

Epsom & Ewell Local Plan – Strategic Housing Land Availability Assessment: Methodology



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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 purpose of this document is to set out the Council's approach to how it will deal with assessing land availability throughout the Local Plan process in the context of the NPPF and Planning Practice Guidance (PPG). This document is a guide to the processes that the Council will undertake and the methodology which will be followed.

1.2 What is a Strategy Housing Land Availability Assessment?

1.2.1 Epsom and Ewell Borough Council is preparing a review and 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 considers the potential future supply of land likely to be available for residential (bricks and mortar) development over the next plan period 2015-2032. 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 prejudice 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 assessment¹ 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

¹ The publication of the site assessment forms will depend on the initial land supply position and whether the assumptions, in particular those in relation to suitability need to be reviewed.

- a housing trajectory of anticipated development and consideration of associated risks against delivery of the Core Strategy target and the OAHN² 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. This is because not all sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable). 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 The assessment will be carried out between January and June 2017 and updates information contained within the previous Epsom and Ewell Strategic Housing Land Availability Assessment (SHLAA) 2009.
- 1.2.6 It should be noted that the SHLAA relates solely to bricks and mortar accommodation. The Council will undertake 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 cooperate with other local planning authorities and other public bodies in preparing and developing their Local Plan so far as it relates 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 All neighbouring authorities were contacted under the Duty to Cooperate to seek their views on the 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.

1.4 Questions

- 1.4.1 If you have any questions relating to the Strategic Housing Land Availability Assessment and how sites will be assessed please contact

² Objectively Assessed Housing Needs as published within the Strategic Housing Market Assessment (SHMA).

the Planning Policy Team on:
LDF@epsom-ewell.gov.uk

2 The Policy Context

2.1 National Planning Policy Framework

- 2.1.1 The 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 As with previous guidance, the NPPF advocates the efficient and effective use of land, in locations that offer good access to a range of community facilities, key services, employment opportunities and infrastructure. The importance of re-using previously development land is retained. Whilst the government has removed the regional tier of planning guidance and devolved the responsibility for setting housing targets down to local authorities, the NPPF still sets out strong guidance on the considerations for setting housing figures.
- 2.1.5 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 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. The PPG states that an assessment should:

- identify sites and broad locations with potential for development;
- assess their development potential; and
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

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 Epsom & Ewell Core Strategy 2007

2.3.1 Epsom and Ewell Council has an adopted Core Strategy (2007) which includes a commitment to deliver at least 181 housing units in each year of the plan period to 2026. Policy CS7 (Housing Provision) sets out the Borough's housing requirement to be 2,715 net homes for the period 2007-2022. 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.

2.3.2 Whilst there is a strong record of housing delivery against the adopted target, the evidence supporting the Core Strategy housing figures had been developed using a different methodology to that now being advocated by Government. The key difference being the previous requirement to plan for housing 'need' rather than the current focus on 'demand'. Furthermore, the uplifted Core Strategy housing target was derived from housing figures within the partially revoked Regional Spatial Strategy which sought to deliver growth namely through redistribution across the South East.

2.3.3 The NPPF sets a clear requirement for LPAs to significantly boost the delivery of housing and to plan to meet the identified need for new homes based on demand. This total is known as the objectively assessed need and should be informed by the latest evidence of population and household projections.

2.3.4 The Practice Guidance at paragraph 30 reference ID: 3-030-20140306 recognises that 'evidence which dates back several years, such as that drawn from revoked regional strategies may not adequately reflect current needs'. A series of decisions made by the Courts and Planning Inspectors in relation to local plans in other areas indicated that plans adopted prior to the publication of the NPPF and any evidence base

prepared prior to this date, where housing delivery was based on Regional Spatial Strategies could not be considered up to date.

- 2.3.5 In response and to ensure that the Council continued to plan positively for growth across the Borough, a decision was made in 2015 to reprioritise and review the Local Plan evidence base documents.

2.4 Epsom & Ewell Development Management Policies Document 2015

- 2.4.1 Epsom and Ewell Council adopted its Development Management Policies Document in September 2015. The purpose of the document is to support the strategic objectives and deliver the vision of the Core Strategy by promoting and enabling development that delivers the Spatial Strategy.
- 2.4.2 In relation to housing provision, Policies DM21 and DM22 provide the policy mechanism to ensure that local housing needs are met and that a suitable mix of housing is provided to deliver balanced and sustainable communities.
- 2.4.3 The Council, in principle, supports proposals for new housing that make the most efficient use of development sites within the urban area. Policy DM11 states that new housing developments in most cases will not exceed 40 dwellings per hectare (dph). DM11 also outlines a number of exceptions where a higher dph could be considered acceptable.
- 2.4.4 Garden land does not fall within the NPPF definition of previously developed land. Furthermore, Policy DM16 states a presumption against the loss of rear domestic gardens due to the need to maintain local character, amenity space, green infrastructure and biodiversity. In exceptional circumstances, modest redevelopment could be considered acceptable, subject to the proposal demonstrating that there will be no significant adverse impact upon the criteria set within DM16.

2.5 The Five Year Land Supply

- 2.5.1 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 of the Borough and the wider Housing Market Area. This takes the form of the joint Strategic Housing Market Assessment (SHMA).
- 2.5.2 The Council's Annual Monitoring Reports (AMR) has demonstrated a strong and consistent delivery against the Core Strategy housing targets. The emerging Housing AMR 15/16 indicates that against the current housing target, there is 10 years of housing land supply (based on the findings of the SHLAA 2009 and sites within the planning process).

- 2.5.3 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'.
- 2.5.4 Furthermore, the paragraph 030 advises that where evidence in Local Plans has become outdated and policies in emerging plan are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered.
- 2.5.5 Therefore, as part of the SHLAA a 5 year housing land supply calculation will be undertaken against the update (but untested) evidence on housing need from the SHMA 2016. 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.

2.6 Objective Assessment of Development Need

- 2.6.1 As part of this review of the Local Plan evidence base, the Council commissioned a joint Strategic Housing Market Assessment (SHMA) with The Royal Borough of Kingston upon Thames, the Borough of Elmbridge and the District of Mole Valley.
- 2.6.2 Using house prices and rates of change in house prices; household migration and search patterns as well as contextual data on travel to work area boundaries, the assessment has identified the extent of the Housing Market Areas and the housing need applicable to the commissioning authorities.
- 2.6.3 The assessment set out housing need over a 15 year time horizon; which can be used to support planning and housing policy within each commissioning authority. The outcome of the SHMA will be cross-referenced with the SHLAA and other evidence base documents to determine whether there is sufficient housing land supply within the Borough to meet the identified need.

2.7 Green Belt Study 2017

- 2.7.1 In signing the interim Surrey Local Strategic Statement (LSS) the Council made a commitment to undertake an assessment of its 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 and Ewell.
- 2.7.2 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. The performance of the individual parcels will be assessed against the 4 purposes of the Green Belt that are relevant to Epsom & Ewell. The outcomes of the GBS are expected in the first quarter of 2017.

- 2.7.3 Should the SHLAA indicate that objectively assessed needs for housing cannot be met within the built –up area, the Council will need to consider whether there are exceptional circumstances to consider sites outside of the built-up area, previous site allocations and preferred housing sites.
- 2.7.4 It should be noted that the GBS purely focuses on the performance of land in relation to the purposes of Green Belt and has been undertaken using a ‘policy off’ approach and therefore consideration has not been given to any other constraints, designations, policies, strategies or the development potential of the Broad Areas or Refined Parcels. Any future consideration of the development potential of such land would need to be supported by a comprehensive ‘policy on’ assessment of the Refined Parcels as to identify areas of land not affected by constraints that would prevent development taking place and where it’s would not be possible to mitigate impacts.
- 2.7.5 The outcomes the SHMA, GBS and the SHLAA, along with further assessments of constraints and infrastructure capacity will ultimately inform the Council’s view to whether there is a case for exceptional circumstances to consider a revision to the Spatial Strategy.

3 Understanding Epsom and Ewell's Housing Need

3.1 Adopted Housing Policy Approach

- 3.1.1 Policy CS7 (Housing Provision) of the Core Strategy sets out the Borough's housing requirement to be 2,715 net homes (181 net dwellings annual average) for the period 2007-2022.
- 3.1.2 The Council has a target that overall, 35% of new dwellings should be affordable, Policy CS9 (Affordable Housing) of the Core Strategy sets out the existing policy for how the Council intends to deliver at least 950 new affordable units within the plan period 2007-2022.
- 3.1.3 With regards to housing mix, the Development Management Policies Plan through Policy DM22 (Housing Mix) sets out how the Council intends to secure an appropriate mix of housing to meet existing and future household need so that the Borough continues to be comprised of balanced and sustainable communities that meet. The policy states that all residential development proposals for four or more units be comprised of a minimum of 25% three bedroom, or more units. On sites particularly suited to larger-sized family houses, the Council encourages the proportion of units having 3 or more bedrooms to be exceeded.
- 3.1.4 Past delivery had indicated that over the past 40 years there has been a trend of building smaller units with fewer family size properties being built within the Borough. Local evidence shows that family sized homes are in demand and that there may be an insufficient supply to meet either market or affordable housing need. The 2007/08 East Surrey SHMA identified that there was a shortfall in three bedroom accommodation and recommended that an affordable housing mix of 65% one and two bedroom homes and 35% three and four bedroom homes.
- 3.1.5 The Council's Authority Monitoring Report reflects upon the performance of the adopted development plan policies and the delivery of market and affordable housing year on year.

