



**Epsom & Ewell
Borough Council
Strategic Housing Land
Availability Assessment
Methodology
Consultation Paper
July 2008**

**Epsom & Ewell Strategic Housing Land Availability
Assessment (SHLAA)
Methodology Consultation Paper
July 2008**

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Strategic Housing Land Availability Assessment (SHLAA) Executive Summary

Government guidance states that local authorities must maintain an adequate supply of new housing sites in their areas. As part of this all Councils have to give consideration to where new housing development might be located within the Borough and to assess all potential opportunities. This will help ensure that the Borough's housing targets, currently set at 199 dwellings per year are achievable over the next 15 years.

The Council is required to carry out a 'Strategic Housing Land Availability Assessment' (SHLAA) so that it can demonstrate that the housing target can be met.

What is a Strategic Housing Land Availability Assessment?

A SHLAA is a technical document, which will help to identify the Borough's future housing supply. It will become part of the 'evidence base' for the Local Development Framework (LDF), which will inform the production of new planning policies.

The SHLAA will not allocate land; this is the role of the Site Allocations Development Plan Document. However, it will help inform the choices as to which sites should be selected in the production of the Site Allocations DPD.

SHLAA methodology & outputs

Through the SHLAA, local authorities are required to identify potential housing sites, in **five yearly periods**, for the next 15 years. Where it is not possible to identify specific sites for years 11 to 15, the broad locations for future growth should be indicated.

The sites identified in the SHLAA, must be deliverable, that is; they are available for development, in a suitable location for development, contribute to sustainable mixed communities and have a realistic prospect of being completed in the next five years.

To produce the SHLAA, the Council is proposing to follow the methodology set out in the government guidance, varying it where appropriate to suit local circumstances. The scope of the study is required to be broad and must not be narrowed by existing planning policies (apart from those relating to certain national designations, such as flood zones). Therefore the study will examine the future potential for the release of sites in the Green Belt. However, it is not envisaged that such sites will be required for the foreseeable future, as the Council is confident that it can accommodate future housing growth within the built up area.

It is intended that the SHLAA will be updated regularly to ensure that a continuous rolling supply of potential sites can be demonstrated.

1. Introduction

- 1.1 This paper sets out the proposed methodology to be used by Epsom and Ewell Borough Council in the production of the Strategic Housing Land Availability Assessment (SHLAA) for Epsom and Ewell Borough.
- 1.2 The Council intends to follow the basic guidance set out within the Department of Communities and Local Government (DCLG) Strategic Housing Land Availability Assessments Practice Guidance (July 2007). The methodology will also take account of the recent Planning Advisory Service guidance on the production of SHLAAs and their use within development plan document (DPDs) production (January 2008).
- 1.3 Consequently, we are taking certain fundamental aspects of the methodology as being established and will not be asking comments on these elements of the methodology. However, we will be seeking comments on those changes, or additions to the methodology that have been introduced in order to take account of and reflect the distinctive character and challenges facing the Borough.
- 1.4 The consultation element of the methodology has been structured to focus upon these differences. Where additions or amendments have been made to the basic SHLAA methodology, comments are invited through focused questions that relate to the changes. The questions appear in bold text at the end of the relevant methodology section. The questions are also reproduced in at the end of the document. We will not consider comments on the basic methodology as set out within the DCLG guidance.
- 1.5 Comments on the methodology questions included within this paper should be received by the Council no later than **5.00pm on Friday 15 August 2008**. All comments should be sent to:

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Planning Policy
Epsom and Ewell Borough Council
Town Hall
The Parade
Epsom
Surrey
KT18 5BY

LDF@epsom-ewell.gov.uk

Please feel free to contact us at the above address if you should have any questions about the SHLAA methodology.

What is the Strategic Housing land Availability Assessment (SHLAA)?

- 1.6 The SHLAA is a technical planning document that forms a key component of the robust evidence base informing the production of the Epsom & Ewell Local Development Framework (LDF).
- 1.7 We are required to produce a SHLAA by Planning Policy Statement 3: Housing (PPS3). This national policy document demands that local planning authorities produce SHLAAs in order to help provide a more responsive approach to housing land supply.

Purpose

- 1.8 The primary role of the SHLAA is to:
- Identify sites with potential for housing;
 - Assess their housing potential; and
 - Assess when they are likely to be developed.

The SHLAA guidance sets out the key features of a SHLAA as being that it is “a strategic assessment, focused on the identification of individual sites with potential for housing, founded upon partnership working with key stakeholders, and an ongoing process, involving regular monitoring and updating.”

Outcomes

- 1.9 The SHLAA will not make decisions about which sites should be developed for housing and when they should come forward for development. Rather, it provides evidence to support decision making as part of the development plan document (DPD) preparation process. Consequently, the SHLAA will not allocate, or de-allocate sites for housing. That is a task for DPDs such as the Site Allocations DPD and Epsom Town Centre Area Action Plan DPD.
- 1.10 However, the assessment findings will identify;
- Recent patterns of housing development
 - The choices available to meet the need and demand for more housing and provide a basis for making decisions about how to shape places in the future
 - Whether action would need to be taken to ensure sites will become deliverable (including infrastructure investment) or whether plan policies need to be reviewed to enable identified sites to be developed for housing.

These outputs will feed directly into and inform decision making during the production of future DPDs.

- 1.11 The SHLAA will have strong links with other technical studies within the Epsom & Ewell LDF evidence base, notably, the forthcoming East Surrey Strategic Housing Market Assessment (SHMA), which is a sub-regional level study commissioned by five of Surrey planning authorities. The SHMA will provide detailed information on the levels of housing demand and need within the sub-region and will help inform our strategy for meeting such needs, particularly in relation to future affordable housing. The SHMA is scheduled for publication during June 2008.

Policy Context

- 1.12 As stated above, the principle requirement that local planning authorities produce SHLAAs stems directly from PPS3: Housing. This document requires that local planning authorities:

- Identify specific, deliverable sites for the first five years of a plan that are ready for development, and to keep this topped up over time in response to market information.
- Identify specific, deliverable sites for years 6 - 10 and ideally years 11-15, in plans to enable the 5 year supply to be topped up.
- Where it is not possible to identify specific sites for years 11-15 of the plan, indicate broad locations for future growth, and
- 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.

The SHLAA will provide evidence to meet these requirements, which will be delivered through the LDF and monitored by our Annual Monitoring Report (AMR).

- 1.13 The DCLG has produced a companion document to PPS3, entitled *Strategic Housing Land Availability Assessments: Practice Guidance* (July 2007), which provides clear guidance on the basic principles of SHLAA production. We have used this guidance as the basis for the Epsom & Ewell SHLAA methodology. Additional good practise guidance is available from the Planning Advisory Service (PAS); as a supplement to the DCLG guidance.

- 1.14 Other national planning policy documents that have an impact upon the Epsom & Ewell SHLAA methodology include:
- PPS1: Delivering Sustainable Development
 - PPG2: The Green Belt
 - PPG4: Industrial, Commercial Development and Small Firms
 - PPS6: Planning for Town Centres
 - PPS7: Sustainable Development in Rural Areas
 - PPS9: Biodiversity and Geological Conservation
 - PPG13: Transport
 - PPG14: Development on Unstable Land
 - PPG15: Planning and the Historic Environment
 - PPG17: Planning for Open Spaces and Recreation
 - PPS25: Development and Flood Risk
- 1.15 The current development plan for the Borough comprises the Surrey Structure Plan 2004, The Epsom & Ewell Local Plan 2000 and The Epsom & Ewell Core Strategy 2007. The current Structure Plan sets a housing target, or quantum, for the Borough of 3000 dwellings during the period 2001- 2016. This equates to 200 dwellings per annum.
- 1.16 The emerging South East Plan is a full revision of Regional Planning Guidance 9 (RPG9 - the current Regional Spatial Strategy for the South East) and will cover the period to 2026. We are currently awaiting the Secretary of State's decision on the proposed changes to the Plan recommended by the Panel Report. When it is finally adopted, the South East Plan will also replace the Surrey Structure Plan and will contain a new housing allocation for Epsom and Ewell.
- 1.17 The Draft South East Plan panel report 2007 figures provide a new housing quantum of 3,980 new dwellings to be delivered in the Borough during the period 2006-2026, which equates of 199 dwellings per annum.
- 1.18 The Epsom & Ewell AMR monitors the performance of development plan policies. In particular, it monitors the delivery of the housing quantum, as set by the Surrey Structure Plan, and potential quantum to be set by the emerging South East Plan. The AMR clearly demonstrates that there are specific, deliverable sites ready for development during the first five years of the Core Strategy period (2007 – 2012).
- 1.19 However, projecting the housing trajectory forward to meet the emerging South East Plan housing quantum, the AMR forecasts a shortfall of 497 dwellings by 2022. It is the Council's intention to address any shortfall through the emerging Epsom & Ewell Site Allocations DPD. The SHLAA will play a key role in identifying and assessing potential housing sites.

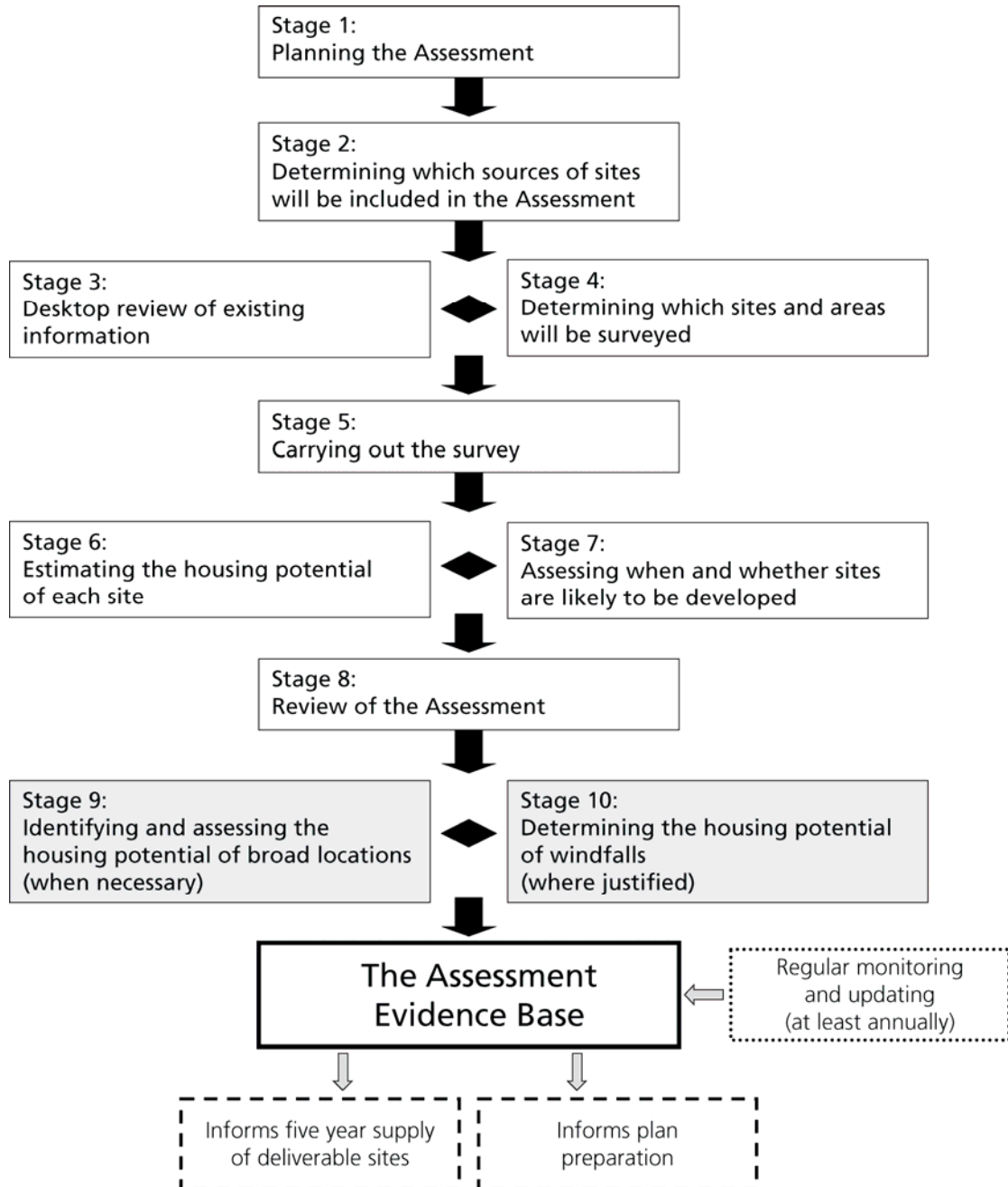
1.20 The Borough is in an extraordinary position of having a housing windfall allowance¹ included as part of the housing land supply that contributes towards meeting the housing quantum. This position was accepted by the Planning Inspector's binding report following the examination in public of the Core Strategy. Consequently, our AMR housing trajectory incorporates a small and medium scale windfall site allowance for the period 2007 – 2022. Even though the role of windfall sites in meeting our housing quantum has been confirmed, the Council will use the SHLAA as an opportunity to identify as many of the potential windfall sites, particularly large and medium scale sites, as possible. This will reduce the current reliance placed upon windfalls and it will also reduce any associated risk. The SHLAA methodology sets out how we propose to address this issue.

