

## SHLAA DISCLAIMER

In relation to the information contained within this report and any other report relating to the findings of the Epsom & Ewell Borough Council Strategic Housing Land Availability Assessment (SHLAA), the Council makes the following disclaimer without prejudice:

- The Council is required by Government to produce a SHLAA.
- It has been necessary for the SHLAA to take an unconstrained view, setting aside the Council's planning policies
- The SHLAA only identifies sites with future development potential. It does not allocate sites to be developed. The allocation of sites for future housing development will take place in the Site Allocation Development Plan Document (DPD), which is scheduled for adoption in late 2010
- The identification of potential housing sites within the SHLAA does not imply that the Council would necessarily grant planning permission for development. All applications will continue to be considered against national and regional policies, the Council's Development Plan and any other relevant material considerations.
- The inclusion of potential housing sites within the study does not preclude them for being developed for other purposes
- The exclusion of sites from the study does not preclude the possibility of planning permission being granted on them. It is acknowledged that sites will continue to come forward (particularly small sites) that will be suitable for development that have not been identified by the SHLAA
- The boundaries of the sites identified in the SHLAA does not limit an extension or contraction of these boundaries for the purpose of a planning application
- The categorisation of sites in terms of when they are likely to come forward is based on the officer's assessment at the time of the study. Circumstances or assumptions may change which may mean sites come forward sooner or later than originally envisaged. The SHLAA does not prevent planning applications being submitted on any sites identified or excluded within it at any time.
- The housing capacity of a site in the study either relates to the number of dwellings granted in a planning permission (where relevant), or is an estimate based on a number of factors. The densities identified in the SHLAA do not preclude the densities being increased or decreased on sites, nor does it mean that the densities identified in the SHLAA are appropriate
- The information that accompanies the SHLAA is based on information that was available at the time of the study and there may be some omissions or factual inaccuracies which the Council does not take liability for. There may be additional constraints on some sites that were not identified at the time of the survey and likewise, some of the identified constraints may have been removed. Planning applications will be treated on their merits at the time of the planning application, rather than on the information contained within the SHLAA.
- The study has a base date of July 2008 and the findings are a 'snapshot' of information held at this time. The Council intends to periodically update the SHLAA.

**Epsom and Ewell  
Strategic Housing Land  
Availability Assessment**

**March 2009**

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# SHLAA Executive Summary

## ***Background***

Local authorities are required by Government to produce a Strategic Housing Land Availability Assessment (SHLAA). This requirement is set out in Planning Policy Statement 3 (PPS3). The purpose of the SHLAA is to review the potential housing land supply in the Borough over the period 2006 to 2026 in relation to the Borough's housing allocation, which will be contained within the South East Plan. This document is in the final stages of production and the most recent figures require the Borough of Epsom & Ewell to deliver a minimum of 3,980 new dwellings during the period 2006 to 2026. The SHLAA identifies potential opportunities for meeting this need.

The SHLAA does not allocate sites for development and is not a decision making document; this is the role of the Site Allocations Development Plan Document (DPD), which is currently in the early stages of production. However, the SHLAA will be an important source of evidence in the production of this document, helping to inform choices.

## ***Production of the SHLAA***

Government has published 'practice guidance' on how a SHLAA should be produced. The methodology for Epsom & Ewell Borough Council's SHLAA, was developed in accordance with this guidance.

Key outputs of a SHLAA are also set out in the guidance, this requires a SHLAA to:

- 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, developable sites for years 6-10, and ideally years 11-15, in plans to enable the five year supply to be topped up; and
- where it is not possible to identify specific sites for years 11-15 of the plan, indicate broad locations for future growth.

PPS3 indicates that windfall allowances<sup>1</sup> should no longer be included in the first 10 years of land supply, unless there are very special local circumstances. This places greater emphasis on the need to identify sites as part of the SHLAA process as unidentified sites (windfalls) cannot be included to meet housing targets.

The guidance requires the scope of a SHLAA to be broad and not narrowed by existing planning policies<sup>2</sup>. Consequently the SHLAA adopted an unconstrained approach in the identification of potential sites to ensure a thorough assessment of the Borough's potential sources of housing land. Approximately 350 sites were examined from a wide range of sources, including some within the Green Belt.

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<sup>1</sup> These being defined as sites which have not been specifically identified in the local plan process. They comprise sites which have become unexpectedly available.

<sup>2</sup> Apart from those relating to certain immovable / inflexible national designations such as Sites of Special Scientific Interest and flood zones

To achieve the required outputs, the SHLAA has considered the deliverability of each potential site in terms of its suitability, availability and achievability. Additionally, a potential housing yield was identified, taking into account a variety of factors. A likely timeframe for the development of each site was also considered, against the SHLAA period (2008 to 2025) which was divided into five yearly periods.

The deliverability of each site was graded 1 to 5. Sites placed within category 1 were considered to be the most deliverable sites (for example, this included those already within the planning system or known to be very likely to come forward during by 2026). Sites within categories 2 and 3 were considered to have high potential although there was less certainty as to when they would be delivered, for example due to land ownership issues. Sites graded in category 4 were considered to have potential, although unlikely to come forward by 2026. Notably, this category incorporated those sites currently in use as open space provision and Greenfield sites within the Green Belt. Whilst the SHLAA considers these sites to be technically deliverable and developable, their release is entirely dependent upon a decision from the local planning authority, which is why their current potential is limited. Finally, sites graded in category 5 were those the SHLAA deemed the least deliverable, having little or no potential housing yield. This category also included those sites whose deliverability and developability was undeterminable.

### ***SHLAA outputs***

The SHLAA provides a thorough analysis of the Borough's housing target and the successes, to date, in meeting the target. The SHLAA develops this analysis further by mapping future potential housing delivery trajectories using data from the surveyed potential sources of housing land supply.

This assessment demonstrates that there are sufficient potential sources of identifiable housing land supply available to meet the Borough's housing target, without having to rely upon a windfall allowance. The SHLAA identifies a number of potential housing land supply scenarios that could emerge to deliver the Borough's target. Some of these scenarios meet the housing target through sources of supply within the urban area, whilst others examine options outside of the built-up area.

Whilst meeting the Borough's housing target purely through urban sources of supply appears ideal, the SHLAA advises caution. The SHLAA highlights that there are constraints surrounding the various sources of supply, which may restrict delivery.

In order to provide the planning authority with greater flexibility to respond to the target, the SHLAA identifies a variety of options that set out how the sources of supply may be drawn upon.

It is not the SHLAA's role to make decisions on any of the potential sources of housing land supply that it identifies. Such decisions will be made by the Council as part of the Site Allocations and Development Management Development Plan Document.



# 1. INTRODUCTION

## 1.1 Overview of the Borough

- 1.1.1 Epsom & Ewell is a small authority in the South East of England, which borders greater London. It has a population of 68,000 people and covers an area of 3,411 hectares. It is the most densely populated Borough in Surrey.
- 1.1.2 Figure 1 shows key elements of the Borough. Approximately half the Borough is comprised of built-up area, while the remainder is comprised of open land; 42% of this being Metropolitan Green Belt.
- 1.1.3 Within the Borough's built-up areas development densities are already high. The future growth of the Borough is constrained by the Green Belt, which runs immediately adjacent to the existing urban area along its southern, eastern and western borders.
- 1.1.4 The Borough's built up area is comprised of a wide variety of very distinctive residential and commercial areas. Many of these are covered by conservation area designations. A recent study (the Environmental Character Study) identifies the key characteristics and visual appearances of those urban areas beyond the conservation areas.
- 1.1.5 The Borough also contains a number of specific sites that have considerable biodiversity interest, most notably the Epsom Common Site of Special Scientific Interest (SSSI) but also local nature reserves at Hogsmill and Horton Country Park. Like much of Surrey, the Borough contains considerable tree cover, this is considered to be a valued resource that positively contributes to its distinctive character.
- 1.1.6 Given it's proximity to greater London, the Borough benefits from high levels of accessibility to public transport, both in terms of rail and bus services. The built up area also benefits from numerous town and local centres which, given its relative compactness, are highly accessible to most of the Borough's residents.

## 1.2 Background to the SHLAA

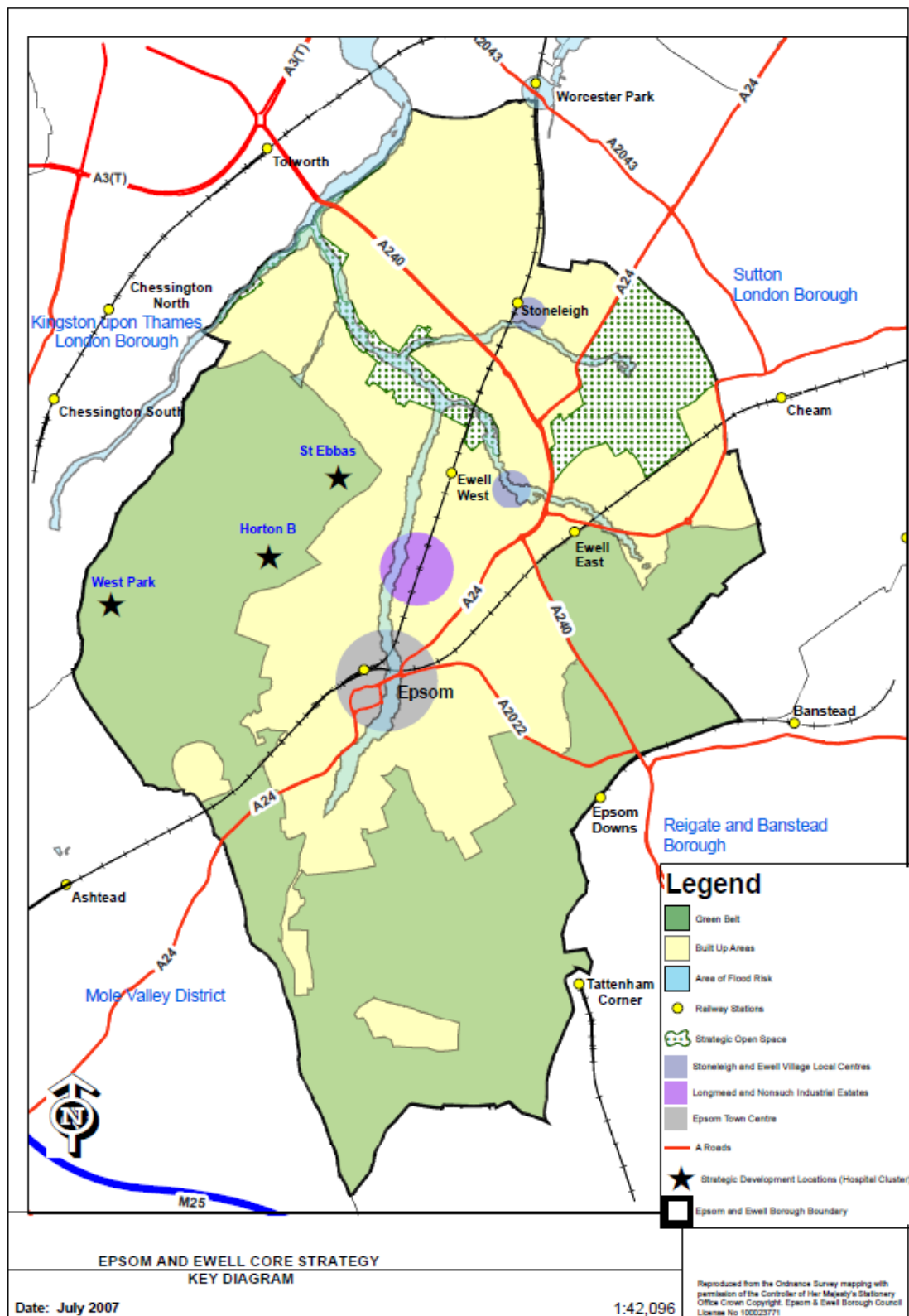
- 1.2.1 Government policy requires that local planning authorities maintain an adequate supply of new housing sites within their areas. As part of this all Councils have to give consideration to where future new housing development might be located within their area and to assess all potential opportunities, regardless of whether these opportunities conflict with their local planning policy constraints. This process helps to ensure that housing targets are achievable during the Local Development Framework (LDF) period.
- 1.2.2 The Borough Council is required by national policy to carry out a Strategic Housing Land Availability Assessment (SHLAA) so that it can demonstrate that its housing target can be met. More fundamentally, by carrying out a SHLAA the Council will be in a stronger position to determine the location of future sources of housing land supply. If the Council chose not to produce a SHLAA, it would be in conflict with national policy and could by default relinquish control over housing delivery within the Borough, potentially leading to 'case-by-case' planning through the appeals process.
- 1.2.3 A SHLAA is a technical document, which will help to identify the Borough's future sources of housing land supply. It will become part of the evidence base for the LDF, which will inform the production of new planning policies.
- 1.2.4 The SHLAA does not allocate land; this is the role of the emerging Site Allocations and Development Management Development Plan Document (DPD). However, it will help inform the choices as to which sites could be selected in the production of the Site Allocations DPD.
- 1.2.5 Through the SHLAA, local authorities are required to identify potential housing sites, in five yearly periods, for the next 15 years; in order to meet their housing target. Whilst the SHLAA identifies a wide number of sites it will not be necessary for all of these to come forward in order to deliver the Borough's housing target.
- 1.2.6 Whilst the sites identified by SHLAAs are technically considered to be deliverable or developable, this is based upon a subjective judgement. That judgement does not assume that all sites identified in the SHLAA will be positively considered by the local planning authority.
- 1.2.7 The primary role of the SHLAA is to:
- Identify sites;
  - Assess their housing potential; and
  - Assess when they are likely to be developed.
- 1.2.8 The government produced SHLAA guidance sets out the key features of a SHLAA as being "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."

- 1.2.9 The sites identified by the SHLAA, have to be deliverable, namely they are available for development, in a suitable location, contribute to sustainable mixed communities and have a realistic prospect of being completed.
- 1.2.10 In producing its SHLAA, the Borough Council has followed and developed the methodology set out in government guidance; varying it where appropriate to suit local circumstances. This developed methodology was tested through a two stage consultation process prior to the commencement of the study.
- 1.2.11 The scope of the SHLAA is required to be broad and must not be narrowed by existing planning policies; the exception being constraints relating to certain immovable or inflexible national designations, such as SSSIs and flood zones. Consequently, national planning policy requires that SHLAAs disregard local policy designations and constraints when considering the deliverability and developability of potential sources of housing land supply.
- 1.2.12 Therefore the SHLAA has examined the Green Belt as a possible future source of housing land supply. However, it must be stressed that any release of land within the Green Belt will only be considered if there is a clear strategic need, which cannot be delivered within the existing urban area. The future potential release of Green Belt land would require further assessment, through a comprehensive review of the Metropolitan Green Belt, possibly at a County-wide level. The SHLAA neither allocates land within the Green Belt (or elsewhere) nor seeks to set a precedent for its future release. The SHLAA does provide an initial analysis of its potential as a future source of housing supply.
- 1.2.13 It is intended that the SHLAA and the delivery of its identified sites will be monitored through the LDF Annual Monitoring Report (AMR) process. When necessary the SHLAA will be updated to ensure that a continuous rolling supply of potential sites can be demonstrated.
- 1.2.14 The SHLAA has been in production since June 2008. The SHLAA's methodology has been subject to two consultation stages and was modified to accommodate a number of points raised by consultees. A further consultation component asked the development industry, local communities and members of the public to identify sites for consideration through the SHLAA.
- 1.2.15 The SHLAA is comprised of an executive summary, an introduction and a policy context, the latter explaining the housing target that drives the scale of supply sought by the SHLAA.
- 1.2.16 The document provides a full explanation of the SHLAA process before providing a commentary on the outputs. The latter section provides an analysis of the Borough's housing target and the possible housing trajectory options for meeting it. The SHLAA also produces a series of pen portraits of the Borough, which illustrate the various surveyed sources of potential supply, including a commentary on their deliverability and developability.
- 1.2.17 These sections are followed by a series of recommendations, which provide the planning authority with options that can be tested through the emerging Site Allocations and Development Management DPD. Notably, the options seek to address the key issue of how the planning authority could deliver its

housing target. The section includes other options, relating to site allocation, potential development management policy options, alternative (non-residential uses) for the surveyed sites and future monitoring arrangements.

1.2.18 Finally, the SHLAA's appendices contain details of the extensive production process, including a full list of the sites surveyed.

Figure 1: Key Diagram of the Borough



## 2. METHODOLOGY OVERVIEW

### 2.1 Introduction

2.1.1 The requirement for local authorities to produce a SHLAA is contained in Planning Policy Statement 3 (PPS3), which requires the issue of land availability to be thoroughly examined through the production of a SHLAA. The SHLAA has the key role of providing evidence of the availability of suitable land for new housing.

2.1.2 This chapter sets out how the methodology for the production of the EEBC SHLAA has evolved. It covers:

- A brief overview of the published government guidance and wider policy context which has influenced the EEBC SHLAA methodology
- How the methodology set out in the government guidance was developed to take account of local circumstances and how this was applied

### 2.2 Government Guidance and Policy Context

#### 2.2.1 PPS3 & Companion Guide

PPS3 sets out the national planning policy framework for delivering the Government's housing objectives. Through the production of a SHLAA, it requires local authorities to:

- Identify specific, deliverable sites for the first five years of a plan (the sites should be available and ready for development within this timescale);
- Identify specific, developable sites for years 6 to 10 in plans (and ideally years 11 to 15), to enable the five year supply to be topped up;
- Where it is not possible to identify land for years 11 to 15 local authorities should identify 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

2.2.2 A companion document 'Strategic Housing Land Availability Assessments: Practice Guidance' was published in July 2007 to support the advice contained in PPS3. This provides clear guidance on the basic principles of SHLAA production and sets out the key outputs for the assessment. This guidance has been used as the basis for the methodology of the Epsom & Ewell SHLAA.

2.2.3 The SHLAA methodology is also influenced by a number of other planning policy documents, which are outlined below.

## **2.3 National Policy Context**

### **2.3.1 *Planning Policy Statement 1: Delivering Sustainable Development (2004)***

PPS1 sets out the overarching strategic planning policies and the contribution the planning system can make to delivering sustainable development. It identifies that to achieve this delivery, planning authorities should seek to:

- Bring forward sufficient land of suitable quality in appropriate locations to meet the expected needs for housing;
- Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development; and,
- Promote the use of suitably located vacant and underused previously developed land in order to achieve government targets

### **2.3.2 *Planning Policy Guidance 2: Green Belts (1995)***

Government guidance in PPG2 clearly states that Green Belt land should only be developed in exceptional circumstances.

### **2.3.3 *Draft Planning Policy Statement 4 - Planning & Economic Development (2007)***

PPS4 encourages local authorities to plan effectively and pro-actively for economic growth and to achieve a proper balance between economic opportunities and environmental and social considerations

### **2.3.4 *Planning Policy Guidance 4: Industrial, Commercial Development and Small Firms (1992)***

PPG4 takes a positive approach to the location of new business developments. The main message is that economic growth and a high-quality environment have to be pursued together.

### **2.3.5 *Planning Policy Statement 6: Planning for Town Centre (2005)***

The key objective of this PPS is to promote the vitality and viability of town centres. Local authorities are expected to manage change in town centres through identifying the need for growth and managing the role and function of existing centres. It is recognized that housing will be an important element in mixed use, multi storey developments.

### **2.3.6 *Planning Policy Statement 7: Sustainable Development in Rural Areas (2004)***

This PPS aims to promote more sustainable patterns of development in rural areas. It guides all forms of residential development with the exception of essential agriculture and forestry uses to existing settlements.

### **2.3.7 *Planning Policy Statement 9: Biodiversity and Geological Conservation (2005)***

This focuses on protection of biodiversity and states that policies should seek to maintain, enhance, restore or add to biodiversity and geological conservation interests

### **2.3.8 *Planning Policy Guidance 13: Transport (1991)***

PPG13 sets out the overarching objectives for an integrated transport network. Amongst many objectives, it requires local authorities to accommodate housing principally within existing urban areas and locations which are highly accessible by public transport, walking and cycling.

- 2.3.9 ***Planning Policy Guidance 14: Development on Unstable Land (1990)***  
This PPG identifies the broad planning and technical issues to be addressed in respect of development on unstable land.
- 2.3.10 ***Planning Policy Guidance 15: Planning and the Historic Environment (1994)***  
This contains a full statement of Government policies in relation to the identification and protection of historic buildings, conservation areas and other elements of the historic environment.
- 2.3.11 ***Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation (2002)***  
This PPG requires local authorities to carry out local needs assessments and audit existing provision of open space. It encourages the setting of local standards and places more emphasis on the quality of open space.
- 2.3.12 ***Planning Policy Statement 25: Development and Flood Risk (2006)***  
This statement aims to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk.

## **2.4 Regional Policy Context**

- 2.4.1 ***Regional Planning Guidance for the South East (RPG9) (March 2001)***  
This is current regional planning guidance which covers the period up to 2016. The guidance will be superseded by the emerging South East Plan which is soon to be published in its final form.
- 2.4.2 ***Surrey Structure Plan (2004)***  
The Surrey Structure Plan will also be superseded by the emerging South East Plan. Specific policies guide the scale and distribution of housing within the county. This requires Epsom & Ewell to be deliver 3,000 new dwellings between 2001 to 2016.
- 2.4.3 ***Emerging South East Plan (SEP)***  
The SEP will cover the period 2006 – 2026, providing the regional spatial planning policy to inform the production of Local Development Frameworks. Amongst many other policies, it will set out the housing quantum's which are to be delivered in each local authority's area.
- 2.4.4 The draft SEP was published in March 2006. It has been subject to public consultation and examination by an independent panel which made numerous recommendations. In response to this, the Secretary of State proposed a number of changes, which were again consulted upon and the publication of the final SEP is expected imminently. It should be noted that the policies in the SEP are therefore not finalised until the final SEP is published.
- 2.4.5 From the initial draft of the SEP, the Borough's housing allocation has altered, as set out in table 1 below:



Table 1: Epsom & Ewell Borough Council's housing allocation

Source of housing target	Housing target 2006 to 2026	Annualised target
Draft SEP (March 2006)	3,620	181
Panel Report (August 2007)	3,980	199
Secretary of State proposed changes (July 2008)	3,980	199

2.4.6 The panel report calls for selective Green Belt reviews around Guildford, Oxford and possibly Woking. This has been accepted in the Secretary of State's proposed changes, although the Borough is not specifically identified as part of a selective boundary review, the proposed changes do allow for smaller scale reviews to come forward at other locations where they are likely to be required to meet strategic objectives.

2.4.7 The Secretary of State's changes make it clear that housing figures are to be treated as a minimum and that local authorities are required to test the scope for maximizing / accelerating the pace of development at strategic locations, identifying additional sources of supply, testing higher levels of provision through Local Development Documents and planning for an upward trajectory of completions.

## 2.5 Local Policy Context

### 2.5.1 *Core Strategy (2007)*

The Core Strategy states that the Council will seek to ensure the sufficient housing is provided to meet the housing requirements in accordance with the submitted South East Plan. Since the adoption of the Core Strategy, the Borough's housing targets have increased by 10%; to reflect the emerging SE Plan.