3.2 Identifying Future Housing Need

- 3.2.1 As part of the review of the Local Plan evidence base, the Council commissioned a joint Strategic Housing Market Assessment (SHMA) with The Royal Borough of Kingston upon Thames, the Borough of Elmbridge and the District of Mole Valley.
- 3.2.2 The assessment sets out housing need over a 15 year time horizon; which can be used to support planning and housing policy within each commissioning authority. It suggests an objectively assessed need of 40,005 dwellings over the 2015-2035/7 period, or 2,000 dwellings per annum across the HMA. Kingston has the largest need (717 per annum), followed by Elmbridge (474), Epsom and Ewell, (418) and Mole Valley (391).

- 3.2.3 The SHMA has identified that by 2037 there will be an estimated increase in Epsom and Ewell's population to 93,000. This results in an Objectively Assessed Housing Need (OAHN) across the period 2015-2035 of 8,352 new dwellings creating approximately 10,000 new households. It should be noted that the household projections indicate a 70% increase in the number of households aged 65 years or over and 147% increase in those aged 85 years or over.
- 3.2.4 The overall OAHN can be broken down by the size of dwellings required. As demonstrated in Table 1 below the primary need is for 2 and 3 bedroom homes.

| No. of bedrooms | Percentage of OAHN | No. of units |
|-----------------|--------------------|--------------|
| 1 | 18% | 1,503 |
| 2 | 36% | 2,988 |
| 3 | 36% | 2,971 |
| 4+ | 11% | 890 |
| Total | 100% | 8,352 |

Table 1: 2015-2035 Dwelling Size Requirements within Epsom & Ewell (Source: Kingston & North East Surrey SHMA 2016)

- 3.2.5 The outcomes of the SHMA 2016 will be cross-referenced with the SHLAA and forthcoming constraints and infrastructure capacity studies including the Green Belt Study to determine whether there is sufficient housing land supply within the Borough to meet this identified need.

3.3 Affordable Housing

- 3.3.1 The cost of housing in the UK and its impact on local people is a key concern for most local authorities, ranking higher than long-held concerns on health and social care services. Demand for affordable housing in the Borough has been acute for some time and this is evidenced in the SHMA. Whilst high house prices and subsequent affordability issues are not particularly unique when it comes to the South-East; with most areas now becoming 'unaffordable' to the first-time buyer, they are most acutely felt in the North East Surrey sub-region that borders Greater London. The cost of housing in the Borough and its impact upon residents is a key corporate concern for the Borough Council.
- 3.3.2 Although the Borough is not the most unaffordable area within the HMA (that honour falls to our neighbour Elmbridge Borough Council) with an average price of £414,312.00 at 2014, it continues to be a very difficult place for people to afford to buy.
- 3.3.3 Coupled to this the Borough has a high affordability ratio of house prices to incomes and has the second highest level of housing benefits claimants in employment across the whole South East. It is particularly noteworthy that within the HMA the Borough has the highest number of families in short-term accommodation. This is set against the background of rising house prices and the growing affordability gap.

- 3.3.4 In accordance with the requirements of the NPPF, the SHMA 2016 identifies the total amount of affordable housing required to meet the needs of households whom cannot afford to access market housing. It assesses the ability to afford housing across all newly-forming households, not simply the net addition to household numbers, adding in any current backlog, and offsets this against the supply of affordable housing in the current stock to produce an estimate of how much additional affordable housing is needed.
- 3.3.5 The SHMA 2016 highlighted that the existing housing stock turns over at roughly half the national average. This means that those families that are fortunate to secure an affordable home within the Borough will tend to stay in that home. There is little evidence that families 'staircase' their way out of affordable housing need onto the 'normal' housing market.
- 3.3.6 As set out in Table 2, affordable housing requirements for Epsom and Ewell are broken down into three sectors: social renting, affordable renting and intermediate housing, based on assumptions about threshold costs

| Affordable Housing Sector | Size of unit | No. of units |
|--|--------------|--------------|
| Social rented sector | 1 Bed | 64 |
| | 2 Beds | 100 |
| | 3 Beds | 57 |
| | 4+ Beds | 39 |
| | Total | 260 |
| Affordable rented sector | 1 Bed | 2 |
| | 2 Beds | 5 |
| | 3 Beds | 4 |
| | 4+ Beds | 3 |
| | Total | 15 |
| Intermediate (shared ownership) sector | 1 Bed | 1 |
| | 2 Beds | -9 |
| | 3 Beds | 4 |
| | 4+ Beds | 4 |
| | Total | 0 |
| All affordable sector | 1 Bed | 67 |
| | 2 Beds | 96 |
| | 3 Beds | 66 |
| | 4+ Beds | 45 |
| | Total | 274 |

Table 2: Net Annual Affordable Housing Requirements (Source: Kingston & North East Surrey SHMA 2016)

3.4 Imbalance in Housing Mix- Delivering a Wide Choice of Homes

- 3.4.1 National planning policy (NPPF, paragraph 50) requires local authorities to deliver a wide choice of high quality homes, widening the opportunity for home ownership and creating sustainable, inclusive and

mixed communities. Local authorities are required to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes). Within their local plans, local authorities are to set out the size, type, tenure and range of housing that is required in particular locations, reflecting local demand, government initiatives such as Starter Homes³ and how this is to be delivered.

3.4.2 In accordance with the requirements of the NPPF, the Kingston and North Surrey SHMA 2016 identifies the existing and projected dwelling size requirements for the Borough. This information is presented in Table 3 below.

| | | Household type | | | | | | | |
|--------------------------------------|-------|----------------|-----------------------------------|---|-------------------------------|-------------------|--------|------|--|
| | | One person | Couple without dependent children | Couple or lone parent with dependent children | Other with dependent children | Other multi-adult | Total | % | |
| Bedrooms occupied 2015 | 1 | 2,339 | 689 | 128 | 0 | 55 | 3,211 | 10% | |
| | 2 | 2,902 | 2,189 | 1,701 | 31 | 834 | 7,658 | 25% | |
| | 3 | 2,598 | 3,443 | 4,084 | 480 | 2,287 | 12,892 | 41% | |
| | 4+ | 798 | 2,019 | 2,413 | 543 | 1,683 | 7,456 | 24% | |
| | Total | 8,637 | 8,340 | 8,326 | 1,054 | 4,859 | 31,216 | 100% | |
| Required 2035 | 1 | 3,512 | 975 | 182 | 0 | 45 | 4,713 | 12% | |
| | 2 | 4,289 | 3,097 | 2,617 | 26 | 616 | 10,646 | 27% | |
| | 3 | 3,824 | 4,871 | 5,187 | 442 | 1,539 | 15,862 | 40% | |
| | 4+ | 1,190 | 2,856 | 2,727 | 479 | 1,094 | 8,346 | 21% | |
| | Total | 12,815 | 11,800 | 10,712 | 947 | 3,294 | 39,567 | 100% | |
| Difference (breakdown of OAN) | 1 | 1,173 | 286 | 54 | 0 | -10 | 1,503 | 18% | |
| | 2 | 1,387 | 908 | 916 | -5 | -218 | 2,988 | 36% | |
| | 3 | 1,226 | 1,428 | 1,103 | -38 | -748 | 2,971 | 36% | |
| | 4+ | 392 | 837 | 314 | -64 | -589 | 890 | 11% | |
| | Total | 4,178 | 3,460 | 2,386 | -107 | 1,565 | 8,351 | 100% | |

Table 3: Existing and Projected Dwelling Size Requirements for the Borough (Source: Kingston & North East Surrey SHMA 2016)

³ Introduced in the Housing and Planning Act 2016, defined as new dwellings; available for purchase by 'qualifying first-time buyers' only; they are defined as people who don't already own a home and who are aged 23-40; to be sold at a discount of at least 20% of their market value, and always for less than the price cap (currently set to £450,000 in Greater London; £250,000 outside of London).

4 Methodology and Reporting

4.1 Introduction

4.1.1 The SHLAA methodology has been developed using the advice within the National Planning Practice Guidance on Strategic Housing and Economic Land Availability Assessments, the Epsom and Ewell Core Strategy 2007 and Development Management Policies Document 2015. The flow chart below, taken from the PPG⁴, details the inputs and process which should be included to produce a robust assessment.

