



Strategic Land Availability Assessment

Appendix I: Methodology



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Surrey Heath Borough Council
Knoll Road, Camberley GU15 3HD
Planning.consultation@surreyheath.gov.uk



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I. Introduction

- I.1. This appendix sets out the methodology that has been used by Surrey Heath Borough Council in the preparation of the Strategic Land Availability Assessment ('SLAA'). The SLAA brings together various sources of information to present a portfolio of sites that may be considered for future development or other planning purposes.
- I.2. The SLAA Methodology has been updated to take account of the publication of the revised National Planning Policy Framework ('NPPF') and the updated Planning Practice Guidance ('PPG'). The SLAA Methodology is therefore fully compliant with updated national policy and guidance.

Strategic Land Availability Assessment (SLAA) Requirement

- I.3. The NPPF¹ states that plan-making authorities should have a clear understanding of the land available for development in their area, which can be achieved through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- I.4. The SLAA has been undertaken to reflect this guidance, providing a comprehensive assessment of land in Surrey Heath borough. The SLAA process has enabled sites to be submitted and evaluated for a range of uses, including housing. This reflects guidance in PPG, which states:

'Plan-making authorities may carry out land availability assessments for housing and economic development as part of the same exercise, in order that sites may be identified for the use(s) which is most appropriate'².

- I.5. The SLAA therefore considers the availability of land for the following types of uses:

Residential:

Use classes falling within C3 (dwelling houses) and C2 (residential institutions). This includes affordable housing; sheltered housing; self and custom build houses; and Gypsies, Travellers and Travelling Showpeople pitches for households.

¹ Paragraph 67 of the NPPF (2021): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

² PPG Paragraph: 001 Reference ID: 3-001-20190722: www.gov.uk/guidance/housing-and-economic-land-availability-assessment.



Economic:

All E use classes (shops, financial and professional services, restaurants and cafés, and business), B2 and B8 use classes (general industry, storage and distribution), use class C1 (hotels) and use class F2 (local community).

Other:

Use classes falling within F1 (learning and non-residential institutions), mixed use developments, and Suitable Alternative Natural Greenspace (SANG).

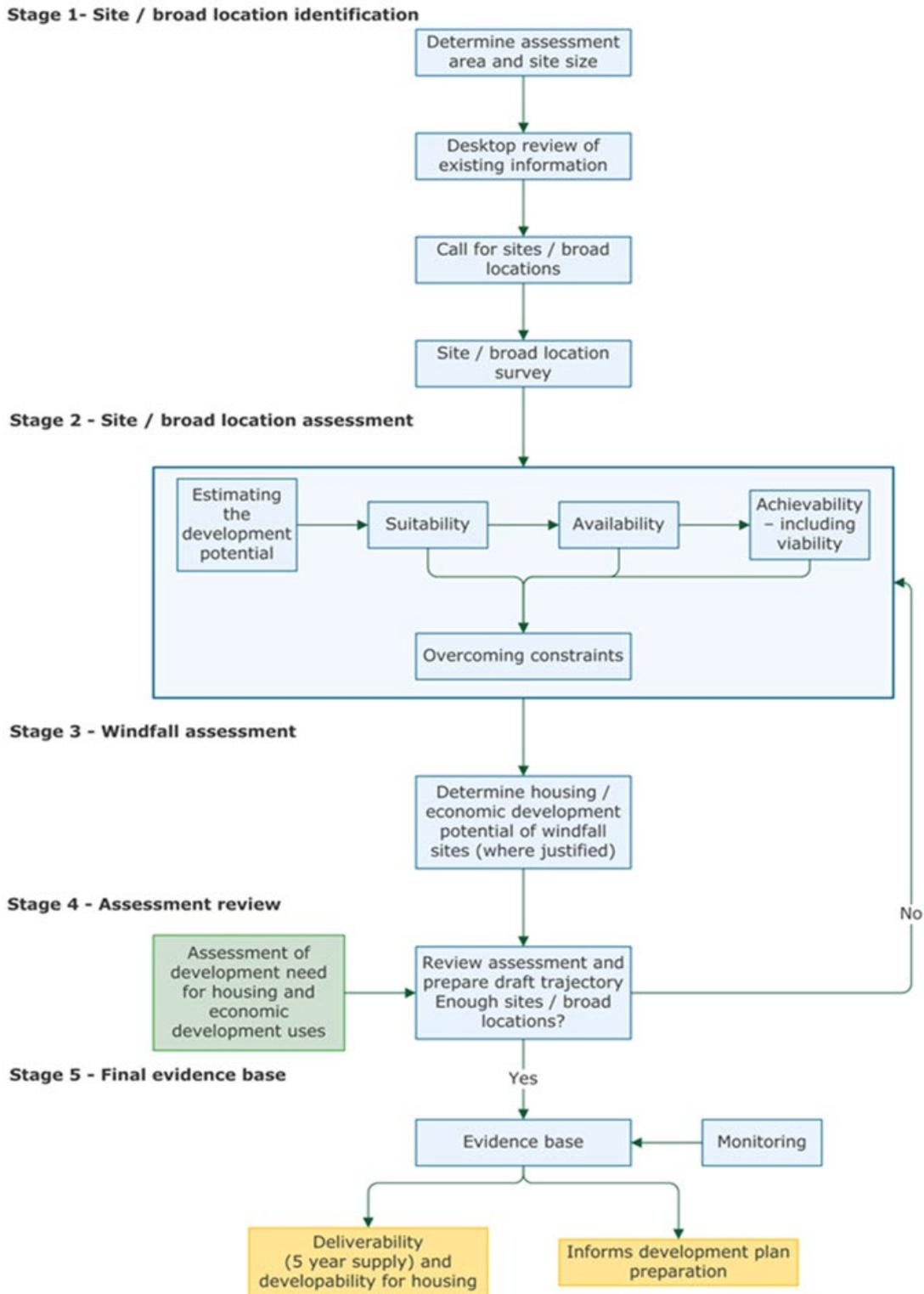
- 1.6. This assessment of land availability is a key element of the local plan's evidence base and its preparation is important for the Local Plan's development and implementation. PPG states that the SLAA should:
1. identify sites and broad locations with potential for development;
 2. assess their development potential;
 3. assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

