residents in detailed discussions about individual SHLAA sites. Residents will have the opportunity to comment on the findings of the SHLAA through consultation on the LDF documents.

3.9 Further details of consultation and engagement can be found at Appendix 6.

Management and Scrutiny arrangements

3.10 The Assessment has been undertaken by an officer level Project Team. The members of the project team bring a wide range of expertise from a variety of disciplines:

- Borough Planning Officer
- Planning Policy Manager
- Senior Policy Officer (Planning)
- Development Control Manager
- Senior Planning Officers (Development Control)
- Principal Design and Conservation Officer
- Valuation Services Manager

3.11 The following officers joined 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).

3.12 A project plan setting out the timetable for key project milestones was developed by the Project Team. The project plan and additional information about the skills of the Project Team and key issues and risks identified during the early stages of planning the Assessment can be located at Appendix 13 of this report.

3.13 As set out in paragraph 3.8, the SHLAA methodology has been subject to public consultation. In particular, the methodology has been subject to the scrutiny of the Home Builders Federation.

3.14 The SHLAA has been subject to the scrutiny of the Council's 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.

- 3.15 The Council currently employs an independent planning consultant, John Silvester Associates, to act as a 'critical friend' for the preparation of the LDF. John Silvester Associates was commissioned to evaluate key stages of the SHLAA process to ensure that it has been prepared in accordance with Government guidance and is a robust study and evidence base to support the LDF. The results of this exercise can be found at Appendix 10.
- 3.16 The SHLAA will be updated by the Project Team 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.

4.0 Determining the sources of sites

4.1 With the exception of clear cut policy designations (such as Sites of Special Scientific Interest), the practice guidance states that the SHLAA should not be narrowed down by existing policies designed to constrain development so that local authorities are in the best possible position to decide its strategy for delivering its housing objectives. This section of the report sets out how the Council has determined the sources of sites for inclusion within the SHLAA.

Policy Exclusions

4.2 Table 2 below sets out the land that has been excluded from the SHLAA and the reasons for those exclusions. Appendix 7 contains a series of maps showing the geographical location of these policy designations.⁶

Table 2: Policy Exclusions

Special Protection Area (SPA)	The whole of Woking Borough falls within 5km of the Thames Basin Heaths SPA. The Council has excluded any sites that come forward within 400m of the SPA on the basis that Natural England has advised that within this zone harm to the SPA cannot be avoided where residential development is proposed. The Council's SPA Interim Strategy currently sets out avoidance measures which will allow sites in the rest of the Borough to mitigate against the impacts of residential development on the SPA. The Council have not therefore excluded sites that fall between 400m and 5km of the SPA for the purpose of this study. This approach has been agreed by Natural England.
Special Area of Conservation (SAC)	A part of the Thursley, Ash, Pirbright and Chobham SAC lies within the Borough boundary. The Council has excluded sites that may come forward within the SAC from the SHLAA. The Council does not currently have a procedure for dealing with sites that come forward in close proximity, however Natural England have been consulted on any sites that fall within 500m of this SAC. Should Natural England deem it appropriate, sites outside of this zone which may have an adverse impact on the hydrology of the SAC may be discounted. This approach has been agreed by Natural England.
Sites of Special Scientific Interest (SSSI)	There are a number of SSSIs within the Borough. All have been excluded from the SHLAA. The Council has consulted with Natural England on any sites that have been identified within 500m of a SSSI. The Council will also consult Natural England on any sites which may be upstream of a wetland or an aquatic SSSI. Natural England will also be consulted on sites adjacent to the undesignated section of the Basingstoke Canal in recognition of the important link between the two sections of the Basingstoke Canal SSSI and its importance as a wildlife corridor. This approach has been agreed by

⁶ The paper version of the Woking Borough Local Plan 1999 Proposals Map is the definitive version.

	Natural England.
Sites of Nature Conservation Importance (SNCI)	There are a number of SNCIs within the Borough. All have been excluded from the SHLAA. The Council has consulted Surrey Wildlife Trust on any sites that fall within 500m of an SNCI.
Local Nature Reserves (LNR)	LNRs have been excluded from the SHLAA.
Public Open Space (POS)	The Council's audit of open spaces, as required by PPG17, concluded that there was not a surplus of open space in the Borough. For this reason, the Council has not comprehensively reviewed the potential of identified and protected open space for housing development as part of the SHLAA, but has not excluded from the SHLAA any open spaces suggested by stakeholders where there may be the potential to provide alternative or additional open space as part of potential housing development.
Ancient Woodland	Areas of Ancient Woodland have been excluded from the SHLAA.
Flood Zones 3a and 3b	In accordance with PPS25: Development and Flood Risk and the Council's Strategic Flood Risk Assessment, flood zones 3a and 3b have been excluded from the SHLAA. The exclusion of land within flood zone 3 will be kept under review in accordance with any advice given by the Environment Agency.

