

# Epsom & Ewell Local Plan – Strategic Housing Land Availability Assessment: Findings Report



# Contents

<b>Contents</b> .....	<b>2</b>
<b>Disclaimer</b> .....	<b>3</b>
<b>1 Introduction</b> .....	<b>4</b>
1.1 Purpose.....	4
1.2 What is a Strategy Housing Land Availability Assessment? .....	4
1.3 Duty to Co-operate .....	5
1.4 Questions.....	6
<b>2 The Policy Context</b> .....	<b>7</b>
2.1 National Planning Policy Framework .....	7
2.2 Planning Practice Guidance .....	7
2.3 The Five Year Land Supply .....	8
2.4 The Housing Trajectory .....	8
2.5 Alternative Sources of Housing Supply.....	9
2.6 Constraints Study 2017 .....	9
2.7 Green Belt Study 2017 .....	9
<b>3 Epsom &amp; Ewell’s Housing Land Supply</b> .....	<b>11</b>
3.1 Committed Residual Developments.....	11
3.2 Sources of SHLAA Sites.....	11
3.3 Site Availability Confirmation (SAC) Responses .....	13
3.4 Review of Previous SHLAA Sites .....	15
3.5 Summary of Discounted Sites .....	17
<b>4 Meeting Epsom &amp; Ewell’s Housing Target and Assessed Housing Need</b> .....	<b>19</b>
4.1 Five Year Land Supply and Housing Trajectory.....	19
4.2 Land Supply Buffers and Non-implementation Discount Rates.....	19
4.3 Windfall Allowance Calculation.....	20
4.4 Meeting Epsom & Ewell’s Existing Housing Target.....	21
4.5 Meeting Epsom & Ewell’s Objectively Assessed Housing Need Figure .....	22
<b>5 Conclusions and Next Steps</b> .....	<b>25</b>
5.1 Conclusions.....	25
5.2 Next Steps.....	25
<b>Appendix 1: Detailed Housing Trajectory against Objectively Assessed Housing Need Figure</b> .....	<b>27</b>
<b>Appendix 2: Housing Sites Under Construction as of 1 April 2017</b> .....	<b>30</b>
<b>Appendix 3: Housing Sites Not Yet Implemented as of 1 April 2017</b> .....	<b>33</b>
<b>Appendix 4: SHLAA Opportunity Sites by Ward</b> .....	<b>37</b>
<b>Appendix 5: Definition of Key Terms</b> .....	<b>41</b>

## **Disclaimer**

The policy context for the Strategic Housing Land Availability Assessment (SHLAA) is set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). In accordance with paragraph 158 of the NPPF Local Planning Authorities (LPAs) should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

The Government views SHLAAs as “a key component of the evidence base to support the delivery of sufficient land for housing to meet the community’s need for more homes”. The NPPF, (para.159) requires local authorities to “prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period”.

The SHLAA does not allocate sites for housing; that is done through more detailed planning assessment and consultation, and is a separate process carried out as part of any forthcoming Local Plan document to determine which sites should be identified for development and according to which timescale.

In relation to the information contained within this report, its appendices and any other forthcoming report relating to the findings of the SHLAA, the identification of potential sites, buildings or areas in the SHLAA does not state or imply that the Council would necessarily grant planning permission for development. All planning applications will continue to be determined against the appropriate development plan and other relevant material considerations.

The conclusions in the SHLAA will be based on information that was available at the time of the study and the Council does not accept liability for any factual inaccuracies or omissions. The information will be a snapshot of the data captured for SHLAA sites submitted at a point in time. Information will be compiled with all due care and attention, however inevitably discrepancies may occur. The SHLAA document should therefore be considered as a ‘live’ one that will be updated.

The boundaries to sites, buildings and areas will be based on the information made available at the time by agents and landowners. The SHLAA does not limit any amendment of these boundaries for the purpose of a planning application.

# **1 Introduction**

## **1.1 Purpose**

- 1.1.1 The Strategic Housing Land Availability Assessment (LAA) is an evidence base document with the key role of identifying sites that have the potential to come forward for housing development in the future. The document considers the capacity of sites and when they could potentially be developed.
- 1.1.2 The purpose of this document is to report on the findings of the Council's Strategic Housing Land Availability Assessment 2017. Furthermore, it provides the wider context as to why the assessment was undertaken and its role within the Local Plan making process. The report supports the Council's Annual's Monitoring Report (AMR) process including the preparation of its Housing Trajectory and Five Year Land Supply.
- 1.1.3 The SHLAA in conjunction with other key evidence studies (such as the Strategic Housing Market Assessment) will inform the direction of the partial review of the Core Strategy and the preparation of options to respond to the objectively assessed needs for the period 2015-2032.
- 1.1.4 This report considers the potential future supply of land likely to be available for development over the current plan period of 2007-2026 and the forthcoming plan period 2015-2032.
- 1.1.5 This assessment has been carried out between January and June 2017 and updates information contained within the previous Epsom and Ewell Strategic Housing Land Availability Assessment (2009).
- 1.1.6 The finding of this report and its appendices should be read in conjunction with the following addendums

- Addendum 1: SHLAA Sites Ward Maps (Nos.1-12)

## **1.2 What is a Strategy Housing Land Availability Assessment?**

- 1.2.1 Epsom and Ewell Borough Council has prepared an update to its Strategy Housing Land Availability Assessment (SHLAA) for the Borough as part of the review of the Local Plan evidence base. The purpose of the SHLAA is to:
  - Identify sites with the potential for future residential development;
  - Assess their development potential; and
  - Assess their suitability for development and the likelihood of development coming forward (their availability and achievability).
- 1.2.2 The SHLAA considered the potential future supply of land likely to be available for residential (bricks and mortar) development over the next plan period up to 2032. Although this assessment makes a judgement about the developability of particular sites for development, it is based on a number of assumptions and does not in any way prejudge any planning applications that may be received on individual sites. The inclusion or otherwise of a site within this assessment does not in itself determine whether a site should be developed.
- 1.2.3 The main outcomes from the SHLAA are:

- an assessment<sup>1</sup> of each site, in terms of its suitability for development, availability and achievability (including whether the site is viable) to determine whether a site is realistically expected to be developed and when;
- more details for those sites which are considered to be realistic candidates for development, where others have been discounted from the land supply figures for clearly evidenced and justified reasons;
- a list of all sites considered, cross-referenced to their locations on maps;
- the potential quantity of residential development that could be delivered on each site/broad location, including a reasonable estimate of build out rates; and
- a housing trajectory of anticipated development and consideration of associated risks against delivery of the Core Strategy target and the OAHN<sup>2</sup> figure.

1.2.4 The assessment is an important evidence source to inform plan making, but does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.

1.2.5 Whilst the overall approach to the SHLAA methodology has been largely predetermined by Planning Practice Guidance (PPG), the Council has considered the finer details of each of the PPG stages of the assessment to ensure that local circumstances are reflected.

1.2.6 Full details of the methodology including details of the Call For Sites and Site Availability Confirmation exercises have been set out within the Epsom & Ewell Strategy Housing Land Availability Assessment- Methodology (June 2017), available to view on the Council's website. The methodology also includes details of as the Council's assumptions in relation to site assessments, development capacities and forecasting delivery.

1.2.7 It should be noted that the SHLAA relates solely to bricks and mortar accommodation. The Council has undertaken a separate assessment in relation to the needs and land availability for our Gypsy and Traveller communities.

### 1.3 **Duty to Co-operate**

1.3.1 Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by section 110 of the Localism Act 2011, introduced a duty to cooperate in relation to the planning of sustainable development. The duty requires the Borough Council to co-operate with other local planning authorities and other public bodies in preparing and developing their Local Plan so far as it relates

---

<sup>1</sup> Site assessment forms are not to be published due to confidentiality and the land supply position requiring a review of the assumptions, in particular in relation to suitability.

<sup>2</sup> Objectively Assessed Housing Need figure as produced by the Strategic Housing Market Assessment (2016).

to a strategic matter. This could include the development of large sites close to authority borders or the cumulative impact of development on infrastructure.

1.3.2 The duty is an important element in the strategic planning functions and one that builds on the Council's existing approach of engagement and partnership working. Work undertaken as part of the Council's duty to co-operate on strategic issues as part of the review of the Local Plan evidence base will be recorded.

1.3.3 The draft methodology for the SHLAA has been subject to a Duty to Co-operate consultation exercise in February 2017. All comments received have been recorded and representations have been taken into consideration. Following consultation there were no significant changes proposed to the methodology. The Council will continue to engage on this report and if sites progress through the Local Plan process, on those where there could be cross-boundary issues.