Methodology Overview

- 1.7. As noted in the Strategic Land Availability Assessment (SLAA) Main Report, national Planning Practice Guidance ('PPG') outlines a five-stage process (see Figure 1 below) which, when followed, leads to the robust assessment of land availability within a plan-making area. The guidance has been followed in the production and implementation of this SLAA methodology and when undertaking the site assessments.
- 1.8. Briefly, Surrey Heath Borough Council's application of the five-stage approach outlined in PPG was carried out in 7 broad steps, which are outlined below and discussed in detail throughout the remainder of this Appendix:
1. Determine assessment area and site size
 2. Desktop review of existing information
 3. Call for Sites Exercise
 4. Site survey
 5. Site assessment
 6. Windfall assessment
 7. Assessment review
- 1.9. The steps noted above were conducted sequentially where possible. However, the implementation of some steps overlapped in practice. This appendix details the stages of the SLAA methodology process in turn below.



Figure 1: PPG SLAA preparation flowchart



2. Detailed SLAA Methodology

Stage I – Identification of sites and broad locations

Site Assessment Area

- 2.1. PPG advises that the area selected for assessment should be the relevant plan-making area³. The extent of the assessment area is therefore the Surrey Heath Borough Council boundary.
- 2.2. SLAAs are expected to be undertaken working with other plan-making authorities in the Housing Market Area (HMA) and Functional Economic Area (FEA)⁴, both of which comprise Hart, Rushmoor and Surrey Heath Council areas. Discussions have taken place between the three plan-making authorities regarding the production and content of this SLAA Methodology. Both Hart and Rushmoor Borough Council have undertaken a SLAA for their plan-making areas. The three documents together provide an understanding of the overall potential supply within the Housing Market Area.

Site size for assessment

- 2.3. In accordance with the PPG, the assessment considers all sites capable of delivering five or more dwellings (net), or economic development on sites that are a minimum size of 0.25ha (or 500sqm net additional floorspace) or above. Sites falling below this threshold will not be included in the SLAA, other than as part of a windfall allowance in the housing trajectory.
- 2.4. The assessment considers a range of different site sizes from small-scale sites to opportunities for larger scale developments, such as village and town extensions and new settlements where appropriate.

Review of Existing Information

- 2.5. In accordance with the PPG, the Council has considered a comprehensive range of sources in order to establish the best available information to identify and assess potential development sites for the SLAA. The Council has actively sought to identify sites to meet our housing and economic needs through the desktop review process.

³ PPG Paragraph: 006 Reference ID: 3-006-20190722: <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>.

⁴ *ibid.*



- 2.6. Sources used in the desktop review of existing information include, but are not limited to; previous iterations of the SLAA, recently refused or withdrawn planning applications, allocated sites in other Plans, and the Brownfield Land Register. Table I (below) sets out the full list of sources of information for this review.
- 2.7. During the review of planning application information, previously identified SLAA sites have been checked against planning application approval records in order to avoid double-counting any sites within the anticipated supply. Sites previously assessed to have the potential to deliver homes within the plan period that have since gained planning permissions have been removed from Appendix 2: Realistic Candidates for Development and the planning permission has instead been counted in the 'Outstanding Capacity' section of the housing trajectory.

Table I: SLAA Sources of Information and Identified Sites

Data Source	Type of Site
Local Development Plans, including Neighbourhood Plans.	Existing housing allocations and development briefs not yet with planning permission.
Planning application records.	Unimplemented planning permissions ⁵ .
Commenced development records.	Housing sites that are under construction.
Planning application records.	Planning applications awaiting determination.
Planning application records.	Planning applications that have been recently refused or withdrawn.
Planning records.	Pre-application inquiries (where not confidential).
Local authority records.	Land in the ownership of the local authority.
Duty to Co-operate discussions National register of public sector land.	Surplus and likely to become surplus public sector land. Such bodies include, but are not limited to, Surrey County Council and the Ministry of Defence.

⁵ Including relevant applications granted prior approval under The Town and Country Planning (General Permitted Development) (England) Order 2015 (or as subsequently amended).



Formal 'Call for Sites' and/or local plan consultation records.	Sites submitted by developers through formal 'Call for Sites' and/or through local plan consultations.
Local Plan consultation events.	Sites suggested through engagement with local communities.
Local Authority Brownfield Land Register.	Previously Developed Land that could be better utilised through development.
Local Authority Empty Property Register.	Vacant and derelict land and buildings.
Geographical Information System Mapping-based review	Sites where more productive use of under-utilised facilities can be made (e.g. Garage blocks)
Enquiries received by the plan-making authority and active engagement with the business sector	Sites anticipated to meet employment/retail requirements
Planning records and 'Call for Sites' records	Sites suitable for SANGs and leisure purposes
Local authority and planning records, as well as 'Call for Sites' records	Sites appropriate for a mix of the above uses

Call for Sites Exercise

- 2.8. A Call for Sites exercise has been undertaken between 07 December 2020 and 18 January 2021, in order to establish the initial land availability for all types of development in the borough, including housing, employment, retail, and others. Local landowners, developers, businesses and other interested parties were invited to submit potential development sites to the Council for appraisal in this exercise.