2.5.2 The Core Strategy also seeks to locate new development within the defined built up area and within the three strategic hospital cluster sites in the Green Belt. Emphasis is placed on the re-use of suitable previously developed land and higher density development is directed towards central, sustainable locations.

## 2.6 Developing and applying the methodology

2.6.1 The government practice 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. These stages are set out in figure 2, with the two additional stages shown in grey. The Core outputs of the SHLAA as set out in the guidance are reproduced in table 2.

Figure 2: Eight main stages in SHLAA production (CLG Guidance August 2007)

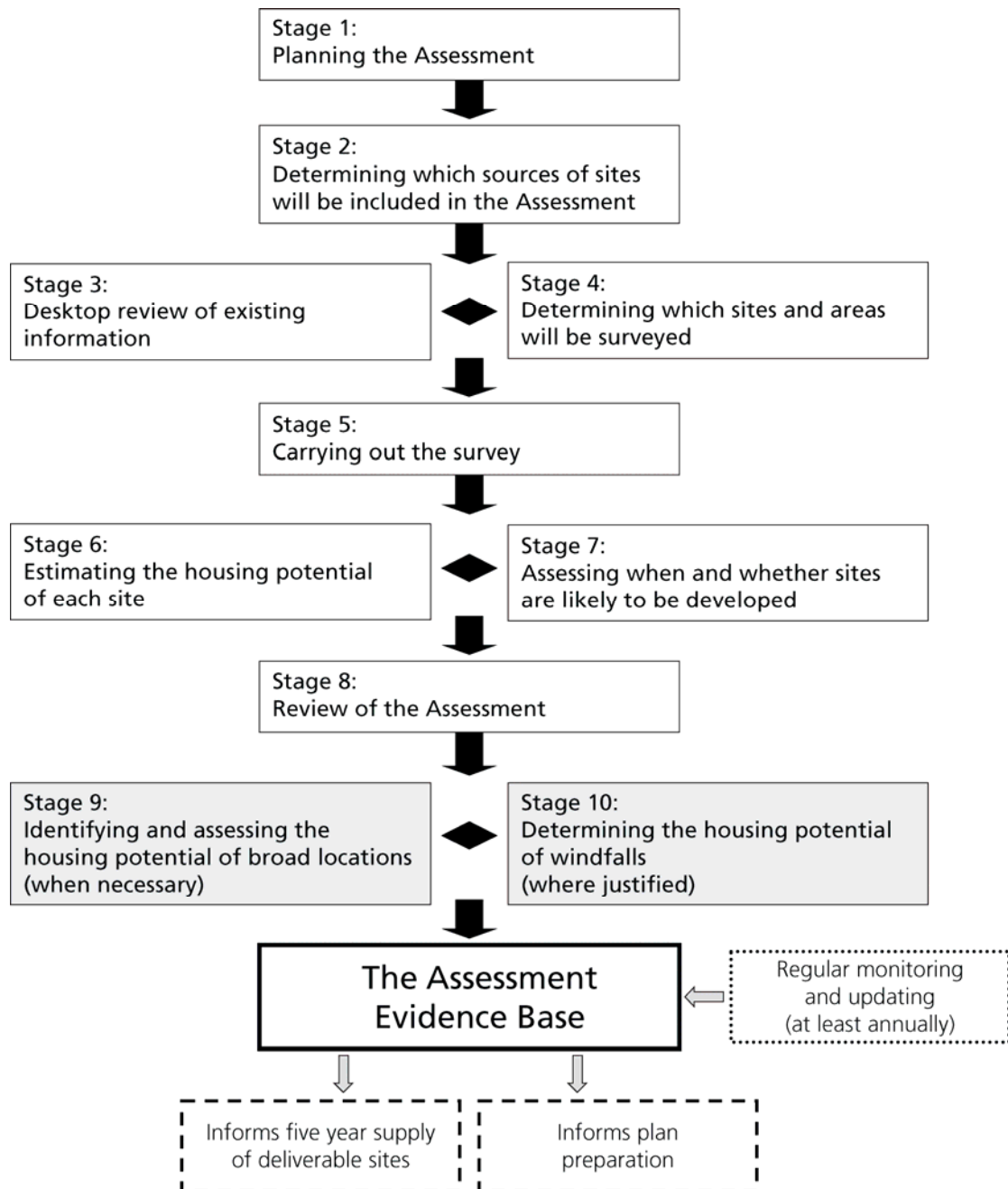


Table 2: Core Outputs for a SHLAA (CLG Guidance August 2007)

<b>Core Outputs for a SHLAA</b>
1. a list of sites, cross-referenced to maps showing locations and boundaries of specific sites.
2. assessment of the deliverability/developability of each identified site to determine when each site is realistically expected to be developed.
3. an assessment of the potential quantity of housing that could be delivered on each identified site.
4. the identification of potential constraints on the delivery of housing on each site and, where appropriate, recommendations on how these constraints may be overcome.

2.6.2 The following section identifies how these stages were used in the development of the methodology for the EEBC SHLAA, and how this worked in practice. It was found that the stages in the methodology were not necessarily carried out separately, as the process was more iterative. A copy of the full methodology can be found in Appendix 1

## **2.7 Stage 1: Planning the Assessment**

2.7.1 The CLG 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. However, this was not considered practical, due to the differing timetables each authority has for the production of LDF documents and associated evidence base documents such as the SHLAA. Additionally, the Borough's have varying constraints and are in many different ways unique and distinctive in their own right. Consequently, the SHLAA considers that the preparation of a joint methodology would not be suitable.

2.7.2 However partnership working was considered important and a number of key local and regional government and non-government stakeholders were invited to join a steering group which would act as a critical friend to the SHLAA process. The original intention was for the creation of a virtual steering group, which would be engaged electronically, either by email or by telephone, on key SHLAA matters. The intention was that the steering group would be kept informed throughout the process by an electronic newsletter. However, upon the completion of the initial stages, involving the preparation and production of the SHLAA methodology, there was no need for further steering group involvement. Equally, other than stating that site survey and assessment was under way, there was nothing of value to report within the proposed electronic newsletter. The SHLAA concludes that whilst there is some value in gaining peer support for its methodology, there is little value in their continued involvement through the technical stages of the process.

2.7.3 A draft methodology was consulted upon in June 2008 and the responses were used to refine and validate the methodology, which was then subject to further more comprehensive consultation among a wider consultation group (Appendix 1). The following stages elaborate on this methodology and how it evolved throughout the production of the SHLAA.

## **2.8 Stage 2: Determining which sources of sites will be included in the assessment**

- 2.8.1 The government guidance identifies a variety of potential sources of sites. Although some of the suggestions were considered not applicable given the nature of the Borough, a virtually unconstrained approach was taken in the consideration of potential sites.
- 2.8.2 For example, it was initially proposed that the Green Belt would not be included in the assessment of sites. However, following consultation and reflection on the objectives of the SHLAA, it was considered that including potential sources of supply located within the Green Belt would provide a more thorough assessment of the Borough's capacity in the long term, increasing the robustness of the SHLAA.

## **2.9 Stage 3: Desktop review of existing information**

- 2.9.1 The Council drew upon a wide variety of sources to identify potential sites which included many of the data sources suggested by the guidance. These included sources such as outstanding planning permissions, the empty property register and aerial photography.
- 2.9.2 In addition, a 'call for sites' exercise was conducted where over one hundred consultees (made up of planning and land agents, developers and landowners) were invited to submit details of potential housing sites which they wanted to be assessed through the SHLAA process. However, although the call for sites exercise was widely publicised through a variety of methods (press releases, the Council's website and directly contacting consultees), it yielded only a limited response. Even extending the time period by an additional month did not greatly increase the number of responses. (The representations received are available in Appendix 2.) The reasons for this may be speculated upon. There is a lack of readily available large sites in the Borough and historic trends in build rates show that small / medium sized developers are more active. Additionally, the SHLAA considers that the development industry may not be incentivised to put sites forward into the SHLAA process as the SE Plan currently seeks minimum housing targets as part of an upward trajectory. Alternatively, the lack of industry interest may be a symptom of the recent economic downturn.

## **2.10 Stage 4: Determining which sites and areas will be surveyed**

- 2.10.1 The nature of the Borough; being primarily a built up area surrounded by Green Belt, helped determine which areas were to be surveyed. Historic trends show that the majority of the Borough's housing supply comes from the intensification of existing urban sites with many smaller sites coming forward as unidentified windfalls. Past delivery of housing has consistently exceeded annual targets demonstrating that this source of supply is reliable. The evidence suggests that these small sites can yield relatively high densities and thus form an important component of supply. Originally, the SHLAA methodology intended to apply a minimum area threshold of 0.12ha when searching for sites, although it became apparent that applying this would discount a significant number of smaller sites and therefore reduce the number of potential sources of identifiable supply. Consequently, a decision

was made not to apply the threshold in the search for sites to capture this source of supply.

- 2.10.2 The only truly strategic source of housing supply in the Borough has come from a number of surplus institutional health care sites located within the Green Belt. These are known as the Hospital Cluster. Over half of these sites have been developed, although the remainder still form an important source of housing land supply, which will be delivered during the SHLAA period. Apart from the Hospital Cluster, there are few obvious suitable housing sites within the Green Belt. Additionally, there are very few Greenfield sites within the Borough that are not designated as Green Belt. However, it was believed that the scope of the SHLAA was wide ranging and thus the potential of these areas were assessed.
- 2.10.3 The lack of sites generated through the call for sites exercise placed a greater emphasis upon Officers to identify sites. To reduce the risks involved in this, there was extensive involvement of other Officers across the Council, who brought their local knowledge and a range of other expertise to the process.
- 2.10.4 The identification of sites was informed by GIS desk top survey work, analysis of previous permissions, refusals and appeals. A number of other factors considered in the GIS desktop survey included the accessibility of areas, public transport corridors and various local constraints such as flood risk, conservation areas and contaminated land. Other sources of information were also fed into the process, such as data from Uniform (the Borough Council's planning applications database) to identify planning histories.
- 2.10.5 Adopting a virtually unconstrained approach and involving other Officers across the Council (and particularly within the planning team) assisted in this exercise, helping to ensure a comprehensive search of the Borough. Details of Officer involvement are outlined below:
- Regular consultation with **Development Control Officers** throughout the SHLAA process, including an initial lunchtime workshop
  - Consultation with the **Design and Conservation Officers** on site histories, suitability, viability and identification.
  - **The Planning Enforcement Officer** was engaged on a number of occasions to discuss details relating to specific sites
  - The **Environmental Health Team** were consulted on issues relating to contaminated land and air quality
  - Biodiversity and ecological issues were discussed with the **Countryside Manager** both strategically and on site specific issues.
  - The **Leisure Services Manager** was consulted in relation to the overall amount of open space and the potential to release specific sites (in association with improvements to existing open space). There were also discussions on site selection and viability
  - **Operational Services Officers** were consulted on the potential options for release of urban allotment sites across the Borough. They also contributed valuable information on the potential to re-provide in an enhanced and extended form within the Green Belt
  - **Housing Services** were consulted in the identification of sites, while housing and gypsy & traveller needs were also examined

- The Council **Tree Officer** was consulted on a number of occasions in relation to the constraints presented by the level of tree cover across the Borough. He provided useful information in relation to specific sites, existing and potential areas of ancient woodland and veteran trees.

2.10.6 Comprehensive notes of these meetings are reproduced under Appendix 3.

## **2.11 Stage 5: Carrying out the survey**

2.11.1 Site survey work was conducted from late summer 2008 into early spring 2009 by the Planning Policy Team. This process took longer than originally envisaged due to the increased number of sites that were to be surveyed and the increased level of detail sought to provide a thorough assessment of their potential as sources of housing land supply.

2.11.2 Each site was individually assessed and the information recorded using a standard pro-forma. A training session for the team on site assessment, led by the Policy Manager, was held to ensure consistency in the process. Constant discussion between the members of the Team, throughout this Stage of the process, ensured that consistency was maintained. Firstly a desktop analysis was carried out, which helped to identify site specific information, such as accessibility to public transport, presence of Tree Preservation Orders, and planning histories. This was complemented by visits to each site, which helped to clarify issues and add further information such as prevailing densities and access.

2.11.3 Continued engagement within the policy team and with other professional officers across the Borough Council helped ensure the survey work was comprehensive. Again engagement with other planning officers was constant throughout this process.

## **2.12 Stage 6: Estimating the housing potential of each site, and Stage 7: Assessing when and whether sites are likely to be developed**

2.12.1 These two Stages of the SHLAA process were effectively carried out simultaneously. Policy Officers collectively evaluated the information gathered for each site to assess their potential viability, density and yield. This was again carried out in consultation with other officers where relevant.

2.12.2 Approximate densities were applied to sites; this process took a conservative approach in order to ensure that there was no over-estimation of potential sources of supply. It was also informed by a variety of other factors including:

- the minimum density target set out in the emerging South East Plan;
- the density of the surrounding urban area, and its implications upon character and appearance; and
- consideration of the conclusions from the Environmental Character Study, which identified the Boroughs different character areas and their sensitivity to change.

2.12.3 From these densities approximate yields were derived.

- 2.12.4 Sites were then graded on a scale of 1 to 5 as to the level of difficulty in bringing the site forward. Again a conservative approach was applied; where issues of uncertainty remained the site was given a higher score (i.e. considered less deliverable). For example, all Green Belt and open space sites were identified as falling into categories 4 or 5 on account of them having some potential, but this being dependent upon the Council actively pursuing a policy of release. A number of other issues that could hinder delivery were also considered, such as multiple ownerships.
- 2.12.5 The original methodology included the application of a matrix analysis (for each individual site) as part of Stage 7. This would have resulted in an approximate ranking of sites based upon their overall sustainability. However, in practice it became apparent that most, if not all, of the criteria used by the proposed matrix were already incorporated within the individual site survey forms. Thus some duplication would have taken place. Additionally, the SHLAA considers that assessment of the sustainability of a site should be carried out through the sustainability appraisal process at the allocations stage, where a more thorough assessment can be made of sustainability criteria. Creating a ranking as part of the SHLAA process would have been difficult and would have resulted in an arbitrary list of preferred sites, which may not fully consider issues of availability and deliverability. It is therefore noted that this issue was raised during the consultation on the proposed methodology. Consequently, during the preparation of the SHLAA, a decision was taken not to apply the matrix as originally proposed. The removal of this part of Stage 7 does not impact upon its overall robustness.

### **2.13 Stage 8: Review of the assessment**

- 2.13.1 Following the completion of the site appraisal stage, the data has been collated to indicate the potential of all sites and an associated housing trajectory produced. The total potential yields from the sites surveyed by the SHLAA were subject to detail discussion by Officers as part of the review process. This discussion examined each individual site. Officers reviewed the analysis of each site, namely, its appropriateness for housing development, the density to which it could be developed and the yields that could be delivered. Officers also carefully evaluated any known constraints. Financial viability was also discussed, particularly in relation to the current economic climate.
- 2.13.2 The above factors were carefully considered and a judgment on each sites overall viability, deliverability and developability was taken. Taking these factors into consideration, Officers classified each site within a scale of 1 to 5 (as per Para 2.12.4) and subsequently placed them within the five yearly timeframes that comprise the SHLAA period.
- 2.13.3 Upon reflection, it is considered that this assessment, which fully incorporated information collated throughout the entire process, was sufficiently robust.
- 2.13.2 The findings of the SLHAA are discussed in detail within the following chapters.

## **2.14 Stage 9 & 10: Further optional stages**

2.14.1 In addition to the eight core stages, the government guidance identifies two additional 'optional' stages. The guidance states that these two stages should only be used if after completing Stages 1 to 8, a shortfall in its potential sources of housing supply is identified. These stages are intended to provide some flexibility in the identification of potential sources of supply. Their application is strictly restricted to extremely unique circumstances when it is impossible to identify, with any certainty, potential sources of supply. They are in effect a 'last resort'. The Epsom and Ewell SHLAA did not need to apply these additional stages.

### *2.14.2 Optional Stage 9: Identifying and assessing the housing potential of broad locations*

The guidance describes 'broad locations' as being identified, where housing development is considered feasible and will be encouraged but where specific sites cannot yet be identified.

### *2.14.3 Optional Stage 10: Determining the housing potential of windfall sites*

Where there are genuine local circumstances, a windfall allowance may be justified. This should be based on an estimate of the amount of housing that could be delivered in the area on land that has not been identified in the list of deliverable / developable sites, or as part of broad locations for housing development.

## **2.15 Engagement throughout the process**

2.15.1 The SHLAA steering group were given a selection of methods through which they could remain informed of progress and an electronic newsletter was the preferred option. However, such a newsletter was only published once (Appendix 4) as it was found that the process of producing a SHLAA did not lend itself to the publication of regular updates. This has not been raised as an issue by any of the steering group. The policy provided updates to stakeholders upon request.

2.15.2 A page on the Council's website provided information on the SHLAA process and contact details for those seeking more information. A press release informed the wider community about the SHLAA and directed them to appropriate sources for information. Articles subsequently appeared in local newspapers and as a result, a number of local residents contacted the policy team to seek further information.

2.15.3 Within the Council, Councillors were kept informed of the SHLAA's progress through the Planning Policy Sub-Committee, while senior management were kept up-to-date via their regular Corporate Board meetings. As mentioned previously, Officer involvement across the Council was widespread and engagement took a variety of forms including workshops and one to one sessions.

2.15.4 Overall, the production of the SHLAA may have benefitted from achieving a greater level of engagement with the house building industry. It would have been useful to gain an industry perspective on the deliverability on certain types of housing land sources which were considered by the SHLAA. Involvement of this sector was sought through the steering group, although



interest was limited. A key original contact was the Home Builders Federation, however during the production of the SHLAA, the South East branch of this organisation ceased to exist.

2.15.5 Evidence of the type of engagement throughout the SHLAA process can be found in Appendix 5.

## **3. SITE SURVEY OUTCOMES**

### **3.1 Introduction**

- 3.1.1 This chapter sets out the key outputs from the SHLAA, namely the theoretical housing yields potentially available from the surveyed sites and how these could contribute towards meeting the Borough Council's overall housing target.
- 3.1.2 The first part of the chapter maps out the sites surveyed by the SHLAA; breaking these sources of supply down into their different categories. These categories seek to illustrate the SHLAA's assessment of each individual site's deliverability and viability. This process will show the development from an unconstrained supply position, where all sources of potential supply are initially considered, before moving towards a potential scenario where the sources of supply are reduced to those more likely to come forward during the SHLAA period.
- 3.1.3 The second section applies the different levels of deliverability to the Borough's housing trajectory. This demonstrates which potential sources of supply need to be considered by the planning authority in order to meet the housing quantum.

### **3.2 Mapping SHLAA outcomes**

#### **3.3 Classification of delivery**

- 3.3.1 One of the key elements of the SHLAA's site survey component (effectively throughout Stages 3 – 8) was the classification of their individual level of deliverability and viability. This part of the process sought to categorise the likelihood of the site coming forward during the SHLAA/ LDF period. This process took account of key issues such as site economic viability, potential biodiversity, geographic/ topographic constraints and land ownership.
- 3.3.2 The site assessment process placed each individual site in a category, ranging from 1 to 5, which reflected its overall deliverability and viability. This classification process effectively determined the site's likelihood of coming forward during the SHLAA period and to a slightly lesser extent the potential yields and densities available from each individual site. The Site Survey Forms, reproduced under Appendix 6, identify these categories as a key part under the Conclusions on the Use of the Site.
- 3.3.3 Sites placed within Category 1 were considered to be the most deliverable sites. These tended to be sites that were either already within the planning system, being under consideration or having planning permission, under construction, or otherwise committed to development. Category 1 also contains sites not currently within the planning process but known to be very likely to come forward during the SHLAA period.
- 3.3.4 Sites classified under Category 2 were also considered to have a high potential as future sources of housing land supply; the SHLAA being very optimistic that delivery would take place during the first half of the SHLAA period. However, these sites are not identified under Category 1 because there is some uncertainty over exactly when they would come forward within

the SHLAA period. All of the sites within Category 1 and most of the sites within Category 2 are considered to be deliverable, as per Stage 7 of the SHLAA methodology.

- 3.3.5 The SHLAA also takes an optimistic view on those sites classified under Category 3, these being sites considered appropriate and viable potential sources of supply but where landowner aspirations are unclear. All of the potential sites classified under Categories 1 – 3 are located within the existing urban area and could theoretically come forward as sources of housing land supply regardless of their identification through the SHLAA process. Sites falling within Category 3 are considered to fall between being deliverable and developable (see Appendix 1, Section 9 for definitions), as per Stage 7 of the SHLAA methodology.
- 3.3.6 The SHLAA has taken a more cautious approach towards the potential of those sites classified under Category 4. The sites identified under this category were recognised as having potential as sources of housing land supply but were generally considered unlikely to come forward during the SHLAA period. Notably, this category incorporated those sites currently in use as open space provision (informal open spaces and allotments) and greenfield sites within the Green Belt. The SHLAA considers many of these sites to be potentially deliverable during the SHLAA period but that their release is dependent upon a Borough Council decision. Consequently, these sites have been classified under this category.
- 3.3.7 Finally, Category 5 sites are those that the SHLAA believes are either entirely unlikely to come forward as sources of housing land supply (at any time) or are sites whose deliverability and viability during the SHLAA period is undeterminable. In this respect, the SHLAA believes that some of these Category 5 sites may come forward naturally during the SHLAA period; in effect constituting an identified form of windfall supply. So, whilst the SHLAA site survey data (Appendix 6) may suggest that some of these Category 5 sites have little or no potential housing yield, this may not serve to prevent real-world delivery.
- 3.3.8 The SHLAA highlights the difficulties in clearly determining whether sites classified within Categories 4 and 5 are genuinely not currently developable, or if in reality their deliverability/ developability is undeterminable.
- 3.3.9 The SHLAA also identified a potential delivery timetable for each individual surveyed site, as part of the survey and assessment process. The SHLAA period was divided into five year periods. Those sites already within the planning process were invariably placed within the first period, running from 2008 – 2013. Some of the sites identified as deliverable and many of those identified as developable fell within the SHLAA's mid-term, during 2014 – 2019. Those sites with an uncertain or undeterminable potential were placed within the latter period of the SHLAA; during 2020 – 2025. The SHLAA highlights that this classification by delivery period is not prescriptive and sites may come forward earlier, or indeed later, than predicted.

### **3.4 Overview of the potential sources of supply**

- 3.4.10 Map 1 (Appendix 7) provides an overview of all of the sites surveyed as part of the SHLAA process, through Stages 3 – 8. This provides a virtually unconstrained overview of the potential sources of supply assessed through the SHLAA. This map shows all sites, regardless of their categorisation. There were 316 sites that were surveyed and assessed through Stages 3 – 8 of the SHLAA process.
- 3.4.11 This map illustrates the generally conservative approach taken by the SHLAA in site identification, even within its virtually unconstrained form. Namely, officers consciously excluded those sites, or areas of the Borough with very little likelihood of coming forward during the SHLAA period during Stage 3 of the process<sup>3</sup>. A truly unconstrained approach could have assessed all of the Borough's land area as a potential source of supply. The SHLAA considers that such an approach is unlikely to have generated meaningful data above and beyond that already produced.
- 3.4.12 Map 2 (Appendix 8) applies constraint to the process and removes those sites classified by the SHLAA under Categories 4 – 5. It is noteworthy that the application of constraint removes not only those sites with an undetermined viability and deliverability but also those sites currently within the Green Belt and those identified as open space provision.
- 3.4.13 This map identifies the 100 sites that fall within Categories 1 – 3.
- 3.4.14 The SHLAA surveyed and assessed 216 sites that were classified as falling within Categories 4 – 5. These included sites with an undetermined level of viability or deliverability, some being initially classified within a range, for example a site falling within a range between Categories 3 – 5. Where sites were initially classified within a range, the SHLAA has taken a conservative approach to delivery and applied the higher category.