#### 1.4 **Questions**

1.4.1 If you have any questions relating to the Strategic Housing Land Availability Assessment and how the sites were assessed please contact the Planning Policy Team on:  
[LDF@epsom-ewell.gov.uk](mailto:LDF@epsom-ewell.gov.uk)

## **2 The Policy Context**

### **2.1 National Planning Policy Framework**

- 2.1.1 The National Planning Policy Framework (NPPF) requires LPAs (Local Planning Authorities) to establish realistic assumption about the suitability, availability and likely economic viability of land to meet the identified need for housing over the plan period. The SHLAA is therefore a fundamental component of the Local Plan evidence base to support development land delivery within the Borough.
- 2.1.2 In accordance with paragraph 158 of the NPPF, LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, where appropriate, and that they take full account of relevant market and economic signals.
- 2.1.3 The Government views SHLAAs as “a key component of the evidence base to support the delivery of sufficient land for housing to meet the community’s need for more homes”. The NPPF (para.159) requires local authorities to “prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period”.
- 2.1.4 LPAs need to ensure that their Local Plans meet the ‘full, objectively assessed needs for market and affordable housing in the housing market area’, identifying and updating annually a supply of deliverable sites sufficient to provide 5 years’ worth of housing with an additional buffer of 5% to ensure choice and competition. Where there is a persistent record of under delivery (which is not defined in more detail) an additional 20% buffer is required. Beyond the first 5 years the NPPF requires local authorities to ‘identify specific, developable sites or broad locations for growth, for 6-10 years and, where possible, for years 11-15’.

### **2.2 Planning Practice Guidance**

- 2.2.1 The Government's Planning Practice Guidance (PPG), launched in March 2014, offers practical guidance to support the NPPF. The section on Housing and Economic Land Availability Assessments sets out that the purpose of such an assessment is to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment of land availability includes the SHLAA requirements as set out in the NPPF.
- 2.2.2 The PPG indicates what inputs and processes should lead to a robust assessment of land availability and that plan makers should have regard to the guidance in preparing their assessments. Where they depart from the guidance, plan makers will have to set out reasons for doing so. The assessment should be thorough but proportionate, building where possible on existing information sources outlined within the guidance.

## **2.3 The Five Year Land Supply**

- 2.3.1 As outlined above, the NPPF requires the LPA to achieve a five year – housing land supply as measured against a local plan that is compliant with the NPPF. Given the concerns relating to conformity with the NPPF the Council has taken steps to understand the Objectively Assessed Housing Need (OAHN) of the Borough and the wider Housing Market Area. This takes the form of the joint Strategic Housing Market Assessment (SHMA) published 2016.
- 2.3.2 The Council's Annual Monitoring Reports (AMR) has demonstrated a strong and consistent delivery against the Core Strategy housing targets. The Housing AMR 15/16 indicates that against the current housing target, there is 11.8 years of housing land supply (based on the findings of the SHLAA 2009, current allocations and outstanding planning permissions).
- 2.3.3 The PPG (paragraph 30 reference ID: 3-030-20140306) advises that 'considerable weight should be given to the housing requirement figures of adopted Local Plan, which have successfully passed through the examination process, unless significant new evidence comes to light'.
- 2.3.4 Furthermore, where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered.
- 2.3.5 Therefore, as part of the SHLAA 2017 a 5 year housing land supply calculation has been undertaken against the updated (but untested) evidence on housing need from the SHMA. Notwithstanding this, the guidance is clear, that the weight given to the identified housing need figure should take account of the fact that it has not been tested or moderated against the relevant constraints.

## **2.4 The Housing Trajectory**

- 2.4.1 The development potential of all sites can be collected to produce an indicative trajectory. This should outline how much housing can be provided and at what point in the future. An overall risk assessment will be undertaken as to whether sites will come forward as anticipated. Going forward beyond this assessment, the database of sites will be used for future monitoring of land availability.
- 2.4.2 If insufficient sites within the built up area have been identified to meet the tested Core Strategy 2007 housing targets, then the Council will need to revisit the assumptions within the SHLAA methodology. This would include reconsideration of discounted sites to establish if the reason(s) for being excluded from the housing land supply could be overcome.
- 2.4.3 In accordance with the PPG, the Council has assessed the land availability against the updated OAHN (albeit untested) as published in the SHMA 2016. An additional Trajectory has been produced to consider the supply of sites throughout the period of 2015-2032.
- 2.4.4 Following this secondary review if there are insufficient sites it may be necessary for the Council to revisit the assumptions within the SHLAA methodology and in consultation with surrounding authorities and other



relevant stakeholders, to consider whether it will be appropriate to meet this shortfall through other means.

## **2.5 Alternative Sources of Housing Supply**

- 2.5.1 Should the SHLAA findings indicate that the existing target and / or the objectively assessed need for development cannot be met within the existing urban area, in accordance with the PPG; the Council will undertake analysis to consider the options or opportunities to increase capacity within the existing built up area of the Borough.
- 2.5.2 This could include reconsidering current policy approaches towards back land gardens or revisiting density assumptions and land use swaps to meet any identified residual housing need. If necessary, the findings of this analysis will likely take the form of an Alternative Sources of Housing Land Supply Paper.

## **2.6 Constraints Study 2017**

- 2.6.1 National planning policy states that local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless; there is any adverse impact of doing so that would significantly and demonstrably outweigh the benefit, when assessed against the policies within the Framework or where specific policies in the Framework indicate development should be restricted.
- 2.6.2 The national Planning Practice Guidance (ID:004-20140306) makes it clear that whilst the establishment of development needs should be unbiased, how an authority meets that need must reflection on the relevant constraints including environmental constraints.
- 2.6.3 To ensure that the Council has taken necessary account of this and can demonstrate that an appraisal of the constraints, relevant to the Borough, has been considered when arriving at development options; it is producing a Constraints Study. The Study defines the 'primary' environmental constraints within Epsom & Ewell that would prevent development from taking place and where it would not be possible to mitigate impact.
- 2.6.4 As part of the SHLAA, the outputs of the Constraints Study have informed the assessment of a site's suitability for housing. The study will also inform the work currently being undertaken on reviewing the performance of the Borough's Green Belt designation.

## **2.7 Green Belt Study 2017**

- 2.7.1 Alongside the SHMA, the Council has undertaken a review of the performance the Green Belt. The purpose of the Green Belt Study (GBS) is to provide evidence of how different areas perform against the Green Belt purposes as set out within the National Planning Policy Framework relevant to Epsom & Ewell.
- 2.7.2 The GBS is a technical evidence base document that provides an objective assessment of the designated Metropolitan Green Belt located within the Borough boundary. The assessment includes the identification of the Broad Areas of the Green Belt within the Borough and smaller Local Areas (referred to as Refined Parcels) based on function and boundary features.

- 2.7.3 The study also assessed discrete parcels of land immediately adjoining the defined Green Belt boundary for their suitability for inclusion within the Green Belt. In order to achieve a completely objective assessment, the GBS took a 'policy off' approach.
- 2.7.4 Further work is due to be commissioned which, informed by the Constraints Study 2017, will provide a refined review of the Borough's Green Belt.
- 2.7.5 This would include a comprehensive 'policy on' assessment of the Green Belt to enable the identification of areas of land not affected by constraints that would prevent development taking place as well as locations where it's would not be possible to mitigate impacts. In addition, it is expected this work will assess in further detail the robustness of the Refined Parcels boundaries and those non-green belt sites identified as well as the potential cumulative implications of any amendments to the existing Green Belt boundary.
- 2.7.6 This further assessment along with other key evidence base documents will inform any forthcoming consideration of whether exceptional circumstances exist to amend the Green Belt boundary. This could include removal and/ or additions to the same.

### **3 Epsom & Ewell's Housing Land Supply**

#### **3.1 Committed Residual Developments**

- 3.1.1 Existing housing commitments in the Borough equates to 430 new dwellings, this comprises 253 residential units currently under construction and a further 177 units committed by virtue of planning permissions that are yet to be implemented. These sites are listed by electoral Ward within Appendix 2 &3.
- 3.1.2 Sites with an outstanding unimplemented planning permission were reconsidered to determine whether the site is likely to be delivered.