- 2.9. The PPG states that the 'Call for Sites' should be aimed at as wide an audience as is practicable so that those not normally involved in property development have an opportunity to contribute⁶. The Call for Sites exercise was advertised on the Council's website and all known stakeholders were contacted to request updated information with regard to the availability and/or deliverability of the relevant site.
- 2.10. Information submitted during the Call for Sites exercise has been taken into account when (re)appraising the SLAA sites in light of the definitions of *deliverable* and *developable* in the NPPF. This review has informed the estimation of site delivery timescales and their estimated delivery trajectory. Due to this reappraisal, some sites in the previous SLAA have been removed, or their estimated delivery trajectory has been amended.
- 2.11. Table 2 in Appendix 6: Deliverability Evidence provides a summary of the deliverability evidence that has supported the inclusion of each site within the SLAA within the first five years of the Plan period. Further detail on the assessment of each site is available in the site appraisals that form Appendix 2: Realistic Candidates for Development. The Council cannot directly publish the evidence obtained to justify the inclusion of each site, but may be able to provide redacted copies, which do not include personal information, upon reasonable request.

Site Survey

- 2.12. Site surveys have been conducted on all sites either identified through the desktop review exercise or submitted to the Council through the Call for Sites exercise. The site surveys incorporated information and constraint data from the Council's Geographic Information System (GIS), information provided on the Call for Sites submission form, information available from previous planning applications, and information gathered through other desk-based research.
- 2.13. The site surveys set out the key identified issues and potential constraints for each site and what further consideration may be required as part of any subsequent planning application. Where appropriate, sites have been visited by planning officers in order to verify elements of the site assessment. These visits also enabled officers to establish whether there were any additional uses and/or constraints present on the site that had not been picked up during the desktop-research exercise.

⁶ PPG Paragraph: 012 Reference ID: 3-012-20190722: <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>.



- 2.14. All sites were included at the site survey stage to ensure comprehensiveness in the approach. However, some sites may have constraints that would severely restrict or entirely inhibit development. Such constraints could include flood risk and Special Protection Areas (SPA), which are considered in the 'Suitability' assessment.
- 2.15. Furthermore, submitted sites and areas that do not meet the site size and/or capacity thresholds as set out in paragraph 2.3 have been excluded from the assessment.
- 2.16. The site surveys seek to establish and record the following:
 1. site size boundaries and location;
 2. current land use and character;
 3. land uses and character of surrounding area;
 4. physical constraints;
 5. potential environmental constraints;
 6. where relevant, development progress.



3. Stage 2 – Site / Broad Location Assessment

- 3.1. Following the identification of potential development sites through Stage 1 of the SLAA methodology, the identified sites were assessed in greater detail to determine their approximate development potential.

Estimating Development Potential (Site Capacity Assessment)

Residential Development

- 3.2. The SLAA does not establish an appropriate mix of homes for a particular site. Rather, the Strategic Housing Market Assessment ('SHMA'), other development plan policy requirements, and information regarding potential constraints, informs the determination of the appropriate approximate capacity of development each site could accommodate. The identified site capacities represent an approximate estimate of an appropriate amount of development based on the best available information.
- 3.3. The estimated quantum of development has been informed by the following considerations, as appropriate:
1. national and local development plan policies,
 2. potential land constraints,
 3. the planning history of the site,
 4. site assessment / initial masterplanning undertaken by site promoters⁷,
 5. the character of the area, and
 6. consideration of the site by planning officers.
- 3.4. The corresponding potential approximate density of development for sites that are considered to be realistic candidates for development is set out on the site assessment proforma in Appendix 2: Realistic Candidates for Development. Density figures provided represent the gross density figure (i.e., number of homes divided by total site area).

Economic Development

- 3.5. In the assessment of economic development, information regarding the standard ratios of development per employee, as identified in the Surrey Heath Employment Land Technical Paper Update (2019)⁸, has informed the identification of how much, and what type of employment use, each site could realistically be expected to accommodate.

⁷ For example, those submitted as pre-application and planning application documents.

⁸ Paragraphs 7.54 to 7.58 of the Surrey Heath Employment Land Technical Paper Update (2019).



- 3.6. In the assessment, the estimated quantum of development has been informed by the following considerations, as appropriate:
1. potential land constraints,
 2. the planning history of the site,
 3. site assessment / initial masterplanning undertaken by site promoters⁹,
 4. the character of the area, and
 5. consideration of the site by planning officers.
- 3.7. For sites that are considered to be realistic candidates for development, the potential capacity of development is set out on the site assessment proforma in Appendix 2: Realistic Candidates for Development.

Developable Area

- 3.8. The developable area of a site does not necessarily represent the gross area of the site as identified by the site boundary. Differences could be caused by issues such as, but not limited to, constraints that cannot be overcome, including the presence of ancient woodland or flooding, the requirement for new infrastructure on the site, the topography or potential contamination of the land. The site assessment proforma in Appendix 2: Realistic Candidates for Development identifies where there are constraints that might impact upon the developable area.