¹ Windfall sites are unallocated housing sites, which speculatively come through the development control process. A windfall allowance is an average annual supply, calculated on the basis of previous annual delivery from this source.

2. The Methodology

2.1 The DCLG guidance sets out eight main stages for the preparation of a SHLAA with two additional stages that may be undertaken if it is not possible for a local planning authority to identify an adequate supply of specific deliverable or developable sites for housing. The stages of the SHLAA are set out in Figure 1. The two additional stages are shown in grey.

Figure 1

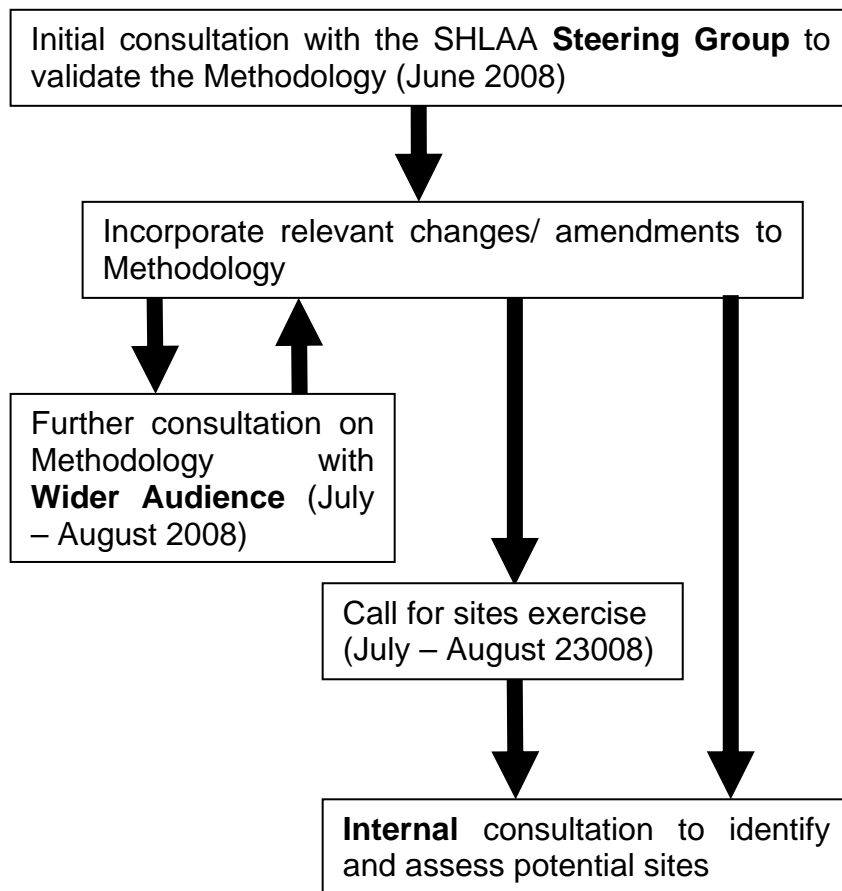


3. Stage 1 Planning the Assessment

Partnership Approach

- 3.1 The DCLG guidance recommends that SHLAAs are prepared jointly with the other local authorities that comprise the local Housing Market Area, namely, the East Surrey Housing Market Area.
- 3.2 Unfortunately, this is not a practical approach in this instance. The other East Surrey Authorities all have different timetables for the production of their Local Development Documents (LDDs). Some of our East Surrey neighbours have already started production of their SHLAAs, whilst others have yet to start. Consequently, we will not be producing a joint-SHLAA with our neighbours.
- 3.3 However, we are enthusiastic about engaging and involving key stakeholders in the SHLAA process, and we believe that the partnerships we develop with these stakeholders will help us produce a comprehensive and robust SHLAA.
- 3.4 One of the first stages of the SHLAA will be to invite membership to a focussed steering group; who will act as a critical friend to the SHLAA process. Initially, providing advice and validating the SHLAA methodology. The steering group will be chaired by the Borough's Chair of Planning Policy Sub-Committee. We propose to invite the following as members to the SHLAA steering group:
 - Government Office for the South East (GOSE)
 - South East England Regional Assembly (SEERA)
 - Surrey Planning Officers Association (SPOA)
 - South East England Development Agency (SEEDA)
 - Surrey County Council (SCC)
 - Home Builders Federation (HBF)
 - Council for the Protection of Rural England (CPRE)
 - Rosebery Housing Association
- 3.5 We consulted the steering group on the initial draft of the SHLAA methodology during June 2008. Their comments (see Annex 6) have been used to refine and validate the SHLAA methodology prior to further, more comprehensive consultation. This subsequent stage of consultation will allow a wider audience to comment on those parts of the SHLAA methodology that are unique to the Borough. We intend to invite responses from a focussed list of stakeholders, which we have reproduced in full under Annex 1. The consultation stages are set out under Figure 2.

Figure 2



Question 1

Do you agree with the list of key consultees that we will involve during the second stage of the methodology consultation process?

Question 2

Is there another body/ organisation that you believe should be included within this consultation? If so can you explain why?

- 3.6 Concurrent with the second stage SHLAA methodology consultation, we will invite those consultees with land or development interests to submit details of potential housing sites that they want us to assess through the SHLAA (Stages 3 – 7). Representations to this call for sites exercise will need to be made on forms set out under Annex 2.

- 3.7 We propose to keep both the steering and wider stakeholder group regularly informed of the SHLAA's progress, possibly by way of a bi-monthly electronic newsletter. We could also hold an information seminar at the end of the assessment process, to which all stakeholders will be invited. Such a seminar will seek to disseminate headline outputs (but not site specific issues) from the SHLAA.

Question 3

We would like to keep you informed of the progress of our SHLAA, particularly its headline outputs; how would you like us to keep you informed –

- i) An electronic newsletter**
- ii) a presentation event, or**
- iii) another option – please tell us.**

- 3.8 We will expand our partnership approach to incorporate engagement with internal corporate sources. For example, colleagues in development control and other relevant services/ divisions. This will help us with identifying and assessing sites.

Question 4

Do you know of any other organisation(s) that we should involve when assessing potential sites? If so can you explain why you think we should involve that organisation?

- 3.9 The projected timetable for the production and completion of the SHLAA is set out under Annex 3.

4. Stage 2 Determining which sources of sites will be included in the assessment

4.1 This stage of the process will establish the broad sources of sites with potential for housing. Further stages will apply constraints to the potential supply.

4.2 The DCLG guidance suggests the following as potential sources of sites:

Sites in 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 site development briefs
- unimplemented/outstanding planning permissions for housing
- planning permissions for housing that are under construction

Sites not currently in the planning process

Examples:

- vacant and derelict land and buildings
- surplus public sector land
- land in non-residential use which may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of mixed-use development
- additional housing opportunities in established residential areas, such as under-used garage blocks
- large scale redevelopment and re-design of existing residential areas
- sites in rural settlements and rural exception sites²
- urban extensions³
- new free standing settlements

4.3 Given the Borough's nature we consider some of these sources either inappropriate, or not applicable to our SHLAA. Nevertheless at this early stage of the SHLAA process we will take a relatively unconstrained approach to potential housing supply and consider all sites.

4.4 However, we will seek to apply relevant constraints through the subsequent stages of the SHLAA process.

² See Paragraph 30 PPS3.

³ The broad location for which will normally have been identified by the Regional Spatial Strategy.

5. Stage 3 Desktop review of existing information

5.1 The DCLG guidance sets out the following table for data sources of potential housing supply:

Sites in the planning process	Purpose
Site allocations not yet the subject of planning permission	To identify sites
Planning permissions/ sites under construction (particularly those being developed in phases)	To identify sites
Site specific development briefs	To identify sites and any constraints to delivery
Planning application refusals	To identify sites – particularly those applications rejected on grounds of prematurity
Dwelling starts and completion records	To identify the current development progress on sites with planning permission
Other sources of information that may help to identify sites	
Local planning authority Urban Capacity Study	To identify buildings and land, and any constraints to delivery
Local planning authority Empty Property Register	To identify vacant buildings
English House Condition Survey ⁴	To identify buildings
National Land Use Database ⁵	To identify buildings and land, and any constraints to delivery
Register of Surplus Public Sector Land ⁶	To identify buildings and land
Local planning authority Employment Land Review	To identify surplus employment buildings and land
Valuation Office database ⁷	To identify vacant buildings
Local planning authority vacant property registers (industrial and commercial)	To identify vacant buildings

⁴ See www.communities.gov.uk

⁵ www.englishpartnerships.co.uk/publications.htm

⁶ www.englishpartnerships.co.uk/rspsl.htm

⁷ See www.voa.gov.uk

Commercial property databases eg estate agents and property agents	To identify vacant buildings and land
Ordnance Survey maps ⁸	To identify land
Aerial photography	To identify land

5.2 We will seek to capture as much data as possible from the above sources onto a seamless layer on ARCMAP GIS to 1:1250 scale. The layer will include data on site area, address details and landowner information, where available. Site data gained from our call for sites consultation exercise (see Para 2.7) and from our recent Site Allocations DPD Issues & Options stage consultation will also be included upon separate GIS layers. We will remove all duplicate sites, and address any site boundary and landowner detail inconsistencies.

Question 5

Can you identify, or supply other sources of information that we can use for this stage of the SHLAA?