Policy Inclusions

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

Table 3: Policy Inclusions

Green Belt/ greenfield land	Sites that are in the Green Belt or that are greenfield have not been excluded from the SHLAA. In light of the South East Plan Panel Report and the Secretary of States Proposed Changes to the draft South East Plan, the Council will undertake a comprehensive assessment of housing potential in Woking to include consideration of Green Belt/ greenfield sites.
Safeguarded land	Safeguarded land, as shown on the Woking Borough Local Plan 1999 Proposals Map, is land that has been kept aside to fulfil long term development needs within the Borough. The safeguarded sites have therefore been included within this SHLAA.
Flood Plain (Zones 1 and 2)	More vulnerable uses (which includes residential) are permitted within Zones 1 and 2 (subject to Flood Risk Assessment where relevant) therefore sites within Zones 1 and 2 have not been excluded from the SHLAA. The Environment Agency has been consulted on sites that have been identified in Zone 2.
Employment Land	In line with the SHLAA guidance, land identified as 'secondary' employment land in the Council's Employment Land Review has been included in the SHLAA.

Urban Areas of Special Residential Character	The Council has included sites within UASRCs in the SHLAA. Estimates of the housing potential of these sites have had regard to the guidance set out in existing SPG on UASRCs and the character of the area, etc.
Conservation Areas	Sites that come forward within or adjacent to Conservation Areas have been subject to appraisal by senior Development Control officers with design and heritage expertise. This approach has been agreed by English Heritage.

Site size threshold

- 4.4 During the five year period between April 2004 and March 2009, 89% of residential completions within the Borough were on sites of 6 or more units. A site size threshold of 6 units has therefore been set for the purpose of the SHLAA - only sites considered capable of accommodating 6 or more net additional dwellings have been included in this Assessment. 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.

Subdivision of existing housing

- 4.5 During the 5 year period between April 2004 and March 2009 a total of 48 additional units were created through the conversion of larger houses into flats (2.3% of total supply). It is therefore considered that the capacity for conversion of larger dwellings to flats is not significant and hence this source of supply has been excluded from the SHLAA. In addition to this, it is not possible to predict which of the Borough's larger houses may come forward for conversion. Further, a site size threshold of 6 has been set for the purpose of the SHLAA and it is considered rare that such development would yield 6 or more units.

Flats above shops

- 4.6 The conversion of upper floors above shops (and offices) is a potential source of housing. The Council's trend data, however, shows that only a modest number of units have been created in recent years (a maximum of 14 new units created between 2004 and 2009 which is equivalent to only 0.7% of supply). Although it is recognised that the development of flats above shops is a source of supply, it is not considered that the capacity is significant and hence this source of supply has been excluded from the SHLAA. Further, a site size threshold of 6 has been set for the purpose of the SHLAA and it is considered unlikely that such development would yield 6 or more units.

Land in existing residential use

- 4.7 In the past, there has been some redevelopment of existing housing in the Borough, as well as some building in back garden land. During the course of the SHLAA, a number of sites were identified that were either wholly or partly in existing residential use. These sites have subsequently been excluded from the SHLAA for the following reasons:

- Market viability – SHLAA sites must be deliverable and developable and this Assessment has therefore involved an evaluation of the cost of acquiring the site in relation to the developable value (as explained in detail in Section 9 of

this report). This valuation exercise effectively discounted the majority of the potential sites identified.

- Following the assessment of availability (outlined in Section 9 of this report) it was recognised that for the remaining sites there was no way of effectively knowing, in the absence of developer interest i.e. pre application enquiries or a submitted planning application, whether these sites would come forward.
- It was considered that, if one of the identified sites did come forward, there was no certainty that this would reflect the site that had been identified in the study as the majority of the sites appeared to be in multiple ownership and therefore their development would be dependant on all owners agreeing to make their land available. If this were to happen a risk was identified that the subsequent site may be less than 6 units. Given that the study has included an estimate of capacity for sites of less than 6 units it was considered that identification of these sites may result in double counting.

Types of sites included

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

Sites within the planning process:

- Land allocated (or with permission) for employment or other land uses which are no longer required for those uses
- Existing housing allocations and development briefs
- Unimplemented/ outstanding planning permissions for housing
- Planning permissions for housing that are under construction
- Sites where planning permission has previously been refused for residential development
- Sites where a planning application has been submitted but not yet determined or that are subject to pre-application advice

Sites not currently within the planning process:

- Vacant and derelict land and buildings
- Surplus public sector land
- Land in non-residential use which may be suitable for redevelopment for housing
- Housing opportunities in existing residential areas
- Sites in rural settlements
- Greenfield sites adjacent to settlements
- Major developed sites outside of settlements
- Sites put forward by stakeholders through a 'call for sites'.

5.0 Desktop review of existing information

5.1 The Council has used a number of sources of information to undertake the desktop review and selection of sites:

- 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/ Housing Potential Study
- Empty property register
- National Land Use Database (NLUD)
- Register of surplus public sector land
- Employment Land Review
- Open Space, Sports and Recreation Audit
- Valuation Office database
- Vacant property register
- OS Maps
- Aerial photography
- Information from Development Control Officers
- Planning decision monitoring database and planning application registration database.

5.2 Having identified land that may have potential for housing development, all sites were mapped on the Council's Geographical Information System (GIS).

6.0 Determining which sites and areas will be surveyed

6.1 The Guidance identifies that, as a minimum, all sites identified through the desk-top review (Section 5 of this report) should be visited and that the site survey should be used to identify further sites with potential for housing development, which were not identified through the desktop review.