Suitability Assessment

- 3.9. The assessment of site suitability for development is a high-level assumption about whether the site reasonably *could* be developed, rather than whether the site *should* or *would* be developed. The suitability of a site is only one aspect of the SLAA assessment, though it is a critical test.
- 3.10. In determining the site's suitability for development, the Council has taken in to account available information to help construct an understanding of the site in relation to its development potential. To assess suitability, aspects including the location of the site, current planning designations relevant to the site, and other evidence documents (such as the Local Plan) have been considered.

⁹ For example, those submitted as pre-application and planning application documents.



- 3.11. PPG advises that assessing the suitability of sites for development should be guided by:
1. the existing development plan, emerging plan policy and national policy;
 2. market and industry requirements in that housing market or functional economic market area;
 3. physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
 4. potential contribution to regeneration priority areas;
 5. potential impacts, including the effect on landscape features and heritage conservation;
 6. contribution to regeneration priority areas, where applicable;
 7. environmental amenity impacts; and
 8. the site's appropriateness and likely market attractiveness for the type of development proposed.
- 3.12. In order to make an accurate assessment, environmental and physical constraints have been considered alongside relevant policy considerations. Some sites have therefore been found unsuitable due to issues such as flooding, unsuitable access or location, and policy designations such as the potential impact on the Green Belt. However, if it is considered that these constraints could reasonably be overcome with an appropriate planning application, the site may be considered suitable for development. This assessment is outlined in the site proforma where appropriate.
- 3.13. Sites allocated in existing development plans or with planning permission for housing or other uses will generally be considered suitable for development, although it may be necessary to assess whether circumstances have changed which would alter their suitability¹⁰.
- 3.14. The suitability of the identified use or mix of uses of a particular site has been assessed, including consideration of the types of development that may meet the needs of the community. Potential uses for sites include but are not limited to: market housing, private rented, starter homes, affordable housing, self-build plots, Gypsy and Traveller pitches, Travelling Showpeople plots, housing for older people, or for economic development, SANG and leisure uses.
- 3.15. Some areas of Surrey Heath borough are not suitable for development. Table 2 (below) outlines some of the main policy constraints that result in a SLAA site being treated as Discounted.

¹⁰ PPG Paragraph: 018 Reference ID: 3-018-20190722: <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>



Table 2: Policy Constraints Relating to Site Suitability in Surrey Heath

Constraint	Justification
Sites lying wholly within, or adversely constrained by, a European Nature Conservation Site (SAC and SPA, including the Thames Basin Heaths Special Protection Area).	The borough contains areas of the Thames Basin Heaths Special Protection Area ('TBHSPA'). This heathland is home to three species of rare, endangered birds, whose habitat is protected by UK and European law. The SPA designation protects the heaths from development, including new homes nearby that could harm the SPA due to increased recreational pressure on these habitats.
Sites lying wholly within, or adversely constrained by, the 400m buffer zone of the Thames Basin Heath Special Protection Area (TBH SPA).	Natural England have advised that it is not possible to prevent harm arising from residential development within 400m of the SPA. Suggested uses other than residential (C3) will be considered on an individual basis, dependent on the nature of the use proposed and impacts upon the SPA.
Within 400-5km of the TBH SPA	Housing development may only be allowed providing that potential harm to the SPA is avoided, usually in the form of Suitable Alternative Natural Greenspace ('SANG'). Further detail on our SANG strategy can be found in the Infrastructure Delivery Plan and the SPA Avoidance Strategy SPD 201911.
Site lying wholly within, or adversely constrained by, a Site of Special Scientific Interest (SSSI). Sites lying wholly within, or adversely constrained by, ancient woodland.	National environmental designations.
Site lying wholly within, or adversely constrained by, Flood Zone 3b – functional flood plain.	Other than water-compatible uses, and in some cases essential infrastructure, development is not suitable in the undeveloped or previously developed land with no building footprint (e.g. a surface car park), in the functional flood plain (Flood Zone 3b) due to high flood risk.

¹¹ Available online at: www.surreyheath.gov.uk/residents/planning/planning-policy/supplementary-planning-documents/thames-basin-heaths-special.



Availability Assessment

- 3.16. The assessment of availability helps to establish whether a site should be considered a valid option for development, relating to the landowner's willingness to see the site developed and the current use of the site. Given the role of the SLAA in enabling the Council to establish a robust land supply for future development, if there is no reasonable prospect that the site will become available over the lifetime of the plan, then it has not been included as a realistic option for development.
- 3.17. In submitting sites to the Council, site promoters were asked to indicate the following on the submission form:
1. Details of land ownership/land interests,
 2. What the current and proposed land uses are for the site,
 3. The reason that the site promoter is proposing the site for development,
 4. Details of when the site is expected to become available for development, and
 5. Whether there are any known constraints that could restrict the development of the land.
- 3.18. Based on the information submitted by the applicant, a judgement was then made as to whether the site was available, and when it is likely to deliver the proposed development. Further communication with the site promoter and other stakeholders has supplemented the information provided on the submission form where appropriate.
- 3.19. Sites are considered to be available where the best information presented to the Council indicates that the site is likely to be promoted for development and that there are no constraints, or other legal or ownership complications, that are likely to stop development happening within the Plan period. The assessment is set out clearly in the individual site proformas.