⁸ See www.ordnancesurvey.co.uk/oswebsite

6. **Stage 4 Determining which sites and areas will be surveyed**

- 6.1 This is a key part of the study. This stage will help us identify new potential sites within the Borough that could form our housing supply during the plan period.
- 6.2 We do not believe that the scope of our search and survey of potential sites is completely unconstrained. The DCLG guidance states that factors to take into account when determining how comprehensive (in terms of geographic coverage) and intensive (in terms of minimum size of site to be surveyed) the survey element of the SHLAA needs to consider:

The nature of the housing challenge facing Epsom & Ewell: the emerging South East Plan currently sets a modest housing quantum for the Borough, which we believe we can meet. The Secretary of State's forthcoming decision on the South East Plan may change this position and we may need to consider an adjustment. However, the shortfall of housing allocation sites (by 497 dwellings) and the reliance upon our windfall allowance during the latter stages of the plan period suggest to us that the SHLAA should seek to identify a comprehensive housing supply. Equally, the Borough's geographical proximity to London and the associated trend of rising average house prices supports this position.

Question 6

Do you agree with our appraisal of the housing challenge facing the Borough? If you disagree with our appraisal, please state why and provide a justification for why we should raise/ lower housing supply?

The nature of Epsom and Ewell: The Borough is a predominantly urban area, surrounded by the Metropolitan Green Belt, which is partially rural and open space in character. We believe that the SHLAA survey element should concentrate upon the urban area. However, for the purposes of this study, an assessment of the long term housing potential of sites located within the Green Belt will be undertaken.

The nature of Epsom & Ewell's housing land supply: The majority of the Borough's housing land supply comes forward through the intensification of existing urban sites. These can include developments within infill and garden plots, demolition of existing large single dwellings and replacement with smaller units, conversion of large dwellings into multiple occupancy and over-shop living within town and local centres. Many of these smaller urban sites come forward as windfalls. Historic trend data demonstrates that the Borough's past performance of housing delivery has consistently exceeded annual targets. This serves as an indicator of the past reliability of windfall supply.

Other recent sources of housing supply have also included the new build and conversion within the footprint of existing surplus institutional sites (the Hospital Cluster) located within the Green Belt and town centre redevelopment sites. With the exception of the Hospital Cluster are no obvious sources of new housing supply within the Green Belt. Equally, there are very few greenfield sites that are outside of the Green Belt.

We believe the scope of the SHLAA needs to be as wide-ranging as possible and should examine sites with potential for five or more dwellings. We believe that this will help us identify a significant proportion of our potential windfall supply. This is an approach that other SHLAAs around the country have shied away from, due to the lack of certainty normally associated with the delivery of small sites. However, given the nature of the Borough's housing land supply, we believe that there is strong justification for our taking a comprehensive approach.

In order to achieve this we propose to apply a minimum site area threshold of 0.12 ha. This site threshold has been calculated upon the basis of the RSS minimum density of 40 dwelling per ha. We believe that this approach will help us identify a significant proportion of our previously hidden windfall allowance.

Question 7

**Have we identified our known housing land supply sources?
Are there any other (generic) land supply sources that we haven't identified? Why should we identify these sources now?**

Question 8

Do you agree with our suggested minimum threshold? If you disagree with our suggested threshold; why do you disagree, what threshold would you apply and what is your justification for applying that lower/ higher threshold?

The resources available to the study group: The Epsom & Ewell SHLAA will largely be produced in-house by the Borough Council's Planning Policy Team. The in-house production of the SHLAA provides an opportunity to carry out a comprehensive assessment of potential housing supply, which may not have been possible (to resource) if external consultants had been commissioned to carry out the study. The Planning Policy Team Leader has experience in the production of an urban capacity study and a recent SHLAA. Other members of the team are familiar with the local area, which will prove beneficial during the survey and analysis stages. Corporate resources, particularly technical expertise and local knowledge, will be utilised when appropriate. The technical expertise of the steering group will be accessed during the preparation of the SHLAA methodology. The focussed consultation exercise will allow further fine tuning of the methodology. Risk, particularly the potential for delay, has been built into the project timetable.

Mapping the Area to be Covered by the SHLAA

6.3 We will seek to map known geographic areas or sites that could come forward as potential sources of housing land supply. The DCLG guidance suggests that we consider mapping the following areas:

- **Development hotspots:** We will map these by using planning application data from our development control database. Multiple applications (on the same site) will be examined and duplicates removed to avoid double counting. Consideration will be given to successive proposals that demonstrate progressive on-site intensification. We will use the resulting data to map those areas where there is an apparent market demand for new housing.

Question 9

Do you agree with our suggested approach of mapping development hotspots? If not, please specify why you disagree and identify an alternative approach that we should take.

- **Town and district centres (and their surrounding pedestrian accessibility catchments):** We will map these areas as per the town and local centre boundaries⁹ identified on the proposals map. Once mapped, we will use GIS to identify 200m, 400m, 600m, 800m and 1000m areas around these nodes to serve as stratified pedestrian catchments. Where pedestrian catchment areas cross onto a key constraint, such as the Green Belt, we will modify the buffer to take account of the constraint.

Question 10

Do you agree with our approach for town and local centre accessibility? Please state the reasons why you disagree and identify an alternative approach.

- **Principle Public Transport Corridors:** We will use existing datasets to identify bus stops, railway stations and cycle networks and map them onto our GIS. We will also seek to use any existing accessibility datasets, such as those produced by the local transport authority in support of their Local Transport Plan.
- **Specific Locations within Urban Area:** We will map these areas as per sites identified for growth on the proposals map. This will include sites currently allocated for uses other than housing, such as employment, retail, open space uses and community uses. We will also map other known potential sites, such as those historically submitted to the Borough Council through the local plan process, NLUD sites and assets in English Partnerships control (see Sections 4 and 5 for further information).
- **Specific Locations outside Urban Areas:** Given the nature of the Borough the potential housing supply from sites outside the urban area is extremely limited. However, we will map any known sites such as those from the sources set out above.

Question 11

Do you agree with this approach to specific sites outside of urban areas? If you disagree, please specify why and provide an alternative approach.

⁹ We will focus upon the following centres Epsom Town Centre, Ewell Village, and Stoneleigh and Kingston Road/ Ruxley Lane local centres, as these provide a range of amenities, services and facilities.

7. Stage 5 Carrying out the survey

- 7.1 We envisage carrying our site survey work during Summer 2008. We intend to take advantage of the favourable weather conditions and longer periods of daylight to ensure that the survey is comprehensive in both scale and content.
- 7.2 The site survey work will principally be carried out by the Planning Policy Team, although the potential use of Officers from other services, such as the Planning Development Control Team, will be considered.
- 7.3 It is envisaged that most site visits will be undertaken from public land, although access onto sites will be sought where it will aid assessment. The survey process will utilise a form – one for each individual site. An example is included under Annex 4.

8. Stage 6 Estimating the housing potential of each site

- 8.1 Here we will seek to identify how intensively (or otherwise) our potential site options could be developed. There are a number of mechanisms that we could use to determine the housing potential of individual sites, these are –
- Use the development/ local plans' policy approach towards housing density to determine housing potential. Although neither our Core Strategy nor local plan has a specific policy on density, or density targets, the emerging RSS provides an overall regional target of 40 units/ ha, which could be used as a minimum density for each individual site. Subsequently, Officers surveying and assessing each site could apply their knowledge of local character and potential constraints to provide an assessment of potential housing yield.
 - An alternative approach suggested by the DCLG guidance is to 'sketch' an indicative layout for each site – given the number of sites we are likely to be surveying, this appears to be excessive.
 - Another urban design approach taken by SHLAAs is to produce 'typical' indicative or illustrative site layouts. These are normally based upon real world/ local examples (within the Borough).

We propose to use a combination of the first and third approaches, namely, the minimum density yardstick and indicative layout approach. The Officers conducting the site survey work are familiar with the local area and can draw upon their own expertise to provide an assessment of potential yield based upon a minimum housing density and the existing character of the surrounding area. In order to ensure consistency, we will record the basis for the Officer's assessment of

potential yield and a quality control element, monitored by the project leader.

Question 12

Which approach do you think will provide the best estimate of housing potential? Do you have an alternative approach that you think we should adopt, please specify how your alternative approach would work?

- 8.2 Given the urban nature of the Borough, there will be sites that have potential to come forward for a mix of uses, for example, retail or employment uses in addition to housing. We envisage that such sites will mostly come forward either within, or on the edge of existing retail and/ or employment centres. There may also be potential for existing employment sites to come forward for redevelopment (through the SHLAA process), which may allow for the retention, and possible intensification, of employment uses within parts of the site.
- 8.3 Where a site could potentially be developed for a mix of housing and retail uses, we will assume that the retail uses will be the predominant ground/ street level use. The housing potential of such sites being confined to the upper floors.
- 8.4 Given the lack of available modern employment floorspace within the Borough, and the consequently latent market demand, we will assume that sites with the potential to accommodate a mix of employment and housing uses will favour the employment use. Therefore, we suggest that such mixed use site options contain a minimum 60% employment use¹⁰. This approach accounts for the under provision of employment land within the Borough and is consistent with our cautious approach towards any employment floorspace loss.

Question 13

Do you agree with our assumptions for those sites that have a mixed use potential? If you disagree, please state why and provide an alternative approach for us to take?

¹⁰ Based upon RICS research and guidance for mixed-use schemes and live/ work developments.

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

9.1 The DCLG guidance sets out three categories of developability -

- The site is **deliverable** – namely, the site is available now and offers a suitable location for housing and has a reasonable prospect of housing delivery within five years of the adoption of the plan. We believe that the types of site that will fall into this category will include – sites with unimplemented permission (either windfalls or allocations) and current applications (considered appropriate for housing; in principle). We envisage that these sites will all be within our current five year housing supply.
- The site is **developable** – namely, the site is in a suitable location to come forward for housing development and there is a reasonable prospect that it will be available and could be developed at a specific point in time. The type of site likely to be included within this category will include – allocations without planning permission (and those that require a long run-in time IE urban extensions), new sites identified through the SHLAA – incorporating our as yet unidentified windfall sites (as they come forward). These sites will form the SHLAA's 6 – 15 year housing land supply.
- The site **is not currently developable** – namely, it is unknown when a site could be developed. Incorporating this category will allow the SHLAA to take an unconstrained approach to site identification; namely, the methodology will consider all sites whilst also allowing for the implications of major constraints (such as the Green Belt).

Stage 7a Assessing suitability for housing

9.2 The DCLG guidance states that a site is suitable for housing if it offers a suitable location and would contribute to the development, creation and enhancement of sustainable, mixed communities. This is likely to apply to most new sites identified by the SHLAA that are located within the existing urban area. Equally, existing permissions and allocations will also be suitable for housing – although the DCLG guidance advises that we validate these through the process.

9.3 For 'new' sites emerging through the SHLAA process, suitability for housing will be assessed using the following criteria:

- **Policy restrictions:** as set out above (see Stage 4). This will include site specific designations and allocations as set out within the development plan. Although not included within the guidance, we propose to factor in existing uses and the more general Core

Strategy policies that may relate to these uses. For example, existing employment and retail sites – our policies seek to retain these uses, therefore, these sites may not be suitable for redevelopment for 100% housing.

Redevelopment of this type of site may be considered suitable if the existing use is no longer viable (IE ageing office stock). However, if the site can still accommodate an alternative employment use we may consider housing an inappropriate alternative use. We will be carrying an employment land assessment concurrently with the SHLAA. The employment land study will provide an assessment of our existing employment land stock. As such it will provide valuable data towards assessing the potential suitability of some of our existing employment sites for other or mixed uses.

Where housing is considered suitable – at the expense of an existing employment or retail use – we should consider introducing a mixed-use development. The mixed-use could conceivably seek to intensify both uses – possibly increasing employment density as well as introducing housing. See also Stage 6.