6.2 The Guidance identifies the factors that should be taken into account in determining how comprehensive (in terms of the geographic coverage) and intensive (in terms of the minimum size of site to be surveyed) the survey element of the assessment needs to be. They include:

- *the nature of the housing challenge* – assessments will need to be more comprehensive and intensive where existing or emerging housing provision targets in the study area are high and/ or where housing market conditions signal worsening affordability, reflecting the need to identify more sites for housing;
- *the nature of the area* – in areas dominated by smaller rural settlements, it may be necessary to identify all the sites with potential for housing, whereas this may not be necessary or feasible in more urbanised areas;
- *the nature of land supply* – where a large proportion of housing is expected to be delivered on small sites this may mean that the survey needs to identify smaller sites than would be necessary in an area where larger sites are likely to make up the bulk of supply; and,
- *the resources available* – which can be brought together for best effect and, should reflect the scale of the task.

6.3 The Guidance also states that mapping the following areas will help identify which geographic areas could be covered by the survey:

- *development hotspots* – that are the focus of recent planning permissions and give an indication of current market demand;
- *town and district centres* – and their surrounding pedestrian catchments. These are often characterised by more frequent land use changes and are most likely to contain development opportunities;
- *principal public transport corridors* – and their walking catchment areas. These areas are not necessarily more likely to contain development opportunities, other than where they are part of a town centre; nonetheless, they are more sustainable locations which merit survey. The extent of the catchment area surveyed could depend on the level of accessibility of the transport stop or interchange;
- *specific locations within settlements* – where regeneration strategies, market renewal initiatives, or housing development intensification or redevelopment strategies are actively pursued; and
- *specific locations outside settlements* – some sites for further investigation may be readily identifiable from existing data sources, such as the Register of Surplus Public Sector Land or may have already been identified by the Regional Spatial Strategy. For other sites, it may be useful to set criteria for the search, such as areas where significant infrastructure exists or is planned. It may not be possible to identify individual sites, but only broad locations where there is housing potential.

- 6.4 The Guidance states that where the survey is to be focused on certain geographic areas, the aim should be to carry out a street-by-street survey in these areas. For the remainder of the study area, a general examination should be carried out; reflecting the decisions taken on how comprehensive and intensive the survey needs to be.

Sites and areas to be assessed within Woking Borough

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

The nature of the housing challenge

- 6.8 The South East Plan requires the provision of 5,840 net additional dwellings between 2006 and 2026 in Woking Borough. This is an increase of 30% - or 69 more units per annum - than the housing target set out in the Surrey Structure Plan 2004 (3,340 net additional dwellings between 2001 and 2016).
- 6.9 Affordability of housing is a Borough-wide issue and the provision of affordable housing the Council's number one priority. The Council's Strategic Housing Market Assessment has been prepared by Fordhams Research for Woking, Guildford and Waverley Borough Councils and will inform both the preparation of the Core Strategy and the revision of the Housing Strategy. The West Surrey SHMA Report looks at the need for affordable housing and the market demand for housing at a strategic level, with a Housing Needs and Market Assessment Survey for each borough providing a snapshot of the profile of local households and their dwellings, and the number, size, type and tenure of new homes required to meet both need and demand.
- 6.10 The assessment of housing need takes account of both the need for and the supply of affordable housing, essentially for those who cannot afford market housing. The assessment of housing demand refers to expressed demand for market housing, essentially from those who can actually afford the type of housing in question.

Key findings of the SHMA - housing need in Woking Borough:

- An estimated total net annual need for affordable housing of 499 units of accommodation.
- Around 70% of the need for affordable housing is for social rented housing and 30% for intermediate housing.
- Most of the net demand for social rented housing is for three bedroom units.
- In terms of intermediate housing, there are shortages of one, two and three bedroom homes.

Key findings of the SHMA – housing demand in Woking Borough:

- There is estimated to be demand for an additional 594 units of housing per year to be provided over the next few years. Just over half is demanded in the market sector with significant demand for intermediate housing.
- The majority of the shortfall in the market sector is for three bedroom homes although there are notable shortages for all other sizes of accommodation.

The nature of the area

6.11 The built up area of Woking Borough comprises the urban area of Woking itself and a number of villages which extend from Byfleet in the East to Brookwood in the West and Kingfield and Old Woking in the South. The built up area is almost entirely surrounded by Green Belt land, which comprises 60% of the Borough's total land area. Figure 2, overleaf, shows the key land uses and constraints in the Borough.

6.12 Due to the geographic 'make-up' of the Borough described above and in Section 4 of this report, this SHLAA has considered a number of sites with potential for housing across the urban area as well as a number of Green Belt sites put forward by stakeholders.