Achievability Assessment

- 3.20. PPG advises that:

"A site is considered achievable for development 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 the capacity of the developer to complete and let or sell the development over a certain period"¹².

¹² PPG Paragraph: 021. Reference ID: 3-021-20140306.



- 3.21. There are some sites within the borough that have planning permission, but have been discounted from the supply, or counted in the supply but in the 6 – 10 year period, in accordance with paragraph 68 of the NPPF, on the basis that the Council considers that there is evidence that they are unlikely to be delivered within the next five years, or at all. These sites are identified in the SLAA Main Report.
- 3.22. A site is considered achievable for development where there is a reasonable prospect that development could take place on the site during the given time period. The assessment of achievability also includes a high-level judgement about the economic viability of a site and the capacity of the developer to complete the housing over a certain period given relevant timescales involved, such as average lead-in times.
- 3.23. In the assessment of a site’s achievability, various factors are considered, including:
1. Likelihood of the site coming forward for the proposed use;
 2. Whether there are any significant abnormal development costs (e.g. contamination remediation, demolition, access etc.);
 3. Possible requirements for significant infrastructure investment to ensure that a site is capable of sustaining new development;
 4. Issues that may influence the economic viability or timing of the development.
- 3.24. Where constraints are identified on a site, the achievability assessment considers the actions that would need to be taken to overcome these constraints, along with when and how this is likely to be undertaken and the consequent likelihood of development being delivered on the site.

Deliverability Assessment

Deliverable Sites

- 3.25. The NPPF requires that Local Planning Authorities identify a supply of:

“specific, deliverable sites for years one to five of the plan period”¹³.

¹³ NPPF Paragraph 68.



3.26. As defined in the NPPF Annex 2: Glossary:

“To be considered deliverable, sites for housing 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 5 years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.”*

3.27. Sites are therefore considered to be *deliverable* if they are found to be suitable, achievable, and available, in accordance with the tests set out above, and if there is evidence that the proposed development could be delivered within the first five years of the plan period.

1. Sites that have outstanding *outline* planning permission have been considered *deliverable* where there is clear evidence to demonstrate that development will be delivered on site within the first five years of the plan period.
2. Sites that have outstanding *detailed* planning permission have been considered *deliverable* except where there is evidence to suggest that the permitted development will not be delivered on site within the first five years of the plan period.

3.28. The definition of a *deliverable* site in the NPPF, as outlined in paragraphs 4.15 and 4.16 of this appendix, requires that any site must meet strict tests of evidence in order to be considered *deliverable* within the assessment. The Council has contacted the relevant agent or site promoter for each outstanding planning permission and commenced scheme within the borough that provides a net contribution of ten or more units, to request updated evidence on the anticipated timescales for the delivery of each scheme. Where expected delivery timescales have been provided, these have been taken forward within the SLAA.



- 3.29. However, in order to account for permissions that do not get built-out, the Council have applied a lapse-rate to the total number of existing planning permissions that have not yet commenced. Over the period covering 1st April 2011 – 31st March 2018¹⁴, 3% of the total units on sites for 5 or more units granted planning permission were not built-out and the permission expired. Therefore, a 3% reduction has been applied to all outstanding planning permissions that have not yet commenced in order to account for this.
- 3.30. The Council has also contacted the site promoter for any site that has previously been identified as being a realistic candidate for development (sites in Appendix 2) within plan period, in order to request updated evidence on the anticipated delivery of the site. The request for evidence included questions regarding the status of any preapplication engagement, expected planning application timescales, whether a housebuilder had been engaged, and the expected delivery trajectory. As a result of the responses, the expected timeframe for delivery of some sites has changed depending on the evidence provided. This represents the best available and most up to date evidence at the time the SLAA was prepared.
- 3.31. Sites that are currently in uses protected by Local Plan policies (for example community or employment uses) have not been considered *deliverable*. The loss of these uses, and therefore the suitability for redevelopment as housing, will need to be demonstrated through the planning application process.

Developable Sites

- 3.32. The NPPF also requires that Local Planning Authorities identify a supply of “specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan”¹⁵.
- 3.33. As defined in the NPPF Annex 2: Glossary:
“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”.
- 3.34. Sites have been considered developable if they were found suitable, achievable, and if the site promoter or other evidence indicated that the site could reasonably come forward for development during years 6 – 10 or 11 – 15 of the plan period.

¹⁴ Planning permissions granted after 31st March 2018 and not currently commenced would be considered extant at the base-date of the LAA and therefore would not have expired.

¹⁵ NPPF Paragraph 68.



4. Stage 3 – Windfall Assessment

Background

- 4.1. NPPF Annex 2: Glossary defines ‘windfall sites’ as “sites not specifically identified in the development plan”.
- 4.2. The NPPF provides that Local Planning Authorities may include an allowance for windfall sites as part of the anticipated housing supply where justified, as follows:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”¹⁶.
- 4.3. PPG confirms that the inclusion of a windfall allowance can be justified in the five-year supply if the local authority has compelling evidence that these sites will continue to provide a reliable source of supply, as set out in paragraph 71 of the NPPF¹⁷. The Borough has identified three sources of windfall sites:
 1. Small sites below the site size threshold,
 2. Prior Notification sites, and
 3. Rural Exception Sites.