#### **3.2 Sources of SHLAA Sites**

- 3.2.1 In line with the SHLAA methodology, the Council undertook a desktop review to search for sites and was proactive in identifying as wide a range as possible of sites for residential development. These are outlined below and summarised in Table1 below.

##### **Review of Previous SHLAA Sites**

- 3.2.2 The previous SHLAA 2009 surveyed and assessed a total 316 sites. Over 70 of these sites have now come forward. Those sites with an estimated capacity below the SHLAA threshold of 5 or more net units were also removed (64 in total). There were 205 sites that had not come forward since the 2009 SHLAA was published. Of these, 171 sites were not included in any previous housing land supply figures.
- 3.2.3 The SHLAA reassessed all of the remaining sites to ensure that individual site assessments were up to date as policy and circumstances may have changed since the 2009 publication. For example, changes to the requirements for residential parking provision (through the adoption of the 2015 SPD) has led to a reduction in the estimated number of units at a number of sites and the introduction of Policy DM16 and its presumption against domestic garden land, which now renders a number of sites unsuitable.

##### **Allocations and Preferred Housing Sites**

- 3.2.4 The Epsom and Ewell District Wide Local Plan 2000 allocated 6 housing development sites across the Borough, of these, five sites have been developed or in the process of coming forward. Similarly, Plan E Area Action Plan (2011) allocates a number of sites for residential and mixed used development.
- 3.2.5 As part of preparation towards the Site Allocation DPD, in 2011 the Council produced a Housing Site Allocations Consultation Paper. This identified preferred housing sites with the potential to deliver ten or more new homes.
- 3.2.6 The remaining 20 undeveloped site's of the allocations and preferred site were assessed.

### **Planning Enquiries, Refusals & Withdrawals**

- 3.2.7 The Council looked at pre-application enquiries for residential development dating back to July 2008<sup>3</sup>. Providing that an application has not subsequently been submitted, the development potential of each site was assessed.
- 3.2.8 Those sites which have been refused planning permission by the Council or dismissed at appeal since July 2008 were considered. Again this is on the proviso, that a subsequent application for the development of a site had not been submitted and granted planning permission. A key consideration was whether the reasons for refusal/dismissal could be overcome. From this source 31 sites were assessed.

### **Call for Sites Submissions**

- 3.2.9 The Council carried out a Call for Sites exercise from 24 February to 24 March 2017. As part of the consultation, the Council wrote to key stakeholders including known landowners planning agents and house builders with interests in the Borough. The Call for Sites was promoted through the Council's website.
- 3.2.10 In total submissions promoting residential development at 34 individual sites were received. It should be noted that 2 sites already benefitted from unimplemented planning permissions and 2 were preferred housing sites.

### **Review of Council Assets**

- 3.2.11 The Council has land holdings within the Borough, including sites occupied by its facilities, such as car parks. The Council has reviewed its land holdings, to consider how best they can be used for a variety of purposes in the future. In total 8 sites deemed surplus and/ or suitable for residential development have been put forward by the Council's Property Services through the Call for Sites exercise.

### **Review of Empty Property Register**

- 3.2.12 Vacant dwellings are inevitable as people's circumstances change; however, there could be some housing capacity in the number of vacant dwellings that could be brought back into use. It is reasonable to assume that the capacity from vacant dwelling should be based on the extent to which local vacancy rates exceed national averages.
- 3.2.13 The Government has committed to bring empty homes back into use. Along with other legislation and initiatives Paragraph 51 of the NPPF states 'local planning authorities should identify and bring back empty housing and buildings in line with local housing and empty homes strategies, and, where appropriate, acquire properties compulsory purchases powers.'
- 3.2.14 The Council's Empty Property Register was reviewed and there are just over 300 empty homes in the Borough which are classed as 'long term empty' having been unoccupied for more than 6 months and no Council tax was

---

<sup>3</sup> The Council has taken the date of July 2008 as its baseline, as it represents the close of the previous SHLAA search for sites.

generated. A significant proportion of these properties are within probate or within the pipeline for development or are being refurbished. As a result, the ‘true’ number of long term empty properties will be lower. However, it appears that the potential source of supply of market homes from empty stock is modest. It should be noted that the Council has been contacting some empty homes owners has applied a subtle level of pressure to developers who had land banked their scheme and may well have had an influence on the timing of their progressing their plans. Two SHLAA Opportunity sites (Site REF: 184 & 500) with the potential to deliver 11 & 12 net units respectively have been included as a result of such intervention.

### **Pure Opportunity Sites**

3.2.15 Using Officer knowledge of the Borough, 2 sites were identified as having long term potential for residential development. This was also based on experience of similar sites coming forward as well as the neighbouring land uses and patterns of development.

Sources of SHLAA Sites	No. of sites
<b>Previous SHLAA sites<sup>4</sup></b>	181
<b>Allocations and Preferred Housing Sites</b>	20
<b>Planning Enquiries, Refusals &amp; Withdrawals</b>	31
<b>Call for Sites submissions</b>	30
<b>Pure Opportunity Sites</b>	2
<b>Total</b>	<b>264</b>

**Table 1: Sources of sites put forward for assessment**

### **3.3 Site Availability Confirmation (SAC) Responses**

3.3.1 To establish the availability of ‘long standing’ previous SHLAA sites and those sites where there had been limited or no recent planning history or interest, the Council proactively contacted the registered landowners.

3.3.2 SAC forms were sent to the registered land owner of 19 sites. In total, 11 completed forms were received, all of which indicated some level of interest in bring forward the site. When no response was received Officers took a view, considering if similar sites had become available. The SAC was a useful exercise as it was able to confirm interest and in some instances expected timescales for delivery and the submission of a planning application.

#### **SHLAA Opportunity Sites**

3.3.3 In total, some 264 sites were identified from various data sources (as discussed above). Each site was assessed for its suitability, availability and achievability.

---

<sup>4</sup> To avoid double counting this figure excluded previous SHLAA sites which either now allocated or a preferred housings site or sites submitted through the Call for Sites exercise.

- 3.3.4 Following this first assessment 203 sites were discounted and a summary of the discounted sites can be found in Section 3.4 below. The remaining sites were subject to an ‘officer level review’, in which the potential yield and timeframe for development was discussed by Officers from across the planning team. Officers also 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.
- 3.3.5 The above factors were considered to reach a judgment on each site’s overall viability, deliverability and developability. Taking these factors into consideration, Officers placed the sites within five year timeframes that comprise the SHLAA delivery periods. The officer review was a highly valued exercise and it should be noted that following the officer level review a small number of sites were discounted and in some instances yield reduced or increased based on officer experience.
- 3.3.6 Following this review the SHLAA identified 61 opportunity sites with the capacity to deliver 1,819 units. The potential supply of identified sites considered to ‘deliverable’ (1-5 years) is 221 units. As shown in Table 2 below, the assessment identified 1,319 units which the Council considers ‘developable’ within years 6-10 and 282 units within years 11- 15+ across the Borough.
- 3.3.7 The distribution of the sites across the Borough is outlined in Table 3 which provides a summary of the number units expected to be delivered in each 5 year timeframe by electoral Ward. In addition to this summary, Appendix 4 provides a detail breakdown of the SHLAA Opportunity sites by Ward.

	Yrs	No. of sites	No. of units (net)
<b>Deliverable Sites</b>	1-5	15	<b>221</b>
<b>Developable Sites</b>	6-10	36	<b>1,316</b>
	11-15	10	<b>282</b>
<b>Total</b>		<b>61</b>	<b>1,819</b>

**Table 2: Summary of Identified Deliverable / Developable Opportunity Sites (Source: SHLAA 2017)**

Ward	Deliverable Sites (units)		Developable Sites (units)	Total
	1-5 yrs	6-10 yrs	11-15+ yrs	
Auriol Ward	---	20	---	20
College Ward	15	84	---	99
Court Ward	3	63	---	66
Cuddington Ward	5	51	8	64
Ewell Court	---	---	---	0
Ewell Ward	6	32	129	167
Nonsuch Ward	85	35	15	135
Ruxley Ward	6	255	10	271
Stamford Ward	11	171	---	182
Stoneleigh Ward	---	40	---	40
Town Ward	90	550	120	760
West Ewell	----	----	---	0
Woodcote Ward	----	15	---	15
<b>Total</b>	<b>221</b>	<b>1,316</b>	<b>282</b>	<b>1,819</b>

Table 3: Summary of Housing Land Supply 2017-2032 by Ward (Source: SHLAA 2017)

3.3.8 In conformity with existing local plan policies, the SHLAA had a general presumption against housing development in the Green Belt, backland garden sites, allotments, open space as well as employment land. Table 4 provides a breakdown of potential units to be delivered on previously developed and greenfield sites.