Development hotspots

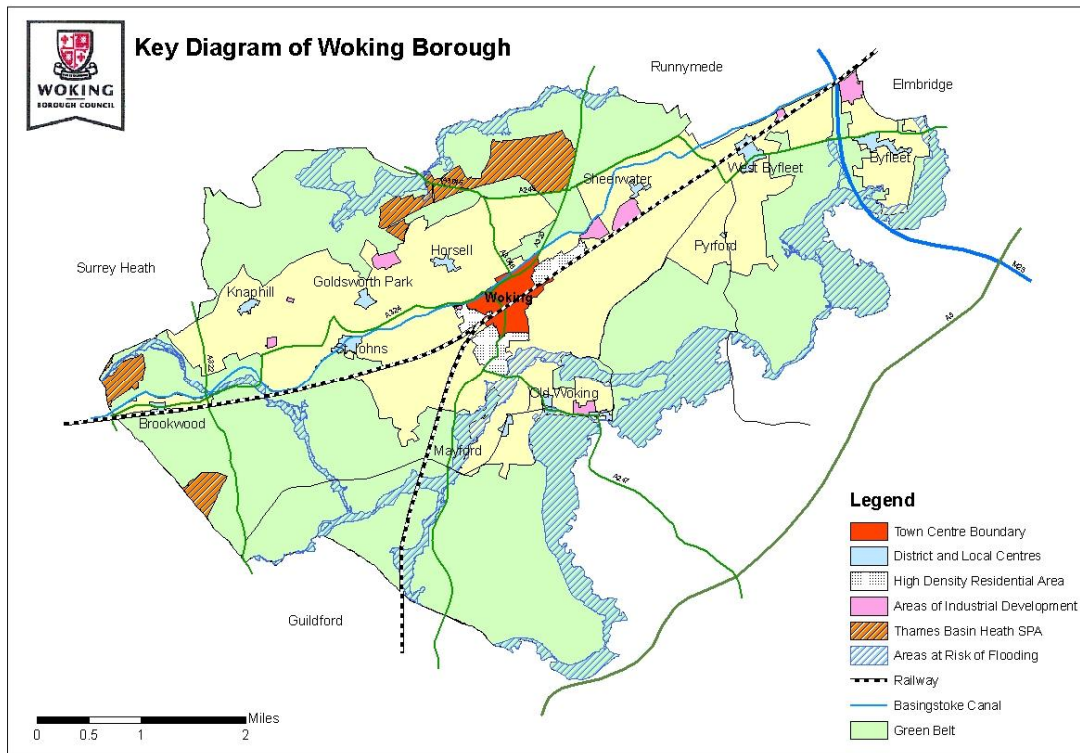
6.13 Woking Town Centre, the High Density Residential Area and the District Centres (Byfleet, West Byfleet, Goldsworth Park, Horsell, Knaphill, St Johns and Sheerwater) have been assessed in detail in this SHLAA as they are areas that are subject to the most frequent land use changes. It should be noted, however, that there are competing demands in these areas that need to be considered through the LDF and that the identification of such sites in the SHLAA does not necessarily mean that they will be allocated for residential development. The map in Appendix 9 shows the location of these areas.

The pedestrian catchments

6.14 The pedestrian catchments of the Town Centre, District Centres as well as the Borough's railway stations have also been assessed in detail as they are the most

accessible and sustainable locations in the Borough. The map in Appendix 9 shows the location of these areas.

Figure 1: Key diagram



The nature of land supply

6.15 The monitoring of residential completion trends during the period 2001 and 2008⁷ identifies the nature of housing land supply in the Borough. The general trend has been for large, high density flatted development in and around Woking Town Centre with a number of smaller schemes across the rest of the urban area.

6.16 Between 2001 and 2009, 86.3% of residential completions were on sites accommodating 6 or more units, and 69.3% of completions were for schemes of 15 or more units. It is anticipated that this trend will continue and so, for the purpose of the SHLAA, sites capable of accommodating 6 or more residential units have been included in the assessment. This site size threshold keeps the number of sites assessed through the SHLAA to a manageable level and is set 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. This threshold was discussed and agreed as a reasonable level for the Assessment at the Stakeholder Workshops held in January and November 2008.

⁷ Annual Monitoring Report 2008, Woking Borough Council, <http://www.woking.gov.uk/planning/policy/ldf/amr>

6.17 It is not considered to be practical to assess the housing potential of sites below this threshold. Many of these sites will include the sub-division of larger houses and the infilling of back gardens. As justified in Section 4 of this report, this type of development has subsequently been excluded from this Assessment.

7.0 Carrying out the survey

7.1 The majority of site visits were carried out in March 2008. Each site was visited by one officer from the Council's Planning Policy team and one officer from the Development Control team.

7.2 Prior to the site surveys being undertaken, all officers involved were briefed in order to ensure a consistent approach to recording information and identifying sites. Officers were made aware of some of the key issues surrounding the SHLAA and were briefed on how to handle questions from members of the public or property owners, with a view to minimising misinformed speculation.

Recording the characteristics of each site

7.3 In order that officers could effectively and consistently record site characteristics, a site survey proforma was developed by the Project Team and refined at the stakeholder workshop in January 2008.

7.4 As recommended in the guidance, a number of characteristics were recorded on site, including:

- Site size
- Site boundaries
- Current use(s)
- Surrounding land use(s)
- Character of surrounding area
- Physical constraints, e.g. access, steep slopes, potential for flooding, natural features of significance, location of pylons
- Development progress, e.g. ground works completed, number of homes started and completed
- Initial assessment of whether the site is suitable for housing as part of a mixed use development.