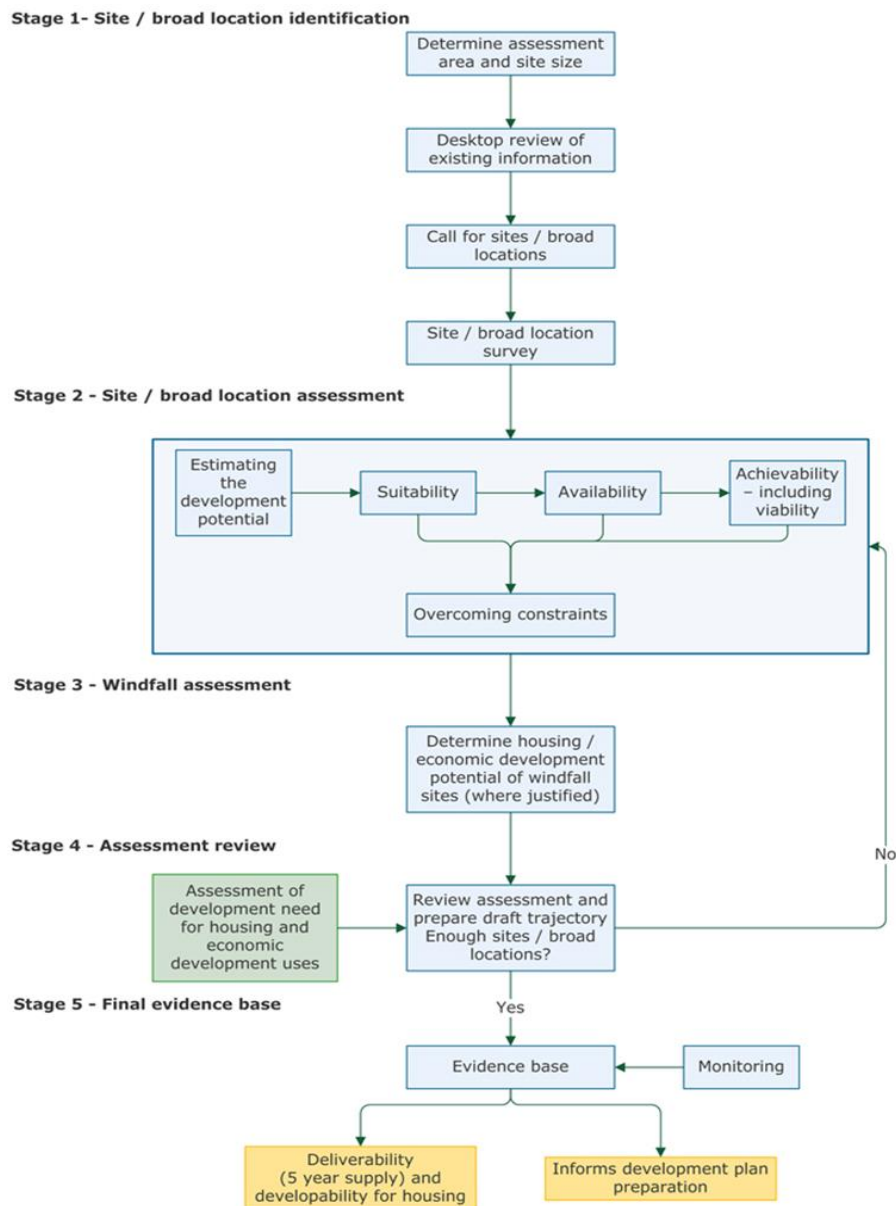


Figure 1: Flow Chart outlining methodology

⁴ Planning Policy Guidance, Paragraph: 006 Housing and economic land availability assessment , Methodology –flow chart

- 4.1.2 The Council will follow this flow chart, building in the previous staged approach used in the 2009 assessment undertaken by the Council. The methodology for the SHLAA has been developed to provide an accessible, transparent and audited process and ensure it has regard to local circumstances. The assessment process is designed to be iterative and reviewed at various stages alongside the review of the Local Plan evidence base, any forthcoming production of Local Plan documents and as new sites come forward and/or circumstances changes.
- 4.1.3 The methodology has been used to review sites that have been identified within previous SHLAA publications, sites put forward by landowners, developers through the Call for Sites exercise and any other sites that the Council believes there is merit in considering.

4.2 Stage 1a- Site/ Broad Location Identification

Determine Assessment Area

- 4.2.1 The geographical area to be covered by this SHLAA will be all the land within the Council's administrative boundary. This area will be subdivided into the 13 political ward areas.
- 4.2.2 In future reiterations of the SHLAA it could be considered appropriate to extend the assessment area to reflect the joint working of the Housing Market Assessment partnering authorities.

Partnership Approach / Stakeholder Involvement

- 4.2.3 National Planning Guidance advocates a partnership approach to undertaking assessment relating to land availability, involving key partners from the outset. The Council recognises the importance of working in Partnership with other key stakeholders.
- 4.2.4 The methodology of the SHLAA is a hybrid of the previous 2009 methodology which has been amended to take into account the most recent changes in national and local policy as well as the PPG.
- 4.2.5 When undertaking the 2009 assessment, to support the delivery of a comprehensive and robust SHLAA a Steering Group was established to act as a critical friend during the SHLAA process and provide advice and validation to the SHLAA methodology. The methodology was also subject to wider stakeholder consultation in July –August 2008.
- 4.2.6 On reflection, the value of the Steering Group was primarily in the formulation of a robust methodology and beyond the initial stages, there was no need for further steering group involvement. As this previous methodology will form the basis of the 2017 assessment, the re-establishing of the Steering Group is not considered necessary.
- 4.2.7 Whilst specific engagement with local house builders and property agents may lead to accusations of favouritism, the Council may wish to consider engaging with the Home Builders Federation to invite them to, as required, to provide comment on the assessment of individual sites

particularly in relation to whether the development of a site is viable and to provide a 'sense check' of the Council's assumptions.

- 4.2.8 The assessment is to be published as part of the evidence base for the Local Plan and is not subject to statutory consultation. The Council will consider any comments on the report and the methodology used during its on-going reviews of Strategic Housing Land Availability Assessment.
- 4.2.9 Officers across the Council (and in particular within the wider planning team) will be called on to assist in the review and assessment of potential sites. This will include the involvement of Development Management Officers, Planning Enforcement Officers, the Environmental Health Team, the Countryside Manger, the Tree Officer, Leisure Services Manager and Property Services Officers.

Site selection threshold

- 4.2.10 In selecting candidate sites, consideration has been given to the amount of development that could be accommodated. A large proportion of development in Epsom & Ewell is delivered on small sites and the Council is seeking to ensure that only those sites that will deliver a higher proportion of development (5 units or more) are considered within the SHLAA. Council will need to consider these to show overall housing delivery against housing requirements / targets. However, in the future the Council will look to allocate larger more strategic sites in accordance within the NPPF⁵.

Housing – potential to accommodate more than 5 dwellings

Only those sites able to support 5 or more net dwellings will be considered as a candidate sites and have their development potential assessed. This approach is in accordance with the National Planning Practice Guidance and reflects local circumstances.

It should be noted that the Council will also consider 'packages' of smaller sites, which would need to come forward together to ensure viability and where in total the resultant yield would be 5 or more net units.

Figure 2: Site selection thresholds for candidate sites

Desktop Review of Existing Information

- 4.2.11 The Stage 1 desktop review provides a baseline position and the starting point for sites to be considered as part of the SHLAA. The PPG recommends that the desktop review should be proactive in identifying as wide a range as possible of sites for development.
- 4.2.12 The SHLAA will consider all available types of sites and sources of data, these 'Candidate Sites' include:

⁵ NPPF, Page 12, Paragraph 52

Allocated and Preferred Housing Sites

- 4.2.13 The Epsom and Ewell District Wide Local Plan 2000 allocated 6 housing development sites across the Borough, to date, 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.
- 4.2.14 As part of preparation towards the Site Allocation DPD, in 2011 the Council produced a Housing Site Allocations Consultation Paper. This is identified 20 preferred housing sites with the potential to deliver ten or more new homes.
- 4.2.15 The remaining undeveloped sites of the allocations and preferred site will be included in the list of sites for consideration.