Land Classification	No. of units
<b>Built up Area</b>	<b>1,644</b>
<b>Built up area- Greenfield</b>	339
<b>Build up area-Brownfield</b>	1290
<b>Build up area- Backland</b>	15
<b>Previously Developed Site within Green Belt</b>	<b>175</b>

Table 4: Land Classifications of Deliverable / Developable SHLAA Opportunity Sites (Source: SHLAA 2017)

### 3.4 Review of Previous SHLAA Sites

3.4.1 As mentioned above, the previous SHLAA 2009 surveyed and assessed a total 316 sites. Over 70 of these sites have now come forward. Those sites with an estimated capacity below the SHLAA threshold of 5 or more net units were also removed (64 in total). There were 206 sites that had not come forward since the 2009 SHLAA was published. Of these, 171 sites were not included in any previous housing land supply figures.

3.4.2 Of the 205 previous SHLAA sites assessed, 34 were considered to be current opportunity sites and included within the land supply figures. 100 sites were considered unsuitable under the current Local Plan. Tables 5 and 6 provide a summary of the review of the previous SHLAA, including reasons for discounting the site and their previous SHLAA Categories. In addition, Table 7 provides the land classifications of the discounted previous SHLAA sites.

	No. of sites
<b>SHLAA Opportunity Sites 2017</b>	34
<b>Sites Discounted</b>	170
<b>Site is not suitable under current local plan</b>	100
<b>Site is suitable but not available</b>	69

Table 5: Summary of the review of Previous SHLAA sites (Source: SHLAA 2017)

Previous 2009 SHLAA Category	No. of sites discounted in 2017 SHLAA
Category 1	0
Category 2	3
Category 3	9
Category 4	41
Category 5	117
<b>Total</b>	<b>170</b>

Table 6: Discounted previous SHLAA 2009 site by category (Source: SHLAA 2017)



Land Classification	No. of sites
<b>Built up Area</b>	<b>81</b>
<b>Built up area- Greenfield</b>	23
<b>Built up area-Brownfield</b>	21
<b>Built up area- Backland</b>	36
<b>Built up area-Office/ employment land</b>	1
<b>Green Belt</b>	<b>19</b>
<b>Previously developed land</b>	4
<b>Greenfield</b>	14
<b>Backland</b>	1

Table 7: Land Classification of Discounted Previous SHLAA sites (Source: SHLAA 2017)

### 3.5 Summary of Discounted Sites

3.5.1 In total 203 sites were discounted from the housing land supply. It was considered that 113 of these sites were unsuitable for residential development when assessed against the current policy. Just 20 sites were discounted solely on the grounds that they were not considered to be available and there were no sites discounted solely on the grounds of achievability. Table 8 provides a summary of the reasons for discounting sites and alongside this, Table 9 provides a breakdown of the discounted site by land classification and type.

Reason for discount	No. of sites
<b>Discount included grounds of suitability</b>	113
<b>Discounted on the grounds of availability only</b>	20
<b>Discounted on the grounds of achievability only</b>	0
<b>Discount included ground of achievability</b>	126
<b>Yield would be below SHLAA threshold (windfall)</b>	18

Table 8: Summary of reasons for discounting of sites (Source: SHLAA 2017)

<b>Land Classification</b>	<b>No. of sites</b>
<b>Built up Area</b>	<b>160</b>
<b>Built up area- Greenfield</b>	28
<b>Build up area-Brownfield</b>	79
<b>Build up area- Backland</b>	49
<b>Built up area-Office/ employment land</b>	4
<b>Green Belt</b>	<b>25</b>
<b>Previously developed land</b>	5
<b>Greenfield</b>	17
<b>Backland</b>	1
<b>Mixed</b>	2

**Table 9: Land Classifications of discounted sites (excluding windfall sites) (Source: SHLAA 2017)**

## **4 Meeting Epsom & Ewell's Housing Target and Assessed Housing Need**

### **4.1 Five Year Land Supply and Housing Trajectory**

4.1.1 As outlined in the methodology the role of the SHLAA is to provide initial information on the range of sites which are available, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs. The SHLAA's findings, including a 5 year trajectory will be cross referenced with the outcomes of the SHMA to establish the Borough's land supply.

4.1.2 The Borough's housing land supply is derived from the following sources:

- Past housing figures from with the plan period;
- Number of units currently under construction;
- Unimplemented planning permissions;
- SHLAA opportunity sites; and
- Windfall sites.

4.1.3 The ability of the Council to identify sufficient housing land against the housing target and the identified (albeit untested) housing needs figure, will determine the path of the review of the Core Strategy.

### **4.2 Land Supply Buffers and Non-implementation Discount Rates**

4.2.1 As previously stated, Paragraph 47 of the NPPF requires LPAs to demonstrate a five year supply of deliverable housing land plus a 5% buffer to 'ensure choice and competition in the market for land'. The NPPF also requires LPAs, where there has been a record of persistent under delivery of housing, to increase this buffer to 20% to 'provide a realistic prospect of achieving the planned supply' on top of ensuring choice and competition in the land market.

4.2.2 Epsom & Ewell has a strong and consistent record of delivering housing against its adopted Core Strategy target. In light of this, the Council considers the 5% buffer is appropriate. Furthermore, the SHMA 2016 and past housing delivery indicates that the local housing market area is attractive and generally resilient.

4.2.3 Not all planning permissions are implemented. Although the Council monitoring data is not conclusive with regards to lapsed permissions, Officers consider a 5% non-implementation discount is appropriate for sites with planning permission. This would represent a reasonable and positive figure based on local experience and judgement.

4.2.4 In conformity with the PPG, the SHLAA considers the deliverability and developability of sites within the short and medium term. This has included making a judgement on the realistic prospect of a site coming forward. This has led to a discounting of a number of long standing sites on the basis of availability.

- 4.2.5 As the Council has taken a cautious but proactive approach to establishing the availability of sites, it is considered reasonable that a 15% rate is applied to opportunity sites.
- 4.2.6 The Council is of the view that the proposed 5% supply buffer and the non-implementation discount rates in conjunction with a robust assessment of sites, yields and estimated timeframes that a realistic and sound housing land supply calculation and housing trajectory can be produced.
- 4.2.7 This approach provides sufficient flexibility to take account of the natural (albeit modest) peaks and troughs of the housing market cycle, prevents an overreliance on the delivery of all opportunity sites as well as ensuring choice and competition in the land market.

### 4.3 **Windfall Allowance Calculation**

- 4.3.1 Paragraph 48 of the NPPF states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the historic windfall delivery rates and expected future trends, and should not include residential gardens.
- 4.3.2 The Council is committed to monitoring its approach to windfall development and does so, on an on-going basis. To date the Council has not included a windfall allowance within its 5 year housing land figure or within its housing trajectories. However, it has monitored and reported the delivery of such sites.
- 4.3.3 Past trends indicate that throughout the previous 8 years the 0-4 (net) windfall figure has mostly consisted of:
- Small house conversions from one unit to two/ three.
  - The erection of one- four new houses within the curtilage of an existing property/ garden land (with or without demolition).
  - Conversion of upper floor above retail units to flats.
- 4.3.4 The average number of units resulting from windfall sites with 1-4 units (net gain) is 31 per year for the last eight years. However, the impact of Policy DM16 (Backland Development) is unclear but it is considered likely to have a reducing effect on the number of new houses built in back gardens. With this in mind it is suggested that the figure of 31 is reduced by 12% in line with the average percentage of small windfalls that are classified as garden land developments each year. This takes the average number of windfalls on sites of 1-4 units to 27 per annum.
- 4.3.5 The Council has adopted a precautionary approach to forecasting windfall allowance to reflect the finite supply of smaller sites. Therefore a reduction in the number of the small windfalls coming forward should also be included as the possible windfall sites will inevitably reduce. A reduction to 20 units per annum is suggested for the last five years (yrs 11-15) of the forthcoming plan period.
- 4.3.6 It is considered that a non-implementation discount rate for windfall sites is not required as this has been reflected in the phased reduction in delivery.

4.3.7 There was no reliance on this source of supply in the years 1-5 of the land supply as effectively these are included within the total number of units committed through current planning permissions. Therefore, the 2017 SHLAA windfall allowance has only been applied to years 6-10 & 11 to 15 respectively.