7.5 The full site survey proforma can be found at Appendix 12

8.0 Estimating the housing potential of each site

- 8.1 The SHLAA guidance states that the housing potential of each site should be guided by the existing or emerging plan policy, particularly the approach to housing densities at the local level. Where the plan policy is out-of-date or doesn't provide a sufficient basis to make a local judgement, one approach to estimating potential is by sketching a scheme from scratch, or by using relevant existing schemes as the basis for an outline scheme, adjusted for any individual site characteristics and physical constraints.
- 8.2 An alternative and less resource intensive approach is to compare the site with a sample scheme which represents the form of development considered desirable in a particular area. Sample schemes selected should be exemplars (not necessarily from the study area) and represent the range of site sizes and locations where housing development is anticipated. Comparison with the sample schemes can then be used in assessing the housing potential of individual sites, adjusted for any individual site characteristics and physical constraints. Using real schemes as comparators has the additional advantage that the form of development on a site can be visualised.
- 8.3 Woking Borough Council has used a combination of the approaches outlined above in order to estimate the housing potential of SHLAA sites. As a starting point, 25 exemplar schemes which reflect the form of development considered desirable in different parts of the Borough were selected by the Project Team. These exemplar schemes were used to determine the indicative densities that would be considered desirable across the Borough.
- 8.4 When assessing the housing potential of each site, regard was had to a number of factors including the character of the area, the type of housing desirable on the site, information available from landowners/ developers and density aspirations set out in the emerging Core Strategy. Regard was also 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. The Council's methodology, as set out in Table 4 overleaf, enabled officers to increase or decrease the density to be applied to a site depending on the factors outline above.
- 8.5 During consultation with key stakeholders on the proposed methodology, concern was raised about how the 'character' of an area would be assessed by officers. For the purpose of the SHLAA, 'character' has been defined as the features of a place that contribute to its unique identity, including: location and setting, landscape, the inter-relationship of spaces within an area, the area's historic development, as well as building traditions and materials. Character appraisal involved a qualitative assessment of how an area performs in terms of urban design objectives. The characteristics of an area were assessed with regard to constraints (the presence of mature trees and listed buildings, for example) and opportunities and capacity for development. Regard was also had to national policy and guidance as well as local character appraisals that have been adopted by the Council.
- 8.6 The requirement to provide on site open space, particularly on large sites in locations where a deficit has been identified, will affect the housing potential of a number of sites assessed. The Council has not made an assumption about open space requirements as a part of this assessment and so indications of potential yield should be viewed with caution in respect of this. For this reason, no

assumption has been made about the potential yield of any Green Belt sites considered in this Assessment.

8.7 Housing potential is a significant factor that affects economic viability. For this reason this stage of the Assessment was carried out at the same time as the assessment of when and whether a site is likely to be developed (see Chapter 9 of this report). This helped to ensure that the housing potential for each site was guided both by planning policies and by economic viability, as recommended in the guidance.

Table 4: Estimating potential methodology

	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.		

Notes on application:

1) In line with the SHLAA methodology, housing potential for each of the SHLAA sites was based on the use of exemplar schemes taking in to consideration constraints on the site such as the shape of the site, access, tree coverage and listed buildings etc. Where

the site is significantly constrained, the lower range density will be applied (and vice versa).

2) Indicative densities for family housing are set at 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.

3) 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)

4) Full details of the exemplar schemes can be found at Appendix 14

9.0 Assessing when and whether sites are likely to be developed

- 9.1 In line with PPS3, assessing the suitability, availability and achievability of a site provides the information on which the judgement can be made as to whether a site can be considered deliverable, developable or not currently developable for housing:
- **deliverable** – a site is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within five years from the date of adoption of the plan; and
 - **developable** – a site should be in a suitable location for housing development, and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time.
- 9.2 The guidance states that where it is not known when a site could be developed, then it should be regarded as not currently developable. This may be, for example, because one of the constraints to development is severe, and it is not known when it might be overcome.
- 9.3 In practice the considerations to be taken into account when deciding whether a site is deliverable, developable or not currently developable, will be the same. It is the *degree* of availability and achievability, and, in particular, when any known constraints can realistically be overcome. The guidance states that the assessment of deliverability/ developability of specific sites should be made irrespective of the level of housing provision that is actually needed over the plan period.
- 9.4 The remainder of this chapter sets out how the Project Team assessed the deliverability and developability of land for residential development.

Suitability

- 9.5 The assessment of whether or not a site is in a suitable location for housing development involves a consideration of both policy and physical constraints of the site.
- 9.6 Generally, sites allocated for housing development in a Local Plan or those with planning permission are considered to be suitable. However, as recommended in the guidance, all sites were assessed against the criteria set out below as circumstances may have changed since allocation or granting of permission which may affect suitability.
- 9.7 In line with the guidance, the Council considered the following criteria when determining the suitability of a site for residential development.
- **Policy restrictions** – As outlined in paragraph 4.2 of this report, land within certain areas of the Borough (such as nature conservation designations) has been excluded from the SHLAA from the outset. Other policy restrictions that might exist for a site, such as the loss of employment land or a community facility, for example, were assessed in terms of the likelihood of a policy objection and the severity of that risk.

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

Availability

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

- Can any identified problems be overcome?

9.11 As set out above, information from landowners is essential to the determination of whether a site is available for development. The Council therefore contacted landowners in order to gain a clear understanding of the status of sites and to ensure a robust assessment.⁸ Where a landowner was unknown to the Council, Land Registry searches were undertaken.