Strategic Housing Land Availability Assessment 2009

- 4.2.16 Sites identified within the SHLAA 2009 and not yet completed, commenced or committed will be reviewed. The previous SHLAA surveyed and assessed⁶ a total 316 sites. 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. Table 4 below, provides a summary of each category from the 2009 assessment. Using this as a basis, the principle of the 5 categories will be taken forward within this assessment but will updated to reflect the most update guidance and terminology of the PPG.
- 4.2.17 The 216 sites considered to fall within Categories 4-5 were effectively discounted from the SHLAA and the 100 sites within Categories 1-3 formed part of the Council's identified housing land supply. The SHLAA divided these sites into two sub- categories; Type A (deliverable) and Type B (developable) sites. These sites were considered to have the potential yield of 1,953 up to a maximum of 2,265 new homes.

| Category | Description |
|----------|--|
| 1 | <p>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.</p> <p>Also contains sites not currently within the planning process but known to be very likely to come forward during the SHLAA period.</p> |

⁶ The SHLAA 2009 is available to view on the Council's website at: <http://www.epsom-ewell.gov.uk/residents/planning/planning-policy/planning-and-supplementary-planning-documents/evidence-base#biodiversity>

| | |
|---|--|
| | <p>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.</p> |
| 2 | <p>Considered to have a high potential as future sources of housing land supply; the SHLAA 2009 being very optimistic that delivery would take place during the first half of the SHLAA period.</p> <p>These sites are not identified under Category 1 because there is some uncertainty over exactly when they would come forward within SHLAA period</p> <p>Most of the sites within Category 2 are considered to be deliverable.</p> <p>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.</p> |
| 3 | <p>Considered appropriate and viable potential sources of supply but where landowner aspirations are unclear.</p> <p>Sites falling within Category 3 are considered to fall between being deliverable and developable.</p> <p>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.</p> |
| 4 | <p>Recognised as having potential as sources of housing land supply but were generally considered unlikely to come forward during the SHLAA period.</p> <p>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.</p> <p>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.</p> |
| 5 | <p>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.</p> <p>Some of these Category 5 sites may come forward naturally during the SHLAA period; in effect constituting an identified form of windfall supply.</p> |

Table 4: Summary of SHLAA site assessment categories (Source: SHLAA 2009)

Information from other Council departments

4.2.18 A number of sites will be considered for future allocation for residential development having been identified as a result of on-going joint working with other Council departments and the County Council e.g. the Council's Property Service.

Sites with planning permission

4.2.19 Sites with an outstanding unimplemented or recently lapsed planning permission will be considered. It is recognised that although planning permission had been granted for an acceptable scheme, the Council needs to consider whether the site is likely to be delivered in accordance with the PPG.

Sites subject to pre-application enquiries

4.2.20 The Council will look at pre-application enquires for residential development dating back to July 2008⁷. Providing that an application has not subsequently been submitted, the development potential of each site will be considered.

Sites refused planning permission

4.2.21 Those sites which have been refused planning permission by the Council or dismissed at appeal since July 2008 will be considered. Again this is on the proviso, that a subsequent application for the development of a site has not been submitted and granted planning permission. A key consideration will be whether the reasons for refusal/dismissal could be overcome.

Call for Sites Exercise/ Broad Locations Survey

4.2.22 Between 24 February and 24 March 2017 the Council will run a specific Call for Sites Exercise. The Council will contact landowners, developers and planning agents known either to be local landowners or to have development interests in the Epsom and Ewell Area. The call for sites will be promoted through the Council's website and letters / email circulation.

4.2.23 Those wishing to submit a site for consideration for potential development will be asked to complete a E-Form and attach a site plan (see Appendix 1). The E-Form requests information regarding the details of the site, ownership, planning history, future uses of the site as well as known constraints and availability.

4.2.24 Prior to February 2017, the Council had undertaken a 'Call for Sites' exercise as part of the previous 2009 SHLAA. Outside of this 'formal' exercise the Council has actively encouraged site owners and agents to engage with the planning team to discuss the potential of sites through its pre-application service.

⁷ The Council has taken the date of July 2008 as its baseline, as it represents the close of the previous SHLAA search for sites.

Sites not currently in the planning process

4.2.25 Potential housing land within the existing urban area could come from the following sources:

- Vacant and derelict land and buildings,
- Surplus public sector land,
- Land in non-residential use which may be suitable for re-development for housing, such as surplus commercial buildings or car parks, including as part of mixed-use development,
- Additional housing opportunities in established residential areas, such as under-used garage blocks and subdivision of larger properties; and
- Large scale redevelopment and re-design of existing residential areas

4.2.26 Other sources of information that may help to identify sites could include:

- Empty Property Register,
- Register of Surplus Public Sector Land,
- Employment Land Review,
- Ordnance Survey Maps; and
- Aerial photograph.

Sites not included on the Candidate Register

4.2.27 Sites not included on the register of candidate sites and not assessed as to their potential for development are those:

- Currently in the 'planning application process'⁸ – for example, sites awaiting a decision on a planning application by the Council or an independent inspector.
- Where development has commenced on a site with planning permission (excluding those that are phased).

4.3 Stage 1b - Site Review and Site Survey

Previously identified sites

4.3.1 The SHLAA 2009 identified 100 sites as being deliverable and developable, these fell into Categories 1-3 (as outlined Table 4). Informed by policy changes and housing delivery, the Council will review the status of those sites that have yet to come forward and the associated assumptions where applicable. This could include the re-assessment of anticipated timeframes for delivery, viability or even the quantum of development.

⁸ Dependant on status of the site (i.e has it previously been identified) and planning history including pre-application enquiries.

- 4.3.2 In addition, the Council will review sites previously identified within Categories 4 and 5, specifically reviewing of the suitability of the sites for housing development, reflecting any relevant changes in policy and land designations since the 2009 assessment.

New sites

- 4.3.3 All new sites identified for inclusion in the SHLAA will be mapped and information about them will be recorded in the site database. In accordance with the PPG, the following information will be recorded at this initial assessment stage:

- Site size, boundaries, and location;
- Current use(s) and character;
- Character of surrounding area and the surrounding land use(s);
- Physical and potential environments constraints e.g. access, steep slopes, natural features of significance and location of pylons; and
- An assessment of planning history
- Where relevant, development progress;

- 4.3.4 National guidance advises that particular types of land or areas may be excluded from the assessment as long as the reasons are justified. The SHLAA will take an initial 'policy off' / unconstrained approach to the review of sites to establish their development potential. However, sites below the identified site threshold will be excluded.

Sites within the Green Belt

- 4.3.5 Following consultation and reflecting on the objectives of the SHLAA, the 2009 assessment took a virtually unconstrained approach in the identification of sites. 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.
- 4.3.6 Green Belt and open space sites where development (excluding footprint development) would be considered to be inappropriate 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. This excluded footprint development.
- 4.3.7 A similar approach will be adopted in this assessment. National and local Green Belt policy regards the construction of new buildings as inappropriate in the Green Belt. The publication of the NPPF has widened the exceptions to when development would not be considered inappropriate. The suitability of new and any previously identified sites within the Green Belt will be assessed against the parameters of the NPPF.
- 4.3.8 If development does not fall within the exceptions as outlined within the NPPF, it is considered premature of the SHLAA to endorse specific sites in the Green Belt as suitable for residential development in

advance of the Council considering the outcomes of other evidence documents such as the Green Belt Study and infrastructure capacity studies.

- 4.3.9 Therefore, such Green Belt sites will be considered not suitable and discounted for the purposes of identifying a supply of deliverable or developable sites for residential development.

Land in employment use put forward for residential use

- 4.3.10 Within the Borough there are a number of sites designated as Employment Land. Identified on the Proposals Map, these sites are protected from being developed into alternative uses under Core Strategy Policy CS11.
- 4.3.11 As such, employment land designations are considered to be a policy constraint in proposals for alternative uses other than employment. Therefore, any site put forward for non-employment use(s) and located within such a designation will be assessed accordingly and is unlikely to be put forward within the housing land supply.
- 4.3.12 Similarly, in considering sites outside of designated employment areas policies within the local plan, such as Policy DM24 of the Development Management Policies Plan as well as the recent Article 4 Direction seek to safeguard the loss of office space. Likewise Policy CS13 of the Core Strategy resists the loss such as cultural, built sports and community facilities and sites.
- 4.3.13 This policy approach is based on a strong housing land supply⁹ across the Borough and the level of housing planned to be delivered from allocated sites to meet the existing housing targets as set out within the Core Strategy. If this position were to change, the Council would need to consider if this policy approach with its strong emphasis for such sites to continue for commercial purposes is appropriate. This of course would need to be balanced against the identified demand for employment land and office space across the Borough.

4.4 Stage 2a – Site/ Broad Location Assessment

- 4.4.1 Once all sites have been collated as part of the initial assessment, Stage 2 will look at whether a site/option is/ remains developable or deliverable taking account of issues relating to suitability, availability and achievability / viability in accordance with the NPPF and planning guidance. The NPPF sets out definitions of ‘deliverable’ and ‘developable’ sites for housing development:

Deliverable - sites should be 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

⁹ Local Plan Annual Monitoring Report 2014-2015

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.