- **Physical problems or limitations:** These are site specific and will be assessed upon the individual characteristics of the site. We suggest that a typical range of problems and limitations will include:
 1. Site topography – slopes, uneven terrain etc; a limitation upon level of yield.
 2. The size of the site – a small site may restrict the delivery of ‘normal’ market housing (at market housing densities) and may require a bespoke solution.
 3. An awkward shaped site – a site that does not readily allow for ‘normal’ market housing delivery and may require a bespoke approach; a limitation upon the level of yield.
 4. Contamination – from previous use; where levels of contamination are known it may be possible to assess potential developability. The size of the site may also affect viability.
 5. Access – we envisage that this will be an issue for smaller sites located within the urban areas, especially for sites within existing residential areas.
 6. Flood risk – Level 1 of our SFRA should help us identify areas of immediate risk (Flood Zones 2 and 3).
 7. Infrastructure – the DCLG guidance identifies this as a possible problem but given the Borough’s urban characteristics, we believe that it is unlikely to be too

great a constraint/ problem for most sites – infrastructure should be relatively available.

8. Hazardous risks – the DCLG guidance is unclear on this issue but we believe that it relates to the implications of adjacent uses – railway, chemical works etc.
9. Important vegetation and ecological considerations – this is an important local consideration, given the contribution that vegetation, especially tree cover, makes towards the Borough's character and appearance.

- **Potential impacts:** the DCLG guidance is vague on what this entails. Based on what is stated, we suggest that these are essentially known constraint/ allocation/ designation based issues – such as the constraints that appear on the proposals map. For example, Conservation Areas (impact upon character, appearance, setting), listed buildings, landscape and townscape. Conceivably, these are impacts that can be mitigated.
- **Environmental conditions (for future residents):** this reflects either existing on-site issues, previous uses on-site and neighbouring uses/ conditions. Again, there may be opportunities to mitigate these conditions – at a cost.

Stage 7b Assessing availability for housing

9.4 This part of the process will seek to identify any ownership/ landowner constraints that may affect the developability of potential sites. The assessment will examine (where possible):

- Potential legal constraints relating to site, including ownership, access, tenancies and operational use of the land
- Issues of multiple ownership and their potential impact upon delivery
- The landowners' desire to release the site as part of the housing supply

9.5 We note that neither a local plan allocation nor a planning permission guarantee the availability of a site to the housing supply. Consequently, we will apply this assessment process when re-assessing those sites already within the planning process.

Stage 7c Assessing achievability for housing

9.6 The DCLG guidance states that a site is considered achievable for development where there is a reasonable prospect of it coming forward at a particular point in time. The DCLG guidance considers this to be a judgement based upon the site's economic viability and the developer's capacity to build and sell houses over a certain period.

9.7 The guidance suggests that achievability can be effected by:

- **Market factors:** adjacent land uses, economic viability of existing uses (IE if existing uses are/ were commercial, attractiveness of the locality, level of potential market demand and projected rates of sales.
- **Cost factors:** site preparation costs (IE relating to potential physical constraints), any exceptional works necessary (IE contamination), relevant planning standards/ obligations/ tariffs (IE our developer contributions SPD) prospect of funding/ investment needed to address identified constraints (IE would a prospective developer be able to borrow from a bank to deliver the site?)
- **Delivery factors:** developer's own phasing, realistic build out rates (IE how long will it take?), whether the site is split across a number of developers, and the size and capacity of the developer

9.8 We believe that current market conditions will have an impact upon economic viability, namely, after an extend period of economic prosperity and a rising housing market we are entering a period uncertainty, which may well affect the short term delivery of our housing supply. Sites that are normally readily available will possibly take longer to reach completion. It is equally possible that the development industry will bank planning permissions until economic conditions become more favourable. Under such conditions sites with minor issues and problems, which would have been deliverable (with mitigation) may, for the short term, become economically marginal. Consequently, those with greater problems may, under current economic conditions, be undevelopable in the short term. In short, we will take a cautious approach.

9.9 We propose to monitor the developing economic climate over the course of the SHLAAs production and once completed, as part of the annual monitoring process.

How we propose to deliver Stage 7

9.10 Whilst the DCLG guidance sets out the factors that have to be considered when assessing the housing potential of a site, it does not set out how the assessment will be carried out. During the preparation of our SHLAA methodology we considered a number of possible approaches for site assessment, which had been used by other local planning authorities.

9.11 After some consideration, we chose to take a matrix approach, which sets out the above variables under their discreet sub-headings. We will apply the assessment matrix to each site. Each variable has a value

(either positive or negative) that contributes to both the total site score, and a sub-heading score. The matrix provides one mechanism for ranking sites but will not be used as the sole factor in determining the deliverability or developability of a potential site.

- 9.12 The total site score will be used to initially rank all potential sites. The site hierarchy will range from deliverable sites, through to developable sites and finally site not currently developable.
- 9.13 An initial ranking, based purely on a sites total score, may not be entirely indicative of the sites suitability for housing. It is conceivable that a sites total score may be skewed by individual high scores within its separate sub-headings. For example, a site may score highly due to its high levels of accessibility but may be constrained due to contamination, a factor which would affect its ability to come forward for housing.
- 9.14 Therefore, we will carry out an additional analysis of scores to identify where individual sites have performed well or poorly. We will rank certain sub-headings/ constraints higher than others. We will subsequently note the potential for either mitigation (to aid a site's developability and raise its matrix score), or alternatively note why a site should be considered as not currently being developable. Where mitigation can be reasonably introduced we will boost the sites total score to reflect that potential. The matrix is reproduced in it's entirety under Annex 5.
- 9.15 The final output from this stage will be a list of all sites sub-divided into sites that are deliverable, developable, or not currently developable.

10. Stage 8 Review of the Assessment

- 10.1 Once the survey of sites and an assessment of their deliverability and developability have been completed, we will collate the housing potential of all sites and produce an indicative housing trajectory. This will set out how much housing can be provided and at what point in time sites could come forward.
- 10.2 We will then carry out a risk assessment to determine the certainty of sites coming forward as anticipated. The risk assessment will examine data collected during the desk top, site survey and call for sites stages, and also take account of the Stage 7 matrix results (normal and boosted).
- 10.3 It is conceivable that the outputs from this stage of the process will suggest that there is an insufficient housing supply.

11. Further Optional Stages

- 11.1 The DCLG guidance advises that local planning authorities faced with a shortfall in housing supply, after conducting a SHLAA, seek further sites to address this issue.
- 11.2 There are two potential paths that a local planning authority could take to resolve this issue. The first approach would be to conduct a re-assessment of those surveyed sites discounted (for whatever reason) during Stage 7 of the SHLAA process. The second would be to examine the potential deliverability and developability of the two alternative housing supply sources set out under optional Stages 9 and 10.

Optional Stage 9 Identifying and assessing the housing potential of broad locations

- 11.3 The guidance describes broad locations as being areas where further housing development is considered appropriate and feasible but where specific sites cannot be identified (through the SHLAA). The guidance suggests that broad locations could include areas within and adjoining settlements, and land outside of settlements.
- 11.4 Although the Green Belt limits the potential for identifying broad locations outside of the Borough's urban area it is conceivable that such broad locations of housing potential could be identified within the existing urban area. Initial desk top analysis suggests that such broad areas may provide a source of housing land supply through intensification. Ideally the SHLAA will identify specific sites within these areas. This approach is not intended to function as a de facto windfall allowance. We will only identify broad areas where they correspond with clusters of sites identified through the SHLAA process – where the deliverability/ developability of those sites cannot be quantified with confidence.

Optional Stage 10 Determining the housing potential of windfall sites

- 11.5 Both PPS3 and the DCLG guidance allow for the inclusion of a windfall allowance, as a source of housing land supply, within the SHLAA in exceptional circumstances.
- 11.6 Following the examination of the Core Strategy, the Planning Inspector fully acknowledged the role of windfall sites in meeting the Borough's housing quantum.
- 11.7 Windfall trends demonstrate a mean supply of 35 units per annum, from small scale sites, and 46 units per annum, from medium scale sites. Whilst the Borough's current housing trajectory is not reliant upon a windfall's from large scale sites, trend data demonstrates that

large sites contributed 214 dwellings to the housing land supply at about 36 dwellings per annum.

- 11.8 Our latest Annual Monitoring Report extrapolates these historic windfall trends to provide a windfall allowance of 1140 units from small (510) and medium (630) scale sites.
- 11.9 Our AMR does not seek to identify an allowance for large scale windfall sites beyond the five known (unallocated sites, therefore considered windfall) sites.
- 11.10 The AMR does identify an allowance, of 56 units per annum, for as yet unidentified allocation sites for the period 2013 – 2022. This allowance totals 497 units. We envisage that the SHLAA will identify these 497 units and the 630 medium scale windfall sites.
- 11.11 Given the nature of small scale windfalls sites, we do not envisage, at this point, it being possible to identify a significant proportion of our 510 small scale windfall allowance through the SHLAA. At this point in the process, we envisage that most of our small scale windfall sites will either be hidden (difficult to identify through the SHLAA survey stages), or be of indeterminate viability. Typically, such sites will include large houses, with potential for intensification, and garden sites in multiple ownership. Consequently, in order to account for this important source of housing supply, we may seek to retain a small scale windfall allowance of about 510 units.
- 11.12 Given the uncertainty of the windfall allowance as a source of supply, we propose to maintain it as a reserve for the latter stages of the plan period.
- 11.13 We will also monitor the annual delivery of windfall sites (these are sites not identified through the SHLAA) through our AMR. We will add these new windfall sites to the SHLAA through this process. This will build our SHLAA site portfolio and conceivably (should sufficient sites come forward) remove any need for a windfall allowance.
- 11.14 However, should the need for a modest windfall supply remain, the annual monitoring (of windfalls coming through) will demonstrate the rate of supply, patterns of windfall development and any growth or decline in that source of supply.
- 11.15 We consider this to be a robust and comprehensive approach towards addressing windfalls through the SHLAA.

Draft Methodology Questions

Question 1

Do you agree with the list of key consultees that we will involve during the second stage of the methodology consultation process?

Question 2

Is there another body/ organisation that you believe should be included within this consultation? If so can you explain why?

Question 3

We would like to keep you informed of the progress of our SHLAA, particularly its headline outputs; how would you like us to keep you informed –

- i) An electronic newsletter**
- ii) a presentation event, or**
- iii) another option – please tell us.**

Question 4

Do you know of any other organisation(s) that we should involve when assessing potential sites? If so can you explain why you think we should involve that organisation?

Question 5

Can you identify, or supply other sources of information that we can use for this stage (Stage 3) of the SHLAA?

Question 6

Do you agree with our appraisal of the housing challenge facing the Borough? If you disagree with our appraisal, please state why and provide a justification for why we should raise/ lower housing supply?

Question 7

Have we identified our known housing land supply sources? Are there any other (generic) land supply sources that we haven't identified? Why should we identify these sources now?

Question 8

Do you agree with our suggested minimum threshold (0.12 ha)? If you disagree with our suggested threshold; why do you disagree, what threshold would you apply and what is your justification for applying that lower/ higher threshold?

Question 9

Do you agree with our suggested approach of mapping development hotspots? If not, please specify why you disagree and identify an alternative approach that we should take.

Question 10

Do you agree with our approach for town and local centre accessibility? Please state the reasons why you disagree and identify an alternative approach.