#### 4.4 Meeting Epsom & Ewell's Existing Housing Target

##### Core Strategy 2007-2022

4.4.1 As of the end of March 2017 the Council's current housing target had reduced to delivering a minimum of 101 homes by 2022, an average of 20.2 per annum over the remaining 5 years of the plan period.

##### Five Year Housing Land Supply

4.4.2 Paragraph 47 of the NPPF requires LPAs to demonstrate a five year supply of deliverable housing land plus a 5 % buffer. The 5 year land supply objective is therefore:

**Calculation: (20.2 units x 5 years= 101) +5% buffer = 106.05 units / 21.2 per annum**

4.4.3 Table 10 provides a breakdown of the Council's 5 year housing land supply objective target and calculation. Table 11 provides an estimate of delivery over the next 5 years; this includes assumptions based on the delivery of larger housing sites which are expected to commence and be delivered over this period.

Deliverable Housing Sites <sup>5</sup>	Units
<b>Under construction</b>	253
<b>Unimplemented planning permissions</b>	168
<b>SHLAA opportunity sites</b>	188
<b>Total</b>	609
<b>Annualised supply</b>	121
<b>Years of supply</b>	<b>5.7yrs</b>

**Table 10: Core Strategy 5 Year Housing Land Supply objective (Source: Emerging AMR 2016/17 & SHLAA 2017)**

<sup>5</sup> Incorporating the non-implementation discount rate

## Core Strategy 2007-2026: Housing Trajectory

Source of supply	2017/18	2018/19	2019/20	2020/21	2021/22	Total
<b>Delivered (2,611 homes) 2007-2016/17</b>						2611
<b>Under construction (255 homes)</b>	159	84	10			253
<b>Planning Permissions</b>	33	64	80			177
<b>Small SHLAA sites (5-10 units)</b>		5		34		39
<b>Medium SHLAA sites (11-19 units)</b>					26	26
<b>Large SHLAA sites (20 units +)</b>						
<b>Tesco Site, Depot Road/ Upper High Street</b>		30				30
<b>Spread Eagle Shopping Centre, High Street</b>		15	10			25
<b>Former Police Station, Church Street</b>		10	11			21
<b>Phase 2, Sycamore Gardens, former NESCOL land</b>		30	30	20		80
<b>Total</b>	<b>192</b>	<b>238</b>	<b>141</b>	<b>54</b>	<b>26</b>	<b>3262</b>

**Table 11: Housing Trajectory against the Core Strategy Housing Target**

4.4.4 Table 11 depicts the rationalised trajectory and shows past delivery rates since 2007. The table provides a breakdown of the expected delivery in each remaining reporting year as well as the expected delivery rate of the Borough's larger SHLAA opportunity sites. In addition, the trajectory shows the annual residual housing requirements until the end of the Core Strategy plan period.

4.4.5 The SHLAA demonstrates that the Council has a 5 year housing supply plus 5% buffer. Furthermore, the Borough has the potential housing sites to exceed the housing requirement as set by the Core Strategy.

### 4.5 Meeting Epsom & Ewell's Objectively Assessed Housing Need Figure

#### Housing Supply 2015-2035 against the OAHN

4.5.1 The SHMA 2016 has identified the need to provide 8,360 new homes of a 20 year period, 2015-2035 at 418 units per annum.

4.5.2 The next local plan period will run from 2015 (the evidence baseline) until 2032 to enable a 15 year land supply from the 2017 reporting year.

4.5.3 Therefore, the housing need figure of the plan period would be 418 units x 17 years = 7,106 units.

4.5.4 Paragraph 47 of the NPPF requires LPAs to demonstrate a five year supply of deliverable housing land plus a 5 % buffer. The 5 year land supply objective is therefore:

**Calculation: (418units x 17yrs= ) +5% buffer = 7,461units / 439per annum**

### **OAHN: Five Year Housing Land Supply**

4.5.5 Over 2015/16 and 2016/17 522 units have been completed, reducing the identified need to 6,939 units therefore resulting the annual figure to 463 for the remaining 15 years of the 17 year plan period. This would be a total requirement to delivery 2,375 over the five year period 2017-2022. Table 12 provides a breakdown of the Council’s 5 year housing land supply calculations based on the OAHN figure, its demonstrates that 1.3 years of supply can currently be identified.

<b>Deliverable Housing Sites</b>	<b>Units</b>
<b>Under construction</b>	253
<b>Unimplemented planning permissions</b>	168
<b>SHLAA opportunity sites 1-5 yrs</b>	188
<b>Total</b>	609
<b>Years of supply</b>	<b>1.3</b>
<b>Residual</b>	<b>-1,706 (-74%)</b>

**Table 12: OAHN 5 Year Housing Land Supply objective (Source: Emerging AMR 2016/17 & SHLAA 2017)**

### **OAHN: Housing Trajectory**

4.5.6 Table 13 provides an overall summary of the supply of housing land against the OAHN figure for the next plan period 2015-2032. It also provides an estimate of delivery yields and timeframe from the SHLAA opportunity sites by size (small, medium & large). Table 14 provides a trajectory of housing delivery against the OAHN figure.

4.5.7 As there is less certainty over the exact yearly completions beyond 5 years, the trajectories provide an estimated total of the 6-10yrs and 11-15yrs time periods. Where an annual figure is required the anticipated total delivery for that 5 year period should be divided by 5.

4.5.8 A more detailed Housing Trajectory can be found in Appendix 1 which includes a breakdown of the larger SHLAA sites.

---

<sup>6</sup> Incorporating the non-implementation discount rate

<b>Deliverable/Developable Housing Sites<sup>7</sup></b>	<b>Units</b>
<b>Under construction</b>	253
<b>Unimplemented planning permissions</b>	168
<b>SHLAA Opportunity sites 1-5 yrs</b>	188
<b>SHLAA Opportunity sites 6-10 yrs</b>	1,119
<b>SHLAA Opportunity sites 11-15+ yrs</b>	240
<b>Windfall sites 6-10 yrs</b>	135
<b>Windfall sites 11-15+ yrs</b>	100
<b>Total</b>	2,203
<b>Years of supply</b>	<b>4.8</b>
<b>Residual</b>	<b>-4,381 (-62%)</b>

Table 13: Summary of Housing Land Supply against OAHN figure (Source: Emerging AMR 2016/17 & SHLAA 2017)

---

<sup>7</sup> Incorporating the non-implementation discount rate



Source	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022-27 6-10 yrs	2027-32 11-15 yrs	Total	Dis8
Delivered	199	323								522	522
Under construction			159	84	10					253	253
Planning Permissions			33	64	80					177	168
Small SHLAA Sites (1-10 units)				5		34		86	18	143	121
Medium SHLAA Sites (11-19 units)								94	15	135	115
Large SHLAA Sites (20+)				85	51	20	26	1136	249	1541	1310
Windfall								135	100	235	235
<b>Total</b>	199	323	192	238	141	54	26	1451	382	3006	2725
Cumulative Total	199	522	714	952	1093	1147	1173	2624	3006	--	--
Cumulative Target	418	836	1254	1672	2090	2518	2926	5016	--		
Cumulative Target + 5% buffer	439	878	1317	1756	2195	2634	3073	5268	--		

**Table 14: Summary of Housing Trajectory against OAHN figure (Source: Emerging AMR 2016/17 & SHLAA 2017)**

### Overall Housing Land Supply Position

4.5.9 The 5 year Housing Supply calculation and Housing Trajectory indicates that, overall:

- Epsom & Ewell does not have a 5 year forward supply of deliverable sites equal to the OAHN figure.
- Against the OAHN figure of 7,106 units between 2015 and 2032, a forward supply of only 2,275 deliverable/ developable units have been identified. Consequently, Epsom & Ewell can achieve less than 40% of the projected housing need to 2032.
- There will be a residual requirement of 4,381 units net, across the 17 year plan period.

4.5.10 In summary, it is clear that the supply of sites within the built up area and in compliance with current local plan policy will not meet the Epsom & Ewell OAHN. There would be a significant shortfall of over 4,000 units.

<sup>8</sup> Incorporating the non-implementation discount rate

4.5.11 Tables 15 and 16 below provide a summary of the Epsom & Ewell housing land supply position following completion of the SHLAA.