Developable – sites should be in a suitable location for housing 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

- 4.4.2 The NPPF practice guidance includes some further assistance on the definitions of 'deliverable' and 'developable' in the context of housing policies and the allocation of sites:

Deliverable - allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years or where planning permission has expired.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome, sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.

Developable - developable sites or broad locations are areas that are in a suitable location for housing development and have a reasonable prospect that the site or broad location is available and could be viably developed at the point envisaged. Local planning authorities will need to consider when in the plan period such sites or broad locations will come forward so that they can be identified on the development trajectory. These sites or broad locations may include large development opportunities such as urban extension or new settlements.

National Planning Practice Guidance

- 4.4.3 The assessment will focus on whether a site is deliverable or developable taking account of the above definitions and broken down and examined under the following headings in accordance with the NPPF and planning guidance:

- Suitability
- Availability
- Achievability/Viability

Suitability

4.4.4 The following factors will be considered to assess a site's suitability for development now or in the future:

- Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- Policy constraints including land designations that would deem sites unsuitable for housing development or which may affect the scale and type of housing development; and
- Potential impacts including the effect upon the environment including landscape features, nature biodiversity and heritage conservation.

4.4.5 Assessing the suitability of sites or broad locations for development will be guided by:

- The Epsom and Ewell Core Strategy, Development Management Policies Document, Plan E AAP and supported adopted guidance, emerging plan policy and national policy; and
- Market requirements.

4.4.6 The assessment of each site will initially take a 'policy off' / unconstrained' approach to identifying development potential. Informed by the Epsom & Ewell Constraints Study, those sites within the following designations, referred to as 'Primary Constraints' which effectively deems the site unsuitable for development under the current Spatial Strategy:

- Flood Zone 3b (1 in 20 year flood outline)
- Green Belt (excluding previously developed land as well of the exceptions as set out within the NPPF)
- Within a Site of Special Scientific Interest (SSSI)
- Registered Historic Parks and Gardens
- Sites of Nature Conservation Interest (SNCI)
- Local Nature Reserves (LNR)
- Ancient Woodlands
- Land designated as Strategic Open Space

4.4.7 Site located within any of these areas will not fall within the 'deliverable' or 'developable' SHLAA categories of 1-3. Sites located in any of these areas will effectively be discounted from the housing land supply but recorded for auditing purposes and reconsidered if necessary in the future. This may be the case depending upon the initial outcomes of the SHLAA and the GBS.

4.4.8 This reflects the PPG which indicates the assessment should be as comprehensive as possible and not be narrowed by existing policies designed to constrain development. It is for this process to "test again

the appropriateness of other previously defined constraints, rather than simply to accept them”.

- 4.4.9 Other policy designations from Epsom and Ewell’s Development Plan and National guidance fall into two broad categories, ‘Environmental Considerations’ and ‘Heritage Considerations’. This includes considerations such as flood risk, Source Protection Zones, location within an Air Quality Management Area (AQMA), Veteran and Aged trees, Tree Preservation Orders, open space, Mineral Safeguarding Area, historical buildings and conservation areas which may affect the scale and type of development.
- 4.4.10 Sites identified to be effected by such considerations will not automatically be discounted from the housing land supply but rather act as an indicator that the site may well have some constraints which would need to be addressed if the site is to be deemed suitable or could restrict the scale and type of residential development.
- 4.4.11 Sites with planning permission will generally be considered suitable for development although there may be instances where it is necessary to assess whether circumstances have changed which would alter their suitability.

4.5 Sites identified in a location of potential land contamination

- 4.5.1 There are numerous examples within the Borough of where the potential challenge posed by land contamination has been successfully overcome in order to facilitate development. In contrast there are very few sites where contamination and/or ground conditions have been the sole factor that has prevented development.
- 4.5.2 In most cases the key issue is not whether a site can be adequately remediated but instead whether it can be done so viably. It will therefore be assumed, unless information was available to suggest otherwise, that the presence of contamination should not constitute a valid reason to render a site unsuitable.

Flood Risk

- 4.5.3 With the exception of previously developed land, sites located within Flood Risk Zone 3b (1 in 20 year outline) will be considered inappropriate for new development.
- 4.5.4 The Strategic Flood Risk Assessment (SFRA) 2010 mapping and most up to date Environment Agency’s (EA) national flood risk zone mapping will be used alongside the general assumption in terms of development potential:
- FZ1- development not constrained
 - FZ2- development not constrained

- FZ3a- development¹⁰ potentially constrained
- 4.5.5 However, it is considered that in general, flood risk ‘influences’ the development potential of a site rather than renders it unsuitable, as sites may be capable of overcoming both the sequential and exceptions test required by national planning policy and guidance. However, a cautious approach will be taken in respect to Flood Risk Zone 3a.
- 4.5.6 The following matters are also to be considered, some of which may preclude development depending on the extent to which the utilities covers a site and its potential impact:
- High pressure gas pipelines;
 - Oil pipelines, national grid transmission lines; and
 - Immovable communication links, such as high speed fibre optic cables utilised by businesses in the area.

Availability

- 4.5.7 To be considered ‘available’ for development the PPG identifies that a site should be free of legal or ownership problems. In short this means there is a willing landowner or developer in control of the site.
- 4.5.8 The decision on whether a site was considered available was reached via considering the following:
- There was a valid planning permission;
 - A recent planning applications made within the last 3* years;
 - A recent pre-application enquiry¹¹ relating to the site and proposed development had made within the last 3* years;
 - Site had been directly nominated by the landowner, agent working on behalf of the landowner or a developer in control (include optioned agreements) through a Call for Sites Exercise;
 - Whether the site was in active use;
 - Whether the site could be developed now; and
 - Whether the site was free of ownership and tenancy issues
- 4.5.9 *The timeframe of 3 years was considered reasonable as it correlated with the time limit of a planning permission.
- 4.5.10 The availability of a site for development will be confirmed by the Call for Sites and information from landowners and legal searches. In accordance with the NPPF and practice guidance, the availability and achievability of sites with planning permission will be considered. As stated in Government guidance the existence of a planning permission does not necessarily mean a site is available as a person making a

¹⁰ With the exception of ‘highly vulnerable uses’ as defined in vulnerability classifications set out in the Planning Practice Guide, which would be inappropriate in FZ3a.

¹¹ Consideration was made as to the nature of the enquiry.

planning application on a site does not need to own or have an interest in the land.

- 4.5.11 In cases where it becomes apparent that a site may be constrained on issues relating to its availability, these will be discussed with those promoting the site and all relevant parties to try and seek a resolution. However, in cases where a landowner will not release their site for a particular alternative development option this is likely to result in the site not being taken any further.
- 4.5.12 To establish the availability of 'long standing' previous SHLAA sites and those sites where there has been limited to no recent planning history or interest, the Council will proactively contact the registered landowners. A Site Availability Confirmation (SAC) letter and form (refer to Appendix 6 & 7) will be issued as a tool to confirm interest and gauge likely yield and timeframes for delivery as well as key constraints. The letter itself will be adapted to reflect how the site had been identified (i.e. SHLAA, pure opportunity, lapsed permission or pre application enquiry in excess of 3 years).
- 4.5.13 Where it was concluded that sites could not be considered available at this time, consideration was given to the likelihood of the site becoming available in the future, based on how and when this might be achieved. However, it is recognised that to be considered 'deliverable' the site must be available at the time of the assessment.
- 4.5.14 It should be noted that the Council will take a more cautious approach to assessing the availability of sites than previous 2009 SHLAA. This could result in a number of 'long standing' opportunity sites being discounted on the basis that they are no longer available for development.

Achievability/Viability

- 4.5.15 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.
- 4.5.16 In assessing whether market demand equated to 'achievability', the Council will utilise the viability testing which supported the introduction of the Community Infrastructure Levy¹² and the adoption of the Revised Developer Contributions SPD (2014). Within these assessments, the Council took a precautionary approach to ensure that the level of CIL that could reasonably be expected to be charged on development without putting it unduly at risk across the whole of the Borough. The assessments had regard to other obligations and costs placed on development.