### **3.5 Housing trajectory**

#### **3.6 Establishing a housing target for the SHLAA**

- 3.6.1 The Secretary of State's Proposed Changes to the draft Regional Spatial Strategy for the South East of England Companion Document was published in August 2008. The Secretary of State recommends an increase of 360 dwellings more than the Draft South East Plan figures, in Epsom and Ewell. This equates to **3,980** new dwellings during the period 2006-2026 or an annual average of **199** dwellings.
- 3.6.2 Previously, the Borough's housing targets had been set out in the Surrey Structure Plan, which required the delivery of 200 dwellings a year. The South East Plan will replace the Surrey Structure Plan and has influenced the Borough's housing targets from 2006. The Core Strategy's housing policy CS7 was based on the emerging South East Plan, which at the time required

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<sup>3</sup> The exception to this was the consideration given, throughout Stages 3-8, of those sites promoted through the Site Allocations DPD and SHLAA call-for-sites consultation stages; even where the potential of such sites was initially considered to be poor.

the provision of 181 dwellings per annum. Since the adoption of the Core Strategy, the Secretary of State's proposed changes to the South East Plan have raised the Borough's housing target to 199 per annum.

- 3.6.3 The delivery of this target is monitored through the LDF Annual Monitoring Report (AMR), under Core Outputs Indicators H1, H2a and H2b, and the Core Strategy Indicator; the number of new housing completions per annum.
- 3.6.4 A key part of this monitoring process is the charting of a housing delivery trajectory. This is a useful approach to assess housing delivery, helping to support the 'plan, monitor, manage' concept. They show past performance and estimate future delivery enabling an assessment to be made of whether there is likely to be a future shortfall or surplus of housing in the Borough in relation to the housing targets. PPS3 states that the Local Development Framework should be informed by a robust evidence base on housing need and demand through a Strategic Housing Market Assessment (SHMA), and land availability through a Strategic Housing Land Availability Assessment (SHLAA). It suggests that the housing trajectory should show net additional dwellings over the previous five years.
- 3.6.5 The target is identified in Core Output Indicator H1 is for **199** dwellings per year. This reflects the minimum target set in the Secretary of State's Proposed Changes to the draft Regional Spatial Strategy for the South East of England Companion Document.
- 3.6.6 For the purposes of the SHLAA, the 2007-08 AMR housing trajectory was updated until the end of February 2009. This exercise shows the progress to date towards meeting Core Output Indicator H1. During the first two years of the plan period (2006-2008), **589** net dwellings were completed. During the third year of the plan period 152 units have been completed up until the end of February 2009, providing a total of **741** completed units. This left a residual **3,239** net dwellings to be completed during the remainder of 2009 until 2026 (as shown below).

Table 3: Epsom and Ewell Housing Requirement 2006-2026

	2006/07	2007/08	2008/ Feb 09	Remainder 2009-2026
Completions	308	281	152	
Residual Requirement				3,239
Total				<b>3,980</b>

- 3.6.7 Information obtained from housing monitoring indicates that at the end of February 2009 there were 125 residential units under construction and 371 residential units with planning permission that have not yet to be started. Table 4 shows that this provides a potential supply of **1,237** dwellings (including completed dwellings 2006-2009) between 2006 and 2026.

Table 4: Summary of potential from sites within the planning process

		Units
<b>Previous completions</b>		<b>741*</b>
<b>Units currently under construction</b>		125
<b>Units with current outstanding planning permissions</b>	<i>Expire 2008/2009</i>	34
	<i>Expire 2009/2010</i>	96
	<i>Expire 2010/2011</i>	136
	<i>Expire 2011/2012</i>	105
<b>Subtotal</b>		<b>1,237</b>
<b>Large sites/ allocations identified in the 2007-08 AMR</b>		
<b>St Ebba's</b>		322
<b>West Park</b>		360
<b>Horton B</b>		39 (31 complete)
<b>Linton's Centre</b>		53
<b>Rosebery School</b>		72
<b>Total</b>		<b>2,083</b>

\*(including 152 units from April 2008 - Feb 2009)

3.6.8 The Large sites/ allocations identified in the 2007-08 AMR are large sites that are either identified as housing sites in the Local Plan, or where development is certain to happen. Their delivery time will be estimated by communication with the case officers and developers.

3.6.9 The table below shows that once the sites within the planning process have been accounted for, the residual requirement to meet our minimum housing target of 3,980 units (and the minimum number of units to be identified through the SHLAA) is **1,897 units**.

Table 5: Residual requirement

Source of Supply	
Sites within the planning process	2,083
Residual requirement (units to be identified through the SHLAA process)	<b>1897</b>
Target (minimum)	3980

3.6.10 It is important to note that in its unconstrained form the SHLAA surveyed sites already within the planning process; namely, sites that are included within the

updated housing trajectory. Those sites form part of the 2,083 units identified in the table above. As explained previously, sites within the planning process were primarily classified as Category 1 sites. The SHLAA has taken great lengths to ensure that the yield from these sites is taken out, or discounted from the outputs that follow, in order to ensure that no double counting takes place. Accordingly, subsequent tables showing potential yield from the different site categories have been adjusted to take account of sites already within the planning system.

### 3.7 Potential housing numbers identified through the SHLAA

3.7.11 The SHLAA process identified an appropriate density and yield to each of the 316 surveyed sites. This process sought to reflect the distinctive and sometimes unique nature of each site, as per Stages 4 and 6 of the SHLAA Methodology. In respect of the latter, the SHLAA took a sustainable but conservative approach to potential densities and yields; namely, seeking to meet (and exceed) the SE Plan’s minimum density target at appropriate locations but also accepting a lower yield and density in those locations where maintaining and enhancing the existing character and appearance is a key consideration. This approach is set out in greater detail within the separate ward pen portraits which follow in Chapter 4 and the individual site survey forms available in Appendix 6.

3.7.12 Taking this flexible approach to potential yields, the SHLAA identified a range of potential housing supply. The SHLAA’s upper yield could provide **5906 units**. These coming from all, virtually unconstrained sources of supply, accounted for within Categories 1 through to 5. The lower unconstrained yield could provide **4578 units**.

3.7.13 A summary of the sites is provided in Tables 6 and 7 below. They show the sites by both delivery category and delivery timescale.

Table 6: SHLAA sites by ‘delivery category’

<b>Delivery Category</b>	<b>Number of units (min)</b>	<b>Number of units (max)</b>
Category 1 <sup>4</sup>	121	121
Category 2	501	621
Category 3	1331	1523
<b>Sub Total</b>	<b>1953</b>	<b>2265</b>
Category 4	1718	2698
Category 5	907	943
<b>Total units</b>	<b>4578</b>	<b>5906</b>

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<sup>4</sup> The potential yields (numbers of units) from Categories 1 and 2 have been adjusted to exclude the known yields from sites already within the planning process.

Table 7: SHLAA sites by 'delivery period'

<b>Delivery timescale</b>	<b>Number of units (Min)</b>	<b>Number of Units (Max)</b>
2008-2013	494	639
2014-2019	1224	1380
2020-2025	2860	3887
<b>Total units</b>	<b>4578</b>	<b>5906</b>

3.7.14 The range takes account of the possibility that sites may yield different numbers of units depending on how they are brought forward; for example be it for mixed use or developed to a lower density.

3.7.15 The SHLAA notes that the potential density levels across the Categories are low; falling between 15 – 19 units/ ha for the unconstrained scenario and between 19 – 23 units/ ha for a scenario based upon potential sites within just Categories 1 – 3. These comparatively low densities are partially due to the conservative approach taken by the SHLAA to ensure that the special qualities of the Borough's existing urban are maintained and enhanced. It is also caused by the SHLAA suggesting that potential sites only be part-developed, with residual areas of the sites being retained, for example, as open space or other forms of green infrastructure provision.

3.7.16 The tables above show that the potential total units exceed the residual requirement identified in Table 5. However, the units above are spread across the delivery categories and many in the higher categories may be either of undeterminable deliverability/ developability, or may not be currently developable. The SHLAA highlights that there is also no guarantee that all of the sites in the lower categories, namely those considered more likely to come forward, will become available.

### **3.8 Possible housing trajectories**

3.8.17 Using the potential range of yields, set out within the above tables, the SHLAA has developed a series of possible trajectories based upon the a virtually unconstrained and a constrained scenario; the former comprised of all SHLAA sites coming forward and the latter of only those sites classified within Categories 1 – 3.

3.8.18 The four possible trajectories represent maximum and minimum site yields, and are an adaptation (to include SHLAA sites) of the housing trajectory model used within the AMR. The SHLAA suggests that this type of trajectory be used as a model for future AMR housing trajectories, which will incorporate SHLAA sites.

3.8.19 Tables 8 and 9 outline trajectories for the two virtually unconstrained scenarios, under which all potential sources of supply come forward during the SHLAA/ LDF period. Taking those sites already delivered and within the planning system into consideration, the unconstrained scenarios could deliver (at maximum yield) nearly twice the required housing target.



Table 8: Unconstrained SHLAA Housing supply/ Trajectory (categories 1-5) - Maximum yield

Source of supply	2006/2007	2007/2008	Years 1-5 (2008-13)	Years 6-10 (2013-18)	Years 11-15+ (2018-26)	Overall Total
			Max	Max	Max	Max
Completed Dwellings	308	281	152 (as end Feb)			741
Sites under construction and with permission			496			496
Large Sites allocated or identified in the AMR			681	165 (West Park)		846
SHLAA CAT 1			121			121
SHLAA CAT 2			147	474		621
SHLAA CAT 3			221	630	672	1523
SHLAA CAT 4				172	2526	2698
SHLAA CAT 5			150	104	689	943
Total			1968	1545	3887	7,989

Table 9: Unconstrained SHLAA Housing supply/ Trajectory (categories 1-5) - Minimum yield

Source of supply	2006/2007	2007/2008	Years 1-5 (2008-13)	Years 6-10 (2013-18)	Years 11-15+ (2018-26)	Overall Total
			Min	Min	Min	Min
Completed Dwellings	308	281	152 (as end Feb)			741
Sites under construction and with permission			496			496
Large Sites allocated or identified in the AMR			681	165 (West Park)		846
SHLAA CAT 1			121			121
SHLAA CAT 2			147	354		501
SHLAA CAT 3			76	597	658	1331
SHLAA CAT 4				170	1548	1718
SHLAA CAT 5			150	103	654	907
Total			1823	1389	2860	6,661

3.8.20 Tables 10 and 11 outline trajectories for the constrained scenarios, under which potential sources of supply identified/ classified within Categories 1 – 3 come forward during the SHLAA/ LDF period. Taking those sites already delivered and within the planning system into consideration, these scenarios could still deliver (under both maximum and minimum yields) the required housing target. However, the risk of not meeting the target, due to sites not coming forward, is greater. This is not only because of the reduced number of sites available to deliver the target; with the possibility that not all of the sites will become available for housing during the SHLAA/ LDF period. Additionally, the predominantly non-strategic nature of the sites classified within Categories 1 -3, suggests that there will be fewer opportunities for the

local planning authority to intervene should annual monitoring demonstrate a shortfall in delivery.

Table 10: SHLAA Housing supply/ trajectory (Categories 1 - 3) - Maximum yield

Source of supply	2006/2007	2007/2008	Years 1-5 (2008-13)	Years 6-10 (2013-18)	Years 11-15+ (2018-26)	Overall Total
			Max	Max	Max	Max
Completed Dwellings	308	281	152 (as end Feb)			741
Sites under construction and with permission			496			496
Large Sites allocated or identified in the AMR			681	165 (West Park)		846
SHLAA CAT 1			121			121
SHLAA CAT 2			147	474		621
SHLAA CAT 3			221	630	672	1523
<b>Total</b>	<b>308</b>	<b>281</b>	<b>1818</b>	<b>1269</b>	<b>672</b>	<b>4348</b>

Table 11: SHLAA Housing supply/ trajectory (Categories 1 - 3) - Minimum yield

Source of supply	2006/2007	2007/2008	Years 1-5 (2008-13)	Years 6-10 (2013-18)	Years 11-15+ (2018-26)	Overall Total
			Min	Min	Min	Min
Completed Dwellings	308	281	152 (as end Feb)			741
Sites under construction and with permission			496			496
Large Sites allocated or identified in the AMR			681	165 (West Park)		846
SHLAA CAT 1			121			121
SHLAA CAT 2			147	354		501
SHLAA CAT 3			76	597	658	1331
<b>Total</b>	<b>308</b>	<b>281</b>	<b>1673</b>	<b>1116</b>	<b>658</b>	<b>4036</b>

3.8.21 The following Figures 3 and 4 plot the two maximum and minimum scenarios against the 2007-2008 AMR housing trajectory in order to graphically demonstrate how the potential sources of supply identified through the SHLAA could be used to deliver the Borough's housing target.

3.8.22 The bottom trajectory (shown in yellow triangles) maps out a steady upward trajectory using the assumed sources of supply set out within the latest AMR. The sources being comprised of known sites within the planning system (including strategic sites) and an average annual contribution from currently unidentified sources (approx. 158 units/ annum from 2016 onwards) – this

explains the steady upward trajectory. The latest AMR notes that future AMRs will identify these latter sources of supply, through the SHLAA process.

3.8.23 The mid and upper trajectories map out the constrained and unconstrained scenarios; shown respectively in pink and blue. Within both maximum and minimum trajectories the constrained scenario has the potential to consistently deliver the Borough's annual housing target of 199 units/ annum during the SHLAA/ LDF period. The two graphs clearly illustrate that the majority of supply could be delivered during the middle of the SHLAA period, with supply trailing off towards the end. This assumption has been on the basis that build/ delivery rates remain constant. It is conceivable that the current economic climate may push delivery rates towards the end of the SHLAA period. However, given the strategic timescale of the SHLAA period and the non-strategic nature of the sites contained within Categories 1 – 3, the impact of the economic climate may not be as pronounced upon these sources of supply as anecdotal evidence would assume.

Figure 3

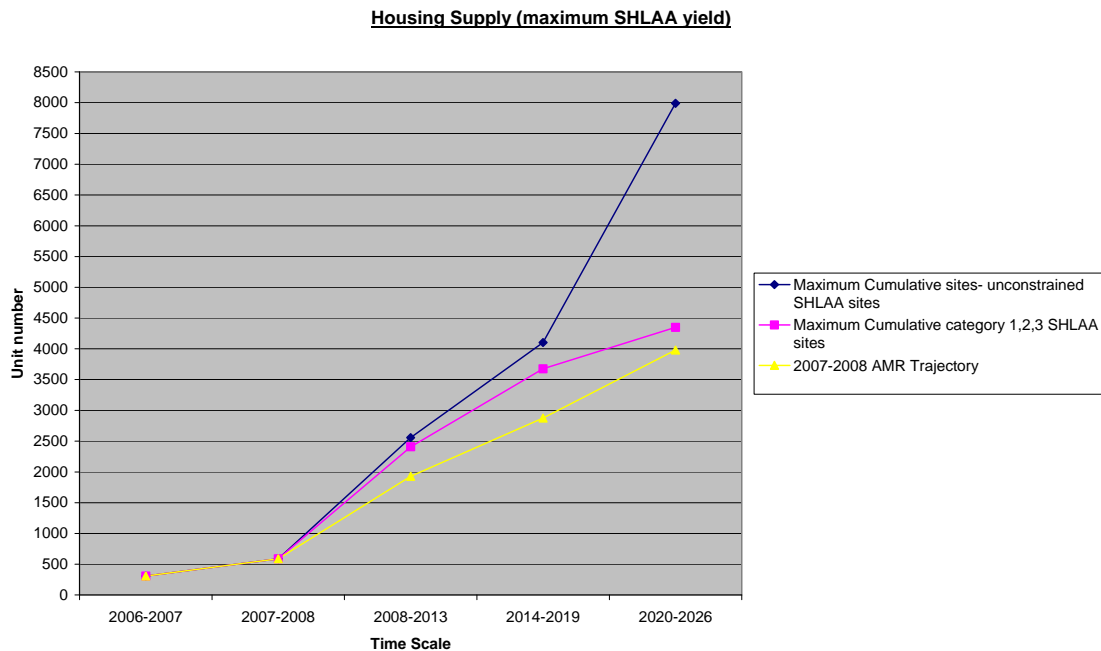
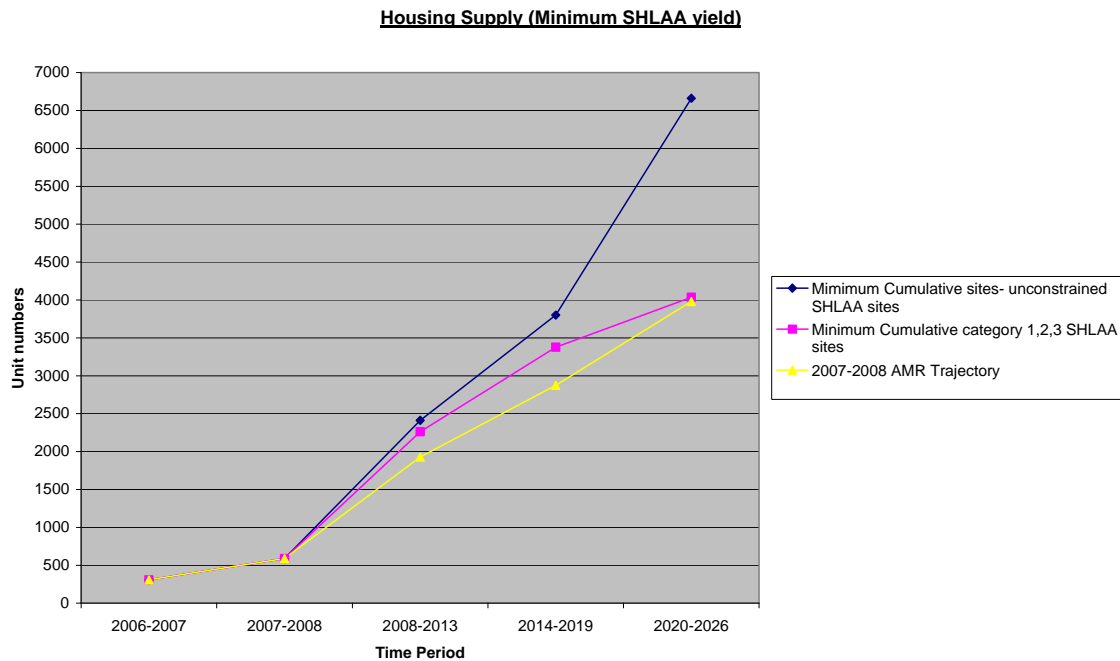


Figure 4



3.8.24 Within both maximum and minimum trajectories the unconstrained scenario is shown as delivering the bulk of its potential supply during the latter stages of the SHLAA/ LDF period. This is entirely consistent with the SHLAA’s approach to classifying sites within Categories 4 – 5 and providing an assessment of when those sites could come forward during the SHLAA period. Given the undeterminable nature of many Category 5 sites, delivery during the latter stages of the SHLAA period appears logical, which accounts for the steep trajectory. However, a real world position, where site release matches a healthy housing market is more likely. If this were to happen, the SHLAA assumes that the unconstrained curve would steady across the SHLAA period; although those sites currently used as open space, located within the Green Belt, or having problem issues are more likely to come forward towards the end of the SHLAA period, beyond it and in some cases not at all. In particular, the SHLAA accepts that sources of potential supply located within the Green Belt are only likely to come forward if there is a clear strategic need, and consequently will fall within the latter stages of the SHLAA period and beyond.

### **3.9 Future Sources of Windfall Supply**

- 3.9.1 Windfall sites have formed an important component of the Borough's housing land supply. The LDF AMR has until recently included a considerable windfall allowance within its housing trajectory for the LDF period. The windfall allowance being calculated on the basis of historic trends averaged across the plan period. Nationally, this was a typical approach to this issue. The Borough Council sought to introduce a greater element of sophistication by re-calculating the windfall allowance on an annual basis, so that it took account of any fluctuations in supply.
- 3.9.2 The inclusion of a windfall allowance as a component of the housing trajectory is no longer justified. The SHLAA demonstrates that there are sufficient identifiable sources of supply. Consequently, the Borough Council will no longer have to include a windfall component towards its housing quantum.
- 3.9.3 However, windfall sites will continue to contribute towards an upward housing trajectory, conceivably pushing housing supply beyond the annual quantum of 199 units/ annum. Therefore an understanding of this additional component to overall supply (beyond the minimum housing target) is beneficial.
- 3.9.4 Windfall sites are by their very nature very difficult to clearly identify. There are many reasons for this difficulty. Within the Borough, these difficulties are primarily (although not exclusively) associated with site size and landownership. That is windfall sites across the Borough tend to be smaller in size and either multiple or complicated landownership.
- 3.9.5 The SHLAA process, through its analysis of sites with existing planning permissions, refusals and appeals, and through its wider analysis of numerous sources of potential supply available across the Borough has identified a variety of different potential windfall types – namely, the types of site that could come forward as windfalls but whose exact location, viability and deliverability is currently unknown. The parallel Environmental Character Study aided this process by identifying the sub-areas across with capacity for change.
- 3.9.6 Whilst the sites identified through the SHLAA process have been assessed in terms of their economic viability and deliverability, the SHLAA believes that a similar assessment of windfall site types would not yield meaningful information. Under normal circumstances most windfall site types, particularly those involving complex landownership issues, would fail a standard economic analysis. However, the very constraints that make most (if not all) windfall unviable are also those most likely to change (for no apparent reason) overnight. For example; landownership may pass to sibling, or the landowner's aspirations or circumstances may change; in both cases a site that previously appeared as a hidden source of supply may come forward.
- 3.9.7 The following schedule seeks to identify the most likely types of windfall supply that are most likely to emerge during the SHLAA period across the Borough. The SHLAA does not seek to attach any certainty to the scale of delivery (IE the number of that will come forward), the potential yield from windfall sites or the timeframe for delivery.

### 3.10 Types of Windfall Site

**3.10.1 Large rear gardens:** significant parts of the Borough are characterised by residential units set within extensive plots, including large rear gardens. These have been noted to come forward as sources of windfall supply, either as single or multiple plots. Access is noted as the single biggest constraint to this type of windfall sources coming forward. Land assembly, when multiple plots are involved is another constraint. The existing character of the surrounding residential area is also likely to influence the viability of this source; most conceivably influencing density, yield and design.

3.10.2 The SHLAA noted that this source could result in a number of characteristic development types. For example, large rear gardens abutting or adjoining the residential roads could yield new units fronting onto the existing road. Alternatively, the assembly of a number of large rear garden plots could, once access has been gained through demolition (of one of the frontage dwellings), be developed into a cul-de-sac style development.