Achievability

9.12 A site is considered to be achievable when there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about whether development of the site is economically viable, including a judgement about the need for section 106 contributions and affordable housing, the likelihood of abnormal development costs, as well as the ability of the developer to complete and sell the housing.

9.13 The Project Team sought specialist expertise from Elder Associates in order to develop a methodology for determining the economic viability of sites. The full methodology is located at Appendix 11

Overcoming constraints

9.14 The assessment of deliverability/ developability has also involved 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.

⁸ A copy of the letter and proforma can be found at Appendix 15

10.0 Review of the Assessment

10.1 Following the assessment of deliverability and developability as described in the previous sections of this report, it has been found that sufficient sites can be identified to meet the housing allocation of 5,840 net additional dwellings to 2026.

10.2 Table 5 below provides a summary of this housing land supply and shows that specific deliverable/ developable sites to provide **5,530** new dwellings during the period 2009/10 – 2025/26 can be identified, representing a potential over-supply of 566 units during that period.

Table 5: Summary of housing land supply

Source of supply/ potential	Timescale				Total
	Pre-Plan 09/10 – 10/11	0 – 5 years 11/12 – 15/16	6 -10 years 16/17 – 20/21	11 – 15 years 21/22 – 25/26	
Units on sites under construction	197	584	0	0	781
Units on sites with unimplemented planning permission*	12	551	426**	0	989
Sites with potential for residential development	0	886	1,306	1,568	3,760
Total	209 (375 units deficit against annual average requirement)	2,021 (561 units surplus against annual average requirement)	1,732 (272 units surplus against annual average requirement)	1,568 (108 units surplus against annual average requirement)	5,530 (566 units surplus against annual average requirement)

*includes those with a resolution to grant planning permission subject to legal agreements

**assumes that planning applications will be granted again on sites where planning permissions expire but where principle has been set.

10.3 Taking in to account the 1,083 units already completed during the period 2006-2009, the total supply equates to 6,613 units – a potential over-supply of 773 dwellings against the housing requirement.

10.4 It is therefore not necessary for the Council to consider revising the assumptions made in this Assessment at this time. However, it is recognised that in the current economic climate and in view of the type of housing required in terms of size, type and tenure, it may be prudent to consider ways in which additional sites may be identified as being deliverable and/ or developable in future years through future reviews of the SHLAA.

Review of excluded sites

10.5 There may be scope in future reviews of the SHLAA to consider the inclusion of sites within flood zone 3 where technical solutions exist and where detailed Flood Risk Assessments are carried out, subject to consultation with the Environment Agency.

- 10.6 This SHLAA has not generally considered areas of public open space as a source of potential housing land supply. Future reviews of the SHLAA may consider open space as a source of supply where there may be opportunity to provide alternative or additional open space as part of any new development proposals. Future reviews of the Council's Open Space, Sport and Recreation audit will inform this matter.
- 10.7 A number of sites in the Green Belt were put forward for assessment in this SHLAA. These sites have all been assessed as not currently being deliverable or developable due to their designation as Green Belt. Any future reviews of the Green Belt boundary may provide additional sources of housing land. This will be informed by the Council's Green Belt study which will be published in late 2009.

Review of density assumptions

- 10.8 Section 8 of this report sets out how the Council has estimated the potential of the sites identified. It is possible that as discussions between the Council and the development industry progress on individual sites that the final capacity of sites may increase.