¹² Epsom and Ewell Community Infrastructure Levy Viability Study (June 2012)

- 4.5.17 The Council is not able to negotiate with regards to CIL. However, the Council's affordable housing Policy CS9 and Developer Contributions SPD recognises that there may be exceptional circumstance where the Council may enter into negotiations where contributions impact significantly on the viability of a development.
- 4.5.18 Where non-viability can be robustly demonstrated, affordable housing contributions and the nature and extent of site-specific items of infrastructure¹³ may be negotiable.
- 4.5.19 In the context of the high land values across the Borough the following factors will be considered when assessing the achievability of a site:
- Whether there is active developer interest in the site?
 - Whether there is known demand for the form of provision approved / proposed?
 - Whether similar sites have been successfully developed in the preceding years?
 - Whether there are any known abnormal development costs?
- 4.5.20 The consideration of this information will enable realistic and informed views to be made as to when development is likely to commence and how long it would take to build out.
- 4.5.21 Epsom and Ewell has a consistently strong housing market, with the number of housing completions remains generally resilient notwithstanding the economic downturn and subsequent recovery since 2008. Residential monitoring has shown that sites continue to yield completions and that developers continue to commence sites for which they have obtained planning approval.
- 4.5.22 The local evidence prepared to support the introduction of CIL suggests that the majority of residential development across the whole of Epsom and Ewell is viable.
- 4.5.23 Therefore, taking into account the land values, the flexibility of Policy CS9 and the findings of the viability assessments that the supported the introduction of CIL, it has been considered reasonable to assume that all sites are viable, unless there has been evidence / information to suggest otherwise.

Overcoming constraints

- 4.5.24 Where policy constraints are identified consideration will be given to whether it will be possible to overcome these. If it is deemed possible to overcome identified constraints, an assessment will then be made as to whether the measures required would negatively impact the viability of the site for the proposed development.

¹³ necessary to address the impact of the development and make it acceptable in planning terms

4.5.25 Identified constraints could vary from those which are easy to overcome (e.g., allowing for stand –off within a development and reducing the overall developable area of a site) to those which could be more fundamental (e.g. legal restrictions which could prevent development). It is likely that in some instances, the measure for overcoming constraints could be easy to implement and not likely to adversely affect viability to unacceptable levels. Where identified constraints would reduce viability to an unacceptable level, this will be reflected within the sites category score.

Estimating development potential

4.5.26 The PPG indicates an estimate of the development potential should be guided by existing or emerging plan policy. The guidance does indicate that where the development plan policy does not provide a sufficient basis to make a judgement then relevant existing development schemes can be used as the basis for assessment.

Density

4.5.27 The NPPF does not identify an indicative minimum net density threshold. The PPG suggests that where considered appropriate to do so, density should reflect local characteristics.

4.5.28 Policy DM 11 (Housing Density) in principle supports proposal for new housing that makes the most efficient use of development sites within the Borough's existing urban area. It advises that 'the density of new housing developments will in most cases not exceed 40 dwellings per hectare.

4.5.29 The Council will assume maximum densities based on current local policy, the local character, neighbouring developments and as well as Government guidance. Where information is available from sources such as, planning applications, pre-application discussions, development briefs and masterplans, the known density information will be used.

4.5.30 This average density has been used based on a gross to net developable area ratio as outlined above. Development sites within town centres are likely to exceeding 40 dwellings per hectare, although the majority of these sites are mixed use with residential to upper floors. For example, it may be appropriate to assume a higher density in retail centres and sites close to railway stations. Consideration will be given to the conclusions from the Environmental Character Study (2008) which identified the Borough's different character areas and their sensitivity to change.

Gross to net site area

4.5.31 The developable area is the likely proportion of the site which will be available for the proposed development. For example, for housing, the land available, after taking into account provision of infrastructure, open space and other land uses designed to complement housing

development. This would also take account of the parking provision requirements to ensure compliance with the Parking Standards for Residential Development SPD (2015). The Council will make a case by case judgement on a based on the character of the area; however a general rule of thumb would be to assume a 80% gross to net ratio on site less than 1ha.

4.5.32 For larger sites over 1ha, a greater percentage of the total site area is deducted in order to give the developable area that can be used for housing, on general a 70% ratio should be assumed. This takes into account other uses that are likely to be incorporated in to larger housing schemes such as education provision or the need for critical infrastructure such as new roads.

4.5.33 In terms of the capacity of the site for development, this will be determined having:

- Assessed the policy constraints which may reduce the developable area of the site and/or the site's capacity taking account of general development management policies and the appropriate housing density;
- Discussed the number of units proposed with those promoting the site and development management officers; and
- Reviewed previous planning application/appeal decisions relevant to the site and the proposed form of development.

How should the timescale and rate of development be assessed and presented?

4.5.34 Once the suitability, availability and achievability of sites have been assessed, and any constraints identified, the likely timescale and rate of development for each site will be able to be assessed. This will be continuously updated throughout the Local Plan process and residential monitoring, with advice being sought from developers on likely timetables, progress made, and any further constraints which may arise. The Council will consider following assumptions relating to lead-in times and build- out rates as reasonable and reflective of previous delivery and the nature of sites within the Borough.

4.5.35 In terms of estimating build out rates, for larger sites an individual assessment on the expected length of time from commencement to completion will be made. For sites of less than 20 units in the main, it will be assumed that these are completed within 1-2 years from commencement, dependant on individual site circumstances and housing type.

4.5.36 Other factors such as whether the development comprised a conversion of an existing building will be considered when estimating time frames for delivery.

4.5.37 The timeframe periods refer to Year 1 being from April 2017.

Sites with Planning Permission

- 4.5.38 The NPPF indicates that sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years.
- 4.5.39 It is reasonable to assume as a starting point lead in times of up to 1 year for sites with Full Permission/ Reserved Matters, up to 2 years for sites benefiting from Outline Permission and up to 3 years for pure opportunity sites without planning permission. However, factors such as site size, location of development, known legal matters and community support will also be taken into consideration.
- 4.5.40 On larger sites, where appropriate, the Council will consult directly with land owners and developers, in order to obtain up to date delivery information about a site. Unless the Council has good reason not to do so, delivery forecast information received will be accepted. When no information is received, delivery information from previous years will be used to inform a delivery forecast.

Sites without Planning Permission

- 4.5.41 PPG indicates that planning permission is not a prerequisite for a site to be considered deliverable within five years. However, the Council will make a general assumption that sites without planning consent will not be delivered within five years unless there is evidence, including market signals to suggest otherwise.
- 4.5.42 Where significant constraints are identified, or sites appear to represent a later phase of an adjacent development, it will be assumed to start delivery within 6-10 years or 11-15 years. If an application is expected to be submitted within 12 months and / or has limited constraints it may be considered part of the 5 year land supply.
- 4.5.43 If sites are neither deliverable nor developable it will not be included within the housing land supply figures.

4.6 Stage 2b – Review of the assessment and classification of delivery

Review of the assessment

- 4.6.1 Following the completion of the initial site appraisal stage, this initial assessment will be subject to an 'officer level review'. In this the potential yield and timeframe for development will be subject to detail discussion by Officers from across the planning team. This discussion will examine each individual site deemed appropriate at that initial stage.
- 4.6.2 Officers will review 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 will also evaluate any known constraints including availability. Financial viability will also be discussed.

4.6.3 The above factors will be carefully considered to reach a judgment on each site's overall viability, deliverability and developability. Taking these factors into consideration, Officers will be able to place them within the five year timeframes that comprise the SHLAA delivery periods.

Classification of delivery

4.6.4 Once the suitability, availability and achievability of sites have been established by Officers and any constraints identified, the likely timescale and rate of development for each site will be able to be assessed. Table 5 below, provides a summary of the site assessment categories.

4.6.5 Sites falling within Category 4 will be 'discounted' from the SHLAA whilst those within Categories 1-3 will form part of the Council's identified housing land supply. Category 1 being deliverable sites and Category 2 developable sites reflecting the definitions within the PPG to enable the preparation of the housing trajectory.

| Category | Description |
|-----------------|--|
| 1 1-5yrs | <p>Site complies with the existing Core Strategy.</p> <p>Deliverable sites and will tended to be sites that were either already within the planning system, being under consideration or having planning permission, or otherwise committed to development.</p> <p>Also contains sites not currently within the planning process but known to be very likely to come forward with the next 5 years.</p> |
| 2 6-10yrs | <p>Site complies with the existing Core Strategy.</p> <p>Considered to have a high potential as future sources of housing land supply.</p> <p>These sites are not identified under Category 1 because there is some uncertainty over exactly when they would come forward. For example, the site does not benefit from planning permission but there have been recent interest (such as a call for site submission or a pre-application enquiry).</p> <p>The sites within Category 2 are considered to developable</p> |
| 3 11-15yrs + | <p>Site complies with the existing Core Strategy.</p> <p>Considered appropriate and viable potential sources of supply but where landowner aspirations (availability) are unclear.</p> <p>Sites falling within Category 3 are considered to be developable.</p> |

| | |
|--|---|
| 4 Discounted from Housing Land Supply | <p>Sites are not suitable due to policy constraints and would be contrary to the existing Core Strategy and / or the site is not considered available and/ or achievable.</p> <p>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.</p> <p>Some of these Category 5 sites may come forward naturally during the SHLAA period; in effect constituting an identified form of windfall supply.</p> |
|--|---|

Table 5: Summary of SHLAA 2017 site assessment categories

4.7 Stage 3 – Windfall Sites

- 4.7.1 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.
- 4.7.2 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 relied on a windfall allowance within its housing trajectory or land supply figures.
- 4.7.3 Depending upon the outcomes of the SHLAA, the Council may have to consider whether a windfall allowance within the trajectory is appropriate.