**3.10.3 Suburban intensification:** the SHLAA noted a number of examples, both recent and historic, where either one or two suburban residential dwellings have been demolished and intensification (an increase in site density) has occurred. Typically, this has involved large detached or semi-detached dwellings set in large plots and has yield between five-six units (net gain of four-five units). The SHLAA notes that the Borough's suburban residential areas have a finite capacity of such sources of supply, if these areas are to retain their distinctive character and appearance.

**3.10.4 Suburban brownfield sites:** within the Borough's suburban residential these sources of supply are generally few and far between. Where they are clearly identifiable the SHLAA has done so; otherwise the SHLAA takes the position that these are currently developed sites that are in active use but where that use may cease, or the building stop being fit-for-purpose at some point during the SHLAA period. Typically, such sources could include sites presently used as domestic garage blocks, small suburban employment/ commercial sites within residential areas and buildings in community use. Where dereliction has occurred, release as a source of housing supply may be encouraged as a regeneration mechanism. Where the site is relatively intact, an assessment of whether the site remains fit-for-purpose (for whatever its previous use) should be sought.

**3.10.5 Urban intensification:** within more urban locations, particularly in close proximity to Epsom Town Centre, local centres and along major public transport corridors a higher level of intensification may result. Typically, very large single occupancy dwellings, set in single plots will merit either conversion or comprehensive redevelopment as flat/ apartment developments. This type of windfall intensification has been commonly noted across the Borough, examples include Alexandra/ College Road (College Ward), Cheam Road (Nonsuch Ward) and Dorking Road (Woodcote Ward). In terms of achieving an upward housing trajectory this could be a valuable source of supply during the SHLAA period. This type of windfall site can include sheltered, student and other institutional accommodation.

**3.10.6 Town/ local centre upper floor living:** the SHLAA notes that a significant source of windfall supply exists within the Borough's town and local centres, where vacant upper floors could come forward for residential use. The suitability of such sites for reuse as housing is best assessed on an individual basis. Consequently, an exact yield from this source is unavailable. Any speculative application seeking the release of this source of supply should provide an assessment of the town/ local centres capacity to accept further residential uses within upper floor locations. The SHLAA acknowledges that these locations need to retain a healthy mix of retail, commercial, community, open space and residential uses in order to remain vital and vibrant. An imbalance in uses could degrade the primary retail/ commercial function of these centres.

### **3.11 Conclusions**

- 3.11.1 The emerging South East Plan allocates a minimum housing target of 3,980 units for Epsom & Ewell during the Plan period. An update of the housing delivery monitoring, until the end of February 2009, shows that over 2,000 units are already identified or committed through the planning system, to meet this target. This leaves a residual requirement of about 1,900 unidentified units for the SHLAA to identify as being deliverable and developable during the SHLAA period.
- 3.11.2 The SHLAA outputs clearly demonstrate that there are sufficient potential sources of identifiable housing land supply available to meet the housing target without having to rely upon a windfall allowance. A scenario based upon the virtually constrained sources of supply could yield nearly double the Borough's housing target. A more constrained scenario, utilising only those sites with a higher probability of delivery/ developability (Categories 1 – 3), could provide sufficient potential sources of supply to just meet the Borough's housing target.
- 3.11.3 Although the delivery of the constrained scenarios would meet the Borough housing target they provide less capacity for non-implementation. In simple terms, all of the sites identified within Categories 1 -3 would have to come forward in order to ensure that the Borough's housing target be met during the SHLAA/ LDF period. Monitoring through future AMRs may demonstrate that the potential sources of supply identified within Categories 1 – 3 are either coming forward too slowly, or not being delivered at all. The local planning authority will need to consider this possible scenario and how it might address it. The SHLAA identifies a number of options within its recommendations.
- 3.11.4 Having taken a conservative approach to site yields and densities, the average SHLAA site density is relatively low; in comparison to the SE Plan's minimum density target. This suggests that even within the constrained scenarios (comprised of just Categories 1 – 3) a higher yield could be achieved if densities were raised. This provides further weight to discounting the need for a windfall allowance. Raising the potential yields from potential sites classified under Categories 1 – 3 could provide greater certainty of meeting the housing target purely within the urban area. However, higher levels of urban intensification could have an adverse impact upon the distinctive character and appearance of the areas found within the Boroughs.
- 3.11.5 The current economic climate will undoubtedly have an impact upon when potential sources of future supply come forward. It will also have an impact upon site viability; the SHLAA has tried to take this into account within its assessment of individual sites. The SHLAA notes that during the housing boom period, Epsom and Ewell performed very well in delivering an upward housing trajectory; delivering 50% above its minimum target on a number of occasions. During this period even the smallest and most difficult sites came forward as sources of housing supply. Under the current economic climate such sites will not be financially viable. However, that will not always be the case and consequently the SHLAA has been optimistic in its assessment of site viability.



## **4. SOURCES OF HOUSING LAND SUPPLY: PEN PORTRAITS OF THE WARDS**

### **4.1 Introduction**

- 4.1.1 The following Chapter provides an overview of the Borough and its potential sources of housing land supply, broken down on a ward basis. This corresponds to the methodology used to identify and survey sites during Stages 3 – 5 of the SHLAA process, which used the political wards to break the Borough down into an easily digestible form.
- 4.1.2 The sites identified through the SHLAA process came forward from a variety of different sources. Many sites were known to the planning process, having either the subject of pre-application enquires, planning applications or appeals. Other sites came forward through consultation, either with internal corporate sources, or with the wider community. All of the sites identified through external consultation progressed to site visit stage.
- 4.1.3 All of the sites identified within this section were the subject of an initial desk top analysis (Stage 3 of the SHLAA process), further analysis to determine their suitability for a site visit (Stage 4 of the process) and following on from that the site visit itself (Stage 5). With the exception of one or two sites, which were identified as being unviable and undeliverable at an early point (Stage 4), all of the identified sites progressed to the site visit stage.
- 4.1.4 It is not the intention to provide an overview of every site surveyed during the course of the SHLAA. Rather, it is intended to identify the different types of housing land supply available within each Borough. Some of these sources are distinctive to their ward, whilst others commonly appear across the Borough.
- 4.1.5 Some of these identified common sources are typical examples of as yet unidentified windfall supply, which will also (inevitably) come forward during the SHLAA period. As per the SHLAA methodology (Appendix 1 Para 6.2), the SHLAA seeks to be comprehensive in site identification in order to minimise the reliance and future impact of windfalls – in simple terms seeking to identify the sources of windfall supply. The pen pictures of the Borough's ward clarify, as far as that is possible, these sources of windfall supply.
- 4.1.6 The ward pen pictures also seek to identify relevant constraints upon supply, density, yield, deliverability and viability. Again these are wide ranging, some being unique to specific locations, others being common across the Borough.
- 4.1.7 Where appropriate the pen pictures make reference to specific sites surveyed as part of the SHLAA process. The pen pictures do not seek to comment on all of the surveyed sites and neither do they contain all relevant information pertaining to those sites referenced. Further information about each individual site is set out in numerical reference order under Appendix 6.

## 4.2 Town Ward

- 4.2.1 The SHLAA process surveyed over fifty sites with housing potential within the Town Ward boundary. This was one of the highest numbers of sites within one ward area. This high number is indicative of the Ward's overall complexity, the wide variety and different types of available and potential sites; its high levels of accessibility and the higher intensity of existing uses (including residential) already present within its boundary. This is a very sustainable location for future housing growth. These factors combine to make the Town Ward one of the most viable development areas within the Borough.
- 4.2.2 The SHLAA process took note of the special qualities, opportunities and constraints present across the Ward. This included the five conservation areas, and nationally and locally listed buildings. Constraints, such as the surface water flow path (identified by the SFRA), landownership and infrastructure (such as the mains electricity line at Ref 216) were also taken into full account.
- 4.2.3 Given the extensive coverage of the five conservation areas much of Town Ward was not directly considered by the recent Environmental Character Study. However, the conservation areas either have or will be the subject of a Borough wide Conservation Area Appraisal and Management Plan programme, which is set to be completed by the end of 2010. The small elements of the Ward considered by the Environmental Character Study are addressed under Character Areas 22, 27, 33, 34 and 49 and Sub Character Areas 22 and 27A.
- 4.2.4 The Town Ward is one of the most highly accessible locations within the Borough with good access to regular inter-urban train services between London and the South Coast. In addition to the railway, the Town Centre has excellent bus service links that link through to locations to the north, south, east and west of the Borough. Pedestrian links, either in the form of roadside footways, or dedicated off-street footpaths/ alleyways are very well established with most amenities, facilities, services and opportunities being within walking distance of one another. The signed cycle routes into the town centre reflect its role as a transport node. The forthcoming Epsom Town Centre AAP will test options for improving access into the town centre.
- 4.2.5 Town Ward is focused upon the historic town centre commercial area located in the heart of Epsom. The town centre area comprises a busy high street shopping environment that broadly follows the A24 as it travels north through the Borough. The retail centre is focussed upon the Ashley Centre, which is located in the south west quarter of the Ward. The Ashley Centre is a modern purpose built shopping complex. The remainder of the town centre's retail area is comprised of a wide variety of different commercial units, dating from of different time periods – including properties dating to the 17<sup>th</sup> Century through to the 'parade' developments of the 1930s and modern contemporary units from the late 20<sup>th</sup> and early 21<sup>st</sup> Centuries.
- 4.2.6 Housing has always formed a vital component within the town centre; historically with provision provided on the upper floors of individual shop units. This tradition of housing has fluctuated over time, in part being dependent upon the historic retail/ commercial requirements. For example as some stores have increased in size their on-site storage requirements have also

increased (into the upper floors); centralised distribution and just-in-time resupply have witnessed the reversal of this trend with upper floors becoming surplus to storage requirements. This has resulted in new sources of housing land supply coming forward in the form of vacant upper floors on the High Street. There are a number of recent examples of this type of housing land supply source, including the permission for the re-use of the Post Office's upper floors (Ref 324). Notably, the recent closure of Woolworths (Ref 330) provides a potential example of future supply. Further as yet unidentified sources of housing land supply waits within the town centre's vacant and underused upper floors. The forthcoming Town Centre Retail Needs Appraisal and Health Check will provide an assessment of potential housing capacity from this source of supply.

- 4.2.7 One constraint to further intensification within the Town Centre is the current restrictive building height policy, which limits new buildings to four storeys (within the retail shopping area). A review of this policy could allow a modest relaxation of this policy in relation to future town centre housing development schemes. Such an approach could allow for the delivery of higher density housing schemes within highly sustainable locations, such as the Town Centre.
- 4.2.8 The contraction of the town centre's retail core has also yielded sources of housing land supply. These sources have come from derelict or surplus sites, which have tended to be located upon the retail centre's periphery. Recent examples of supply include Capital Square and Hudson House, both of which have retained or re-instated a retail element within the development. The SHLAA has identified a wide variety of peripheral sites, some of which are vacant or derelict (the former Iceland site Ref 256), others that are currently occupied but who have users that are seeking to relocate (the Fire Station Ref 255), and some where the landowners are actively seeking intensification through mixed use development schemes (the Baptist Church Ref 20 and the United Reform Church Ref 148). The SHLAA identifies other examples. However, given the unpredictable nature of landowner/ user aspirations/ objectives other currently unidentified sites of this type could come forward during the SHLAA period. Consequently, the SHLAA identifies this type of town centre periphery intensification as a distinct form of future windfall supply within the Borough.
- 4.2.9 East Street, which lies to the northeast of the Town Centre, is the Town Ward's (and the Borough's) main commercial (business) area. The East Street frontage is lined with office buildings interspersed with other commercial enterprises (such as the edge of centre Retail Park comprising Majestic and Staples). The East Street area is well defined starting where the Town Centre finishes (at the Hook Road junction) and ending at the Kiln Lane local centre. The northern part of the East Street area includes a scattering of modern flat/ apartment developments, which also front onto East Street. The SHLAA has identified a couple of additional sites (Refs 169 and 238) with potential for further intensification of this nature.
- 4.2.10 The East Street area also contains a number of large brownfield opportunity sites, which lie to land to the immediate north of East Street and east Hook Road. This land is currently occupied by a mix of utility infrastructure providers, including the National Grid, Scotia Gas and the local water company (See Refs 186 and 187). These underused brownfield sites are identified for a mix of uses within the current local plan. Contact with the

various landowner interests strongly suggests that the majority of the site could be brought forward for comprehensive redevelopment during the SHLAA period. This site is an appropriate location for a mixed use commercial and residential development scheme, comprised of modern office accommodation fronting onto East Street with residential to the rear. The adjacent Linton's Lane area (to the immediate east) provides a model of the type of commercial/ residential mix that could be achieved. Although, given the sites closer proximity to the town centre a higher density scheme is considered more appropriate.

- 4.2.11 At the Ward's northern most extreme lies the Nonsuch Trading Estate that also incorporates the Kiln Lane out of centre retail park. Although bounded by residential areas (both in Town and Ewell Wards) this part of the Ward is predominately commercial in its character and appearance. The housing potential within this part of the Ward is limited. The exception is a strip of scrub land currently safeguarded for the Kiln Lane link road (Ref 258). The long term deliverability of this link road is open question. It is scheduled to be considered for funding during the period up to 2016. Parts of this site are currently in temporary commercial (open storage) use. Given the uncertainty over the future of this site the SHLAA has made an unoptimistic assessment, discounting it as a source of supply.
- 4.2.12 The SHLAA surveyed two modern office buildings within the Town Ward for their housing potential; either as conversions or as redevelopment sites. These sites were Global House (Ref 301) and Shaftesbury House (Ref 327). Whilst the conversion of office buildings to residential has met with success elsewhere, such developments have tended to be in large centres with a healthy supply of commercial office floorspace. The recent Borough-wide Employment Land Assessment demonstrates that there is insufficient office provision within the Borough. This position is supported by the relatively low vacancy rates (for modern office facilities) and by continuing demand for further accommodation (based on information gained from local agents). Consequently, the SHLAA has taken a cautious approach to the housing potential from this source of supply.
- 4.2.13 In contrast the SHLAA also surveyed an unimplemented permission for a new office block (Ref 157). The failure to implement the identified scheme may be a side effect of the current economic climate. Equally, the failure may be attributable to changing and more flexible work patterns, which negate the need for expansive office floorspace. Whatever the reason, the SHLAA has taken a more optimistic approach on the basis that the employment use is unimplemented – as opposed to those sites where an employment use is already present.
- 4.2.14 To the immediate north of the Town Centre, to the north of the railway station and railway line, lies a predominantly residential area comprised of Edwardian terraces and 1930s semi-detached houses. Just like other suburban areas across the Borough, this residential area offers potential sources of housing land supply, which would have previously been classified as windfall sites (namely previously unidentified sites of unknown viability or deliverability). Typically, these are backland sites (such as Refs 166 and 237), back garden sites (such as Refs 164 and 165) or sites with potential for intensification (such as Refs 161 and 162). As with other similar sites across the Borough, the SHLAA has taken a cautious approach to the deliverability and viability of these sites. The exception to this being where planning history suggests an

improved prospect of delivery during the SHLAA period. During the site visit stage of the process (Stage 5) examples of windfall delivery were noted, most notably new housing adjacent to sites Ref 164 and Ref 167, which suggests that some of these sites could come forward.

- 4.2.15 In an almost mirror image of the Town Ward's northern residential area, the southern quarter of the Ward is characterised by high value residential properties, comprised of Edwardian terraces, larger detached housing and flats/ apartments. A large part of this distinctive residential area falls within the Church Street Conservation Area. Unlike the northern residential area, the road network is noticeably narrower with a high level of commuter parking during the working week. The exceptions being Ashley Road and Church Street, which provide an arterial link through to Epsom Downs and beyond.
- 4.2.16 Unlike the Ward's northern residential area, which has a number of backland opportunities and partially accessible rear garden plots, the southern residential area has few opportunities for further intensification. This is primary due to historic backland and infilling developments taking place. The residential area immediately south of the Parade serves as a very good example of successful intensification on backland and rear garden sites. It is notable that to the casual observer such high density residential development appears completely natural.
- 4.2.17 The southern quarter of the Ward contains two significant local institutions both with their own on-site accommodation. The first of these, the University for Creative Arts (Ref 254) sits within its own campus, complete with some student accommodation. The College is pursuing a planned growth strategy during the SHLAA period. As part of their plan, the College is seeking to increase the availability of accommodation for its first year students. Their objective is to provide this increase in provision either within the campus or on adjacent sites an alternative approach could secure new provision at the United Reform Church (Ref 148), or the Linton's Centre (Ref 187). Given the Colleges desire to increase provision the SHLAA has taken an optimistic approach to this issue.
- 4.2.18 The other institution, the Action for the Blind housing at Swail's House (Ref 303) would under normal circumstances be considered a good opportunity for further intensification. The site serves as rented residential accommodation for blind and partially sighted members of the community. This is a very low density development, which is coming to the end of its life. The SHLAA has applied a purely technical assessment of this sites potential as a source of supply. Clearly there are issues surrounding the re-housing of the existing residents. However, an intensification option could enable improved accommodation for existing residents through a market housing element on part of the site.

### 4.3 Ewell Ward

- 4.3.1 The SHLAA surveyed about 26 sites across this diverse Ward area. The Ward is comprised of a variety of different townscapes, including higher density residential areas, lower density suburban residential areas, Ewell Village local centre, local centres, out of centre retailing (Homebase on the Ewell Bypass), education provision, cultural facilities (Bourne Hall), the Hogsmill nature reserve, formal and informal open space provision and unmanaged urban scrubland. This diversity is reflected in the higher number of sites initially identified as being potential sources of housing land supply.
- 4.3.2 The SHLAA process took note of the special qualities, opportunities and constraints present across the Ward. This included the Ewell Village conservation area, which covers much of the Ward, and contains nationally and locally listed buildings. Other constraints and opportunities included; flood risk along the path of the Hogsmill (identified by the SFRA), landownership and the desire to retain strategic landscaping alongside the route of the Ewell Bypass were all noted by the SHLAA process.
- 4.3.3 Much of the Ward is covered by the Ewell Village conservation area designated and consequently was not directly considered by the recent Environmental Character Study. However, the conservation area has been the subject of a recent Conservation Area Appraisal and Management Plan review. Those residual parts of the Ward not covered by the conservation area designation were assessed by the Environmental Character Study and categorised under Character Areas 5, 20 and 21 and Sub Character Areas 5C, 5D, 21A and 21B. The SHLAA has noted the Character Study's commentary on these Areas and particularly notes its recommendations upon its sensitivity to accommodate further change, in relation to potential housing densities and yields.
- 4.3.4 The Ward is located close to the geographic centre of the Borough, to the immediate north of the Town Ward. The Ward is bounded two north-south railway lines to its north, west and south east. The A24 and the Ewell Bypass both bisect and bounds the Ward to the east and northeast.
- 4.3.5 Transport links to the Ward are very good. Frequent major route bus services operate along the Ewell Bypass and there is bus penetration into the core of Ewell Village along the east-west axis. The Ward is well served by north-south rail links, with Ewell West Station being within walking distance of much of the Ward area and Ewell East located just outside the ward boundary to the east. There are established footpath and cycle networks across the Ward.
- 4.3.6 In terms of accessibility, the Ward also benefits from having the vibrant Ewell Village local centre at its core. The Ward also contains part of the Castle Parade local centre (the other effective part being in Stoneleigh Ward), an out of centre retail use (Homebase) and convenience store (part of the petrol filling station) both located along the Ewell Bypass. Although the number of orthodox employment uses within the Ward is limited, there are a wide variety of service sector employers contained within its boundary. Notably, there are a number of institutional employers comprised of local government, education, and health and care facilities. Ewell Ward is a sustainable location for further intensification.

- 4.3.7 Ewell Village local centre sits at the heart of the Ward and forms its historic core. Identifying opportunities for intensification and potential sources of housing land supply within Ewell Village local centre was problematic. Historically, housing intensification has taken place; typically (as within Town Ward) potential sources of supply include upper floors above retail/commercial units. Given the unpredictability of this source of supply, the SHLAA assumes that this source will form part of the windfall component, and consequently has not identified a yield towards meeting the Borough's quantum. Equally unpredictable are brownfield sources of supply. The historic nature of Ewell Village suggests that comprehensive redevelopment and any resulting intensification is generally unlikely – there simply aren't any brownfield sites. However, the SHLA has identified recent proposals to redevelop the Cheam Road Motors site (Ref 274) for a mixed use scheme comprised of a food store and 28 units.
- 4.3.8 Along the outer edge of the Village local centre, the SHLAA identifies a number of different sources of supply, which demonstrate the diverse range of opportunity present within the Ward. Travelling south along the Cheam Road (away from the centre) there are two unmanaged open space/scrubland sites, the Dell (Ref 119) and Hatch Furlong east (Ref 125). The first of these is owned by the Borough Council and is in poor condition and of dubious value as open space. It considered a useful source of housing land supply. The adjoining Hatch Furlong east site although unused and of little formal open space value is considered an important piece of strategic landscape infrastructure for the Ewell Bypass. Nevertheless the SHLAA identifies the site as having some potential, particularly if developed in concert with the adjoining site.
- 4.3.9 The residential areas that surround Ewell Village local centre provide examples of typical sources of housing land supply. Notably the SHLAA identifies a small number of large dwellings within large single plots, which merit further analysis for their potential for intensification. The site at 76 West Street (Ref 130) is a good example of viable and deliverable source of supply. The existing dwelling is vacant. The site and the surrounding townscape have capacity to accommodate a number of different schemes with a variety of densities and yields. Consequently, the SHLAA has taken an optimistic approach with this site. In contrast, the long term potential of superficially similar sites such as 22 The Headway (Ref 127) could not be determined by the SHLAA, due to owner occupancy, high land values, difficult access arrangements and potentially negative impacts upon the character and appearance of the surrounding townscape.
- 4.3.10 To the north of the Village Centre the SHLAA identified two basic types of potential housing supply source, namely sites in active non-residential use and open space provision. The former potential sources of supply included uses such as the Telephone Exchange, London Road (Ref 132) and the domestic garage block at the rear of Holman Court, Church Street (Ref 116). Neither of these sites was considered viable or deliverable sources during the SHLAA period.
- 4.3.11 However, the SHLAA is more optimistic about the prospects for the TAVR Centre (Ref 113) and Etwelle Service Station (Ref 131), which could come forward individually or as part of a comprehensive scheme, retaining commercial uses and possibly incorporating adjacent sites (Refs 133 and 249).