### Summary of Epsom & Ewell's Housing Land Supply

Approach	Completed Sites April 2007 – March 2017	Under Construction at April 2017	Planning Permissions not yet implemented at April 2017	SHLAA Opportunity Sites		Total Estimated Capacity	Housing Target 2007-2022	Surplus / Shortfall
				Apr 2017-Mar 2022 1 – 5 Years				
1	2611	253	177	221		3262	2715	547 (+20%)
2*	2611	253	168	188		3220	2715	505 (+19%)

**Table 15: Housing Land Supply 2007– 2022 (Core Strategy) (Source: SHLAA 2017 & Emerging AMR 2016/17)**

*\*\*Non-implementation discount rates applied - refer to Section 4.2 for assumptions*

Approach	Completed Sites April 2015 – March 2017	Under Construction at April 2017	Planning Permissions not yet implemented at April 2017	SHLAA Opportunity Sites			Small Site Windfall* Allowance 2022 –2032 (10yrs)	Total Estimated Capacity	Objectively Assessed Housing Need (OAHN) (17 yrs)	Surplus / Shortfall
				Apr 2017- Mar 2022	Apr 2022- Mar 2027	Apr 2027- Mar 2032				
				1-5 Yrs	6-10 Yrs	11- 15Yrs				
1	522	253	177	221	1316	282	235	3006	7106	-4100 (-48%)
2**	522	253	168	188	1119	240	235	2725	7106	-4381 (-62%)

**Table 16: Housing Land Supply 2015 – 2032 to meet Objectively Assessed Housing Need (Source: SHLAA 2017 & Emerging AMR 2016/17)**

*\*Rationalised windfall figure- refer to Section 4.3 for calculation and assumptions*

*\*\*Non-implementation Discount rates applied – refer to Section 4.2 for assumptions*

## **5 Conclusions and Next Steps**

### **5.1 Conclusions**

- 5.1.1 The SHLAA has identified sites within Epsom & Ewell which comply with current policy and considered suitable for housing and which are deliverable and developable. These sites have the potential capacity of delivering approximately 2,725 new homes.
- 5.1.2 The Councils' current Core Strategy plans for the delivery of 2,715 net new homes between 2007 and 2022, with an average delivery of 181 net homes per annum. Strong delivery to date and the identification of sufficient land, through existing housing commitments and opportunity sites, indicates that the Council will exceed the existing target. Notwithstanding this, the Government is clear that a housing target based on a pre-NPPF plan and evidence base (such as the Epsom & Ewell Core Strategy) is out of date and could be open to challenge.
- 5.1.3 The Strategic Housing Market Assessment (SHMA) 2016 has identified the need to deliver 418 new homes within Epsom and Ewell per annum from 2015 to 2035. This is a significant increase in what had been previously planned for. The updated evidence in relation to housing need has clearly indicated that the housing targets set within the Core Strategy are no longer up to date.
- 5.1.4 Through the undertaking of the SHLAA it is apparent that, under current policy, the Council is not able to identify sufficient land to meet its housing need in accordance with the National Planning Policy Framework (NPPF) and more specifically, the Council will not be able to demonstrate a 5 year housing land supply + 5%. In total, 62% of the housing needs figure would be unmet, equating to 4,381 units across the 17 year period (2015-2032).

### **5.2 Next Steps**

- 5.2.1 It is important to note that the SHLAA is a starting point for the Council in its responsibility to prepare an up to date local plan to ensure that there is an adequate land supply to meet the needs of the Borough.
- 5.2.2 However, further work is required to enable the Council to assess the options for and implications of meeting the OAHN for the Borough. This includes revisiting some of the Council's assumptions relating to site suitability and capacity. In addition work will need to be undertaken to consider, in full, the approaches that could be applied to achieving the residual housing need figure in the existing built up area. This will likely take the form of an Alternative Sources of Housing Land Supply Paper.
- 5.2.3 In meeting this shortfall, the Council and its residents may be required to make some tough policy choices. In conformity with existing local plan policies, the SHLAA had a general presumption against housing development in the Green Belt, backland garden sites, allotments, open space as well as employment land. Furthermore, yields were guided by the existing policies in relation to density and building

heights. There may be a need to revisit some of these areas due to the long term under supply of housing sites.

- 5.2.4 As outlined in section 3 of this report, a substantial proportion of the 'Call for Sites' submissions made by landowners and developers were large sites located in the Green Belt. This could mean the consideration of sites outside of the built up area for which the Green Belt Study as well as the consideration of exceptional circumstances will be fundamental to any assessment of such land.
- 5.2.5 With regard to increasing the 5 year housing land supply figure, in the short term, the Council should undertake a detailed review of the sites within 6-10 year timeframe to consider if there are any opportunities which could enable the site to come forward earlier. This could include positive Council intervention such as preparing Development Briefs to provide greater certainty for the market or promoting the use of Planning Performance Agreements committing to clear time scales for decisions on planning applications. However, considering the extent of the shortfall and the robust approach undertaken in the initial assessment, any resultant increase in the figures is likely to be limited. Furthermore, there is a risk that over confidence in the timescale for a site's delivery could be open to challenge.

## Appendix 1: Detailed Housing Trajectory against Objectively Assessed Housing Need Figure

Source	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022-27 6-10 yrs	2027-32 11-15 yrs	Total	Dis <sup>9</sup>
Delivered	199	323								522	522
Under construction			159	84	10					253	253
Planning Permissions			33	64	80					177	168
Small SHLAA Sites (1-10 units)				5		34		86	18	143	121
Medium SHLAA Sites (11-19 units)								94	15	135	115

### Large SHLAA Sites (20+ units)

Tesco Site, Depot Road/ Upper High Street				30						30	1547
Spread Eagle Shopping Centre, High Street				15						11	
Former Police Station, Church Street				10	11					21	
Phase 2, Sycamore Gardens, former NESOCOT land				30	30	20				80	
Epsom Baptist Church, Church Street								41		41	
TA Centre, Welbeck Close									62	62	
Longmead Road/ Gibraltar Crescent								50		50	

<sup>9</sup> Incorporating the non-implementation discount rate

Source	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022-27 6-10 yrs	2027-32 11-15 yrs	Total	Dis <sup>9</sup>
Church Street Conservative Club, Epsom Club and United Reform Church								40		40	
Dairy Crest Ltd								20		20	
32 Waterloo Road/ BRM Coachworks									30	30	
Land at Epsom and Ewell High School								130		130	
29-37 East Street, Gas and Water Works Site								165		165	
Hope Lodge Car Park									30	30	
The Organ & Dragon, London Road								40		40	
Fire Station, Church Street								25		25	
EEBC Town Hall, The Parade									30	30	
Swail House, Ashley Road								150		150	
Depot Road Car Park									30	30	
Priest's Hill Sports Centre, Cheam Road								20		20	
Grafton Stables								40		40	
Linden House, 9 College Road								25		25	
Land South of Sailsbury Road								20		20	

Source	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022-27 6-10 yrs	2027-32 11-15 yrs	Total	Dis <sup>9</sup>
Lower Mill								20		20	
Home Base, 23 Reigate Road									50	50	
Ewell Esso Express, 26 Reigate Road									17	17	
Watersedge Estate Regeneration / Ash Court								110		110	
TK Maxx Store								65		65	
Health Clinic and Ambulance Station, Church Street								25		25	
Remaining West Park Sites								150		150	
Windfall								135	100	235	
Total	199	323	192	238	141	54	26	145 1	382	3006	2725
Cumulative Total	199	522	714	952	109 3	114 7	117 3	262 4	300 6	--	--
Cumulative Target	418	836	125 4	167 2	209 0	251 8	292 6	501 6	--		
Cumulative Target + 5% buffer	439	878	131 7	175 6	219 5	263 4	307 3	526 8	--		

## Appendix 2: Housing Sites Under Construction as of 1 April 2017

Application Number	Site Address	No. of Units (Net)	Permission Date	Estimated Completion Year
--------------------	--------------	--------------------	-----------------	---------------------------

### Auriol Ward

14/00952	5A Stoneleigh Park Road, Stoneleigh	1	07/11/2014	2017/18
----------	-------------------------------------	---	------------	---------

### College Ward

14/01153	South Hatch Racing Club, 46 Burgh Heath Road	1	09/01/2015	2017/18
14/01579	3 Alexandra Road, Epsom	5	01/04/2015	2017/18
14/01855	Priam Lodge Stables, 83 Burgh Heath Road, Epsom	4	09/06/2015	2017/18
15/01323/FUL	Berridale, 15 College Road	10	06/12/2015	2019/20