4.8 Stage 4: Assessment Review

Review Assessment and prepare trajectory

- 4.8.1 The development potential of all sites can be collected to produce a trajectory. This should outline how much housing land can be provided, and at what point in the future. This will be against the tested Core Strategy 2007 housing targets and against the OAHN figure identified within the SHMA 2016.
- 4.8.2 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.
- 4.8.3 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. This could potentially range from reviewing density assumptions to the consideration of alternative planning policy options that could have the potential to increase the supply of housing land.

- 4.8.4 A similar exercise will need to be undertaken to identify where there are sufficient sites within the within the built –up area to meet the OAHN figure. Following this secondary review if there are insufficient sites, it may be necessary for the Council to revisit the parameters of the methodology to investigate how to potentially plan for this shortfall.
- 4.8.5 A cautious approach will need to be undertaken as the needs figure is untested and this ‘raw’ figure does not take into consideration other constraints to delivery such as infrastructure provision.
- 4.8.6 The Council will need to consider whether it will be appropriate to meet any forthcoming shortfall through other means, in consultation with surrounding authorities and other relevant stakeholders. It is likely this will be through the Council determining whether exceptional circumstances exist to necessitate a change in the Spatial Strategy.

4.9 Stage 5: Final Evidence Base

Data Outputs

- 4.9.1 Following the Call for Sites exercise and the site assessment process, the Council will publish a findings report which will include:
- A list and map of all sites.
 - An assessment¹⁴ of each site, covering its suitability for development, availability and achievability. This assessment will determine whether a site is realistically expected to be developed and the timeframe for any such development, or reasons why a site has been discounted for future development. This is summarised by the classification of the site. The potential type and quantity of residential development which could be delivered on each site or broad location. This will include an estimate of build out rates as well as any barriers to delivery which may be needed to be overcome; and
 - A housing trajectory of the estimated delivery of the potential development.

Monitoring

- 4.9.2 Once the site assessments have been collated into a portfolio this will be used to continuously monitor sites. As part of the Annual Monitoring Report (AMR) the Council will publish the Housing Trajectory and 5 year Housing Land Supply.

Five Year Land Supply

- 4.9.3 NPPF requires local planning authorities to identify and maintain a rolling five-year supply of deliverable housing land. The assessment of

¹⁴ The publication of the site assessment forms will depend on the initial land supply position and whether the assumptions, in particular those in relation to suitability need to be reviewed.

this supply is a material consideration in the determination of residential planning applications and helps to ensure that the housing needs of the local area are met over the life of the plan period.

- 4.9.4 A five year land supply calculation will be produced against the current adopted (tested) Core Strategy housing target and against the OAHN (untested) figure identified in the SHMA 2016.
- 4.9.5 This information will be updated on an annual basis to reflect any new sites that become available and any change in circumstance with existing sites. It may be updated throughout the year if necessary, but as required by the PPG, this annually produced report provides the Council's position on the five year land supply position for the year from 1st April 2017.

5 Next Steps

5.1 Following the completion of the SHLAA

- 5.1.1 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. Once, the SHLAA is completed, its findings, including the indicative 5 year trajectory will be cross-referenced with the outcomes of the SHMA.
- 5.1.2 The ability of the SHLAA to identify sufficient housing land¹⁵, will determine the path of the Epsom and Ewell development plan and the partial review of the Core Strategy. Notwithstanding this unknown, what is certain is that the use of the SHLAA and the process for any allocation or designation will be the same.
- 5.1.3 The SHLAA is the initial stage in identification and consideration of sites for potential allocation or designation. Those sites identified as being deliverable and developable will be subject to further consideration, the next steps being a consideration of site options which involves a detailed Sustainability Assessment.

¹⁵ Considered to be deliverable and developable against the housing target and the identified, albeit untested OAHN need figure.

6 Appendix 1: Call for Sites Letter and E-Form



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

Epsom & Ewell SHLAA 2017 Call for Sites Form

We have begun a review of our Local Plan evidence base documents to inform an update to the Spatial Strategy for Epsom & Ewell. This will guide future development over the next plan period up to 2035. As part of this process, we are undertaking a formal call for sites. The call for sites will help identify land within the Borough that may have potential for development over this period.

You can submit sites for any type of future use such as new homes, employment, retail and community facilities. We will review these sites as part of any forthcoming local plan site allocations.

We will consider sites submitted for new homes as part of our Strategic Housing Land Availability Assessment (SHLAA). The SHLAA will be part of our evidence base, documenting our housing land supply to 2035.

Submitting a Site

Sites can be submitted using the 'Call for Sites' 2017 E- Form available on our website at: [insert link](#) or alternatively through our Consultation Portal available at: <http://consult.epsom-ewell.gov.uk/portal>. Please complete the sections that are relevant to the specific site you are submitting to us.

In order for a site to be considered, the completed E- Form and a site plan (1:1,250 or 1:2,500 in scale) with the boundaries of the site clearly outlined must both be submitted together as attachments in an email to LDF@epsom-ewell.gov.uk by 17:00 on 24 March 2017.

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

- We will consider all sites submitted as part of the SHLAA process. We cannot treat the information you submit as confidential
- Only sites proposing five or more (net) new homes should be submitted
- Please complete the call for sites E-form in as much detail as possible.
- Please sign and date the form.
- Attach an up to date Ordnance Survey based map at 1:1250 or 1:2500 outlining the precise boundaries of the site and the part that you think is

suitable for new homes (if this is not the whole site area). Without this mapped information we are unable to register the site

- Use a separate form for each site you submit
- Please do not submit sites that already have planning permission for development unless a new and different proposal is likely in the future.

Please note that even if land is identified in our SHLAA as having potential for housing development, this does not indicate or confirm that we will allocate the site for development or that we will grant planning permission in the future.

If you should have any queries regarding our call for sites, please contact the Planning Policy Team at LDF@epsom-ewell.gov.uk

Are your details correct?

To keep up to date on progress with our Local Plan and to be notified when a consultation is taking place you can register and manage your details using our Consultation Portal available at: <http://consult.epsom-ewell.gov.uk/portal> .

If you no longer wish to be contacted, you can opt to receive no communication by changing your settings in the Portal or alternatively please advise us via email to LDF@epsom-ewell.gov.uk and your details will be removed from our Consultation Database.

Thank you for your continuing engagement in the Local Plan making process.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Berry', with a stylized flourish at the end.

Mark Berry

Head of Place Development



Call for Sites Form

Please return completed questionnaires to the Planning Policy Team.

Contact Details:

Email LDF@epsom-ewell.gov.uk

Whilst we recognise that it may not be possible to supply all the requested information please enter as much information as possible.

| Section 1: Your Contact Details | |
|---|--|
| Name / organisation: | |
| Representing (if applicable): | |
| Address and postcode: | |
| Phone: | |
| Email: | |
| Are you the owner of the site? | |
| If you are not the owner, please state your personal interest in the site (e.g. land agent, planning consultant, developer, registered social landlord or other (please state)) | |

| Section 2: Site Details | |
|--|--------------------------------|
| Site Address & postcode: | |
| Site Co-ordinates: | |
| Please provide a scale map (typically 1:1250 or 1:2500) showing the site / location of the proposal with the site edged clearly with a red line) | |
| Estimated area of site (ha): | Entire site area: |
| | Area suitable for development: |
| Number of on-site ownerships? | |
| Has this site been nominated in previous call for site exercises? If yes, please provide details. | |

| | |
|---|--|
| Current use: | |
| What is the number of existing houses located on the site, if any? | |
| Is the site Greenfield, Brownfield (previously developed land) or a mix? If it is a mix, please provide approximate area that is Brownfield land (ha) | |

| Section 3: Proposed Use of Site | | |
|---|---|--|
| Proposed use: Housing / other (please state) | | |
| Proposed housing type: | Proposed housing type | Estimated number of units |
| | Market housing | |
| | Affordable housing | |
| | Starter homes | |
| | Sheltered housing | |
| | Residential institutions with care (C2) use | |
| | Live/ work units | |
| | Other, please specify | |
| Overall total of estimated no. dwellings proposed | | |
| Other uses | Detailed Use Type | Estimate for floor space (m ²) |
| Employment: | Office | |
| | Light industry | |
| | General industry | |
| | Storage / distribution | |
| | Other, please specify | |
| Retail, leisure or community uses: | Shops | |
| | Food/ drink establishments | |
| | Leisure | |
| | Community facilities | |
| | Other, please specify | |
| Suitable Alternative Natural Greenspace (SANG): | | |
| Other, please specify | | |