- 4.3.12 The open spaces identified by the SHLAA to the north of the Village local centre are comprised of privately owned formal pitch provision (Ref 279), Borough Council owned informal open space and allotments (Ref 133 and Ref 108 respectively) and unmanaged scrubland (Ref 23 and Ref 278). The deliverability of these potential sources of supply is varied. The decision to release Borough Council owned open space provision will be difficult but could be justified on the basis that new or improved provision will be enabled/ provided elsewhere conceivably within the Green Belt. The release of privately owned open space is possibly an easier proposition. For example, the part development of the Salasian College sports ground (Ref 279) could either enable investment in the remainder of the site, or sports/ education facilities elsewhere. The adjacent sheltered housing scheme at Priory Court provides a template for the type of housing that could be accommodated on this site.
- 4.3.13 Open space sites that are unmanaged and have been allowed to return to a semi-natural scrub state present the SHLAA with an interesting challenge. Two such sites exist within the northern part of this ward. The first of these sites, land east of Church Street (Ref 278) appears to have been reserved as an extension to the adjoining church cemetery. However, its overall condition and the complete of a natural access from the cemetery suggest that its future role is open to question. Being a landlocked site, access is a major constraint and would require the demolition of an adjoining dwelling, which raises the overall cost of bringing a site like this forward particularly in the current economic climate. The SHLAA is not overly optimistic about the prospects for this type of site. However, allocation could raise its chances of delivery.
- 4.3.14 The other scrubland site identified by the SHLAA presents an interesting scenario for the Borough Council. Land to the rear of Elm Road (Ref 23) was historically a private allotment site that has fallen out of use and returned to a scrub woodland state. Site ownership is unknown. The site has access issues but these are not insurmountable. Once again allocation as a source of housing land supply could help bring the site forward during the SHLAA period.
- 4.3.15 The southern quarter of the Ward is dominated by the A24, which flows out of East Street, towards London. The area south of the A24 is comprised of residential uses, whose density increases southwards (towards Epsom) and decreases closer to Ewell. Land values correspond to these densities.
- 4.3.16 The potential sources of supply identified within these residential areas are typical for most of the Borough's residential areas, being either intensification within rear gardens (such as Ref 26) or intensification through demolition and comprehensive redevelopment (such as Ref 128). The potential for higher density flat schemes increases the further south one travels along the A24. As noted within the section covering the Town Ward, the area along East Street and adjoining the Kiln Lane junction is characterised by flat schemes, which serve as templates for future sources of supply.



#### 4.4 **Auriol and Stoneleigh Wards**

- 4.4.1 The SHLAA identified and surveyed eighteen sites with these two adjoining Wards. This is one of the lowest ward site yields identified by the SHLAA. This is primarily due to the existing character and residential densities present with these Wards. That is not to say that existing densities are high and physical capacity is low. Rather, the dominant suburban characteristics of the two Wards are such that significant increases in housing density will have a damaging impact upon the special character and appearance present within these Wards.
- 4.4.2 Although this part of the Borough contains neither conservation areas nor many listed buildings it does have a very distinctive suburban residential character. The Environmental Character Study classifies these Wards under two broad Character Areas (Areas 3 and 5), with two Sub Character Area (Areas 5A and 5B). The SHLAA has noted the Character Study's commentary on these Areas and particularly notes its recommendations upon its sensitivity to accommodate further change, in relation to potential housing densities and yields.
- 4.4.3 These Wards are located within the Borough's northern quarter. The Ward's southern, eastern and western boundaries are clearly defined by the adjacent road network; the Ewell Bypass/ Kingston Road runs along the southern and western boundary, whilst the London Road (A24) defines the eastern boundary. The Wards' northern boundary is less defined. The two Wards are separated from one another by a north-south railway line.
- 4.4.4 Transport links to the Wards are good. Frequent major route bus services operate along the Ewell Bypass/ Kingston Road and the London Road (A24) and there is some bus penetration into the core of these predominantly residential areas. The railway station at Stoneleigh Broadway is well sited in relation to the existing housing, the local centre and surrounding infrastructure, and is within walking distance of most locations within the two Wards.
- 4.4.5 The two Wards benefit from being in close proximity to a number of small local centres and shopping parades, which are either within the Wards themselves or immediately adjacent. These are Stoneleigh Broadway, which sites at the heart of the two Wards, Castle Parade (to the immediate south of Stoneleigh Ward), Stoneleigh Parade (located upon the Kingston Road) and Vale Road (located in the north Auriol Ward). The Wards are over 1 mile distant from the wider facilities available from the larger centre of Worcester Park, which is to the immediate north of the Wards, in the London Borough of Sutton.
- 4.4.6 The dominant character and appearance of these two Wards is 1930s suburban housing, serviced by linear suburban residential streets, the housing being punctuated by local centres, shopping parades, education and open space provision. The existing housing is primarily comprised of either large detached or semi-detached two storey buildings, although pockets of bungalows were noted within Auriol Ward. The overall housing density is low, being around 20 – 30 units/ ha. Whilst the Wards have their own unique character, there are similarities with other adjacent wards.

- 4.4.7 Given the Wards' special character and appearance, and the desire to maintain and enhance that character and appearance, the potential to identify sources of housing land supply was initially considered minimal. The desk top survey (Stage 3) suggested that clear opportunities for intensification among the existing housing stock would be limited to small windfall-type sites; typically large back garden sites.
- 4.4.8 However, access and multiple landownership issues effectively stymie many of these potential sources of supply. Consequently, only a small number of this type of site was surveyed. Nevertheless, a small number of sites were identified. Those sites considered most deliverable and viable being corner houses with large/ long back gardens adjoining the adjacent road network (such as Refs 101, 110, 111, 118 and 120). This type of site has been noted as a windfall in other parts of the Borough. In contrast large back garden sites, landlocked by surrounding housing (such as Refs 104 and 115) were considered to have little prospect of coming forward during the SHLAA period due to access, highland values, impact upon character and multiple ownerships.
- 4.4.9 In common with the rest of the Borough, the potential housing yield from previously developed land is low, an example of this source of supply being Ref 250 a former local plan housing allocation on the site of a former cinema, which has since been developed. Future sources were identified by the SHLAA on land to the rear of Stoneleigh Broadway local centre (Ref 243) but given the positive contribution made to the vitality and viability of the adjoining local centre, redevelopment for housing is not considered desirable. Similar opportunities were identified at two pubs (Refs 112 and 244), which are potential sources of supply either through comprehensive redevelopment or conversion. In addition, the part redevelopment of the Mead & Auriol School site (Ref 259) presents the SHLAA with an almost certain source of housing land supply, albeit with a yield reduced by design and access issues.
- 4.4.10 Stoneleigh Ward features two sources of supply on open space. The first of these is identified upon Park Avenue West informal open space and allotments (Ref 109). As with other open space/ allotment sites across the Borough, access to this mostly landlocked site is a constraint. However, its very concealment from the surrounding townscape provides an opportunity for higher densities (than the surrounding housing). The other open space site is the former Borough Council Nursery (still in Borough Council ownership), also known as the Cherry Orchard (Ref 114). This is a very sensitive site. Whilst its recreation value, and biodiversity interest and value are arguable (it is unmanaged degenerating scrub woodland) there is a local initiative to bring it forward as an extension to the adjoining Nonsuch Park. The potential release of any existing urban open space provision as a source of supply is entirely dependant upon the Borough Council preferred approach towards meeting its housing quantum.

## 4.5 College Ward

- 4.5.1 The SHLAA identified and surveyed thirty-two sites within College Ward. These sites are mostly made up of large houses on large plots along roads running into the town centre. The main constraint on the Ward is the large area of Green Belt to the east and south of the Ward. Outside of the Green Belt the Ward is mainly residential.
- 4.5.2 The SHLAA process has taken note of the special qualities, opportunities and constraints present across the Ward. This included the Downs Road, Burgh Heath Road, Worple Road and College Road Conservation Areas. These areas are all the subject of Conservation Area Appraisal and Management Reviews which are scheduled to be complete by the end of 2010. Other constraints and opportunities included landownership, high property values, maintaining and enhancing access to and the open quality of the Green Belt, and improving biodiversity. Epsom Downs Golf Club is also part of the Epsom Downs Grade 2 Site of Nature Conservation Interest.
- 4.5.3 The urban areas not covered by the conservation area were assessed by the Environmental Character Study and categorised under Character Areas 29,31, 33,38, 39 and Sub Areas 29A, 31a, 31b, 31c, 38a, 39b. The SHLAA has noted the Character Study's commentary on these Areas and particularly notes any recommendations upon their sensitivity to accommodate further change, in relation to potential housing densities and yields.
- 4.5.4 The Ward is located in the south east quarter of the Borough, bounded by the Green Belt and Ashley Road to the South, Epsom town Ward to the North East and other residential areas in Reigate and Banstead to the South East.
- 4.5.5 The Ward's transport links are focused on Ashley Road, Burgh Heath Road and Alexandra Road/ College Road which are arterial routes of the A24. Epsom Downs railway station is just outside the Ward and Borough, as is Tattenham Corner Station (both within Reigate and Banstead). These stations are more likely to be used by residents living to the south of the Ward as other residents may choose Epsom or East Ewell stations (both within walking distance) for their greater links with London. The Ward's residential areas are well served by existing footpath/ bridleway networks from Epsom, East Ewell and Epsom Downs.
- 4.5.6 There are no Local Centres identified in the ward but this is tempered by the close proximity to Epsom town centre of the northern part of the Ward. There is a convenience store on Burgh Heath Road which provides a local centre function serving the residential areas to the south of the Ward. The northern part of the Ward does contain several schools (including Epsom College), a GP Surgery and some areas of employment around Mill Road.
- 4.5.7 The ward has a mixed character with varying plot sizes and building scales. The predominant housing style is 1930s detached and semi-detached houses on generous plots. Around Alexandra Road there are long straight streets with large mature trees and a good interaction with the neighbouring green spaces. 6 sites have been identified by the SHLAA on Alexandra Road which are all large houses or large gardens with the potential for redevelopment and intensification, particularly for flats or apartments. At the northern end of Alexandra Road there are many four and three storey flatted developments already present, some of which are recent additions. There is potential on

Alexandra Road and other arterial roads such as College Road from the town centre for flattened development, and this area could be a source of windfall supply in the future. Other residential plots have been identified throughout the Ward where the plot sizes are large. In some areas of the Ward there are a number of small infills, increasing the diversity in range of styles of periods.

- 4.5.8 Another potential source of supply within this part of the Ward comes from the redevelopment of open space. The SHLAA recognises the potential that such open space sites have to contribute towards the Borough's sources of housing land supply. However, the SHLAA also recognises that open space release (as with Green Belt release) is dependent upon the wider assessment of need and/ or re-provision elsewhere within the locality, or improving (capacity) of other higher value open spaces. This understanding is reflected in the SHLAA's assessment of all open space sites and the options set out within the overall recommendations. The SHLAA identified a strip of scrubland at Mill Road (21) which has been the subject of some pre-application discussions. It also identified Alexandra Allotments (202). As with other open space/ allotment sites across the Borough, access to this mostly landlocked site is a constraint. However, its very concealment from the surrounding townscape provides an opportunity for higher densities (than the surrounding housing), and the possibility for partial development on a section of the site could possibly exist.
- 4.5.9 The SHLAA does accept that the release of well used allotment sites such as this is difficult.
- 4.5.10 The Metropolitan Green Belt places a considerable constraint upon the Borough's sources of housing land supply; particularly in terms of potential strategic provision. Put simply, there are few greenfield opportunities available within the Borough. Those greenfield opportunities that do exist outside of the Green Belt boundary (see Ref 202 above) are generally smaller sites that have a low yield (in strategic terms) and will be largely reliant upon existing infrastructure, rather than developing their own. Consequently, the SHLAA has taken a virtually unconstrained approach to potential housing sources outside of the existing urban area, in order to demonstrate strategic options of housing land supply. The two sites identified in the Green Belt in College Ward are land adjacent to Epsom Cemetery, Downs Road (266) and the land behind Beech Road (253). Both sites are adjoining existing residential areas and consist of large open fields used for grazing. Any future green belt release will require comprehensive assessment and review of sites such as these. It is essential to maintain the open quality of the Green Belt and as these sites would act as extensions to the existing urban area they may be more appropriate than some Green Belt sites.
- 4.5.11 Fundamentally, the Borough Council will need to decide how it intends to address potential sources of housing land supply currently located within the Green Belt, such as these two sites. If a release is required, a thorough analysis of all available potential sites should assess which Green Belt site(s) are appropriate for long term release. Consequently, the SHLAA identifies these two sites as appropriate sites for the latter part of the SHLAA period and beyond.

## 4.6 Court Ward

- 4.6.1 The SHLAA surveyed about 20 sites across this Ward area. The Ward is comprised of three distinctive areas; the Longmead Industrial Estate, along its eastern boundary, the Longmead and Long Grove Park residential areas at its core and the Metropolitan Green Belt, including the Horton/ Livingstone Park, St Ebba's and Hook Road Arena sites, to the north and west. This diversity is reflected in the type of site identified through the SHLAA.
- 4.6.2 The SHLAA process took note of the special qualities, opportunities and constraints present across the Ward. This included the Horton and St Ebba's conservation areas, which cover core areas within these two sites, and contain nationally and locally listed buildings. Other constraints and opportunities included; flood risk along Longmead Road (identified by the SFRA), landownership, under provision of open space and maintaining the open quality of the Green Belt.
- 4.6.3 The Horton and St Ebba's conservation areas will be subject to the Borough wide conservation area appraisal and management plan review process, which is scheduled to be completed at the end of 2010. The urban areas not covered by the two conservation areas were assessed by the Environmental Character Study and categorised under Character Areas 15, 16, 23, 24, 47, 49 and 50 and Sub Character Area 16A. The SHLAA has noted the Character Study's commentary on these Areas and particularly notes any recommendations upon their sensitivity to accommodate further change, in relation to potential housing densities and yields.
- 4.6.4 The Ward is located close to the geographic centre of the Borough, to the northwest of the Town Ward and southwest of Ewell Ward. The Ward is bounded by Horton Lane (part of the Hospital Cluster distributor road network) to the north and west, Chessington Road to north and northeast and the north-south railway line, in part, to the east. The Ward's southern boundary is less defined. This is reflected by the Environmental Character Study which defines this area under Character Area 24; a character area shared by the Ward and Town Ward.
- 4.6.5 The transport links to this part of the Borough are entirely road-based. Main route bus services enter the Ward from the south (from Epsom Town Centre) via Hook Road and Longmead Road, and from Chessington Road to the north. A bus service penetrates the Longmead Estate residential area off of Longmead Road. Pedestrian and cycle route links are good, with a direct off-road footpath linking the southern half of the Ward with the adjoining Town Ward (and the Epsom Town Centre beyond). The Ward has good access to employment and education opportunities. The southern and northern parts of the Ward have good access to existing local centre shopping facilities, either within the Ward itself, or immediately adjacent (on Chessington Road). Shopping provision in the centre and to the west of the Ward will be improved by the redevelopment of Hollymoor Road local centre and completion of Horton local centre respectively. Generally this is a sustainable location for further housing.
- 4.6.6 The centre of the Ward is predominantly comprised of residential uses, split between the Victorian and Edwardian housing around Hook Road and Lower Court Road, and the mixture of late 20<sup>th</sup> Century housing focused upon the Longmead Estate. The late Victorian and Edwardian housing is already built

to a relatively high density, being comprised of terraces and higher density semi-detached developments. Unlike some other residential areas, in other wards, the existing high density layout reduces opportunities for further supply – it could be argued that the land has already been developed efficiently. The sites identified by the SHLAA within this part of the Ward have commonalities with potential sources of supply identified in the neighbouring Town Ward to the immediate south. Most notable are two landlocked backland sites. The first of these sites, land at Horton Footpath Lower Court Road (Ref 221), has pedestrian access via a footpath that links through to Epsom Town Centre. Whilst the site has some potential as a source of supply, its release is entirely dependant upon the relocation of the existing on-site community uses. Consequently, the SHLAA is not optimistic about its prospects. The SHLAA is even less optimistic about the prospects for the other site as it is completely landlocked. However, the SHLAA has noted examples of successful release of housing land supply, for instance land rear of 49 – 71 Upper Court Road, which is a backland site recently developed for seven dwellings (05/00427FUL).

- 4.6.7 The SHLAA found that the late 20<sup>th</sup> Century housing developments centred upon the Longmead Estate also yielded few clear cut opportunities for future sources of housing land supply. It is considered that this is due to the existing densities and layouts found within this part of the Ward. These conspire to remove common sources of supply (found elsewhere in the Borough), such as vacant/ surplus backland sites and larger gardens. However, the SHLAA did identify two sites where the potential for comprehensive redevelopment could provide a source of supply through intensification. The first of these sites the Sefton Arms Hollymoor Road (Ref 176) is an existing planning permission (07/00893), which seeks to demolish a public house and replace it with 28 affordable housing units. The other potential opportunity for comprehensive redevelopment, the Gainsborough Road Estate (Ref 281), appears an unlikely prospect (during the SHLAA period) due to multiple landownership issues. Nevertheless there is potential to not only deliver significant intensification but also achieve housing renewal (the existing dwellings were built to low specifications).
- 4.6.8 Another notable potential source of supply within the Longmead Estate area is surplus school playing field land (Ref 178 and Ref 282). The SHLAA identifies these two sites as under utilised and low value open spaces that, upon release, could form logical extensions to neighbouring residential areas. It is conceivable that the release of these sites could enable improvements to other recreation or education facilities within the wider site area. The release of these sites is dependent upon the local education authority and/ or the aspirations of the school itself.
- 4.6.9 The eastern section of the Ward provides few opportunities for future sources of housing land supply. This is primarily due to the employment uses (Longmead Industrial Estate) that dominate this area. The one exception identified by the SHLAA is land at Longmead Road/ Gibraltar Crescent (Ref 136), which is currently low value open space/ strategic landscaping. The site has some potential to come forward as future potential source of housing land supply. The release of the site is dependant upon the Borough Council making a decision on the future development potential of its low quality/ under-used open space provision. Equally, there needs to be a resolution as to the most appropriate re-use of the site, namely, residential or new

community infrastructure. Consequently, the SHLAA has taken a cautious approach to potential from this site.

- 4.6.10 The western half of the Ward provides very good examples of the sources of housing land supply that have helped meet the Borough's housing quantum at a strategic level; namely Horton/ Livingstone Park and St Ebba's, two of the four sites identified as part of the strategic Hospital Cluster housing allocation. The Hospital Cluster allocation was comprised of four redundant hospital campuses set within the Metropolitan Green Belt. Two of these hospital campuses, The Manor and Long Grove/ Clarendon Park are now complete. The third, Horton/ Livingstone Park, is almost finished, the Horton B site (Ref 217) being the one outstanding component. The St Ebba's site (Ref 251) is the final hospital campus to come forward as part of the Cluster Allocation, and has recently gained planning permission for 322 units (08/00576RES). A fifth hospital campus, West Park (Ref 252 see commentary on Stamford Ward) is also set to come forward for redevelopment shortly. The Hospital Cluster sites have provided the Borough with its sole strategic sources of housing land supply.
- 4.6.11 The Metropolitan Green Belt places a considerable constraint upon the Borough's sources of housing land supply; particularly in terms of potential strategic provision. Put simply, there are few greenfield opportunities available within the Borough. Those greenfield opportunities that do exist outside of the Green Belt boundary (for example Ref 208 see commentary on Nonsuch Ward) are generally smaller sites that have a low yield (in strategic terms) and will be largely reliant upon existing infrastructure, rather than developing their own. Consequently, the SHLAA has taken a virtually unconstrained approach to potential housing sources outside of the existing urban area, in order to demonstrate strategic options of housing land supply.
- 4.6.12 Court Ward contains four such site options. The greater Horton Farm site (comprised of Ref 220, Ref 267 and Ref 268) provides a potentially useful source of strategic supply. The entire site is contained within the defensible boundary of Horton Lane, which acts to defend further incursion into the Green Belt, and the sensitive Horton Country Park nature reserve to the northwest. Equally the site is relatively well located in relation to the existing urban area, adjoining housing developments (including Horton/ Livingstone Park and St Ebba's), existing infrastructure, and a range of education and employment opportunities and local facilities, services and amenities. Importantly, the site is owned by English Partnership, a potential partner that could ensure successful delivery. Whilst the SHLAA recommends the greater Horton Farm site as a potential strategic option it is accepted that any future Green Belt release will require comprehensive assessment and review. Consequently, the SHLAA identifies this as an appropriate strategic site for the latter part of the SHLAA period and beyond.
- 4.6.13 In a similar vein, Hook Road Arena (Ref 265) also provides a potential strategic source of supply within the Metropolitan Green Belt. However, the existing and planned for open space uses suggest that the site be retained. A potential option for the Borough Council's consideration is that the Arena site be retained and enhanced for leisure uses, possibly with improvements being enabled through the release of low value urban open space sites as sources of housing supply.

## 4.7 Cuddington Ward

- 4.7.1 The SHLAA identified and surveyed around twenty three sites within this Ward. This is one of the lowest ward site yields identified by the SHLAA. This is primarily due to the existing character and residential densities present with this Ward. That is not to say that existing densities are high and physical capacity is low. Rather, the dominant suburban characteristic of the Ward is such that significant increases in housing density will have a damaging impact upon the special character and appearance present within this Ward.
- 4.7.2 Although this part of the Borough contains neither conservation areas nor many listed buildings it does have a very distinctive suburban residential character. The Environmental Character Study classifies these Wards under two broad Character Area (Areas 1, 2, 3 and 6), with Sub Character Area 2A. The SHLAA has noted the Character Study's commentary on these Areas and particularly notes its recommendations upon its sensitivity to accommodate further change, in relation to potential housing densities and yields.
- 4.7.3 This Ward is located within the Borough's northern quarter. The Ward's strongest boundaries are defined by the London Victoria railway line to the east, the A240 Kingston Road (in part) to the southwest and the Worcester Park Road (Hogsmill River) to the west. The Ward's northern boundary (with Kingston Borough) is entirely artificial.
- 4.7.4 Transport links into the Ward are relatively speaking not as good as those available to other parts of the Borough. Although is well served by an established residential road network, through routes, between Kingston Road (to the southwest) and Worcester Park (outside of the Borough to the northeast) are limited to Grafton Road/ The Avenue and Salisbury Road. There is some bus penetration into the core of this predominantly residential area along these through routes. Whilst the Ward lacks a railway station of its own, the northern part of the Ward is within walking distance of Worcester Park station, which lies just outside of the Borough boundary to the northeast. Shopping opportunities within this Ward are noted as being limited to the Vale Road local centre, which is shared with Auriol Ward to the immediate south. Again the larger centre at Worcester Park (in Sutton Borough) is within walking distance for most of the Ward's northern half. The south western part of the Ward is within walking distance of the Kingston Road/ Ruxley Lane local centre.
- 4.7.5 The SHLAA notes that the Ward is predominantly residential in character and appearance, being punctuated by open space provision and some small scale semi-rural uses at Cromwell Road and Old Malden Lane. It is also noted that the Ward contains small pockets of woodland; including Dancer Dick Wood, which may shortly be reclassified as ancient woodland.
- 4.7.6 The Ward's existing housing is primarily comprised of either large detached or semi-detached two storey buildings. The northern part of the Ward, particularly along and off the Avenue is noted as containing noticeably larger single dwellings (in larger plots), and as it approaches Worcester Park flat/ apartment developments. The overall housing density is low, being around 20 – 30 units/ ha. Whilst the Ward has its unique character, there are similarities with other adjacent wards.