Question 11

Do you agree with this approach to specific sites outside of urban areas? If you disagree, please specify why and provide an alternative approach.

Question 12

Which approach do you think will provide the best estimate of housing potential? Do you have an alternative approach that you think we should adopt, please specify how your alternative approach would work?

Question 13

Do you agree with our assumptions for those sites that have a mixed use potential? If you disagree, please state why and provide an alternative approach for us to take?

Annex 1: List of Stakeholders

Agents Forum

Mr I Stagg
Mr B Townsend, Huggins Edwards & Sharp
Mr A Shortt, Building Plans
Mr B Cross, Brian R Cross & Associates
Mr R Najim
Mr D Saunders, DS Designs
Mr P Elkins
Mr J Langley
Mr A Leonard
Mr C Rutter, Architectural Designs
Mr N Wigg
Mr M Marriott
Mr D Erriker
Mr A Kenfield
Mr A Mason, Samway Designs
Mr P Parkinson, Dean Design Architectural Services Ltd
Mr S Tween, Design Solutions
Mr J Moss, John Moss Designs
Mrs S Duffell, Glebe House Construction
Mrs B Bianchi, Effectiveness by Design
Mr J Draper, J W Design Services
Mr K Kennedy
Mr B Adams
Mr A Manington
Mr C Rutter, Architectural Designs
Mr L Pitters, Canopy Planning Services
Mr I West, EPS
Mr D Bowler
Mr E Forster, Renco Architectural Designs
Mr R Clarke
Mr J Fury
Mr K Simpson
Mr P Michelmore, PMA Architects
Mr G Lawrence, Geoff Lawrence Associates
Mr A Kockek, AKSESS
Mr R Hand, Home Counties Design
Mr J Cavilla
Mr C Orchard
Mr G Williamson, Plans People
Mr James Templeman
Mr B Duffy
Mr M Everett

Local Estate Agents

Alistair Hodge & Co
Bairstow Eves
Barnard Marcus
Browns Property Services
Cairds

Douglas & Co
Eastons Estate Agents
Gascoigne-Peas
Greenfield and Company
Jackson Noon
John McCann & Co
Justmove.com
Mann Countrywide
The Personal Agent
Robert Dean

House Builders

Fairview New Homes
Gladedale (South East Ltd)
Laing Homes
McCarthy & Stone
Rushmon Homes
Crest Nicholson Residential (South) Ltd
Charles Church Developments (SE) Ltd
Linden Homes South East Ltd
Martin Grant Homes
Taylor Woodrow Developments
Try Homes
Octagon Developments Ltd
Persimmon Homes (South East)
Latchmere Properties Ltd
Berkeley Homes (Southern)
Antler Homes Southern plc
Croudace Homes Ltd
Barratt Homes (South East)
Bellway Homes South East
Bewley Homes
Bovis Homes
Cala Homes South Ltd
Chartridge Developments plc
David Wilson Homes
George Wimpey
LiveIn Quarters
Michael Shanley Homes
Miller Homes
Millgate Homes
Redrow Homes Southern
Rydon Homes
Village Developments
Wates Homes

Housing Associations

Thames Valley Housing Association
Town and Country Housing Group
Orbit Housing Group
Mount Green Housing Association

The Hyde Group
Housing Corporation

Planning Consultants

WS Atkins
Barton Willmore Planning
DP9
G L Hearn

Local Agencies

Churches Together
East Elmbridge & Mid Surrey PCT
Surrey and Borders Partnership NHS Trust
National Trust
Racecourse Holdings Trust
University College for the Creative Arts at Farnham
NESCOT
John Sharkey & Co
The Mall / Ashley Shopping Centre
Natural England
English Heritage
Environment Agency, Thames Region
Surrey Wildlife Trust
Epsom & Ewell History & Archaeology Society
Surrey County Council
Estates Planning and Management
Epsom Protection Society
Ramblers Association

Residents Associations

Association of Ewell Downs Residents
College Ward Residents Association
Cuddington Residents Association
Ewell Court Residents Association
Ewell Village Residents Association
Howell Hill Residents Association
Nonsuch Park & District Residents Association
Stamford Ward Residents Association
Stoneleigh & Auriol Residents Association
Town Ward Residents Association
West Ewell Residents Association
Woodcote Residents Association

Annex 2: Call for Sites Representation Form

Epsom & Ewell SHLAA Call for Sites Pro Forma

Site Submission

As part of the Strategic Housing Land Availability Assessment (SHLAA) process, developers and the wider public have the opportunity to put forward potential housing sites from **25 July 2008** to **15 August 2008**.

Where do I send the completed forms?

Please return all completed forms to: **Karol Jakubczyk**, Planning Policy, Epsom and Ewell Borough Council, Town Hall, The Parade, Epsom, Surrey, KT18 5BY. Completed forms must be submitted no later than **5.00 PM on 15 August 2008**.

You may also fax submit your completed form to LDF@epsom-ewell.gov.uk no later than **5.00 PM on 15 August 2008**.

If you have any difficulties completing this form please contact us at LDF@epsom-ewell.gov.uk, or by telephone on 01372 732000.

What happens next?

Submitted potential housing sites will be considered as part of the SHLAA process. Potential sites for alternative land uses will be considered as part of the Site Allocation Development Plan Document (DPD).

Important: Before completing this form, please read the following guidance notes.

- All sites submitted will be considered as part of the SHLAA process and cannot be treated confidentially.
- Please complete the 'call for sites' pro forma in as much detail as possible, sign and date. Attach a map outlining the precise boundaries of the site and the part that is deemed suitable for housing (if this is not the whole area.) This will help with the assessment of the site.
- Use a separate form for each site.
- Please do not submit sites that already have planning permission for development unless a new and different proposal is likely in the future.
- Only sites that are 0.12 ha or greater in size should be submitted.

Section 1 Your Contact Details:

Name/ Organisation:

Representing:
(if applicable)

Your Address:

Telephone Number:

Email Address:

**Your Status: Landowner/ Land Agent/ Planning Consultant/ Developer/
Registered Social Landlord/ Other (please state)**

(Please cross out those that do not apply to you)

I am the landowner of the submitted site.

I confirm that the owner(s) have been informed of this site submission.

(Please cross out those that do not apply)

Signature:

Date:

Section 2 Site Details:

Site Address:

Site Area (ha):

Current Land Use:

Site Co-ordinates:

Proposed Use for Site: Housing/ Other (please state)

(Please cross out those that do not apply)

Relevant Planning History (if known):

Number of on-site Ownerships:

Is there Developer Interest in the Site (if yes, please specify)?

When will the site become available for development?

- **Within 5 years**
- **Within 6 – 10 years (2014 – 2018)**
- **Within 11 – 15 years (2019 – 2023)**
- **After 15 years (beyond 2023)**

(Please cross out those that do not apply)

Section 3 Constraints:	
Are there any limitations that may restrict the development of this site? (Please provide brief details)	
Access: Limitations, or potential problems relating to site access	
Topography/ Ground Conditions: Site slopes, varying site levels etc	
Vegetation and Tree Cover: Extent, age and species of vegetation and tree cover	
Contamination/ Pollution/ Hazards: Previous hazardous uses, unstable potentially contaminated structures	
Flood Risk: Site's liability to flooding – see Environment Agency website at http://www.environment-agency.gov.uk/subjects/flood/?lang=_e	
Legal Issues: Ownership/ multiple ownership, tenancies, or operational requirements of landowners/ adjacent users	
Environmental Constraints: Potential impacts upon local landscape/ townscape character, including loss of tree cover, impact upon character of the area, loss of open space	
Planning Policy Constraints: Current adopted policy for the site, impacts upon adjoining designations or protected areas including SSSIs, Conservation Areas, Local Nature Reserves – see the proposals map at http://eplanning.epsom-ewell.gov.uk/eebc_mapper/	
Other Considerations:	

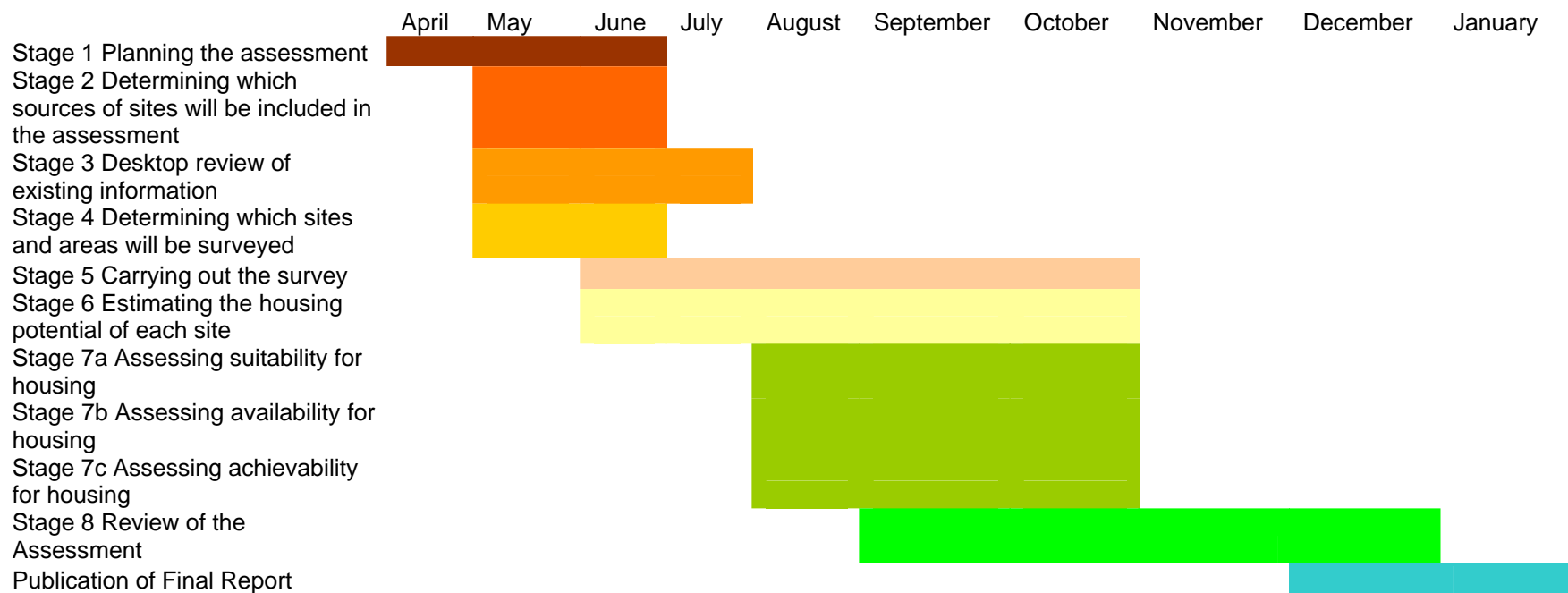
Section 3 Constraints (continued):

**Do you believe that the above on-site constraints could be overcome?
(Please provide brief details)**

Section 4 Additional Information:

Is there any additional information relating to the site that would help us with our assessment?

Annex 3: Timetable for SHLAA Production



Annex 4: Site Survey Form

Address:	
-----------------	--

OS Grid ref:		Site Area (Ha):	
Ownership:			

Existing land use:	
Neighbouring land uses:	

Location <i>(Tick all that apply)</i> <i>Note: Will help to identify whether site is in a sustainable location</i>	<input type="checkbox"/> Built up area <input type="checkbox"/> Within 800m of town centre <input type="checkbox"/> Green Belt	<input type="checkbox"/> Town centre <input type="checkbox"/> Within 800m of local centre <input type="checkbox"/> Open Space
	Other:	

Accessibility:

Accessibility of site to key public services using public transport:

.....