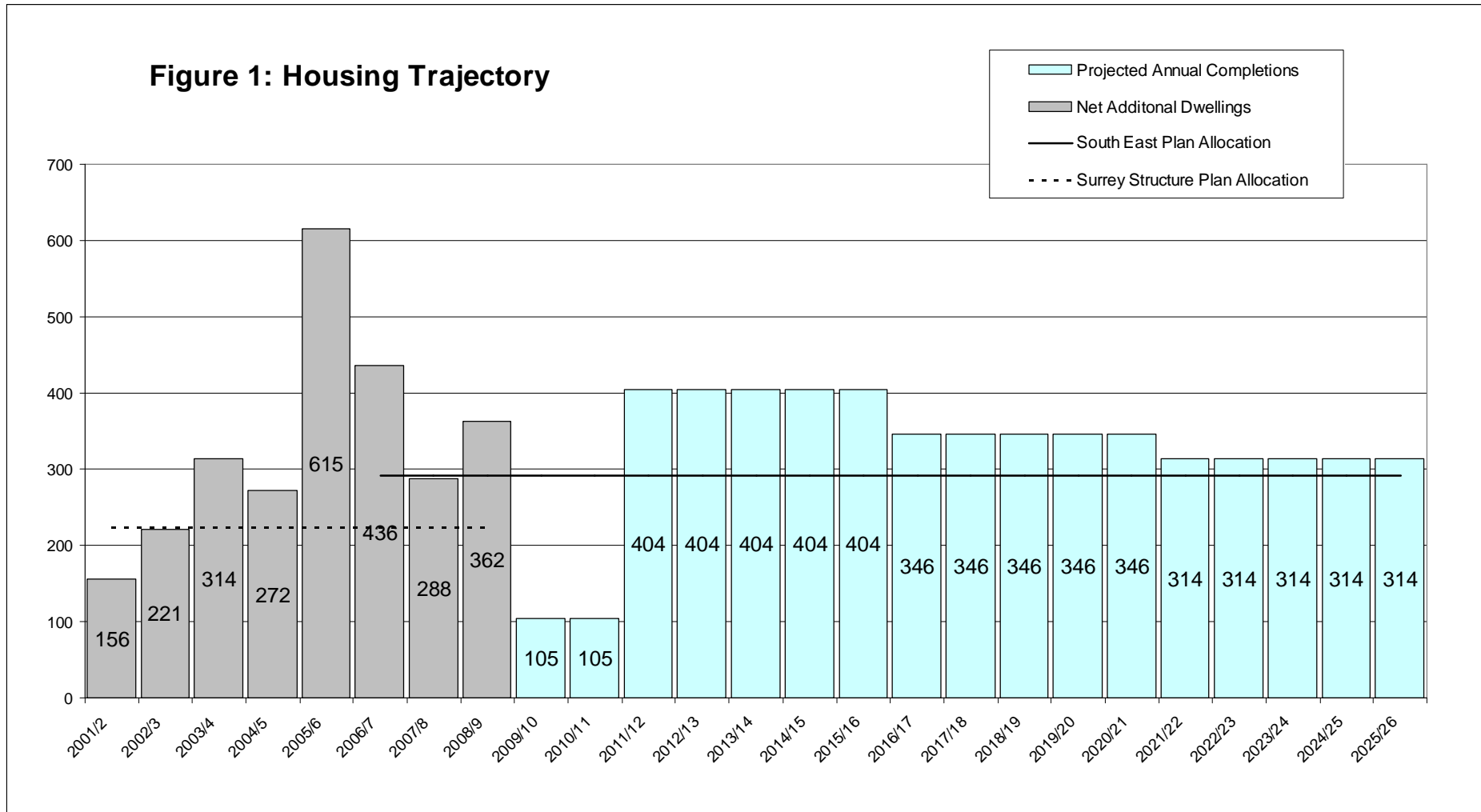
Review of economic viability

- 10.9 Assumptions made about the economic viability of sites are subject to change as changes in the economic climate occur and as discussions with the development industry about particular sites progress. The Council will review the assumptions made about achievability in future reviews of the SHLAA, as detailed in Appendix 11 of this report.

Next steps

- 10.10 The identification of sites from broad locations is an option available to the Council. It is not necessary to identify such sources of sites at this time and such an assessment may lead to double counting.
- 10.11 The SHLAA Practice Guidance makes provision for the allowance of a windfall estimate at this stage of the Assessment where justified. The Council has not included a windfall allowance, however, as set out in section 11 of this report, has included an annual small sites estimate in the housing trajectory in recognition of this source of supply.

Housing Trajectory



11.0 Small sites estimate

11.1 As set out in section 10 of this report, the Council can identify a sufficient number of specific deliverable and/ or developable sites in order to meet the Borough’s housing allocation to 2026. It has not therefore been necessary for the Council to identify broad locations for future growth or to include a windfall allowance.

11.2 However, as described in section 4, this Assessment has included a site size threshold of 6 units, i.e. only sites that are capable of accommodating 6 or more dwellings have been considered for the purpose of this SHLAA (for those sites without existing planning permission). Table 6, below, shows that around 11% of the Borough’s new housing is completed on schemes of 5 units or fewer – an average of 32 units per annum.