- 4.7.7 Given the Wards' special character and appearance, and the desire to maintain and enhance that character and appearance, the potential to identify sources of housing land supply was initially considered minimal. The desk top survey (Stage 3) suggested that clear opportunities for intensification among the existing housing stock would be limited to small windfall-type sites; typically large back garden sites. However, access and multiple landownership issues effectively stymie many of these potential sources of supply. Consequently, only a small number of this type of site was surveyed. Nevertheless, a small number of sites were identified. Those sites considered most deliverable and viable being corner houses with large/ long back gardens adjoining the adjacent road network (such as Refs 92, 93, 94, 95, 97 and 98). This type of site has been noted as a windfall in other parts of the Borough. In contrast large back garden sites, landlocked by surrounding housing (such as Refs 87, 89 and 122) were considered to have little prospect of coming forward during the SHLAA period due to access, highland values, impact upon character and multiple ownerships. Surprisingly, the planning history for land rear of 117-119 Salisbury Road (Ref 88) suggests that such sites can occasionally be brought forward by landowners as a source of supply. However, because the site has no planning permission, the SHLAA to taken a cautious approach to its delivery during the SHLAA period.
- 4.7.8 More certain sources of supply present themselves in the form of intensification through comprehensive redevelopment. The house at 57 Salisbury Road (Ref 91) has an existing permission for redevelopment as a block of 12 flats. Other sites of this nature come forward during the SHLAA period as a source of windfall supply. A clearer example of supply is provided by the garages to the rear of Marland Court (Ref 99), which have permission for 8 residential units. Surplus, underused or derelict garage blocks can provide a useful source of supply – some wards have a greater potential for this than others. The overall potential within this Ward, beyond this site, is limited. As with all sites with recent permissions, the SHLAA is optimistic in terms of delivery.
- 4.7.9 The SHLAA also notes the limited opportunities for identifying sources of supply in the southwest corner of the Ward, in the residential focused upon Grafton Road and Mortimer Close. Whilst this part of the Ward may yield housing from windfall sources, during the SHLAA period, their unpredictability renders site specific identification impossible. Sources of windfall supply within this area of the Ward will come from the comprehensive redevelopment of single or multiple plots. Whilst the plots within this part of the Ward contain large rear gardens, these lack sufficient depth to allow them to come forward as a source of supply by themselves.
- 4.7.10 The other significant potential source of supply identified within the Ward comes from its open spaces. At one end of the scale the SHLAA examined the potential to release the southern part of Shadbolt Park (Ref 85) as a source of supply. Although such a release appears tempting, as a logical rounding off of the surrounding townscape, at the desk top level (Stage 3 of the SHLAA process), its deliverability is ultimately problematic for many reasons. Consequently, the SHLAA discounts this site as a deliverable source of supply during the SHLAA period. Equally, the issues of access, ecological and biodiversity interests suggest that Dancer Dick Wood and land rear of Old Malden Lane (Ref 311 and Ref 260) are also unlikely to come forward.

4.7.11 In contrast land rear of Grafton Park Road and Royal Avenue Open Space (Ref 84 and Ref 312) are both thought to have potential as sources of supply, providing that an appropriate development takes full account of surrounding tree cover issues. However, given their active use as informal open space provision any decision on release will require further assessment of their value, which suggests that their potential as a source of supply is focused upon the end of the SHLAA period and beyond.

## 4.8 Ewell Court Ward

- 4.8.1 The SHLAA identified and surveyed thirteen sites within this Ward, which is the lowest ward site yield within the Borough. As per other adjacent wards, the low yield of sites is primarily due to a combination of constraints, ranging from the Ward's established character and appearance, a lack of vacant, derelict or previously developed urban land and the difficulty in clearly identifying sites that could come forward as part of the windfall supply.
- 4.8.2 Although this part of the Borough contains neither conservation areas nor many listed buildings it does have very distinctive suburban residential characters. The Environmental Character Study classifies the Ward within five broad Character Areas (Areas 4, 6, 7, 8 and 9). The SHLAA has noted the Character Study's commentary on these Areas and particularly notes its recommendations upon its sensitivity to accommodate further change, in relation to potential housing densities and yields.
- 4.8.3 The Ward is located within the Borough's northern quarter and forms part of the Borough's boundary with Kinston Upon Thames. The Ward's boundaries are clearly defined by the Hogsmill nature reserve to the north, south and west, the north-south railway line to the southeast and the Kingston Road (in part) to the east. The Hogsmill nature reserve provides a solid constraint to development along the southern part of the Ward, containing biodiversity interest and being an area of flood risk.
- 4.8.4 Transport links to the Ward are good. Frequent major route bus services operate along the Ewell Bypass/ Kingston Road and there is bus penetration into the core of the residential areas along Ruxley Lane.
- 4.8.5 In terms of accessibility, the Ward also benefits from being in close proximity to a couple of small local centres, which are either within the Ward itself or immediately adjacent. These are the Kingston Road/ Ruxley Lane junction local centre, which has a wide range of shops and facilities and Stoneleigh Parade, which is located further south along the Kingston Road.
- 4.8.6 The dominant character and appearance of these two Wards is 1930s suburban housing, serviced by linear suburban residential streets, the housing being punctuated by local centres, education and open space provision. The existing housing is comprised of either large detached or semi-detached two storey buildings, a number of bungalow developments. The wider diversity in character is detailed within the Environmental Character Study. The open spaces found within this Ward, most notably the Hogsmill and Ewell Court House, positively contribute to its character and appearance. The overall housing density is low, being around 20 – 30 units/ ha. Whilst the Ward has its own unique character, there are similarities with other adjacent wards.
- 4.8.7 As with other wards, the opportunities for deliverable housing land supply from intensification of existing housing were limited. Only a handful of rear garden sites merited surveying through the SHLAA. These included, land rear of Huntsmoor Road (Ref 9), which also incorporated a block of domestic garages and land rear of Chestnut Avenue (Ref 105). Neither of these sites was considered deliverable during the SHLAA period, due to access, ownership and site size issues.

- 4.8.8 In contrast, the Ward is considered to have some potential as a source of supply through demolition and comprehensive redevelopment of existing dwellings. Within the Ward's suburban estates examples of this form of intensification have already taken place; 8 Percival Way (Ref 12) is a good example, where a single dwelling has been demolished and replaced with multiple dwellings. Such developments are indicative of the type of small scale urban intensification typically found across the Borough. This type of site has traditionally fallen within the windfall category. Other sites such as Percival Way may lie undiscovered elsewhere within this Ward. Whilst the Borough Council may decide to encourage this source of windfall supply, caution should be exercised to ensure that there are no negative impacts upon its wider character and appearance.
- 4.8.9 Additionally, along the Kingston Road other forms of housing intensification have, or are about to take place. Notably, the sheltered housing development at Calverly Court (on the northern side of the Kingston Road) provides a model for a type of high density intensification that could be accommodated on the adjoining site at 376 – 380 Kingston Road (Ref 124). To the south of the Kingston Road (Ref 262), the demolition and redevelopment of six houses for a mixed use development comprised of nine units and a food store provides an appropriate model for mixed-use schemes.
- 4.8.10 The SHLAA identified four potential sources of supply from existing open space provision. The majority of these potential sources are either difficult (at best), or impossible to deliver with any certainty during the SHLAA period. The Ward's sole allotment site (Ref 30) is practically landlocked by surrounding housing. As with other similar sites, access could be gained via demolition of an adjoining house, although final housing yields would be low. Land to the rear of 126-148 Curtis Road (Ref 107), would appear to provide an opportunity to logically extend the neighbouring housing. However, potentially adverse impacts upon the Hogsmill nature reserve, which this site forms part of, ultimately make it unsustainable. In a similar vein, the development of land at Timbercroft (Ref 117) although physically possible, would have a significant negative impact upon the character and appearance of the surrounding area.
- 4.8.11 The redevelopment potential of the scrubland used as informal open space adjoining St Francis' Church, Ruxley Lane (Ref 11) provides a useful illustration of a mixed use scheme comprised of community and residential uses. The open space is unmanaged and in poor condition; its redevelopment could provide an enabling opportunity to secure improved community facilities as well as a source of housing land supply.

## 4.9 Nonsuch Ward

- 4.9.1 The SHLAA surveyed over 30 sites across this Ward. The Ward can be divided into three basic types of land use. Residential uses are the dominant built form of development, with the core Nonsuch residential area being located at the heart of the Ward and Ewell Downs area to the southwest. The Metropolitan Green Belt separates these two residential areas and provides an important open space gap between Epsom's urban settlements and the neighbouring settlements of Cheam and Nork. Although not part of the Metropolitan Green Belt, Nonsuch Park, in the northern quarter of the Ward, also provides a valued local open space gap between Epsom's settlements and parts of Cheam. It is designated as Strategic Open Space. It is noteworthy that Nonsuch Park also separates the Ward's core residential area from Stoneleigh Ward to the north. The implications of these three separate areas have been taken into account by the SHLAA in terms of considering potential sources of supply, density and yield.
- 4.9.2 The SHLAA process took note of the special qualities, opportunities and constraints present across the Ward. This included Ewell Downs Conservation Area and any nationally and locally listed buildings found across the Ward. Other constraints and opportunities included; the flood risk along a surface water flow path (identified by the SFRA along the Cheam Road), landownership, high property values, the value of Nonsuch Park as a site of archaeological and historic interest, maintaining and enhancing access to and the open quality of the Green Belt, and improving biodiversity.
- 4.9.3 The Ewell Downs Conservation Area has recently been the subject of conservation area appraisal and management plan review, which was adopted at the end of January 2009. The urban areas not covered by the conservation area were assessed by the Environmental Character Study and categorised under Character Areas 18, 19 and 28 and Sub Character Areas 18A and 19A. The SHLAA has noted the Character Study's commentary on these Areas and particularly notes any recommendations upon their sensitivity to accommodate further change, in relation to potential housing densities and yields.
- 4.9.4 The Ward is located to east of the Borough's geographic centre, to the northeast of the Town Ward and east of Ewell Ward. The Ward is bounded by the A24 to its north (as the London Road) and to the west (as the Ewell Bypass/ Kingston Road). The Ward's eastern boundary is less defined, following part of the Nonsuch Park boundary in the north, before running along the outer boundary of the Metropolitan Green Belt as far as Drift Bridge. The Ward's south western boundary approximately follows the outer boundary of the Ewell Downs residential area.
- 4.9.5 The Ward's transport links are focused upon the Cheam and Reigate Roads, which are arterial routes radiating out from A24. Main service inter-urban bus routes use these routes. The west of the Ward is also served by Ewell East railway station, which is within walking distance of much the Ward's core residential area (north of the Cheam Road). The Ward's residential are well served by existing footpath networks. The Metropolitan Green Belt between Reigate and Cheam Road is crossed by a public footpath/ bridleway. Nonsuch Park has a number of signed footpaths and cycle routes. Whilst the Ward's residents have access to a variety of transport choices (in terms of infrastructure and services), the Ward is relatively inaccessible in terms of

employment and education opportunities, shopping and community facilities, and other services and amenities. It is noteworthy that this is the only ward in the Borough with neither a local centre nor convenience food store. The nearest facilities and amenities are located in Ewell Village to the west and Cheam to the east.

- 4.9.6 The Ward's central residential core is primarily located upon rising ground between Cheam Road to the south and Nonsuch Park to the north. Although this residential area is cut in half by the London Victoria railway line, the Environmental Character Study categorises this as a single unified Character Area. The Character Study notes that the area *"forms a fine example of the 1930's estates which are indicative of the north of the Borough"* and that *"the area's overall uniformity and quality are reflected in the sensitivity to change"*. This initially suggested to the SHLAA that opportunities for identifying new sources of future housing land supply within this part of the Ward would be limited. Whilst in numerical terms the SHLAA has not identified a high yield from this part of the Ward it has identified examples of supply, which could be brought forward within its urban design related sensitivities.
- 4.9.7 Whilst this part of the Ward contains many large rear gardens their potential as a source of supply is limited due to poor access and multiple landownership. A better source of supply, both in this Ward and in other similar northern wards, is from comprehensive redevelopment of existing residential plots. A good historic example of this is Mint Water Close and Charlemont House both located at the far western end of Cheam Road. The former being a small cul-de-sac of family homes and the latter a larger flat scheme, both sites benefit from good access to public transport services and closer proximity to the services and amenities available from Ewell Village. The SHLAA also identified an adjacent site, 37 Cheam Road (Ref 320), where this localised trend of intensification through comprehensive redevelopment continues. The SHLAA suggests that other opportunities for this type of intensification exist along those sections of Cheam Road that have good access to public transport. Another identifiable example of this source of supply being the Public House Cheam Road (Ref 43), which could be suitable for intensification either through conversion or comprehensive redevelopment.
- 4.9.8 A number of sites were identified and surveyed within the Ewell Downs residential area in the south of the Ward. In many respects this residential area has the same characteristics and consequently constraints to intensification as those set out above. It is tempting to suggest that the overall quality of this areas character and appearance, not to mention its designation as a Conservation Area, minimise potential sources of deliverable supply even further. Certainly sites such as 19 & 21 The Green (Ref 53) and 13 & 15 Higher Green (Ref 50) have minimal potential as sources of supply. The overall value of these sites, their qualitative value to the conservation area and the relatively low yield that could result from their intensification strongly suggests that they will not come forward during the SHLAA period. However, other sites 72 Longdown Lane (Ref 299) and 56 & 58 Reigate Road (Ref 54) have potential as sources of supply. Both sites lie outside of the conservation area and sit within a more diverse townscape (IE the surrounding developments are not to a uniform style). Both of these sites also lie upon main bus service routes. The SHLAA suggests that both have to be viable sites for intensification, either through conversion or comprehensive redevelopment, following a similar model to the flat/

apartment schemes identified along Cheam Road. Equally, the SHLAA suggests that other examples of this type of supply may exist at other points along the Reigate Road and close the Longdown Road/ College Road junction. The SHLAA believes that this will be a source of windfall housing supply during the SHLAA period.

- 4.9.9 The Metropolitan Green Belt places a considerable constraint upon the Borough's sources of housing land supply; particularly in terms of potential strategic provision. Put simply, there are few greenfield opportunities available within the Borough. Those greenfield opportunities that do exist outside of the Green Belt boundary (see Ref 208 below) are generally smaller sites that have a low yield (in strategic terms) and will be largely reliant upon existing infrastructure, rather than developing their own. Consequently, the SHLAA has taken a virtually unconstrained approach to potential housing sources outside of the existing urban area, in order to demonstrate strategic options of housing land supply.
- 4.9.10 The SHLAA surveyed six sites located in the Metropolitan Green Belt within the Ward. Some of these sites were considered unlikely to come forward during the SHLAA period, either because of their existing land uses, namely the NEScot site (Ref 276), or through being poorly located in relation to the existing urban area, such as the North Looe Estate (Ref 273). The SHLAA notes and underscores that the essential quality of the Metropolitan Green Belt in this location is in providing a clearly identifiable visual gap between settlements. The depth of the Green Belt at this location is very shallow, which demands any future release be sensitive in terms of scale and relationship to the existing urban area. Sites dislocated from the existing urban area, such as the North Looe Estate, would form crude intrusions into the Green Belt, severely eroding its value at this location.
- 4.9.11 However, some of the surveyed sites do offer potential options as sources of supply. For example, land to the rear of Reigate Road (Ref 283). This site is well concealed and is barely visible for either the immediate surrounding area or the wider landscape. The SHLAA suggests that a future Green Belt review consider a variety of housing options for site, ranging from a modest scale development, involving the northern part of the site, or a comprehensive development. Whatever the scale of any development on this site, it is recommended that landscaping to the south of the site be an integral element to minimise any impact.
- 4.9.12 Another suggested potential source, albeit modest, could comprise a small part of the Northey Estate site (Ref 272). The SHLAA suggests that an option to release a modest portion of this site, fronting the Cheam Road at Howell Hill, be explored. Such a release could enable the remainder of the Northey Estate (to the south) to be retained as open Green Belt as an extension to the adjacent Howell Hill nature reserve (located to the east of the site). This would allow not only introduce a management regime for the site (although agricultural land, the site is not in active use) but could also see biodiversity improvements and help provide a continuous link through from Howell Hill to the Green Belt land to the south of Banstead Road. There would also be the potential to include the former quarry site (Ref 209) as a component of the wider nature reserve. The SHLAA notes that the site is in County Council ownership, and that consequently the landowner (as public body) has a duty under the 2006 Act to enhance biodiversity interests upon its land assets, and

that this duty is also assess under the National Indicators. This suggests that the above option could be delivered during the SHLAA period.

- 4.9.13 In a similar vein, the SHLAA examined a potential source of housing land supply, which would enable the development of a nature reserve across the chalk grassland at Priest Hill. The derelict sports pavilions at Reigate Road (Ref 175) provide an opportunity for a modest source of housing supply within the existing building footprint. Careful landscaping of a scheme at this location would minimise any impact upon the wider landscape. As with the potential options for Northey Estate, a managed nature reserve would not only improve the character and appearance of the Green Belt at this location but would also enhance any biodiversity interest. It would also improve public access to the Green Belt.
- 4.9.14 In addition to the longer term potential sources of supply identified within the Green Belt the SHLAA also examined a small number of open space sites found within the Ward.
- 4.9.15 Two of these form part of the wider Nonsuch Park area, which lies within the northern half of the Ward. Nonsuch Park provides an important strategic open space resource not only for the Borough but also for the adjoining London Borough of Sutton. Although it is not contained within the Green Belt designation, the Park does perform a secondary role as a de facto buffer between settlements. The Park is also designated as a Site of Nature Conservation Interest, and also has historic and archaeological interest.
- 4.9.16 However, there are potential sites located along the Park's periphery that merited further consideration through the SHLAA. The first of these sites is land at lower Nonsuch Park (Ref 313). This site is comprised of a former (historic) landfill site that has returned to a semi-natural scrub woodland state. The site is immediately adjacent to an existing residential area, a potential access point and another, similar, SHLAA site (Ref 114 see Stoneleigh Ward section for commentary). The site is not currently managed and is considered to be of low value in countryside/ biodiversity terms. It has been suggested that the development of the site could fund countryside management measures elsewhere within the Borough. The SHLAA is not optimistic about this site's prospects.
- 4.9.17 The other site surveyed by the SHLAA within the wider Nonsuch Park area is the Woodland Trust land at Warren Farm (Ref 245). Again this peripheral site appears to offer a potentially good source of supply, being adjacent to an established residential area, with access off the existing road network. However, given the current landowners long term objectives for this site, as future woodland, release as a source of supply is thought unlikely.
- 4.9.18 The two other open space sites identified by the SHLAA within the Ward are worthy of individual attention. Both of these sites are located to along the Ewell Bypass/ Kingston Road. The first of these sites is the nursery at hatch Furlong west (Ref 35). Ostensibly open space, the site is in active use as a commercial nursery. In visual terms the current on-site uses provide some strategic landscaping for the adjoining Bypass. As per Hatch Furlong east (Ref 125), this site provides some potential as a modest source of supply, which if released could incorporate a managed landscaped component. The site adjoins the Mint Water Close development (see above), which suggests that a modest housing yield could be accommodated within its boundary.



Consequently the SHLAA has taken an optimistic position. As with all of the SHLAA sites considered to be deliverable, should the planning authority take a contrary view, alternative sites will need to be examined.

- 4.9.19 The other site located along the Ewell Bypass/ Kingston Road is significantly larger but in other respects similar to Hatch Furlong east. The NESCOL Animal Husbandry land (Ref 208) is currently used as part of the adjoining NESCOL college site; teaching students to care and maintain farm animals. Although private land with no public access it does provide secondary functions as visual open space amenity land and de facto strategic landscaping for the adjoining Bypass. In contrast to other sites within this Ward, the site is well located in relation to access to infrastructure and other existing facilities, services and amenities. It is known that the landowner has a medium term objective to relocate the current on-site uses, making the site surplus to their requirements. As a potential source of supply, this is the largest greenfield site contained within the existing urban area, which means that it is also the only strategic site available without undertaking a Green Belt review. As such, it forms an extremely valuable component towards meeting the housing quantum. As above, should the planning authority take a contrary view, alternative sites will need to be examined.

## 4.10 Ruxley Ward

- 4.10.1 The SHLAA identified and surveyed 29 sites in Ruxley Ward. This is one of the highest yield numbers within a ward to the north of the Borough, identified by the SHLAA. This is mainly due to the range of different types of site in the area, the large number of garage sites identified and the previous planning history on Chessington Road. The main constraint to the Ward is the large area of Green Belt/ Nature Reserve at Horton Country Park and the Flood Zones to the north (as identified in the Epsom and Ewell Strategic Flood Risk Assessment).
- 4.10.2 The Environmental Character Study classifies the ward within character areas 9, 10 and 10A. The SHLAA has noted the Character Study's commentary on these Areas and particularly notes its recommendations upon its sensitivity to accommodate further change, in relation to potential housing densities and yields.
- 4.10.3 The ward is located at the north west of the Borough, forming part of the northerly band of suburban development along the Borough's northern boundary. The ward's northern boundaries are clearly defined by the Hogsmill Open Space and Bonesgate, and its southern boundary runs through Horton Country Park in the Green Belt. The ward boundary to the east is less easy to define, running behind the high school and down Horton Lane, also through the Green Belt. The Hogsmill nature reserve provides a solid constraint to development along the southern part of the Ward. Containing biodiversity interest, flood risk, and the Green Belt at Horton Country Park provide a solid constraint to the majority of the southern part of Ruxley ward.
- 4.10.4 Transport links to the ward are not as good as some, and there are no train stations within 1000 metres. Frequent major route bus services operate along Kingston Road and Chessington Road and there is bus penetration into the core of the residential areas along Ruxley Lane.
- 4.10.5 The Ward benefits from two shopping areas at Ruxley Lane- Gatley Avenue and Chessington Road- Ruxley Lane. The ward is also home to various community facilities including Epsom and Ewell High School, Cox Lane Community Centre and GP Surgery and The Edge Youth Centre.
- 4.10.6 The character and appearance of the Ward is quite mixed in terms of built provenance, with 1930's, 1950's and 1960's properties and has a mixed road layout with varying sized plots and positioning. The built form is predominately 2 storey semi-detached with occasional blocks of flats, terraces and detached properties (mainly on Ruxley Lane and Chessington Road). To the northern part of the ward is the 1960s Watersedge Estate which mainly consists of 3 storey flatted blocks, with a higher density than the surrounding ward. The southern part of the ward consists mainly of open space (Horton Country Park and Golf Club) and its boundaries merge into the Green Belt land at Stamford Ward.
- 4.10.7 The range of sites that were identified through the SHLAA are more varied than some neighbouring wards (eg Ewell Court and West Ewell). Only three back garden sites were surveyed (ref 135, 137 and 319) and these were identified due to their planning history. The Ward is considered to have more potential as a source of supply through demolition and comprehensive redevelopment of various under used sites (such as low density housing or

garages). The SHLAA identified a hand full of residential sites for redevelopment including sites at Chessington Road (ref 16 and 223) and Ruxley Close (ref 140) with outstanding planning permissions. The sites on Chessington Road are examples of the types of site that might come forward on this road as windfall sites in the future. Twelve garage sites were identified as a potential source for housing, but most were discounted due to poor access/ small site size and multiple ownership issues. Opportunities were identified at three community facilities in the Ward. The Methodist Church at Ruxley Lane has been granted permission for 16 residential units, and The Edge Youth Centre (134) and Cox Lane Centre (305) were considered important community facilities and were therefore considered to have limited housing potential.