### Court Ward

14/01766	72 - 74 Temple Road, Epsom	6	24/04/2015	2018/19
15/01395	Garages 23 to 42 Teddington Close	6	18/02/2016	2018/19
15/01497/FUL	101 to 111 Hollymoor Lane	24	17/03/2016	2018/19
13/01718/FUL	Meadowcroft, 56 Longmead Road	3	27/11/2014	2018/19
16/00348/FUL	School Bungalow, Longmead Road, Epsom	5	15/06/2016	2018/19

### Cuddington Ward

10/00465	13 The Avenue, Worcester Park	5	26/10/2010	2017/18
13/00924	19 Cleveland Gardens, Worcester Park	3	11/12/2013	2017/18

### Ewell Ward



Application Number	Site Address	No. of Units (Net)	Permission Date	Estimated Completion Year
12/00985	8 The Hawthorns, Ewell	2	18/03/2013	2017/18
15/01133 (also 15/01574/REM)	4-6 Chuters Grove, Epsom	2	23/12/2015	2017/18
15/01548/FUL	6 to 8 Chuters Grove	2	24/03/2016	2017/18
15/00362	Land Rear of 13 to 26 Elm Road & 121 to 159 Kingston Road, Ewell	3	30/07/2015	2017/18
13/01334	6 Chuters Grove, Epsom	2	27/06/2014	2017/18
15/00632	Epsom Marble, 49 High Street, Ewell	1	22/09/2015	2017/18
16/00378/PDC OU	Bank House, 42 High Street, Ewell	4	02/06/2016	2018/19

#### Ewell Court Ward

14/01036	2 Elm Way, Ewell	1	05/12/2014	2017/18
15/00297	2 Riverview Road, Ewell	1	10/07/2015	2017/18
15/01215/FUL	News Shop 12 Ruxley Lane West Ewell	1	01/12/2015	2017/18
14/00646	69 Meadow Walk, Ewell	1	23/09/2014	2017/18

#### Nonsuch Ward

15/00098	NESCOT Agricultural Land, Reigate Road, Ewell	60	20/08/2015	2017/18
----------	---	----	------------	---------

#### Ruxley Ward

11/00366	117 Ruxley Lane, West Ewell	2	17/08/2011	2017/18
15/01544/FUL	60 Cox Lane	1	21/03/2016	2017/18
16/00380/FLH	97 Ruxley Lane West Ewell	1	21/07/2016	2017/18

#### Stamford Ward

14/00032	Pine Lodge, Horton Lane	10	20/06/2014	2017/18
15/00492	Court Lodge, Court Lane, Epsom	9	24/07/2015	2018/19
16/01340/FUL	Epsom Common Working Mens Club 121 - 122	2	06/03/2017	2018/19

Application Number	Site Address	No. of Units (Net)	Permission Date	Estimated Completion Year
	Stamford Green Epsom			

#### Stoneleigh Ward

14/00795	Rear of 72 Stoneleigh Broadway	6	11/11/2014	2017/18
15/00076	27 Ewell Park Way, Stoneleigh	1	05/08/2015	2017/18
15/00076	Land adj to 27 Ewell Park Way, Stoneleigh	1	05/08/2015	2017/18
10/00366	18 Stoneleigh Broadway, Stoneleigh	2	06/08/2010	2017/18

#### Town Ward

16/00215/FUL & 16/01624/CON	93 - 95 High Street, Epsom	2	07/06/2016	2017/18
15/01913/PDCOU (also 14/00540)	Apex House, West Street, Epsom	4	25/05/2016	2017/18
14/00954/PDCOU	Flat 131 East Street, Epsom	0	02/10/2014	2017/18
16/00410/FUL	The Epsom Framing Company, 41 Waterloo Road	2	20/06/2016	2017/18
11/01469	Barclays Bank Ltd, 82-84 High Street, Epsom	1	14/11/2012	2018/19
15/01561	Trevi 33 Heathcote Road, Epsom	3	30/01/2016	2018/19
15/01532/FUL	Ashley House, Ashley Road	12	27/01/2016	2018/19
13/00530 & 14/00205/CON	31 High Street Epsom	1	18/09/2013	2017/18

#### West Ewell Ward

10/00641	Land adj 41 Plough Road, West Ewell	1	18/01/2011	2017/18
15/00604	93 Chessington Road, Ewell	4	28/08/2015	2017/18

Application Number	Site Address	No. of Units (Net)	Permission Date	Estimated Completion Year
15/00176	14 Station Avenue, West Ewell	1	23/06/2015	2018/19

Woodcote Ward

12/00148	11 Warren Hill, Epsom	1	16/08/2012	2017/18
10/00653	Caithness Cottage, 60 Worple Road, Epsom	3	04/04/2012	2017/18
15/01337/FUL	13 Pine Hill, Epsom	1	29/01/2016	2017/18
15/01370/FUL	Sunnybank, The Ridge	1	16/02/2016	2017/18
15/00804/ 16/00225	86 Grosvenor Road	3	09/11/2015	2017/18
16/00608/FUL	15 Pine Hill, Epsom	1	18/07/2016	2017/18
12/01159/REN	9 & 11 Pine Hill	2	11/03/2013	2017/18
15/01500	Ardingly Court, Woodcote Road	4	21/03/2016	2018/19
15/00967	Kit Stone Kitchens, 77-79 South Street, Epsom	4	28/09/2015	2018/19
15/00992/FUL	Ryebrook Studios, Woodcote Side	14	26/01/2016	2017/18

### Appendix 3: Housing Sites Not Yet Implemented as of 1 April 2017

Application Number	Site Address	No. of Units (Net)	Permission Date	Estimated Completion Year
<b>Auriol Ward</b>				
15/01870/FUL	16 Kirby Close, Ewell	1	07/06/2016	2018/19
<b>College Ward</b>				
16/00489/OUT	32 Downs Road, Epsom	1	12/09/2016	2018/19
<b>Court Ward</b>				
14/00167	Garages 1-9 Ormonde Avenue	2	28/07/2014	2017/18
15/01396	Garages 1 to 37 Bahram Road	5	24/02/2016	2018/19
<b>Cuddington Ward</b>				
16/00520/FLH	17 Cleveland Gardens, Worcester Park	1	05/09/2016	2018/19
15/00377	Land Rear of 35 The Avenue, Worcester Park	2	28/07/2015	2018/19
16/00193/OUT	Land west of Old Malden Lane, Worcester Park	1	16/09/2016	2019/20
<b>Ewell Ward</b>				
14/00296	Ewell Post Office, 4-5 Market Parade, High Street, Ewell	4	26/08/2014	2017/18
15/00548/PDCOU	Brookland House, 2B West Street, Ewell	1	09/07/2015	2017/18
15/01388	Grange Mansions, Kingston Road	4	10/02/2016	2018/19
15/00845/FUL	Salesian College Sports Ground	60	07/06/2016	2019/20
<b>Ewell Court Ward</b>				
14/00077	287 Kingston Road	1	06/08/2014	2017/18
16/00311/FUL	1 Chestnut Avenue,	1	29/07/2016	2018/19

Application Number	Site Address	No. of Units (Net)	Permission Date	Estimated Completion Year
	Ewell			
15/00339	17 Riverview Road, Ewell	1	10/08/2015	2018/19
15/00016	110 Ruxley Lane, West Ewell	1	12/06/2015	2019/20
Nonsuch Ward				
16/00166/FUL	37 & 37a Cheam Road, Ewell	15	05/04/2017	2019/20
Ruxley Ward				
13/01759	Wey Stores, 34 Hogsmill Way	2	23/09/2014	2017/18
16/01401/FUL	The Roveries 59 - 63 Cox Lane West Ewell	8	27/03/2017	2018/19
Stamford Ward				
16/00096/FUL	Epsom Social Club, Horton Lane, Epsom	1	20/06/2016	2018/19
14/01750/RES	57 Woodlands Road, Epsom	5	21/04/2015	2018/19
16/00585/FUL	45 Manor Green Road, Epsom	1	16/09/2016	2018/19
Stoneleigh Ward				
15/01899/FUL	1 Clandon Close, Stoneleigh	1	01/06/2016	2018/19
14/01857/FUL	London Road Lodge Nonsuch Park	1	28/05/2015	2018/19
15/00336	Land Rear 44-48 Stoneleigh Broadway, Stoneleigh	6	23/11/2015	2018/19
Town Ward				
14/00954	Flat 131 East Street, Epsom	1	17/11/2014	2017/18
13/00886	Deeburn, 15 Depot Road, Epsom	1	03/12/2013	2017/18
14/00176	Epsom family Chiropractic, 121 East Street	1	20/06/2014	2017/18