Proximity to local centres:

.....

How well the site is served by cycle / footpaths?

.....

Environmental Considerations:

Is site in flood zone 2/3? <i>(using Environment Agency maps)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is the site vulnerable to other sources of flooding? <i>(using information derived from the Strategic Flood Risk Assessment)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is the site contaminated / potentially contaminated? <i>(advice from the Council's Contaminated Land Officer)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the site contain any notable biodiversity features?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is the site near an AQMA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is the site in an area of open space deficiency? <i>(using information from the Open Space Study)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Are there any local road safety issues?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

Details / comments:

.....

.....

Distance of site from nearest SPA / SAC: < 5km 5 to 10 km 10km+

Heritage Considerations:

Is the site in a conservation area / area of special character?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the site contain any listed buildings?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is the site in an area of potential archaeological interest?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Details / Comments:

.....

.....

General:

Details of planning history:	
Development Control officer comments:	
Highways comments:	
Infrastructure issues:	

Additional issues to consider (not all may be relevant)

- Could any existing buildings on site be re used?
- What are the housing needs of the Borough (type of housing / affordability)?
- Would the provision of live work units be suitable on this site?
- What would the impact on infrastructure be?
- Is the site suitable for renewable energy?

- Potential impacts SPA / SAC (further consideration drawing on Appropriate Assessment)
- Could improvements be made to biodiversity?
- Could improvements be made to road safety?
- Could improvements be made to reducing crime or fear of crime?

Difficulty in bringing site forward for development (1 to 5 rating)?

(1 being fairly straightforward, 5 being the most difficult)

Likely timeframe for development: 2018 - 2022

2007 - 2012

2013 - 2017

Conclusions as to use of site:

Appropriate density for the site:		Number of units site is likely to provide:	
Affordable housing provision (% or no of units):		Appropriate type of dwellings (e.g. flats / family homes / student accommodation / sheltered accommodation)	

Other comments / conclusions:

.....

.....

.....

Annex 5: Site Assessment Matrix

Stage 7a Assessing suitability for housing					
Land to be potentially excluded from the assessment as unsuitable					
Site is within Green Belt		Potentially discount	✓		
Site located within one of the following: SSSI, SAM, SNCI, Ancient Woodlands		Exclude	✓		
Spatial suitability – creating sustainable communities					
Re-use of land	Site is 100% PDL or vacant urban land	Yes = 10	✓	✓	
	Site is mixed greenfield/ PDL with > 50% PDL	Yes = 5	✓	✓	
	Site is mixed greenfield/ PDL with < 50% PDL	Yes = 0	✓	✓	
	100% greenfield site	Yes = -5	✓	✓	
Located within an existing settlement	Site entirely within an existing built up area	Yes = 10	✓	✓	
	Site on edge of an existing settlement but would form a logical rounding off	Yes = 5	✓	✓	
	Site on edge of an existing area but constitutes an intrusion into the countryside	Yes = 0	✓	✓	
Site accessibility to local services by foot (from centroid to centroid)	Site is within 800m of all three of the following: convenience store, primary school and GP surgery	Yes = 10	✓		
	Site is within 800m of two of the following: convenience store, primary school and GP surgery	Yes = 8	✓		

	Site is within 800m of one of the following: convenience store, primary school and GP surgery	Yes = 5	✓		
	Site is further than 800m from all of the following: convenience store, primary school and GP surgery	Yes = 0	✓		
Accessibility to public transport services	Site is within 400m of a bus stop, or 800m of a railway station with hourly or more frequent services	Yes = 10	✓		
	Site is within 400m of a bus stop or railway station with less than hourly services	Yes = 5	✓		
	Site is more than 400m of a bus stop and a railway station	Yes = 0	✓		
Accessibility to higher services by public transport	Site is within 30 minutes travel time of all of the following: hospital, secondary school, areas of employment and major retail centre	Yes = 10	✓		
	Site is within 30 minutes travel time of two of the following: hospital, secondary school, areas of employment and major retail centre	Yes = 5	✓		
	Site is further than 30 minutes travel time to any higher order services	Yes = 0	✓		

Score (out of 50):

Policy restrictions					
Planning and other designations	The site is in the Green Belt	Yes = -10	✓		
	The site is allocated for housing	Yes = 10	✓		
	The site is allocated for employment, retail or other commercial uses	Yes = 0	✓		
	The site is not covered by any designations	Yes = 10	✓		
	The site is identified as recreation/open space	Yes = 5			
	The site will potentially effect a Conservation Area, or an area of special character	Yes = -2	✓	✓	

Score (out of 10):

Physical problems or limitations					
Access	Existing access	Yes = 10	✓	✓	
	No access but potential to introduce access	Yes = 5	✓	✓	
	Site has severe access limitations	Yes = 0		✓	
Infrastructure	Site unaffected by infrastructure limitations	Yes = 10		✓	
	Potential infrastructure limitations	Yes = 5		✓	
Ground conditions	No adverse ground conditions	Yes = 10		✓	
	Potential ground condition issues BUT can potentially be mitigated	Yes = 5		✓	

	Severe ground condition limitations	Yes = 0		✓	
Water environment issues	Site is Flood Zone 1	Yes = 10	✓		
	Site is Flood Zone 2	Yes = 0	✓		
	Site is in SFRA Flood Zone 3a	Yes = -5	✓		
	Site is in SFRA Flood Zone 3b	Yes = -10	✓		
	Site is within a Groundwater Source Protection Zone	Yes = 5	✓		✓
Contaminated land	There are no known contamination/ pollution issues	Yes = 10	✓	✓	
	There are potential contamination issues	Yes = 2	✓	✓	
	There is a known contamination issue with the site	Yes= 0	✓		

Score (out of 55):

Potential Impacts					
Townscape/ Landscape/ Ecological character	Development on the site will potentially improve/ enhance or have a positive impact upon the townscape/ landscape	Yes = 10			
	Development will have a neutral impact upon the townscape/ landscape	Yes = 5			
	Development will have a potentially negative impact upon the townscape/ landscape	Yes = -5			

Score (out of 10):

Environmental conditions					
Potential Surrounding Impacts	Site unaffected by noise, neighbouring uses, power lines	Yes = 10			
	Minor impact from noise, neighbouring uses, power lines	Yes = 5			
	Site affected by noise, neighbouring uses, power lines	Yes = -5			

Score (out of 10):

Stage 7b Assessing availability for housing					
Landownership/control	Landowner is known: private landowner, developer, public authority	Yes = 10			
	Landownership is currently unknown	Yes = 5			
Intention to develop	Landowner has specified the time period during which the site will become available	Yes = 10			
	Landowners intentions are currently unknown	Yes = 0			
	Landowner has stated that the site will not be made available	Yes = -10			
Ownership	Site is in a single landownership	Yes = 10			
	Site is in multiple ownership but is optioned to a single developer	Yes = 5			
	Site is multiple ownership with no	Yes = 2			

	developer currently involved				
	Access onto the site is constrained by an ownership issues – IE ransom strip	Yes = 0			
Legal issues – IE restrictive covenants, tenancies etc	Site is unconstrained by legal issues	Yes = 10			
	The site's legal issues are unknown	Yes = 0			
	There are known legal issue effecting the release of the site	Yes = -5			
Planning status	There is an outstanding housing allocation or planning permission on the site	Yes = 10			
	The site has previous planning history – IE lapsed permission, withdrawn application, refusal but where housing has been accepted in principle	Yes = 8			
	The site has come forward as a pre-app, as a LDF site, or as an objection site	Yes = 5			
	The site has no planning history	Yes = 0			
	The site is allocated for another use	Yes = -5			

Score (out of 50):

Stage 7c Assessing achievability for housing					
Market factors					
Impact of adjoining uses to the site	Adjacent uses have a positive impact upon the marketability of the site (IE residential uses)	Yes = 10			
	Adjacent uses have a neutral impact on marketability	Yes = 5			
	Adjacent uses have a negative impact on marketability	Yes = 0			
Economic viability of existing on-site uses	Current on-site uses are no longer economically viable	Yes = 10			
	Economic viability unknown	Yes = 5			
	Existing on-site uses still viable	Yes = -5			
Site's market/economic viability for uses other than housing – IE employment	Housing the most economically viable option	Yes = 10			
	Unknown	Yes = 0			
	Other uses remain more economically viable on this site	Yes = -10			
Attractiveness of the location	Positive influence on the potential viability of housing	Yes = 10			
	Unknown	Yes = 5			
	The location is unattractive to housing	Yes = 0			
Level of market demand for the site	Market demand is strong in this location	Yes = 10			
	Market demand is average in this location	Yes = 5			
	Market demand is low in this	Yes = 0			

	location				
Cost factors					
Site preparation costs relating to physical constraints	Preparation are considered to be low	Yes = 10			
	Preparation costs are considered average	Yes = 5			
	Preparation costs are considered to be potentially high	Yes = 0			
Planning design requirements	Normal good quality design requirement	Yes = 0			
	Specific design requirements relating to conservation area/ listed buildings	Yes = -5			
Prospects of securing funding to address known constraints	No constraints or abnormal circumstances	Yes = 10			
	Funding to address issues considered likely to be available	Yes = 0			
	Funding unavailable	Yes = -10			

Delivery factors					
Phasing of development	The developer anticipates a single phase of development	Yes = 10			
	No information available	Yes = 0			
	Developer anticipates more than one phase of development	Yes = -5			
Multiple developers	Multiple developers working well together	Yes = 5			
	Multiple developers not working harmoniously (potential constraint)	Yes = -5			
Size/ capacity of developer (IE past history of delivery)	Developer has capacity to deliver the site	Yes = 10			
	Unknown	Yes = 0			
	Developer may not have sufficient capacity to deliver the site	Yes = -5			
Necessary infrastructure (to deliver site)	Infrastructure is/ will be in place to deliver the site	Yes = 10			
	Unknown	Yes = 0			
	Infrastructure is not/ will not be in place to deliver the site	Yes = -10			

Score (out of 105):

Annex 6: Steering Group Consultation Responses

General Comments

Respondent	Response	Officer Action
Surrey County Council	<p>Overall, we do not demur from the approach to the Methodology to be adopted.</p> <p>We would advise the Borough that Reigate and Banstead and Runnymede Boroughs and Mole Valley District are producing SHLAA's at this current time. Their documents are on their web-sites.</p> <p>We suggest, for reasons of consistency, that the Borough takes regard of the process being undertaken within these authorities.</p>	<p>Welcome support.</p> <p>Ideally, the Borough Council would have taken the wider partnership approach and prepared a SHLAA with the other East Surrey authorities. However this is not practical.</p> <p>Furthermore, the Borough has a number of unique qualities that are not present within other Surrey authorities. Consequently, the DCLG guidance on SHLAAs has been amended to address the Borough's local distinctiveness.</p>
Home Builders Federation	<p>HBF's view on windfalls is that local authorities should follow the PPS3 approach. While the reference to the Inspector's report is noted, his comments were hardly a glowing endorsement of a clear, transparent and well evidenced approach to housing supply. They were also made prior to the CLG SHLAA guidance being published and, as noted in SEERA's planning committee report on windfalls of March this year, should be viewed as a response made at a time in transition between different approaches to housing supply and should not be taken as an automatic justification for future windfall allowances.</p> <p>Therefore we welcome the fact that the council is seeking in this SHLAA to correct this situation and to reduce reliance</p>	<p>Welcome support.</p>

	on windfalls as far as possible.	
SEEDA	<p>The Agency welcomes the opportunity to assist local planning authorities in developing their evidence base to support the development of Local Development Frameworks.</p> <p>We consider our expertise in economic development will prove beneficial to local authorities producing Employment Land Reviews and Strategic Housing Market Assessments.</p> <p>However, we consider that the development of Strategic Housing Land Availability Assessments is an area where our expertise will not add value.</p> <p>Therefore, we do not have any comments to make on the Draft Methodology and due to limited resourced I wish to decline your invite to sit on the SHLAA steering group.</p>	Support welcomed.
GOSE	<p>In relation to the SHLAA methodology, we would support the proposal to set up a steering group.</p> <p>We would suggest, however, that the membership of the group be widened to include representatives from local house builders and local property agents (question 2).</p> <p>Since the SHLAA is a technical exercise, we are puzzled at the choice of an elected Member as the chairman of the steering group. We do not consider this to be appropriate and would suggest that the group should be chaired instead by a senior Council officer.</p>	<p>Welcome support.</p> <p>The interests of the development industry are duly represented by the Home Builders Federation – including specific agents or developers ahead of others may lead to accusations of favouritism. In any case, individual agents and developers will have an opportunity to become involved in the SHLAA process.</p> <p>Member involvement within the production of evidence base studies is extremely valuable. In particular, it provides Members with an improved understanding of the issues (in this case housing supply) and an advanced buy-in into potential options. The Chair of</p>

		the steering group will not influence the management or content of the SHLAA.
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Question 1

Do you agree with the list of key consultees that we will involve during the second stage of the methodology consultation process?