Approach

- 4.4. The delivery of housing on unidentified small sites has been and will continue to be an integral source of housing supply within the borough. ‘Windfall’ sites are often first encountered upon submission of a planning application, or during pre-application discussions. Windfall sites are generally small or involve the conversion of existing buildings, but they can also comprise larger unidentified sites. The SLAA therefore includes an assessment of potential housing supply from windfall sites as outlined below.
- 4.5. In accordance with PPG advice, the SLAA applies a site size threshold of five or more homes (net). Therefore, the SLAA does not identify suitable, available and achievable development sites capable of delivering homes below this threshold. Development on these sites has historically been integral to housing delivery in the borough and will continue to be throughout the plan period. To avoid potential double counting the SLAA includes an allowance for windfall sites accommodating fewer than 5 dwellings (net) only.

¹⁶ NPPF Paragraph 71.

¹⁷ PPG Paragraph 24. Reference ID: 3-24-20140306.



General windfall sites

- 4.6. The NPPF provides that where windfall allowances are included as a source of supply, the assessment should be as realistic as possible, being justified by compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. Surrey Heath has set out a locally-derived allowance for windfall sites within the SLAA.
- 4.7. In calculating an estimated small site windfall figure, the average net permissions for residential developments on sites of fewer than 5 dwellings (net) has been determined between the 2000 to 2021 monitoring periods, as shown in Table 3 below.

Table 3: Windfall completions by local area, 2000-2021

Category	Bagshot	Bisley	Camberley	Chobham	Deepcut	Frimley	Frimley Green	Lightwater	Mytchett	West End	Windlesham	Total
2000 – 2008 (Annualised average)	0.38	0.75	2.5	0.75	0	0.75	0.63	0.5	0.13	0.25	0	6.63
2008 – 2021 (Annualised average)	1.69	0.46	9.62	2.62	0.46	1.08	0.38	0.38	1.46	1.15	1.23	19.50
2000 - 2021 Overall	1.19	0.57	6.90	1.90	0.29	0.95	0.48	0.43	0.95	0.81	0.76	15.33

- 4.8. It is clear from the above that small windfall sites have historically made a small but consistent contribution towards the Surrey Heath Housing Land supply.
- 4.9. It is reasonable to expect this trend to continue providing new homes on small windfall sites, especially in light of policy contained in the NPPF, in particular the presumption in favour of sustainable development. Moreover, the SLAA identifies a number of suitable sites for development, in addition to many discounted sites. Through the production of the SLAA, many sites have been promoted to the Council that fall below the minimum site threshold of 5 units (net). These sites are likely to come forward for development in the future, as will many that the SLAA process has not been able to identify.



- 4.10. Therefore, it is reasonable to include a small windfall allowance should therefore be included in the SLAA at an average of 15 dwellings per annum, excluding years 1 and 2 to avoid double counting. In years 9 and 15 of the Plan period, the windfall allowance is increased to 16 units in order to account for the rounding-down of the historic trend figure. Based on the annualised average derived from past completion rates of windfalls, 197 units could be expected to be delivered from unidentified general windfall development over a 15 year period.
- 4.11. It is considered that the above figures represent an extremely conservative estimate of future windfall completions. This is due to the following:
1. In the 2012 version of the NPPF, paragraph 48 stipulated residential garden redevelopment should be excluded from windfall calculations. Therefore, for years 2000-2018, such sites were not included in the Council's windfall allowance. In reality however such sites have historically made a significant contribution to the Borough's housing figures and there is no indication of this trend slowing down. The version of the NPPF published in 2018 and future iterations no longer precludes residential garden development from being taken account of in the windfall allowance calculations. Therefore, from the monitoring years 2018-21, such sites have been included in these calculations.
 2. The constraints imposed on development by the Thames Basin Heaths SPA has resulted in a significant decrease in overall housing completions over the earlier part of the period monitored, which is likely to be mirrored in the number of windfall sites which have come forward during this period.
 3. From 2000-2008 only sites of fewer than 5 units have been included in the calculations when in fact it is likely that some larger windfall (i.e. previously unidentified) sites are likely to have been developed during this period.

Small sites in pipeline

- 4.12. These are sites of less than 5 units (net), which are identified in the development pipeline.
- 4.13. This includes sites with planning permission that are either yet to commence, or under construction. At the SLAA base date, 88 units benefited from planning permission on small sites. These sites are included in Appendix 4 – Sites with Planning Permission.

Prior Notifications

- 4.14. The NPPF is clear that, where estimating an appropriate windfall allowance, consideration should be given to future trends as well as long-term historic rates.



- 4.15. Planning reforms introduced within recent years, including the expansion of permitted development rights through the General Permitted Development Order 2015¹⁸ (GPDO), which allows offices, light industrial uses, and other uses, to be converted into residential use without the need for planning permission, have and will continue to stimulate delivery of new homes on small windfall sites.
- 4.16. Although existing office-space, for example, is a finite resource that is likely to become relatively scarce as a resource for permitted development to residential use, the SLAA cannot identify some sites as suitable, available and achievable, which could be converted to residential through permitted development rights, such as office sites in high-risk flood zones. Therefore, there is likely to be additional homes delivered from office sites in these locations, which have not been identified as realistic candidates for development in the SLAA.
- 4.17. The government has recently introduced further extensions to permitted development rights in order to stimulate housing development from smaller sites, including;
1. the change the use from Class E to residential to provide new homes, and
 2. a new right to allow for the demolition of existing commercial buildings and their redevelopment as residential¹⁹.
- 4.18. Therefore, alongside the small site windfall allowance, an allowance will be included for dwellings likely to arise from conversions to residential units from other uses carried out under the General Permitted Development Order (GPDO). In order to avoid double-counting, Prior Notification applications have been excluded from the small site windfall calculation.
- 4.19. Prior notifications for conversions from office to residential development form the bulk of this type of windfall. This type of permitted development was introduced in 2013, and therefore the period of completions for such residential conversions in Surrey Heath covered to inform the windfall allowance will be 2014-2020. This enables a year lead-in for completions of this type of development to occur, following their introduction.