| Section 4: Delivery details | |
|---|--|
| Is there Developer Interest in the site (if yes, please specify?) | |
| When will the site become available for development? Within 5 years (2017-2022) Within 6 – 10 years (2022 – 2027) Within 11 – 15 years (2027 – 2032) | |

| | |
|---|--|
| Will the development need to be phased? If so, please provide details of likely phasing. | |
|---|--|

| Section 5: Possible Constraints | |
|--|--|
| Are there any limitations that may restrict the development of this site? (Please provide brief details) | |
| Suitability | |
| Access: Limitations, or potential problems relating to site access | |
| Topography/ Ground Conditions: Site slopes, varying site levels etc | |
| Vegetation and Tree Cover: Extent, age and species of vegetation and tree cover | |
| Contamination/ Pollution/ Hazards: Previous hazardous uses, unstable potentially contaminated structures | |
| Flood Risk: Site's liability to flooding – see Environment Agency website at http://maps.environment-agency.gov.uk/wiyby/wiybyController?topic=floodmap&layerGroups=default&lang=en&ep=map&scale=7&x=531500&y=181500 | |
| Environmental Constraints: Potential impacts upon local landscape/ townscape character, including loss of tree cover, impact upon character of the area, loss of open space | |
| Planning Policy Constraints: Current adopted policy for the site, impacts upon adjoining designations or protected areas including SSSIs, Conservation Areas, Local Nature Reserves – see the proposals map at http://www.epsom-ewell.gov.uk/map-planning | |
| Availability | |
| Ownership status: Is the site owned by a developer or is the owner willing to sell? | |
| Legal or ownership Issues: Ownership/ multiple ownership, tenancies constraints on the site that might prohibit or delay development of the site (e.g. third party access rights, unresolved multiple ownerships or covenants)? | |
| Land acquisition or relocation of uses: Must land off site be acquired to develop the site? Are there any current uses which need to be relocated? | |
| Achievability | |

| | |
|---|--|
| <p>Abnormal development Costs: Are there any known significant abnormal development costs (e.g. contamination, remediation, demolition, access etc.)?</p> | |
| <p>Infrastructure Requirements: Does the site require significant new infrastructure investment to be suitable for development?</p> | |
| <p>Viability Constraints: Are there any issues that may influence the economic viability or timing of the development?</p> | |
| <p>Other Considerations: Please specify</p> | |
| <p>Do you believe that the above on-site constraints could be overcome? (Please provide brief details)</p> | |
| <p></p> | |

| | |
|---|--|
| <p>Section 6: Additional Information</p> | |
| <p>Is there any additional information relating to the site that would help us with our assessment?</p> | |
| <p></p> | |

7 Appendix 2: SHLAA 2017 Site Survey Form

REF NO: xxx

| | |
|-----------------|--|
| Address: | |
|-----------------|--|

| | | | |
|---------------------|--|----------------------------|--|
| OS Grid ref: | | Site Area (Ha): | |
| | | Net Site Area (Ha): | |
| Ownership: | | | |

| | | |
|-------------------------------------|-------------------------------------|---------------------------------|
| Existing land use: | | |
| Neighbouring land uses: | | |
| <input type="checkbox"/> Brownfield | <input type="checkbox"/> Greenfield | <input type="checkbox"/> Vacant |

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

Call for Sites Information:

| | |
|-------------------------------|--|
| Date: | |
| Summary of submission: | |

Accessibility:

Accessibility of site to key public services using public transport:

.....

Proximity to local centres:

.....

How well the site is served by cycle / footpaths?

.....

Environmental Considerations:

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

Details / comments:

.....

.....

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

Heritage Considerations:

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

Details / Comments:

.....

.....

General:

| | |
|---|--|
| Details of planning history (including pre-application enquiries: | |
| Development Management Officer comments: | |
| Highways comments: | |

| | |
|--|--|
| Contaminated Land Officer comments: | |
|--|--|

Additional issues to consider (not all may be relevant)

- Could any existing buildings on site be re used?
- What are the housing needs of the Borough (type of housing / affordability)?
- Would the provision of live work units be suitable on this site?
- What would the impact on infrastructure be?
- Potential impacts SPA / SAC (further consideration drawing on Appropriate Assessment)
- Could improvements be made to biodiversity?
- Could improvements be made to road safety?
- Could improvements be made to reducing crime or fear of crime?

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

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

Likely timeframe for development: 2017-2022 2022 - 2027 2027-2032

Conclusions as to use of site:

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

Other comments / conclusions:

.....

.....

8 Appendix 3: Site Availability Confirmation Letter



Town Hall
The Parade
Epsom
Surrey
KT18 5BY
Main Number (01372) 732000
www.epsom-ewell.gov.uk
DX 30713 Epsom

| | | |
|---|-------------|------------------------|
| Date | Contact | Mrs Rachael Thorold |
| | Direct line | 01372 732 3690 |
| Your Ref | | |
| Our Ref: Site Availability Confirmation | Email | LDF@epsom-ewell.gov.uk |

Dear Sir,

As you may be aware, we have begun a review of our Local Plan evidence base documents to inform an update to the Spatial Strategy for Epsom & Ewell. This will guide future development over the next plan period up to 2035. As part of this process we are reviewing the supply of housing land across the Borough.

The following site, **[insert site names]** has previously been identified as having potential for housing in the **[Strategic Housing Land Available Assessment (SHLAA) 2009]**.

To assist in the preparation of a housing trajectory setting out the number of new homes expected to be delivered each year within the Borough we are updating the SHLAA. In conjunction with a call for new sites we are contacting the relevant land owners and agents of previously identified sites that have yet to come forward to establish whether they remain available and deliverable within the next plan period.

To confirm the availability of your site and likely timeframes for the delivery of new homes please complete and return the enclosed form. Completed forms should be emailed to LDF@epsom-ewell.gov.uk by **[insert date] 2017**.

If you are unable to provide this information we will conclude that your site is no longer deliverable within the plan period and it will be discounted from our land supply.

Please note that even if land is identified in our SHLAA as having potential for housing development, this does not indicate or confirm that we will allocate the site for development or that we will grant planning permission in the future.

Are your details correct?

To keep up to date on progress with our Local Plan and to be notified when a consultation is taking place you can register to be on our consultation database by emailing your details to LDF@epsom-ewell.gov.uk .

If you wish to update your details or no longer wish to be contacted, please advise us via email and your details will be removed from our consultation database.

Thank you for your continuing engagement in the Local Plan making process.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Berry', is centered on a light grey rectangular background.

Mark Berry

9 Appendix 4: Site Availability Confirmation Form



Site Availability Confirmation

To provide us with information relating to the status of the site and likely timeframes for the delivery of new homes please complete and return this form using the enclosed pre-paid envelope.

Failure to provide this information may lead us to conclude that the site is no longer deliverable within the plan period and will be discounted from our land supply. Please note that even if land is identified in our SHLAA as having potential for housing development, this does not indicate or confirm that we will allocate the site for development or that we will grant planning permission in the future.

Contact Details

| | |
|---|--|
| Name / organisation | |
| Representing (if applicable) | |
| Address and postcode | |
| Phone | |
| Email | |
| Are you the owner of the site? | |
| If you are not the owner, please state your interest in the site (e.g. land agent, planning consultant, developer, registered social landlord or other (please state)) | |

Site Details

| | |
|--------------|--|
| Site Address | |
| Postcode | |

Proposed Use of the Site

| Housing Type | Market housing | Affordable housing | Starter homes | Sheltered housing | Residential institutions with care (C2) use | Live/work units | Other, please specify |
|-----------------|----------------|--------------------|---------------|-------------------|---|-----------------|-----------------------|
| Number of Units | | | | | | | |

Availability

| | |
|--|--|
| Is the site owned by a developer or is the owner in a position to dispose of the site? | |
| Are there any ownership/ multiple ownership, tenancies constraints on the site that might prohibit or delay development of the site (e.g. third party access rights, unresolved multiple ownerships or covenants)? | |
| Is there need for land acquisition or relocation of uses (e.g. must land off site be acquired to develop the site? Are there any current uses which need to be relocated)? | |

Delivery Details

| | |
|--|--|
| Is a developer involved? If yes, please specify. | |
| When will planning permission be sought for the development? | |
| When will new homes be delivered? Within 5 years (2017-2022) Within 6 – 10 years (2022 – 2027) Within 11 – 15 years (2027 – 2032) After 15 years (beyond 2032) | |
| Will the development need to be phased? If so, please | |

| | |
|---|--|
| provide details of likely phasing. | |
| Are there any known significant abnormal development costs (e.g. contamination, remediation, demolition, access etc.)? | |
| To your understanding will the site require investment in new infrastructure to be suitable for development? Please specify the nature and scale of infrastructure investment required and how you have arrived at this conclusion. | |
| Are there any issues that may influence the economic viability or timing of the development? | |
| Are there any other considerations? Please specify. | |