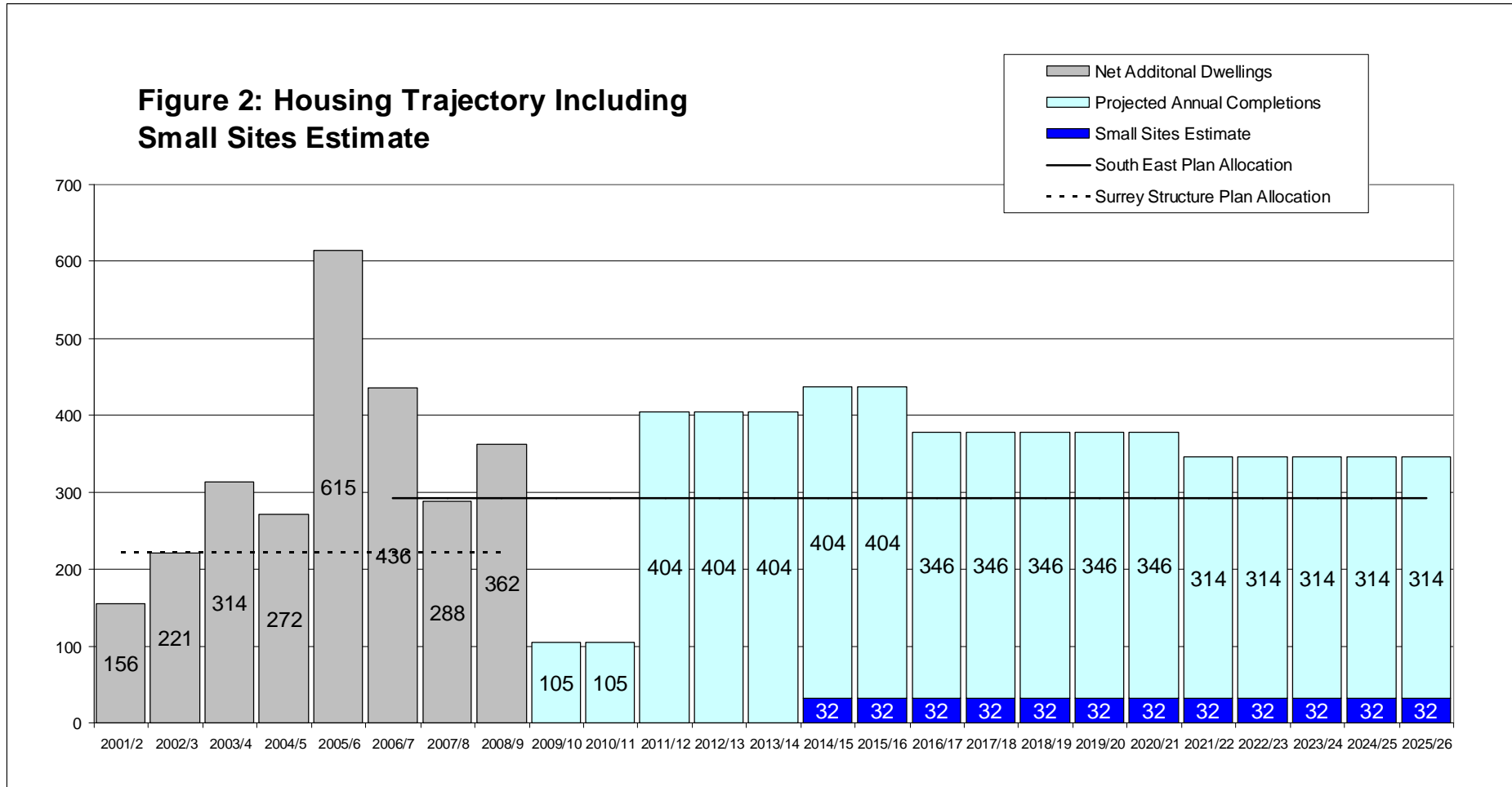
Table 6: Completions on small sites since 2001

	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	Total
Schemes of 5 units or fewer	21	47	71	29	44	38	43	225
Schemes of 6 units and greater	135	174	278	250	592	425	266	1811
Total units	156	221	349	279	636	463	309	2036
Percent of total on schemes of 5 units or fewer	13.50%	21.20%	20.3%	10.4%	6.9%	8.2%	13.9%	11.1%

11.3 It can therefore be seen that small sites have been a significant source of housing land supply in the Borough and, although it has not been possible to identify such small sites through this SHLAA, this source should not be ignored in the future due to the implications that these additional dwellings will have on the demand for infrastructure, for example.

11.4 For this reason, the Council has included an annual small sites estimate of **32** units in the housing trajectory as shown overleaf. It should be noted that this is a conservative estimate – the annual average for planning permissions on sites of 5 or fewer is 43 units.

Housing Trajectory



12.0 Conclusions

12.1 This Assessment has been carried out in accordance with the Government's SHLAA Practice Guidance and has been considered by the Council's Local Development Framework Members Working Group.

12.2 The housing allocation tested in this Assessment is the figure of 5,840 units as set out in the South East Plan 2009. The summary of housing land supply provided in section 10 of this report found that specific deliverable/ developable sites to provide **5,530** new dwellings during the period 2008/09 – 2025/26, representing a potential over-supply of 566 units during that period.

12.3 An assessment of the potential of broad locations has not been considered in this SHLAA given the risk of double counting. The Council has not included a windfall allowance in this SHLAA, however, in order to recognise the contribution of small sites not considered in this Assessment, an annual small sites estimate of 32 dwellings has been included in the housing trajectory, as shown in section 11 of this report. The results of the SHLAA are summarised in Table 7, below.

Table 7: Summary of the Strategic Housing Land Availability Assessment

Source of supply/ potential	Timescale				Total
	Pre-Plan 09/10 – 10/11	0 – 5 years 11/12 – 15/16	6 -10 years 16/17 – 20/21	11 – 15 years 21/22 – 25/26	
Units on sites under construction	197	584	0	0	781
Units on sites with unimplemented planning permission*	12	551	426**	0	989
Sites with potential for residential development	0	886	1,306	1,568	3,760
Total	209 (375 units deficit against annual average requirement)	2,021 (561 units surplus against annual average requirement)	1,732 (272 units surplus against annual average requirement)	1,568 (108 units surplus against annual average requirement)	5,530 (566 units surplus against annual average requirement)
Small sites estimate	0	64	160	160	384
Total including small sites estimate	209 (375 units deficit against annual average requirement)	2,085 (625 units surplus against annual average requirement)	1,892 (432 units surplus against annual average requirement)	1,728 (268 units surplus)	5,914 (950 units surplus against annual average requirement)

*includes those with a resolution to grant planning permission subject to legal agreements

**assumes that planning applications will be granted again on sites where planning permissions expire but where principle has been set.

12.4 The SHLAA will be reviewed in spring 2010 as a part of the Annual Monitoring Report process.