¹⁸ The Town and Country (General Permitted Development) (England) Order 2015:
<http://www.legislation.gov.uk/uksi/2015/596/contents/made>

¹⁹ See The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 3) Order 2020. Available at: <https://www.legislation.gov.uk/uksi/2020/756/contents/made>.



Table 4: Prior Notification Windfall completions by local area, 2014-2020

Period	Bagshot	Bisley	Camberley	Chobham	Deepcut	Frimley	Frimley Green	Lightwater	Mytchett	West End	Windlesham	Total
2014-2020 Total	3	0	35	3	10	8	0	0	0	0	0	59
2014-2020 Overall Annualised	0.43	0	5	0.43	1.43	1.14	0	0	0	0	0	8.43

- 4.20. Based on the annualised averages derived in Table 4, a windfall allowance has been calculated for residential development coming forward through prior notifications. Therefore, there is a small prior notification windfall allowance included in the SLAA at an average of 8.4 dwellings per annum (rounded), excluding years 1 and 2 to avoid double counting. Based on the annualised average derived from past completion rates of windfalls, 109 units could be expected to be delivered from prior notifications windfall development over a 15 year period.
- 4.21. The rate of Prior Notification approvals and completions has not slowed down since its introduction and it is reasonable to expect that this will continue. If the number of units granted prior approval for office to residential conversions decreases over a sustained period in future years, the period that the allowance is applied for will also be reduced. This will be reviewed annually.

Rural Exception Sites

- 4.22. As set out in the NPPF, Rural Exception Sites comprise development sites that seek to address the affordable housing needs of local communities in rural locations. In designated rural areas and areas designated as Green Belt, rural exception sites are the only sort of exception site that can come forward.
- 4.23. The SLAA housing trajectory includes an allowance for the development of Rural Exception Sites throughout the plan period. The Rural Exception Site allowance takes account of previous delivery and a conservative estimate of likely future delivery.
- 4.24. Rural Exception Sites have been delivered consistently within Surrey Heath borough. Within the previous 5-year period a total of new 50 homes have been permitted on Rural Exception Sites within the borough. This comprises an average of 10 homes per year.



- 4.25. Further Rural Exception Sites are continuing to be promoted through the SLAA Call for Sites exercise. It is likely that these sites will come forward for development in the near future, in addition to other sites currently identified that will also come forward for development during the plan period. In particular, these sites are likely to come forward where extensions to the village are not identified within the emerging Local Plan.
- 4.26. Rural Exception Sites generally comprise sites that are located within the Green Belt designation. Given the presumption against inappropriate development in the Green Belt, the SLAA has discounted these sites from the supply as specific development sites on the basis of their suitability. However, many of these sites could reasonably come forward within the plan period but the suitability of the development would need to be determined at the planning application stage. Table 5 (below) sets out the potential Rural Exception Sites that have been discounted within the SLAA.

Table 5: Potential Identified Rural Exception Sites

Site ID	Site Address	Ward	Capacity
238	Land at Mincing Lane, Chobham, GU24 8RS	Windlesham and Chobham	30
546	Land Read of the Grange, Chobham, GU24 8NQ	Windlesham and Chobham	10
597	Land North West of the Grange, Chobham, GU24 8NQ	Windlesham and Chobham	35
409	Land at Latchetts Mead, Green Lane, Chobham, GU24 8PH	Windlesham and Chobham	15
609	Land North of Reserve Site, Heathpark Drive, Windlesham, GU20 6HS	Windlesham and Chobham	35
915	Land Rear of 1 - 31 Broadley Green, Windlesham, GU20 6AJ	Windlesham and Chobham	11
276	Land East of Snows Ride and Hatton Hill, Windlesham, GU20 6LA	Windlesham and Chobham	34

- 4.27. Given the number of sites that have either been promoted as a Rural Exception Site, or have been identified as being capable of delivering homes as a Rural Exception Site, it is reasonable to include an allowance for Rural Exception Site development within the housing supply trajectory.



- 4.28. The previous trend comprises a permission rate of 10 dwellings per annum from Rural Exception Sites. It would be reasonable to expect this figure continue to be delivered throughout the plan period, given the number of sites that are currently being promoted for development. The 7 identified sites could be capable of delivering a combined 170 dwellings, which would provide 11 dwellings per annum throughout the 15-year SLAA period.
- 4.29. However, it is unlikely that all of the identified potential Rural Exception Sites will progress through to development within the plan period. Equally, it is unlikely that the SLAA process has identified all of the potential Rural Exception Sites that will be promoted for development within the plan period. Therefore, rather than representing the historic rate or the identified potential capacity, it is considered reasonable to take-forward a more conservative windfall allowance of 7 dwellings per annum from Rural Exception Sites.
- 4.30. To avoid double-counting, the annualised supply from Rural Exception Sites has not been included within the first two years of the housing trajectory. Sites delivered within this time period are likely to already benefit from planning permission.