Respondent	Response	Officer Action
Cllr Michael Arthur	Yes	Welcome comments. No changes to SHLAA methodology in respect of this response.
CPRE	Yes	Welcome comments. No changes to SHLAA methodology in respect of this response.

Question 2

Is there another body/ organisation that you believe should be included within this consultation? If so can you explain why?

Respondent	Response	Officer Action
Cllr Michael Arthur	Local agents (who deal with planning matters) not listed are Michael Everett 87 High St. Epsom and Gascoigne-Pees with offices in both Epsom and Ewell High Streets.	Welcome suggested additions to list of consultees. Ensure that these new consultees are added to Annex 1 and engaged during the next stages of SHLAA consultation.
CPRE	We would suggest the addition of both the Ramblers Association and the Epsom Protection Society among the consultees. Both organisations have considerable knowledge and interest in matters affecting development in the Epsom & Ewell area.	Welcome suggested additions to list of consultees. Ensure that these new consultees are added to Annex 1 and engaged during the next stages of SHLAA consultation.

Question 3

We would like to keep you informed of the progress of our SHLAA, particularly its headline outputs; how would you like us to keep you informed –

- iv) **An electronic newsletter**
- v) **a presentation event, or**
- vi) **another option – please tell us.**

Respondent	Response	Officer Action
Cllr Michael Arthur	Electronic newsletter OK. I also consider a presentation event of “where we are now” might be held after a few weeks/months have elapsed	Agreed. The steering group and other consultees who have expressed an interest in the SHLAA will be kept informed via an electronic newsletter.
CPRE	An electronic newsletter would be most valuable. An informal presentation (or presentations) at an appropriate time would also be welcomed.	Agreed. In addition to an electronic newsletter, the Council will organise an event to present to broad outputs from the study (not site specific issues).
Surrey County Council	We prefer electronic newsletter.	Agreed.
Home Builders Federation	A regular email update should suffice rather than the council having to go to the trouble of producing a newsletter. However, at some point, probably towards the end of the process, a seminar or workshop for stakeholders to discuss the approach and the initial findings of the study would be useful prior to the work being finalised.	Agreed. In addition to an electronic newsletter, the Council will organise an event to present to broad outputs from the study (not site specific issues).

Question 4

Do you know of any other organisation(s) that we should involve when assessing potential sites? If so can you explain why you think we should involve that organisation?

Respondent	Response	Officer Action
Cllr Michael Arthur	No	Welcome comments. No changes to SHLAA methodology in respect of this response.
CPRE	See our response to Q2: <i>“We would suggest the addition of both the Ramblers Association and the Epsom Protection Society among the consultees. Both organisations have considerable knowledge and interest in matters affecting development in the Epsom & Ewell area.”</i>	Agreed. Consult the two suggest consultees on the suitability of sites where appropriate.

Question 5

Can you identify, or supply other sources of information that we can use for this stage (Stage 3) of the SHLAA?

Respondent	Response	Officer Action
Cllr Michael Arthur	Check previous (old) approval permissions but not implemented, and obviously not the subject of later alternatives (which might have been implemented) - suggest this goes back about 40 years (I know of a 1968 approval not implemented)	Agreed. The SHLAA will examine unimplemented permissions. However, it will neither be practical nor technically possible (within the time constraints) to examine all applications made during the last 40 years.
CPRE	No	Welcome comments. No changes to SHLAA methodology in respect of this response.
Surrey County Council	The County have identified sites as part of the Core Strategy consultation process. We can do so again at the Sites	Sites previously submitted by the County Council will be assessed through the SHLAA process. However,

	Allocation DPD in due course.	the County Council will be provided with an opportunity to identify
Home Builders Federation	<p>Most authorities have records of lapsed permissions as well as a database of what are usually termed 'objection sites' put forward through various plan-making processes. It may be worth revisiting these sources of information.</p> <p>We would also suggest that, in the Table included under paragraph 5.1 of the methodology, the purpose of looking at allocations and permissions (as set out in the first two lines of this table) is not just to identify sites. Consideration will have to be given to the timing of delivery / phasing and constraints to delivery of those sites, particularly in the current market conditions, in the same way as other categories of site further down this table.</p>	<p>Agreed. The Borough Council has already acknowledged these potential sources for identifying sites.</p> <p>Whilst the Borough Council fully supports this suggestion, Stage 3 of the SHLAA methodology is specifically about data collation. Data collected during this stage will be taken into full account under Stage 7. We make this point in order to ensure that the SHLAA process is clear and transparent.</p>

Question 6

Do you agree with our appraisal of the housing challenge facing the Borough? If you disagree with our appraisal, please state why and provide a justification for why we should raise/ lower housing supply?

Respondent	Response	Officer Action
Cllr Michael Arthur	I question the statement "modest housing quantum for the borough" Many residents feel that the targets set (referred to in Exc. Summary) are at a top end with any increase being unsustainable. I do not feel that we should raise these numbers	<p>Comments noted.</p> <p>It is not the SHLAA's role to either question or support the Borough's housing quantum. However, the SHLAA seeks to provide a robust assessment of potential future housing supply. This will provide useful evidence should housing targets rise.</p>
CPRE	Reference is made in 6.2 to the "trend of rising average house prices" in areas near to London. Clearly this is at least on hold at present and there is increasing evidence that the South East housing boom may be on hold for some	<p>Comments noted.</p> <p>The SHLAA covers a fifteen year period, so whilst there is a current climate of economic uncertainty this</p>

	years to come. Overall, we agree with your appraisal.	will not always be the case. Consequently, it is correct that the SHLAA continues to assess the level of supply required to meet future housing demand.
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Question 6a

Are there any exceptional circumstances that would justify changes to the Green Belt Boundary? What are these exceptional circumstances?

Respondent	Response	Officer Action
Cllr Michael Arthur	<p>I cannot state any at present.</p> <p>I strongly feel that the GB boundary be robustly protected and any changes (to reduce) cannot be contemplated.</p>	<p>Comments noted.</p> <p>The land designated as Metropolitan Green Belt is protected from built development.</p> <p>However, an assessment of the long term housing potential of sites located within the Green Belt is considered to be of benefit to this technical study.</p> <p>An assessment of the long term housing potential of such sites will aid decision making should the study clearly demonstrate that there is insufficient housing capacity within the existing urban area.</p>
CPRE	<p>As we state in our preamble, we fully support the Council's position on Green Belt development.</p> <p>It is, of course, possible that the Government may seek to impose higher housing figures on Epsom than the 199 dwellings per annum referred to in this document. This should be very firmly resisted.</p>	<p>Comment noted. The land designated as Metropolitan Green Belt is protected from built development.</p> <p>However, a full, unconstrained assessment of the Borough's potential housing supply sources will aid long term decision making should the study clearly demonstrate that there is insufficient housing capacity within the existing urban area.</p>
Surrey County Council	In our view, 'exceptional circumstances' would include the proven case that urban options have been investigated.	Agreed.

	<p>Alternatives would need to be justified as genuine and viable. In respect of Epsom and Ewell, it is the case that the Hospital Cluster, which is a major developed site within Green Belt, may provide for significant longer term housing provision, as indicated within the Core Strategy.</p>	<p>Recommend that appropriate sites located within the Green Belt only be considered as potential sources of housing land supply if the SHLAA clearly demonstrates that the existing urban area has insufficient housing capacity to meet the Borough's housing quantum.</p>
<p>Home Builders Federation</p>	<p>Yes, the exceptional circumstance is the need to provide sufficient certainty that the housing requirement will be delivered. This was considered specifically by the SE Plan EIP Panel in their report and I would refer the council to paragraphs 20.51 and 20.69 of the report where the panel specifically stated that there may be a need to review the MGB in Epsom & Ewell.</p> <p>Furthermore, in commenting on the first paragraph on page 19 of the methodology, we would argue that it is a self-fulfilling prophecy that, if sufficient sites are not identified, then a high windfall rate (especially in high demand areas such as most of Surrey) is the obvious outcome. Government is trying to move local authorities away from what is essentially a negative wait-and-see approach of letting the market decide which sites to bring forward and towards a more positive and proactive role for councils. This approach is a win-win as it provides certainty and direction for developers as well as putting the council in the driving seat in terms of dictating the location of new development and ensuring that local infrastructure is able (or will be made able) to cope. That is the essence of this new frontloaded, evidence based, proactive and collaborative LDF system compared to the old local plan approach of local authorities producing plans and then leaving the rest up to the market. So, just because windfalls have come forward in the past</p>	<p>Agreed.</p> <p>For the purposes of this technical evidence base study, sites located within the Metropolitan Green Belt will be assessed through the SHLAA process.</p> <p>Recommend that appropriate sites located within the Green Belt only be considered as potential sources of housing land supply if the SHLAA clearly demonstrates that the existing urban area has insufficient housing capacity to meet the Borough's housing quantum.</p> <p>Recommend that potential housing sites located within the Green Belt be identified for the later stages of the SHLAA period – during the 11-15 year period. This recommendation on the basis that this type of site is more likely to yield a higher housing numbers and require a longer lead-in time; in order to plan for associated community infrastructure.</p>

	does not mean they can be relied upon as a mainstay of housing supply in the future. Again, we note and welcome the council's aspiration to address this but thought the point worth making in order that HBF's position on the windfalls issue is clear.	
GOSE	On page 18 of the draft methodology consultation paper, there is a reference to discounting the Green Belt's land supply potential. Given that the purpose of the SHLAA is to consider potential sources of supply and not to allocate sites, we think that the broad-brush exclusion of the Green Belt from the outset is not justified (question 6a).	Agreed. For the purposes of this technical evidence base study, sites located within the Metropolitan Green Belt will be assessed through the SHLAA process.

Question 7

Have we identified our known housing land supply sources? Are there any other (generic) land supply sources that we haven't identified? Why should we identify these sources now?