- 4.10.8 The Metropolitan Green Belt places a considerable constraint upon the Borough's sources of housing land supply, particularly in terms of potential strategic provision. There are few greenfield opportunities available within the Borough. Consequently, the SHLAA has taken a virtually unconstrained approach to potential housing sources outside of the existing urban area, in order to demonstrate strategic options of housing land supply. The SHLAA notes that Horton Country Park (site ref 264) is a site located within the Metropolitan Green Belt, and although the site is heavily managed and maintained as a golf course, with consequential impacts upon natural habitats, it is within Horton Country Park Nature Reserve and immediately adjacent to woodland, which forms one of the most sensitive parts of the Reserve. There would be serious concerns raised about the potential impact of housing redevelopment on this site upon the Nature Reserve.

## 4.11 Stamford Ward

- 4.11.1 The SHLAA surveyed around twenty two sites across this diverse Ward. Just like the adjoining ward at Woodcote, much of the Ward's existing urban area forms a residential hinterland to Epsom Town Centre, lying to the immediate west of the Town Centre. This area, known as Stamford Green, sits to the north and south of West Hill/ Christ Church Lane (B280), which as an arterial road travelling westwards out of Epsom Town Centre. The residential areas within this part of the Ward are punctuated by open space and education uses, including Court Recreation ground. Much of this part of the Ward is within walking distance of Epsom Town Centre.
- 4.11.2 Immediately west of Stamford Green, the existing urban area ends and the Metropolitan Green Belt wraps itself around the western half of the Borough. Sited within the Green Belt to the west of Stamford Green is the former Manor hospital campus, which has been redeveloped as a component of the wider Hospital Cluster strategic housing allocation. Further to the west (along the axis of the B280) and also within the Metropolitan Green Belt is the semi-derelict West Park hospital campus. Horton Country Park nature reserve, which was itself an agricultural component of the historic cluster of five hospital complexes, is located to the north of West Park and the Manor.
- 4.11.3 To the south of the B280 (Rushett Lane) lies the southern half of the Ward. This half is dominated by Epsom Common SSSI, one of two SSSIs located within the Borough. This remains a highly sensitive part of the Borough in terms of ecological and biodiversity interest and is an important constraint/consideration to growth within adjoining areas.
- 4.11.4 Sitting upon the Ward's southern most boundaries (with Mole Valley to the south) is the relatively isolated and distinctive 'village-type' settlement of the Wells. This residential was originally developed during the 1930s and is laid out in a very distinctive circular pattern.
- 4.11.5 The SHLAA process took note of the special qualities, opportunities and constraints present across the Ward. This included the Metropolitan Green Belt, which comprises most of the Ward's geographic area, Epsom Common SSSI, Horton Country Park, Stamford Green, Manor and West Park Conservation Areas and the locally listed buildings found across the Ward. Other constraints and opportunities included; the area of higher archaeological potential at West Park, landownership, high property values, maintaining and enhancing access to and the open quality of the Green Belt, and maintaining and improving the highly valued biodiversity interest.
- 4.11.6 Stamford Green conservation area has already been the subject of a conservation area appraisal and management plan review, Manor and West Park conservation areas are currently under review, which are scheduled to be completed within the first half of 2009. The urban areas not covered by the three conservation areas were assessed by the Environmental Character Study and categorised under Character Areas 25, 26, 43, 45 and 46 and Sub Character Areas 25A, 26A, 26B, 27A (part), 43A, 43B and 45A. The SHLAA has noted the Character Study's commentary on these Areas and particularly notes any recommendations upon their sensitivity to accommodate further change, in relation to potential housing densities and yields.

- 4.11.7 In terms of transport links the Ward is primarily reliant upon the arterial road network radiating from Epsom Town Centre. The B280 (Rushett Lane/ West Hill) provides the main east-west route through the Ward. The B280 provides a good bus route through the Ward. However, there is little bus penetration into the surrounding Stamford Green residential areas. The Hospital Cluster sites have good access from their associated distributor road network. The Manor development has good bus penetration via dedicated bus-only routes. The Wells residential area is accessed via a road spur off the Dorking Road (A24). This provides good access for a main route bus service, which is understood to be well used by local residents. Ward residents are dependant upon Epsom station (to the east) for access to the railway network. The railway station at Ashstead (in Mole Valley) provides an alternative rail route for the residents of the Wells.
- 4.11.8 The Ward has limited retail opportunities within its boundaries; although the Wells residents do have the benefit of a convenience store. However, this relative lack of access is tempered by the close proximity to Epsom Town Centre afforded to the eastern part of the Ward.
- 4.11.9 The residential areas to the west of Epsom Town Centre, to the north and south of West Hill (B280) were identified as having a number of different potential sources of housing land supply. Typically, these included types of site common across the rest of the Borough, such as land rear of 1-27 Christ Church Mount and land rear of 33 – 63 Christ Church Mount (Ref 204 and Ref 205), which are both sites comprised of large rear gardens. Whilst such sites offer a potential source of supply, it is impossible for the SHLAA to accurately determine at what point during the SHLAA period they are likely to come forward. Such sites may emerge, naturally, as windfall sites.
- 4.11.10 The SHLAA noted that clearly identifiable opportunities for comprehensive redevelopment (of previously developed sites) within this part of the Ward do exist. Good examples of small scale sources of this form of supply are the Jolly Coopers & 82 Wheelers Lane (Ref 80) and Hollydene, Birchcroft & Court (Ref 184), the latter site being a carried over local plan allocation. Both sites would require demolition of existing residential properties and intensification through comprehensive redevelopment. Whilst both sites have their problems, the SHLAA takes an optimistic view towards both sites, due to consistent planning histories and recent expressions of interest from landowners.
- 4.11.11 As noted in other wards, the redevelopment of existing allotment provision provides the planning authority with a potential option as a source of future housing land supply. Within Stamford Ward, the Epsom Common allotment site (Ref 82) provides a possible long term option. The redevelopment of this site for housing could serve as a logical extension to the surrounding urban townscape. However, the SHLAA accepts that the release of well used allotment sites such as this is difficult and open to considerable misinterpretation. The release of any open space provision, if taken up as a source of housing land supply, will need to ensure re-provision, either in quantitative or qualitative terms, elsewhere. The SHLAA suggests that the Site Allocation DPD looks to those areas of the Metropolitan Green Belt that are currently in a poorly maintained state (some considered within the SHLAA as sources of housing land supply), as potential sources of replacement, or new open space provision.

- 4.11.12 The relatively isolated residential area of the Wells, located within the Ward's southern quarter has few clearly identifiable sources of housing land supply. The two exceptions being 57 Woodlands Road and land rear of 38 Woodlands Rise (Ref 25 and Ref 79 respectively). Both sites were considered as being deliverable during the SHLAA period.
- 4.11.13 Elsewhere within the Wells area, sources are not so clearly defined. This is a reflection of the areas existing character and appearance, which is worthy of preservation. The Environmental Character Study notes that this is "*A self contained area with a location and plan layout which adds to its local distinctiveness*" but also that "*Change which follows basic principles of scale and style of neighbours could be accommodated within this area*". The Character Study's final point is optimistic; there is capacity for further change. The SHLAA believes that such change is likely to comprise the two identified sites and possibly a small number of low yield (one or two units per site) windfall opportunities. In the greater scheme of things, the Wells will not make a significant contribution towards meeting the Borough's housing target.
- 4.11.14 In sharp contrast to the Ward's existing urban area, the Metropolitan Green Belt, which forms the bulk of the Ward's land area, provides a good source of housing land supply.
- 4.11.15 The western half of the Ward provides very good examples of the sources of housing land supply that have helped meet the Borough's housing quantum at a strategic level; namely the former Manor hospital and partially derelict West Park hospital; the former being one of the four sites identified as part of the strategic Hospital Cluster housing allocation. The Hospital Cluster allocation was comprised of four redundant hospital campuses set within the Metropolitan Green Belt. Two of these hospital campuses, The Manor and Long Grove/ Clarendon Park are now complete. The third, Horton/Livingstone Park, is almost finished, the Horton B site (Ref 217) being the one outstanding component. The St Ebba's site (Ref 251) is the final hospital campus to come forward as part of the Cluster Allocation, and has recently gained planning permission for 322 units (08/00576RES). A fifth hospital campus, West Park (Ref 252) is also set to come forward for redevelopment shortly. The scale of development at West Park has been the subject of much discussion and there is an understanding that it is at capacity within its current mixed use development form. It is noteworthy that these sites have provided the Borough with its sole strategic source of housing land supply.
- 4.11.16 The area of land lying between the Manor and West Park provides (in part if not in their entirety) two potential sources of supply. The first of these is land to the south west of the Manor, Horton Lane (Ref 293). This site is comprised of rough unmanaged scrubland, which was used as a spoil dump during the redevelopment of the Manor. The northern part of the site was historically used as a cricket pitch. It is now under Borough Council ownership. The SHLAA considers the site offers some potential as a future source of housing land supply; possibly via a modest release (about 1.4 ha in area) within the northern part of the site, as an extension to the adjoining Manor. The majority of the site could then come forward as managed informal open space serving the southern part of the hospital cluster. It has been suggested that such managed open space provision could serve local dog walkers (from the Hospital Cluster) and take the pressure off the adjacent Epsom Common SSSI.

- 4.11.17 An adjoining site, Hollywood Lodge, Horton Lane (Ref 269) also offers some potential as a future source of housing land supply; possibly via a modest release (about 2.41 ha in area) within the northern part of the site, as an extension to the adjoining West Park site. In a similar vein to Ref 293 the remainder of the site could then come forward as managed informal open space also serving the southern part of the hospital cluster.
- 4.11.18 Fundamentally, the Borough Council will need to decide how it intends to address potential sources of housing land supply currently located within the Green Belt, such as these two sites. If a release is required, a thorough analysis of all available potential sites should assess which Green Belt site(s) are appropriate for long term release. Consequently, the SHLAA identifies these two sites as appropriate sites for the latter part of the SHLAA period and beyond.

## 4.12 West Ewell Ward

- 4.12.1 The SHLAA identified and surveyed fourteen sites within this Ward, which is the second lowest ward site yield within the Borough. As per other adjacent wards, the low yield of sites is primarily due to a combination of constraints, in particular a lack of vacant, derelict or previously developed urban land and the Strategic Open Space and flood zones that run through the northern part of the ward.
- 4.12.2 This part of the Borough does not contain any Conservation Areas (it is separated from Ewell Village Conservation Area by the railway), or many listed buildings. The Environmental Character Study classifies the Ward within Character Areas 12, 13, 14 and 16 and Sub-Areas 13A, 13B and 16A. The SHLAA has noted the Character Study's commentary on these Areas and particularly notes its recommendations upon its sensitivity to accommodate further change, in relation to potential housing densities and yields.
- 4.12.3 The Ward is located to the north of the centre of the Borough, immediately to the west of Ewell Village Conservation Area. The ward's boundaries are clearly defined to the east by the railway line, and to the South by Chessington Road and the Green Belt. The Hogsmill nature reserve provides a solid constraint to development along the northern part of the Ward, containing biodiversity interest and being an area of flood risk.
- 4.12.4 Transport links to the Ward are good. Ewell West Station is located on the ward boundary with regular trains to London and south to Epsom and beyond. Chessington Road on the southern boundary is a major road in and out of the Borough. Frequent bus services operate along Chessington Road.
- 4.12.5 The Chessington Road- Green Lanes shopping area is in this ward. It is also within 400 metres of the Ruxley Lane- Gatley Avenue shopping area.
- 4.12.6 The dominant character and appearance of this ward is 1950's 2 storey semi-detached housing with some older 1930s streets, and lower quality 1950/60s housing estate developments. The straight streets heading southwards from the Hogsmill Open Space add to the wards well-defined character which is detailed within the Environmental Character Study. The Hogsmill Strategic Open Space runs along the northern boundary of the ward and positively contributes to its overall character and appearance.
- 4.12.7 As with other wards, the opportunities for deliverable housing land supply from intensification of existing housing were limited. Only two rear garden sites merited surveying through the SHLAA. One of these (Rear of Chessington Road- Ref 34) was not considered deliverable during the SHLAA period, due to access and multiple ownership issues and the other (land rear of 1-3 Gibraltar Crescent- Ref 323) has a current planning application attached to it and is considered developable for 2 units. The SHLAA also identified 2 garage sites (Ref 241 and 242) and a car park site (Ref 318) although their potential for housing is low, partly due to parking displacement, and some what unknown due to ownership issues.
- 4.12.8 In common with the rest of the Borough, the potential housing yield from previously developed land is low. Three sites in the ward were considered to have some potential as a source of supply through demolition and



redevelopment. At Vernon Close (ref 17) the demolition of two bungalows and intensification of residential use on the site is an example of a type of supply that might come forward as a windfall site throughout the ward and the Borough as a whole. There is an example of this type of development opposite at the relatively newly constructed Servalan Court. Similarly, the demolition of The Plough pub, Plough Road (ref ref 193) and its comprehensive redevelopment to residential units is an example of a type of supply that is potentially present elsewhere. In the last five years a new development at 'Revere Way' of 138 new dwellings has been completed which was developed on a site previously used by Surrey County Council containing operational offices and temporary units.

- 4.12.9 Open space features as a large potential source of supply from West Ewell, with four separate types identified, all of which would be difficult to deliver. The first of these is Chessington Road Recreation Ground (ref 39), an actively used area of open space providing a recreation facility for the surrounding area, that could only be seen as a potential site for housing if this facility was to be re-provided elsewhere. The second is land at the Harrier Centre (ref 31), where a very limited area of open space to the front of the site was identified, with low housing potential. The third is part of Northcroft Road Allotments (ref 173), which has better access than other comparable sites but is a large and important allotment site for the Borough. Land to the rear of Eastcroft Road (Ref 280) would appear to provide an opportunity to logically extend the neighbouring housing. However, potentially adverse impacts upon the Hogsmill nature reserve, which this site forms part of, ultimately make it unsustainable and development here would have a significant negative impact upon the character and appearance of the surrounding area. The potential release of any of the existing urban open space provision as a source of supply is entirely dependant upon the Borough Council preferred approach towards meeting its housing quantum.

#### 4.13 Woodcote Ward

- 4.13.1 The SHLAA surveyed around thirty sites across this diverse Ward. It is comprised of roughly four distinct urban/ semi-urban areas. The first of these is an area that can broadly be described as Epsom Town Centre's residential hinterland, lying to the south of Rosebery Park and to the north and south of Dorking Road. The residential areas within this northern part of the Ward are punctuated by open space, education and health uses. To the immediate south of this area lies the Woodcote Estate, which the Environmental Character Study (Character Area 37) describes as *"an area of high quality residential townscape of detached properties set back from the carriageway, and a mature integral landscape which blends streetscape and front plots"*.
- 4.13.2 Immediately south of the Woodcote Estate is a linear development comprised of large high value single dwellings, contained within large plots and a private members country club/ golf course. This semi-urban settlement extends into the Green Belt and is known as the Ridge. To the east, separated by the parkland of the golf course (which is entirely within the Green Belt) sits Langley Vale. This is the one of two 'village-type' settlements within the Borough, being surrounded by the 'open countryside' comprised of Epsom and Walton Downs. Langley Vale has a limited range of services and amenities, including a convenience shop, a school and a place of worship.
- 4.13.3 The Ward is dominated by the Metropolitan Green Belt, which extends around its eastern, southern and western quarters. There are a variety of open space land uses contained within the Green Belt, most notably the ecological and biodiversity interests found within Epsom Common SSSI and the Epsom Downs Site of Nature Conservation Interest. The commercial leisure provided by the golf course (see above), the Green Belt also provides a home to the local horse racing industry, with a number of stable yards and studs focused upon the Epsom Downs Racecourse, which is located within the south western quarter of the Ward. The SHLAA notes that the Ward adjoins the settlements of Ashted (in Mole Valley) and Tattenham Corner (in Reigate and Banstead) along its western and eastern boundaries respectively. The gap (formed by the Metropolitan Green Belt) between Woodcote's existing urban area and Ashted is noted as being particularly narrow.
- 4.13.4 The SHLAA process took note of the special qualities, opportunities and constraints present across the Ward. This included the Metropolitan Green Belt, which comprises most of the Ward's geographic area, the Sites of Nature Conservation Interest found across Epsom Downs, the area of great landscape value within the southern half of the Ward, Woodcote, Worple Road and Chalk Lane Conservation Areas and the locally listed buildings found across the Ward. Other constraints and opportunities included; the flood risk along a surface water flow path (identified by the SFRA), landownership, high property values, maintaining and enhancing access to and the open quality of the Green Belt, and maintaining and improving the highly valued biodiversity interest.
- 4.13.5 The Ward's three conservation areas will be the subject of conservation area appraisal and management plan reviews, which are scheduled to be completed by the end of 2010. The urban areas not covered by the three conservation areas were assessed by the Environmental Character Study and categorised under Character Areas 34, 35, 36, 37, 41 and 42 and Sub Character Areas 34A, 35A, 35B, 35C, 35D and 35E. The SHLAA has noted

the Character Study's commentary on these Areas and particularly notes any recommendations upon their sensitivity to accommodate further change, in relation to potential housing densities and yields.

- 4.13.6 In terms of transport links the Ward is primarily reliant upon the arterial road network radiating from Epsom Town Centre. The Dorking Road (A24) provides the main north-south and east-west route through the Ward. The Dorking Road is well served by the main route bus network. Woodcote Road/ Woodcote Green Road runs parallel to the A24 and provides a secondary route into the residential areas within this part of the Ward. These roads enable some degree of public transport penetration into the Woodcote Estate residential area. The Ridge and Langley Vale residential areas, although served by the bus network, are largely reliant upon the private motor car for access. Ward residents are dependant upon Epsom station (to the north east) or Ashted station (to the south west) for access to the railway network. The railway station at Tattenham Corner (in Reigate and Banstead) provides an alternative rail route for the residents of Langley Vale.
- 4.13.7 The Ward has limited retail opportunities within its boundaries; although Langley Vale residents do have the benefit of a convenience store. However, this relative lack of access is tempered by the close proximity to Epsom Town Centre afforded to the northern part of the Ward. Equally, it is noted that the northern half of the Ward does contain a number of employment, education and community health facilities.
- 4.13.8 The residential areas to the south west of Epsom Town Centre, to the north and south of Dorking Road were identified as having a number of different potential sources of housing land supply. Typically, these included types of site common across the rest of the Borough, such as Oakmead Green and land rear of Woodcote Park Road (Ref 3 and Ref 71), which are both sites comprised of large rear gardens. Whilst such sites offer a potential source of supply, it is impossible for the SHLAA to accurately determine at what point during the SHLAA period they are likely to come forward. Such sites may emerge, naturally, as windfall sites.
- 4.13.9 Clearly identifiable opportunities for comprehensive redevelopment (of previously developed sites) within the northern part of the Ward are considered to be limited. Epsom Hospital, which sits at the centre of the northern part of the Ward, provides a number of potential sources of supply. The SHLAA notes the sensitivities associated with the consolidation and streamlining of local health care facilities and consequently takes a conservative view as to the scale likely to be made available from this source. The SHLAA identifies the Hospital's Nurses Accommodation (Ref 291) as a potential source but one whose certainty of delivery remains uncertain.
- 4.13.10 The other main potential source of supply within this part of the Ward comes from the redevelopment open space provision; in this case predominantly privately owned provision. The site, land adjacent St Joseph's and Rosebery Schools (Ref 200) provides an example where open space release is currently delivering the Borough's housing quantum; the site is being developed for 72 dwellings. Another source of potential supply is the Schnadhor's Memorial cricket ground on Woodcote Road (Ref 290). The open space provision (the cricket pitch) is known to be of insufficient capacity to accommodate the current occupier's needs and they have (historically) sought to relocate; such relocation being enabled by the redevelopment of

this site. The SHLAA recognises the potential that such open space sites have to contribute towards the Borough's sources of housing land supply. However, the SHLAA also recognises that open space release (as with Green Belt release) is dependent upon the wider assessment of need and/ or re-provision elsewhere within the locality, or improving (capacity) of other higher value open spaces. This understanding is reflected in the SHLAA's assessment of all open space sites and the options set out within the overall recommendations.

4.13.11 The SHLAA considers the Woodcote Estate to have similarities (in terms of potential sources of supply) with other pre-war (1930s) residential estates found within the northern part of the Borough. In particular, the SHLAA notes the Environmental Character Study's commentary, which states: "*...the area is considered to have a high townscape sensitivity. This is reinforced by its intactness, which affords only limited accommodation for change*". As with the Borough's northern wards, the SHLAA found it difficult to identify genuinely deliverable sources of housing land supply. Sites such as Wilmercroft and Robin Hill on Wilmerhatch Lane (Ref 195) may have potential to come forward for intensification through comprehensive redevelopment but the high land values and land assembly issues associated with their release make it difficult to predict when this will occur. In contrast, land at 117 Pine Hill (Ref 198) demonstrates that such sites can come forward as sources of supply. Consequently, the SHLAA is not generally optimistic about delivery of this type of but accepts that these sites and similar currently unidentified sites may come forward, the latter as windfalls, during the SHLAA period.

4.13.12 Equally, the 'village-type' settlement at Langley Vale provides few genuine opportunities for further sources of housing land supply. The Environmental Character Study notes that: "*...the combination of setting and ecological value helps to increase the area's sensitivity to change...development should aim to enhance intactness rather than further dilute the appearance, form and scale of the area*". This appears to confirm the SHLAA's conclusion that there is potential for modest intensification but as before, such sources of supply are difficult to identify with absolute certainty.

4.13.13 The Metropolitan Green Belt places a considerable constraint upon the Borough's sources of housing land supply; particularly in terms of potential strategic provision. Put simply, there are few greenfield opportunities available within the Borough. Those greenfield opportunities that do exist outside of the Green Belt boundary are generally smaller sites that have a low yield (in strategic terms) and will be largely reliant upon existing infrastructure, rather than developing their own. Consequently, the SHLAA has taken a virtually unconstrained approach to potential housing sources outside of the existing urban area, in order to demonstrate strategic options of housing land supply.

4.13.14 Within the Ward, the SHLAA surveyed a variety of different Green Belt sites to assess their potential as sources of housing land supply. The historic walled garden at Woodcote Park (Ref 287) provides an interesting opportunity as a potential source of supply. The 1.3 ha site is contained within a listed structure, the garden wall and gardeners cottage, the former being a fair state of repair, the latter being derelict. The SHLAA has taken the view that housing contained entirely within the walled garden boundary would provide an appropriate form of enabling development – it could also conceivably provide sheltered accommodation for the adjoining private members club's

older members. Developments of this nature exist elsewhere and have a limited impact upon the wider landscape as they are visually contained within the walled garden. The SHLAA is optimistic about this site as a source of supply.