Application Number	Site Address	No. of Units (Net)	Permission Date	Estimated Completion Year
14/00736	122 Hook Road, Epsom, KT19 8TX	2	04/11/2014	2017/18
14/00724/PDCOU	19 Church Road, Epsom	2	31/10/2014	2017/18
15/00308/PDCOU	Offices Above Cadogan House, 4 - 6 High Street, Epsom	7	05/06/2015	2017/18
14/01920/PDCOU	24-28 West Street, Epsom	3	08/04/2015	2017/18
16/01407/FUL	69-71 High Street Epsom	3	13/02/2017	2018/19
15/00043	Haddad House, 91 East Street, Epsom	5	25/06/2015	2018/19
15/00686	15A Upper High Street, Epsom	2	20/11/2015	2018/19
16/00501/PDCOU	Rosebery Lodge, 61a South Street, Epsom	9	18/08/2016	2018/19

#### West Ewell Ward

16/00712/FUL	1 Gadesden Road West Ewell	1	05/10/2016	2018/19
15/01514/FUL	11 Danetree Road, West Ewell	3	14/04/2016	2018/19

#### Woodcote Ward

14/00242	70 Worple Road, Epsom	2	11/07/2014	2017/18
14/01442	54 Rosebery Road, Epsom	4	04/03/2015	2017/18
16/00055/FUL	85 Rosebery Road, Epsom	1	12/07/2016	2018/19
16/01581/FUL	The Gold Peak, Wilmerhatch Lane	1	30/03/2017	2018/19
15/00228	Land At Lord Rosebery Lodge, 6 Elm Grove, Epsom	2	10/09/2015	2019/20
15/00214/OUT	RO 12&14 Grosvenor Road Epsom	1	12/10/2015	2019/20

## Appendix 4: SHLAA Opportunity Sites by Ward

Site Ref	Site Name	Deliverable Sites (units)	Developable Sites (units)	
		1-5 yrs	6-10 yrs	11-15+ yrs

### Auriol Ward

551	Land South of Salisbury Road		20	
Total		---	20	----

### College Ward

21	Rail Land, Mill Road	15		
22	Builders Yard, Mill Road		17	
154	Dairy Crest Ltd		20	
213	Land R/O Sunninghill, Downs Avenue		10	
500	25 Alexandra Road		12	
508	Linden House, 9 College Road		25	
Total		15	84	---

### Court Ward

136	Longmead Road/ Gibraltar Crescent		50	
560	Land at Bishopsmead Close	3		
561	Land at Blenheim School		13	
Total		3	63	---

### Cuddington Ward

91	57 Salisbury Road, Worcester Park		11	
99	Garages R/O Marland Court, Ardrossan Gardens			8
331	Grafton Stables		40	
513	Land to r/o 35 The Avenue, Worcester Park	5		
Total		5	51	8

### Ewell Ward

113	TA Centre, Welbeck Close			62
-----	--------------------------	--	--	----

Site Ref	Site Name	Deliverable Sites (units)	Developable Sites (units)	
		1-5 yrs	6-10 yrs	11-15+ yrs
329	King's Arms Public House, East Street		12	
555	Lower Mill		20	
556	Home Base, 23 Reigate Road			50
557	Ewell Esso Express, 26 Reigate Road			17
562	Bourne Hall Garages	4		
563	Land rear of Fairview Road	2		
Total		6	32	129

#### Nonsuch Ward

43	Public House next to railway bridge, Cheam Road			15
56	86 Reigate Road	5		
194	Etwell House and former coach depot, Station Approach		10	
315	Priest's Hill Sports Centre, Cheam Road		20	
521	47 Cheam Road		5	
553	Phase 2 Sycamore Gardens, former Nescot Land	80		
Total		85	35	15

#### Ruxley Ward

15	442 Chessington Road and coach park			10
171	Epsom and Ewell High School		130	
225	Garage block at Crane Court & Nos.36-40 Rowden Road	6		
305	Cox Lane Community Centre and Surgery, Cox Lane		10	
558	Watersedge Estate Regeneration/ Ash Court		110	
564	Scotts Farm Road		5	
Total		6	255	10



Site Ref	Site Name	Deliverable Sites (units)	Developable Sites (units)	
		1-5 yrs	6-10 yrs	11-15+ yrs

#### Stamford Ward

184	Hollydene & Birchcroft & Court (off Court Lane)	11		
269	Hollywood Lodge, Horton Lane		5	
548	The Sycamore Centre, 14 West Hill		6	
565	The Wells, Spa Drive		10	
569	Remaining West Park Sites		150	
Total		11	171	---

#### Stoneleigh Ward

244	Former The Organ and Dragon, London Road		40	
Total		---	40	---

#### Town Ward

20	Epsom Baptist Church, Church Street		41	
148	Church Street Conservative Club, Epsom Club and United Reform Church		40	
151	6 The Grove and garages at Grove Avenue		7	
159	Land at Rosebank	3		
163	32 Waterloo Road/ BRM Coachworks			30
186	29-37 East Street, Gas and Water Works Site		165	
217	Hope Lodge Car Park,			30
255	Fire Station, Church Street		25	
256	Tesco Site, Depot Road/ Upper High Street	30		
284	EEBC Town Hall, The Parade			30
303	Swail House, Ashley Road		150	
308	Depot Road car park			30

Site Ref	Site Name	Deliverable Sites (units)	Developable Sites (units)	
		1-5 yrs	6-10 yrs	11-15+ yrs
529	24-28 West Street		14	
535	Former Police Station, Church Street	21		
537	Spread Eagle Shopping Centre, High Street	25		
541	81 East Street	6		
566	TK Maxx Store		65	
567	Health Clinic and Ambulance Station, Church Street		25	
568	Land R/O The Albion Public House, High Street		8	
570	Sunnybank House, 39a East Street		10	
571	111 East Street	5		
Total		89	550	120

Woodcote Ward

545	Chalk Lane Hotel, Chalk Lane		15	
Total		---	15	---

Overall Total		221	1316	282
---------------	--	-----	------	-----

## Appendix 5: Definition of Key Terms

Achievable	A site is considered 'achievable/viable' where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and development option and, where appropriate, the capacity of the developer to complete and sell the development over a certain period.
Available	A site is considered 'available' when, based on the information presented there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners that would prevent the site and development option from being delivered
Backland Development	Development on domestic back garden land. In general Policy DM16 sets a presumption against new development on domestic back garden land.
Brownfield Land	As also referred to as 'Previously Developed Land' (PDL)- see definition below
Built up area	Land within the built up / developed areas of the Borough.
Call for Sites	Exercise carried out by the Council inviting interested parties to submit sites for consideration in the Strategy Housing Land Availability Assessment and local plan making process.
Deliverable Site	Site is available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. (NPPF, Para. 47 and Footnote 11 & 12)
Density	A measure illustrating the potential number of dwellings that can be accommodated within a defined area. (Usually measured as the number of dwellings per hectare).  Gross Density- Applying the total area of a site to the Density measurement, before discounting any land from ancillary purposes to the development (i.e. land for roads, access, open space provision)  Net Density- Measurement of the site's area that will actually be developed (i.e. discounting land for roads, access, open space provision)
Developable Site	Site is in a suitable location for development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. (NPPF, Para. 47 and Footnote 11 & 12)
Green Belt	A designation for land around certain cities and large built up areas, which aims to keep this land permanently open or largely undeveloped. The purpose of the Green Belt is to;

	<p>check the unrestricted sprawl of large built up areas;  prevent neighbouring towns from merging into one another;  safeguard the countryside from encroachment;  to preserve the setting and special character of historic towns; and  assist urban regeneration by encouraging the recycling of derelict and other urban land.</p>
Greenfield Land	Land which has never previously been developed. This could be both within and outside the built up area
Housing Trajectory	Report comparing past housing supply performance against future rates of predicted supply
Previously Developed Land (PDL)	<p>Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.</p> <p>PPG, Annex 2: Glossary</p>
SHLAA Opportunity Site	Sites identified as being Deliverable and Developable but do not benefit from planning permission.
Suitable	<p>Site is considered suitable for development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities.</p> <p>For sites not having the benefit of planning permission, policy restrictions, physical problems or limitations, potential impacts and environmental conditions are considered.</p>
Windfall Site	Sites of 4 or less housing units or sites that have not been specifically identified in the local plan process. They comprise previously developed sites that have unexpectedly become available.