Respondent	Response	Officer Action
Cllr Michael Arthur	I wonder here about School Playing fields of which there are quite a number in the borough	Comment noted. Surplus open space, including school playing fields, may contribute towards potential future housing land supply. Officers will engage with appropriate partners and organisations to determine which sites may come forward as a future source of housing land.
CPRE	As set out in 4.2 land allocated for non-housing uses should be considered for future housing use and we recommend that this be included here. We believe there is potential in the Borough for small, and possibly large, housing developments on previously	The SHLAA process will examine the housing potential of land currently used for non-residential uses, including commercial sites. However, given the lack of available employment land within the Borough it may be appropriate to consider such sites for mixed-use developments.

	commercial sites (eg. the old filling station at the corner of East Street and Windmill Lane, Epsom).	
Surrey County Council	A 'generic' land supply may include 'broad areas' of search as required to be identified under the DCLG guidance and PPG12.	<p>Agreed.</p> <p>Practical experience during the initial desk top study stages of the process suggests that it may be possible to identify broad areas of search (such as Wards, or sub-Ward areas). Typically, these are areas that may contribute small sites to the future housing land supply through intensification. Assessing the deliverability/achievability of these small sites is not always straightforward and there will be uncertainty in their ability to come forward. Consequently, identification within a broad area of search or intensification may provide an appropriate mechanism for encouraging this type of site to come forward. However, it may not be possible to quantify the level of supply that such broad areas can deliver.</p>

Question 8

Do you agree with our suggested minimum threshold (0.12 ha)? If you disagree with our suggested threshold; why do you disagree, what threshold would you apply and what is your justification for applying that lower/ higher threshold?

Respondent	Response	Officer Action
Cllr Michael Arthur	I suggest 0.10 ha as a minimum. This would cover sites down to about three/four units. It might also be able to include empty residential above shop units the latter I assume are "development sites" (where they have long been out of use)	<p>Agreed.</p> <p>The area of 0.12 ha was calculated as the minimum site threshold on the basis of average site density of 40 dwellings per ha yielding 5 dwellings. This equates to the medium site definition (6 – 10 dwellings). Consequently, the suggested lower threshold could potentially aid in the identification of smaller sites.</p>

		Practical experience at the initial desk top study stages of the SHLAA process has shown that it is possible to identify smaller sites (of sites areas below 0.12 ha). However, there may be greater uncertainty over the deliverability of such sites during the later stages of the SHLAA process.
CPRE	Yes	Welcome comments. No changes to SHLAA methodology in respect of this response.

Question 9

Do you agree with our suggested approach of mapping development hotspots? If not, please specify why you disagree and identify an alternative approach that we should take.

Respondent	Response	Officer Action
Cllr Michael Arthur	Yes	Welcome comments. No changes to SHLAA methodology in respect of this response.
CPRE	We believe that a more objective way of mapping development hotspots should be adopted. It is well established that land owners and developers will, on occasion, submit many planning applications for the same site in the hope that opponents will "eventually be worn down". Frequency of planning applications should not be used and indeed, in the case of Epsom & Ewell, we question the usefulness of identifying development hotspots at all.	It is not the intention to map the frequency of planning applications. Mapping development hot spots demonstrates those locations where industry and market demand is at its highest. This will aid the assessment of viability/ deliverability. Multiple applications (on the same site) will be examined and duplicates will be removed to avoid double counting. However, consideration will be given to successive applications/ proposals that demonstrate progressive on-site intensification. This will aid the

		assessment of potential yield.
Surrey County Council	We would query the use of the term 'hotspots'. Should the Borough wish to identify areas where higher density development would be mostly unacceptable on visual and amenity grounds, then this should be noted.	<p>Comments noted.</p> <p>The Council will utilise existing Conservation Area Appraisals and the recently completed Environmental Character Study to identify potential constraints to density or yield.</p>
Home Builders Federation	We have no problem with the principle of mapping development hotspots or town centres but would question the justification and evidence which supports the 800m catchment distance. PPG13 on transport takes 2km as a reasonable walking distance (paragraph 75) so we would like further explanation of why only 800m has been chosen. Even if 2km is taken as a there-and-back trip it would suggest 1,000m would be more appropriate than 800m if not 2km in full. This requires further explanation otherwise the PPG13 figure should be used instead.	<p>Comments noted.</p> <p>It is acknowledged that PPG13 provides for distances in excess of the proposed maximum 800m. However, PPG13 is an increasingly aging document, which has in many aspects been overtaken by good practise developed elsewhere. The intention is to produce a series of stratified layers of accessibility based upon reasonable walking distances. These distances, ranging from 200m – 800m were taken from RPG10, which covers the South West. The Borough Council will incorporate an additional 1000m layer but given the predominantly urban character of the Borough the value of this wider area is questionable – it is conceivable that the entire Borough will be shown as being uniformly accessible (as per accessibility mapping produced by Surrey County Council).</p> <p>It should be noted that current levels of accessibility only form one part of the site assessment process and will not by itself determine a site is deliverable or achievable for housing.</p>

Question 10

Do you agree with our approach for town and local centre accessibility? Please state the reasons why you disagree and identify an alternative approach.

Respondent	Response	Officer Action
Cllr Michael Arthur	Yes	Welcome comments. No changes to SHLAA methodology in respect of this response.
CPRE	Yes	Welcome comments. No changes to SHLAA methodology in respect of this response.
Surrey County Council	We agree that town and local centre accessibility should be a key site matter. Improvements to accessibility should be a requirement for major schemes.	Welcome comments.

Question 11

Do you agree with this approach to specific sites outside of urban areas? If you disagree, please specify why and provide an alternative approach.

Respondent	Response	Officer Action
Cllr Michael Arthur	Yes	Welcome comments. No changes to SHLAA methodology in respect of this response.
CPRE	Yes	Welcome comments. No changes to SHLAA methodology in respect of this response.
Surrey County Council	We would agree that the Borough's approach to specific locations outside urban areas is acceptable, given the	Welcome support for proposed approach.

	adopted Core Strategy. We therefore accept that the potential for such sites is 'extremely limited'. Such sites should be identified only under exceptional circumstances.	
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Question 12

Which approach do you think will provide the best estimate of housing potential? Do you have an alternative approach that you think we should adopt, please specify how your alternative approach would work?

Respondent	Response	Officer Action
Cllr Michael Arthur	The first bullet point under 8.1. I would add comment that not all sites may achieve 40 units/ha, this figure should be treated as an average	Agreed – not all sites will achieve 40 dwellings per ha. Practical experience from the initial desk top study stages suggests that a mixture of the first and third approach, namely the density yardstick and indicative layout will provide a quick but effective assessment of potential site yield.
CPRE	We agree that the first approach best suits the Borough although limited resort to be other approaches could be useful for some sties.	Welcome support. Practical experience from the initial desk top study stages suggests that a mixture of the first and third approach, namely the density yardstick and indicative layout will provide a quick but effective assessment of potential site yield.
Home Builders Federation	HBF would be happy with a density yardstick approach but we would request that this is not applied inflexibly but is used sensitively taking into account the specific needs of the site being surveyed and the context and character of the area in which it is located. 40dph may be a reasonable yardstick but is unlikely to be acceptable for each and every site.	Welcome support. We believe that a combination of the density yardstick and indicative layout approaches, and input from the Borough Council's Conservation and Design Officers will provide an improved assessment of potential site yield.

Question 13

Do you agree with our assumptions for those sites that have a mixed use potential? If you disagree, please state why and provide an alternative approach for us to take?

Respondent	Response	Officer Action
Cllr Michael Arthur	Yes, but.....this Borough has always been low on employment and high on residential land use the 60% ratio of employment use may need to be a little flexible	<p>Comments noted.</p> <p>The suggested 60/ 40 split between employment and residential uses within mixed-use development sites comes directly from the RICS. It reflects the primary role of such mixed-use sites for employment uses. This is important where a mixed-use development is replacing a wholly employment use. However, it is agreed that will be employment or commercial sites, such as small sites located within predominantly residential areas that may be better suited to redevelopment for purely residential use. These need to be considered on an individual basis.</p>
CPRE	<p>See our response to Q7 above. CPRE Surrey would wish to learn more about "the lack of available modern employment floor-space within the Borough".</p> <p>In particular, we believe there are a number of sites within Epsom & Ewell which are allocated for non-housing uses but which provide little or no employment (eg. old utility sites). In addition, we believe much office floor-space could be upgraded to modern needs.</p>	<p>Comments noted.</p> <p>Evidence clearly demonstrates that there is insufficient employment land available within the Borough to meet latent demand. The reliance upon employment uses located beyond the Borough's boundaries is unsustainable in the long-term. An appropriate balance of uses is needed to ensure the development of sustainable communities.</p> <p>Whilst the long term re-use of existing commercial buildings is a commendable goal, the commercial</p>

		<p>market has historically favoured new build solutions over conversion or modernisation. This is due to the cost.</p> <p>However, the SHLAA process will examine the housing potential of land currently used for non-residential uses, including commercial sites.</p>
Surrey County Council	We agree in principle that mixed use schemes should be identified for sites with the required level of accessibility and likelihood of low impact. Emphasis should be given to such schemes in town and local centres.	Welcome support and note comments.

General Comments Relating to Stage 7 – Assessing when and weather sites are likely to be developed

Respondent	Response	Officer Action
Home Builders Federation	<p><u>Paragraph 9.1 Second Bullet point</u></p> <p>HBF is concerned that the council is proposing to depart from national policy guidance in PPS3 and advice in the SHLAA practice guidance by including a windfall allowance from year 6 onwards. PPS3 and the practice guidance is clear that windfalls should not be included in the first 10 years of supply. Therefore, this reference should be amended to refer to years 11-15 rather than 6-15. The council will also have to provide robust evidence of genuine local circumstances which prevent specific sites being identified (paragraph 59 of PPS3) before such an allowance could be justified.</p> <p>A high past rate of windfalls coming forward is not, on its own, sufficient justification as the 3rd bullet point under paragraph 25 of the CLG practice guidance makes clear and as already stated above.</p>	<p>Comments noted.</p> <p>The Borough is in an almost unique position, its existing urban area being heavily constrained by the Green Belt. Whilst the SHLAA actively seeks to significantly reduce the 'reliance' upon the acknowledged windfall supply, there is a clear understanding that it will be impossible for the SHLAA to identify all sites that would have traditionally been defined under the windfall allowance. Consequently, the Borough Council propose to monitor the SHLAA (as part of its AMR propose) and incorporate 'windfall' sites (not already identified by the SHLAA) into the equation.</p>

<p>Home Builders Federation</p>	<p><u>Paragraph 9.11 and 9.12</u></p> <p>HBF is concerned at the way the council is proposing to use a matrix and ranking approach to site assessment. There is nothing wrong with this in itself. But it needs to be used with caution, particularly in the later stages of the study and presentation of the results. HBF would warn against the final study presenting the information in the form of a ranking or hierarchy as this can be misconstrued and lead to all sorts of practical difficulties when it comes to releasing sites for development through the LDF. If it is used as a tool to assist in arriving as judgements on whether a site falls within the developable, deliverable or not-developable category, that is fine but there should be no further sub-categorisation or ranking beyond this.</p>	<p>Comments noted.</p> <p>The use of a matrix provides a (single) mechanism for ranking sites. Matrices are commonly used within SHLAAs and other types of land assessment exercises.</p> <p>The intention is to use the matrix as one part of the SHLAA assessment process.</p> <p>We will seek to clarify this position within the methodology.</p>
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