4.13.15 The Ward's largest Green Belt site is one of the few that came forward through the SHLAA's call-for-sites consultation exercise. The site being Woodcote Stud (Ref 310), which lies within the Green Belt, sandwiched between Epsom Common SSSI and Ashstead. This is only potential strategic opportunity within this Ward. This site has problems, most notably it is distant and physically removed from the existing urban area, has possible impacts upon the adjoining SSSI and the wider landscape, and if developed would lead to coalescence between Ashstead and Epsom. Consequently, the release of this greenfield Green Belt site should only be considered if there is an over-riding strategic housing requirement that cannot be met within the existing urban area; as with all Green Belt sites being considered by the SHLAA, the suitability and appropriateness of releasing this site will need to be carefully considered as part of a wider longer term Green Belt review process.

4.13.16 Coming forward as part of the Site Allocations DPD call-for-sites exercise, the Epsom Downs Racecourse complex (Ref 270) has been promoted to that process as being appropriate for an intensification of existing commercial (conferences, concerts etc). This complex of sites has been considered by the SHLAA not only for completeness but also to consider the housing requirements associated with the horse racing industry. The SHLAA notes comments made to the Development management DPD process that Jockey Club regulations require stable lad accommodation on-site within stable yards and studs in order to ensure animal care and welfare. This clearly conflicts with planning policy, which only recognises agricultural occupancy need if there is robustly demonstrated need associated with the care and welfare of agricultural animals – in normal circumstances this excludes equine uses. Where a twenty four hour on-site need cannot be demonstrated planning policy guides agricultural accommodation to neighbouring settlements, which are usually rural towns and villages. However, the high land and property values within the Borough are in complete contrast to most rural settlements, which means effectively means that agricultural or equine associated accommodation is undeliverable.

4.13.17 Whilst the racecourse and grandstand complex is a considered an inappropriate source of housing land supply, fundamentally being distant and physically removed from the urban area, Hill House at Tattenham Corner (Ref 261) does provide an opportunity both as a source of housing land supply and as accommodation associated with the horse racing industry.

4.13.18 If the planning authority is unable to identify viable or deliverable sites for equine associated accommodation within the urban, the windfall sources within the Green Belt may have an unexpected role in meeting this distinctive form of housing need. In this respect, the SHLAA suggests that the planning authority assess the level of need associated with this type of housing and then examine the potential for a development management policy approach that allows for the delivery of such accommodation within the Green Belt as an exception – where that need is very clearly demonstrated. In addition to being a modest source of windfall supply, this could enable the survival of this important local industry.

## 5. Recommendations

### 5.1 Introduction

5.1.1 The SHLAA seeks to provide the local planning authority with a series of options that aid them in the delivery of their housing target and to a lesser extent other planned for growth across the Borough (such as commercial employment and retail, open space and other green infrastructure uses). In this respect, the SHLAA's objective is to provide a selection of deliverable options that can be further tested by the planning authority through the development of its emerging Site Allocations and Development Management DPD. Some options may also be useful in guiding the production of other local development documents brought forward as part of the Epsom & Ewell LDF.

5.1.2 The options set out within this chapter cover a number of areas:

- **How should the planning authority seek to deliver its minimum housing target?**
- **How to translate the potential sources of supply identified by the SHLAA into site allocations, and**
- **How to ensure the future delivery of potential sources of supply through Development Management.**

5.1.3 Some of these options will translate directly into planning authority strategy, site allocations and development management policies. Other options or elements of options may require the local planning authority to work differently in the future. The SHLAA suggests that a significant part of these potential 'changes' in working will fall within the evolution from traditional development control operations to a true development management regime, which seeks to deliver the shared visions of the local authority and its partners within the Epsom & Ewell LSP.

5.1.4 As stated elsewhere, the SHLAA is a technical study and not an executive document. The SHLAA does not allocate individual sites as sources for future housing development. Neither does it recommend, by itself, specific sites for future allocation through the Site Allocations DPD. The decision to allocate specific sites for future growth (whether housing, employment or other forms of growth) will be made through the development of the Site Allocations DPD, and will require further technical assessment and full engagement with partners and the wider community. That process will provide partners and the wider community with the appropriate opportunity to comment on the options suggested by the SHLAA and any potential site specific allocations proposed by the Site Allocations DPD.

### 5.2 How should the planning authority seek to deliver its minimum housing target?

5.2.1 The previous chapter, which described the SHLAA's outputs in relation to the Borough's housing target, established how much of its minimum target had already been delivered, or had been committed to development through the planning system. Consequently, the previous chapter identified how many housing units would need to be delivered to meet the minimum target during the LDF period. The residual requirement is to identify sufficient sources of

housing land within the Borough to deliver another 1,897 housing units during the period until 2026.

5.2.2 The key strategic question for the planning authority, is how they should plan to ensure the delivery of these 1,897 housing units? The SHLAA seeks to identify the advantages, disadvantages and potential risks associated with each option. Whilst the SHLAA notes that some options have less risk than others, and that some options are arguably more sustainable than others, it does not, by itself, commend a single option above others.

### 5.3 **i) Do nothing**

5.3.1 This option presupposes that the Borough's housing needs can only be met through a combination of existing allocations (the Hospital Cluster) and a windfall allowance.

5.3.2 However, these sources of supply are insufficient and other sources of supply need to be identified. Hospital Cluster sites are finite and are already within the planning system and accounted for within the housing trajectory. They sources of supply do not contribute towards meeting the residual requirement for 1,897 units. Windfall sites, namely unidentified sites that come forward for development 'naturally' through the planning system are by themselves an unreliable source; more so within the current economic climate. Their historic contribution towards meeting the housing target has fluctuated with economic conditions. Even during the housing boom, the contribution from windfall sources, accounting for just 20 – 23% of housing completions.

5.3.3 Critically, a do nothing approach leaves the planning authority wide open to the possibility of planning by appeal, where developers take the initiative and force sites through on the basis that there is insufficient housing land supply. The planning authority would have the power to refuse such speculative planning applications but the danger arises when refusals are appealed on the basis that the planning authority has not identified sufficient specific sources of housing land supply. In the absence of site specific sources of five and ten year supply, a Planning Inspector is highly likely to favour unplanned proposals that deliver sites for housing. This may open a path for inappropriate sites to come forward speculatively.

5.3.4 Whilst the planning authority could hypothetically choose this option, the SHLAA highlights the significant risks involved. This option is not a credible planning position and would damage the authority's standing.

### 5.4 **ii) Seek to deliver the majority of SHLAA sites identified within Categories 1 – 3**

5.4.1 The SHLAA's outputs suggest that the Borough's housing target will be met if all of these sites are delivered, within the density/ yield range identified by the SHLAA. The outputs identify a conservative maximum and minimum yield of between 2, 265 and 1,953 units

5.4.2 This option appears to provide an 'ideal' solution as it is principally comprised of sites within the existing urban area. Consequently, many of the sites identified within this Category range are already broadly acceptable for housing in planning policy terms. The planning authority may consider this a

sustainable option as it does not seek the release of sites currently in open space use or within the Green Belt.

5.4.3 Nevertheless there are risks. Most notably the site yields from the sites classified within these three Categories are very tight. Consequently, there is little room to manoeuvre if sites are subsequently found to be inappropriate, either in terms of the principle of residential use, design or density; or if the sites simply fail to come forward during the LDF period. The SHLAA notes that this Option will also lead to significant intensification within the existing urban area, which may be considered an undesirable alternative to releasing some Green Belt.

5.4.4 Future AMRs will monitor the delivery of sites identified through the SHLAA process. The AMR process will provide advance warning to the planning authority if the sites included within this option fail to provide sufficient sources of supply to meet the housing target. If that were to happen, the planning authority would need to consider how it would intervene in order to restore a deliverable housing trajectory. Other options suggested by the SHLAA (set out below) may need to be considered in order to bolster the delivery of Option ii.

5.4.5 In conclusion this option offers a reduced risk, especially at the beginning of the plan period. However, there is still a risk of under provision later on and this may still result in case-by-case planning by appeal.

5.5 **iii) Meet the housing target through a mix of SHLAA sites comprised of Category 1 – 3 sites and an appropriate release of some Category 4 & 5 sites:**

5.5.1 This is a development of the Option ii, which is set out above. This option seeks to meet the majority, if not all, of the housing target through sites identified within Categories 1- 3. The significant difference is that it removes the risk present within Option ii by bringing forward additional sites currently identified within Categories 4 & 5 as sources of supply. These additional sources of supply would serve as a reserve to those sites classified under Categories 1 – 3, which could be brought forward as necessary to ensure that the housing target is met during the LDF period. Intervention would only be necessary if the monitoring process clearly demonstrates that the sources of supply identified within Option ii are not coming forward in sufficient quantity to meet the housing target.

5.5.2 Option iii would require the planning authority to make a decision upon which types of sites classified within Categories 4 and 5 it could use to positively influence the delivery of its housing target. For example, the SHLAA suggests that the planning authority may consider the release of existing urban open space sites as sources of housing land supply; particularly those sites that are surplus to requirement, or poor quality sites within areas (of the Borough) with high levels of open space provision. Such sites provide the planning authority with a controllable source of supply, which can quickly be released to help meet the housing target. The SHLAA suggests that the funds generated from such a controlled release could be used to re-provide open space provision within the locality, improve the quality and capacity of



other local open space provision, or provide new and enhanced strategic provision within the Metropolitan Green Belt.

5.5.3 Equally, the SHLAA suggests that Option iii could examine the release of some of the potential sources of housing land supply contained within the Green Belt. Again, this offers the planning authority a controllable source of supply, which can be used to respond to a shortfall in delivery from the potential sources classified within Categories 1 – 3 (Option ii). The SHLAA also suggests that the funds generated from such a release could be positively utilised to enhance the landscape and biodiversity quality, and accessibility of the wider Metropolitan Green Belt. This could aid in the development of the Green Belt as a long term strategic green infrastructure asset.

5.5.4 This Option firmly places the planning authority in control of housing land delivery. The redevelopment of (some) existing open space provision could release funds to re-provide and improve provision elsewhere within the Borough – potentially within the Green Belt. Alternatively, the long term release of some appropriate sites within the Green Belt could remove some of the pressure for higher densities within the urban area. The SHLAA believes that this Option provides the planning authority with a highly defensible position to protect the Borough from inappropriate, speculative planning applications justified on the grounds of housing land supply.

5.5.5 Should the planning authority take this approach there would be a requirement for an early review of the Core Strategy. This would allow for a review of the Green Belt boundary to meet the housing target. The release of sites within the Green Belt could only take place as part of wider Green Belt review process, which would suggest that these sites be programmed to come forward towards the end of the LDF period.

5.6 **iv) Seek to accommodate the majority of the remaining housing target within one or more strategic urban extensions**

5.6.1 This Option provides a development of Option iii. It assumes that the local planning authority has taken the decision not to meet the housing target through the allocation of sites within the existing urban area; on the grounds that the character and appearance of the Borough's built-up area is so distinctive and valuable that further intensification (of the scale required to meet the housing target) is undesirable. Consequently, Option iii seeks to deliver the majority of the residual housing requirement (1897 units) within one, or more, strategic urban extension(s). Given the scale of the residual housing requirement, this Option would require an appropriate release of Green Belt land.

5.6.2 Whilst this approach contains risks, it has a number of advantages in planning terms. The great advantage in taking this approach early is that through the allocation of one or two appropriate major sites the planning authority will take considerable pressure off the existing urban area as a source of housing land supply. This will potentially strengthen the planning authority's position when confronted by housing applications seeking intensification within the existing urban area – there will be greater scope to set policies and negotiate schemes (within the urban area) in relation to scale, character, appearance and density. It is important to note that this Option will not facilitate the end of further housing intensification within the urban area. However, it will reduce

the need for the higher levels of intensification, which are necessary to meet the housing target.

- 5.6.3 Equally the identification of large strategic site(s) also provides an opportunity to comprehensively plan and integrate their development; fundamentally ensuring that there is sufficient infrastructure to support growth. This may encompass new transport services/ infrastructure, renewable energy generation, improved ICT connectivity, open space provision, enhancements to biodiversity interest, wider green infrastructure provision and ensuring the allocation fits within the rest of the Borough.
- 5.6.4 The disadvantages to this Option centre upon the loss of Green Belt land and the potentially negative impacts that this may bring. The SHLAA emphasises that the role of the Green Belt designation is neither concerned with landscape nor biodiversity protection. Rather the Green Belt designation is identified in its current open space extent to protect against the coalescence of neighbouring settlements with one another. In the case of Epsom and Ewell, the Green Belt protects the Borough's existing settlements from merging with the existing built-up areas of Cheam, Nork, Tattenham Corner, Ashstead and Chessington. Any future Green Belt release will need to take this strategic objective (of preventing coalescence) into full account. The SHLAA notes that the Green Belt has greater depth in certain parts of the Borough than in others. A future Green Belt review could examine these components for appropriate and sensitive release.
- 5.6.5 The SHLAA notes that as this approach will require a review of the Metropolitan Green Belt, it provides the planning authority with longer term option that would continue to deliver sources of supply beyond the current LDF period.

5.7 **How to translate the potential sources of supply identified by the SHLAA into site allocations**

- 5.7.1 The SHLAA also considers how to allocate or bring forward sites in sufficient numbers. Many of the sites identified by the SHLAA are relatively small in size. This is due to the SHLAA's objective to identify as many viable and deliverable sites within the urban area as possible. The problem with this approach is that it will not be possible to allocate all of these sites through the Site Allocations DPD. Many of the sites will simply be too small to allocate. Consequently, the SHLAA suggests the following approaches and options:

5.8 **i) Allocate the medium – large sized sites within the Site Allocations DPD**

- 5.8.1 This approach follows the traditional local plan approach by allocating medium, large and strategic sized sites within the Site Allocations DPD. This provides an opportunity to differentiate between sites, in terms of an orthodox housing allocations, mixed-use allocations, brownfield and strategic sites. The DPD process would not test this approach as an option by itself but would test individual sites as options.
- 5.8.2 The DPD could have separate policies that address each type of housing site allocation; for example, potential strategic sites (such as the NESCOL Animal Husbandry Land Ref 208), previously developed sites (such as Epsom Railway Station Ref 263) and sites with mix-use potential (such as the former Woolworths store, High Street, Epsom Ref 330). The SHLAA suggests that

future DPD policy could identify the various opportunities and constraints present within these site specific allocations, and stipulate appropriate density, yields and mixes of use.

5.8.3 Additionally, as part of the allocation policy for strategic sites, the DPD could clearly identify wider infrastructure requirements, either on-site or within the locality. Where the development of a site raises specific infrastructure requirements, policy could make explicit reference towards the requirement that development contribute to the delivery of existing or future identified infrastructure projects. The SHLAA suggests that strategic sites and conceivably more problematic ones be subject to development briefs, which could address these issues in further detail.

5.8.4 The SHLAA notes that the sites identified for allocation would not meet the housing target by themselves and would need to be supported by sites coming forward under one of the development management policy options set out below.

5.9 **ii) A Development Management Policy that makes specific reference to all of the non-allocated SHLAA sites identified within the existing urban area**

5.9.1 This Option provides an alternative approach to the above and specifically seeks to deliver those SHLAA sites classified under Categories 1 - 3. Rather than identify and allocate some, or all of the SHLAA sites within the Site Allocations DPD, this approach would provide a streamlined policy that makes explicit reference to the SHLAA, removing the need for separate site allocations policies.

5.9.2 In practical terms this Option would comprise a DPD policy that makes specific reference to the SHLAA and the delivery of those sites classified under Categories 1 – 3. This Option would raise the importance of that specific part of the SHLAA (namely those specific sites classified under Categories 1 – 3) from a technical study to a quasi-executive or supplementary planning document. In effect that part of the SHLAA would become the residential allocations section of the DPD.

5.9.3 This Option would require further refinement of the SHLAA before it could be considered sound as a supplementary planning document. Those sites classified within Categories 1 – 3 would need further assessment. Such an assessment would need to take account of the possibility that some of those sites currently classified under Categories 1 – 3 may merit re-classification (to Categories 4 and 5), which may require further consideration of the housing trajectory.

5.9.4 Alternatively, the part of the SHLAA that classifies these sites could be included as an Appendix to the DPD itself; negating the need for a separate document. This approach would also require further assessment of the sites. The DPD process is the correct method for testing the soundness of these sites.

**5.10 How to ensure the future delivery of potential sources of supply through Development Management**

**5.11 i) Maintain the current policy approach towards proposals for housing within the existing urban area**

5.11.1 This Option seeks to roll forward, either in its existing form or with minor changes, existing policy towards new residential development; principally, saved local plan Policy HSG11 (but also saved Policies such as DC13 and DC14).

5.11.2 This Option would allow the smaller sites identified by SHLAA and indeed unidentified windfall sites as well, to come forward naturally through the planning system without the need for allocation.

5.11.3 The broad policy principle that development within existing urban areas, whether contained by a specifically defined development envelope (such as town policy limits) or defined by proxy by other policy constraints (such as the Green Belt), is established through PPS3. The added value of saved Policy HSG11 is that it seeks to loosely reflect the existing context of the urban area. The disadvantage of this approach is that it is not entirely reflective of local distinctiveness and there is no direct link between delivering site densities and yields, and positively seeking to meet the Borough's housing target. In basic terms, Policy HSG11 is a traditional development control policy that addresses planning applications in an ad hoc fashion.

**5.12 ii) Devise a Development Management Policy that applies a differential housing capacity for the constituent parts of the Borough, based upon the sites identified through the SHLAA and upon the character areas identified within the Environmental Character Study:**

5.12.1 This Option, in conjunction with a site specific allocations approach, refines Option i (above) and allows for the natural development of the SHLAA's smaller sites, whilst identifying appropriate densities and capacities for the Borough's different character areas, as identified by the Environmental Character Study. Such an approach would also allow appropriate windfall sites to come forward and contribute towards an upward housing trajectory.

5.12.2 The starting points for such a policy would be the outputs from the Environmental Character Study (in terms of determining character area capacity for further housing), the sites identified by the SHLAA process and the residual housing target left after the identification of potential site allocations. By using this information the DPD process could identify with some confidence a capacity for each character area. This Option would require urban design input to test the capacity of more sensitive areas. It provides a more sophisticated and viable alternative to the optional Stage 9 (identifying and assessing the housing potential of broad locations). This approach provides greater certainty of delivery through the identification of a specific area capacity.

5.13 **iii) Devise a Development management Policy that applies a differential housing capacity to locations within the Borough that have a higher level of accessibility**

5.13.1 Most of the Borough's existing urban area is highly accessible to public transport, facilities, services and amenities. However, certain parts of the Borough have higher levels of accessibility. These are Epsom Town Centre, Ewell Village Centre, the larger local centres, and public transport nodes and bus service routes. A development of Option ii (above) would be to positively promote higher densities at these locations. Such an approach would not only deliver an upward trajectory but would also conceivably reinforce the town, village and local centres as commercial and transport hubs within the Borough.

5.13.2 In practical terms the Option will encourage intensification at those locations with higher levels of accessibility. This could incorporate a review of the current height restriction policy (Policy BE19), which could specifically allow higher urban densities at town/ local centre locations. Another approach would be to actively encourage the redevelopment and intensification of large residential plots at appropriate locations.

5.13.3 The capacity for undeveloped sites within these locations delivering higher levels of intensification is limited. Consequently, intensification at these locations is likely to come forward as in the form of unidentified windfalls. Examples of different types of future windfalls are identified within Section 3.3.

**5.14 Other site specific options identified through the SHLAA**

5.14.1 Whilst the SHLAA's primary role is to account for the Borough's deliverable and developable sources of potential housing land supply, the site survey and assessment process provides an opportunity to consider appropriate alternative uses for sites. This analysis provides added value to the SHLAA and will be useful for the planning authority when considering site allocation options for future employment, retail, community, open space and green infrastructure provision.

5.14.2 The SHLAA has identified the potential for other non-residential uses within the individual site survey forms (reproduced under Appendix 6). Examples include:

5.14.3 ***Global House (Ref 301) and Shaftesbury House (Ref 327)***: two office buildings within Epsom Town Ward. Although these two sites have potential as sources of housing land supply, their location within the Borough's central commercial area and the under-provision of employment land strongly suggest that their existing employment uses be retained, either in their current or redeveloped form.

5.14.4 ***The Northey Estate (Ref 272)***: open land (formerly agricultural) within the Green Belt, located between Nonsuch and Cheam. Whilst the SHLAA identifies part of the site as being a potential source of supply, it suggests that housing be used as enabling development to fund the preservation and restoration of the majority of the site as an extension to the adjoining Howell Hill nature reserve. This provides the planning authority with a potentially

deliverable option for new green infrastructure. This option could facilitate the improvement of poor quality open land as natural chalk grassland, with associated improvements to access for the wider community. This option could also help secure the protection of the adjoining former-quarry site at Beverley Close (Ref 209).

5.14.5 **Land at Longmead Road/ Gibraltar Crescent (Ref 136):** low value open space and some strategic landscaping located on the edge of an industrial estate. It could form a logical extension to the adjoining housing developments. Equally, it has the potential to meet local community infrastructure needs, such as a new emergency service facility.

5.14.6 **Land to the south west of the Manor (Ref 293) and land at Hollywood Lodge (Ref 269):** unmanaged land within the Green Belt lying between the southern part of the Hospital Cluster and Epsom Common SSSI. Again, whilst the northern quarter of these two sites could be released as modest sources of housing land, any future housing development should be used to enable the considerable residual land to be brought forward as managed informal open space. This would serve the wider Hospital Cluster and help to take the pressure off the adjoining SSSI.

## 5.15 Future monitoring arrangements

5.15.1 The planning authority will need to monitor the progress, within the planning system, of all sites as part of the AMR process. In general this should include monitoring the extent, density and yield of sites coming forward for development. The AMR should also note the use, or mix of uses proposed on the site.

5.15.2 The progress of those sites that are subsequently allocated or identified as the local authority's preferred sources of housing land (such as those sites classified within Categories 1 – 3) will need to be monitored with greater care in order to ensure that a continuous supply is maintained. The latest AMR states that future AMRs will incorporate a component for monitoring the delivery of SHLAA sites, and mapping their progress onto the housing trajectory.

5.15.3 It is conceivable that future AMRs, will demonstrate that sources of supply are not sufficient to meet the housing target. If this scenario arises, the planning authority will need to consider intervention in the process. Options may include:

- Seek to increase densities and yields, where appropriate, within existing allocation sites.
- Review the planning application decisions to ensure that housing supply is being given sufficient weight
- Consider working with other partners, such as the County Council and registered social landlords, in actively bringing forward sites. The SHLAA notes that the Town and Country Planning Association have recently promoted public house building as a possible option to stimulate the housing industry during the current economic climate.

- Consider the release of other deliverable and developable sites, which are currently protected by planning designations. For example, appropriate sites within the Green Belt, as classified under Category 4.

5.15.8 Whilst some local planning authorities have taken the route of wholesale review of their SHLAAs, this approach is not recommended to the Borough Council as there is little scope for identifying further major sources of potential housing land supply in the near future.

5.15.9 However, given the urban nature of the Borough's built-up area, it is conceivable that 'new' previously developed sites may come forward during the SHLAA/ LDF period, which could positively contribute towards meeting the housing target. These sites should be incorporated into the SHLAA where possible. The annual National Land Use Database (NLUD) return can be used to identify and incorporate these sites into the AMR's housing trajectory. This would be a timely and cost-effective mechanism for identifying 'new' potential sources of supply.