Conclusion

- 4.31. The evidence set out above demonstrates that there is a clear case for the inclusion of a reasonable windfall allowance within the housing supply trajectory. Surrey Heath currently obtains a windfall housing supply from 3 sources.
- 4.32. Over the next fifteen years these sources are expected to provide 397 homes to the housing supply. This is comprised of the following sources:
1. General windfalls (197 homes),
 2. Prior notification windfalls (109 homes), and
 3. Rural Exception Sites windfalls (91 homes).



5. Stage 4 – Assessment Review

- 5.1. The SLAA process may reveal that there are insufficient sites/broad locations to meet the housing requirement in an up-to-date Local Plan or the local housing need figure, where strategic policies are more than five years old.
- 5.2. In such cases, in order to meet local housing needs, as far as possible, the SLAA should be re-appraised in an iterative process, as set out in Stage 2 and 4 of Figure 1: PPG SLAA preparation flowchart.
- 5.3. In the production of the 2021 SLAA, the following actions have been undertaken in order to establish a robust housing land supply position, as the initial SLAA site assessments did not identify a sufficient supply that would meet the local housing requirement figure throughout the 15-year period.
- 5.4. Iterative processes of revision were undertaken to establish a sufficient housing land supply. Practices taken as part of this exercise are as outlined below:
 1. Site capacity on Deliverable and Developable sites may be re-appraised;
 2. Assumptions made on appropriate density and the suitable developable area of sites may be reconsidered, ensuring capacities optimise the efficient use of land;
 3. The phasing of sites may be reassessed;
 4. Where 'Discounted' sites are advised to be available within the 15 year period, their suitability and achievability will be reappraised.
 5. Where sites are classified as 'Not Currently Developable' on the basis of unknown availability alone, the site-promoter has been contacted to establish availability.
 6. Further desk-based exercises may be undertaken in order to identify additional sites. For example, further consultation with internal and external sources, such as the Council's Development Management and Assets teams, Neighbourhood Planning Groups, and Parish Councils, in order to capture sites in the development pipeline.



6. Stage 5 – Final Evidence Base

Core outputs

- 6.1. The following core outputs will be produced as part of the assessment and presented in the main report:
1. A list of all sites or broad locations considered, cross-referenced to their locations on maps;
 2. An assessment of each site or broad location; addressing its suitability for development, availability and achievability, to determine whether a site should realistically be expected to be developed and when;
 3. The potential type and quantity of development that could be delivered on each site or broad location; including a reasonable estimate of build-out rates, setting out how any barriers to delivery could be overcome and when; and
 4. An indicative trajectory of anticipated development and consideration of associated risks, based on the available evidence.

Five-Year Housing Land Supply

- 6.2. The SLAA main report sets out the Five-Year Housing Land Supply Position. SLAA Appendix 7: Five Year Housing Land Supply provides a detailed assessment of the housing land supply position.
- 6.3. The NPPF provides that plan-making authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of the appropriate housing requirement²⁰. In producing this, plan-making authorities are required to consider both the delivery of sites against the forecasted trajectory, and the deliverability of all the sites identified as deliverable within the first five years of the supply period.
- 6.4. Following the publication of a Five Year Housing Land Supply position, it is not necessary for the assessments to be updated for a full twelve months unless significant new evidence comes to light. This approach will help establish a strong position for demonstrating a robust supply of sites, and help determine whether the authority can demonstrate a five year housing land supply.

²⁰ NPPF Paragraph 74:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf.



Monitoring

- 6.5. The following housing supply information will be recorded when monitoring and updating the assessment:
1. Progress of development on allocated sites and sites with planning permission;
 2. Submitted and approved planning applications on sites and broad locations identified in the assessment;
 3. Progress made on removing constraints on development and whether a site is now considered to be Deliverable or Developable;
 4. New unforeseen constraints that have emerged and which mean that a site is now non-Deliverable or Developable, and how these could be addressed;
 5. Whether the windfall allowance is coming forward as expected, or may need to be adjusted.



7. Glossary

Advanced emerging plans	Emerging plans that are at pre-submission stage
Deliverable sites	A site for housing that is available, suitable and achievable now with a realistic prospect that housing will be delivered within five years', as defined within the NPPF Glossary, based on the best available evidence.
Developable sites	Sites in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at some point in the period 6 – 15 years, as defined within the NPPF Glossary, based on the best available evidence.
Discounted sites	<p>Sites that are not included within the Housing Land Supply calculation for the purposes of the SLAA.</p> <p>Sites may be discounted if there is insufficient information to demonstrate that the site would be suitable, available, and/or achievable for development within the plan period.</p> <p>Sites may also be discounted if there is information that demonstrates that development would not be appropriate on the site. For example, sites lying wholly within a European Nature Conservation Site, SSSI, the 400m buffer zone of the Thames Basin Heath Special Protection Area, Flood Zone 3b, Ancient Woodland, or the Public Safety Zone for Farnborough Airport.</p> <p>Sites are also discounted where the site would not be able to provide development that would meet the threshold for inclusion in the SLAA. For example, residential sites submitted to the Council for fewer than 5 dwellings (net).</p>
FEA	Functional Economic Area
HMA	Housing Market Area
NPPF	National Planning Policy Framework
PPG	National Planning Practice Guidance
PDL	Previously Developed Land
PN	Prior Approval Notification
SHMA	Strategic Housing Market Assessment
SHLAA	Strategic Housing Land Availability Assessment
SLAA	Strategic Land Availability Assessment

