

**STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT**

Report of the: Head of Place Development

Contact: Rachael Thorold

Urgent Decision?(yes/no) No

If yes, reason urgent decision required:

Annexes/Appendices (attached): Strategic Housing Land Availability Assessment Methodology June 2017  
Strategic Housing Land Availability Assessment Findings Report June 2017  
Strategic Housing Land Availability Assessment- Addendum 1 Map of Land Supply

Other available papers (not attached):

**REPORT SUMMARY**

The Strategic Housing Land Availability Assessment (SHLAA) is key evidence base document that seeks to identify and account for future potential sources of housing land supply. The SHLAA should identify a five year supply of specific deliverable sites. It should also identify a supply of developable sites for the next 6-10 years and where possible for 11-15 years.

Whilst the sites identified by SHLAAs are technically considered to be deliverable or developable, this is based upon a subjective judgement. 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.

**RECOMMENDATION (S)**

- (1) The Committee considers the SHLAA and agrees to its publication;
- (2) Notes the findings of the SHLAA 2017 and the five year housing land supply position and housing trajectory against the Objectively Assessed Housing Needs (OAHN) figure.
- (3) Acknowledge that the outputs from the SHLAA will be used to inform the partial review of the Core

*Notes*

<b>Strategy</b>	
-----------------	--

## **1 Implications for the Council's Key Priorities, Service Plans and Sustainable Community Strategy**

1.1 The delivery and implementation of the Epsom & Ewell Local Plan contributes towards all of the Council's Key Priorities. The partial update of the Core Strategy is critical part of the Local Plan preparation as it will set out how sustainable growth will be delivered during the next plan period. The SHLAA is an important piece of evidence, which is required by government to support the preparation of local plans.

## **2 Background**

2.1 The SHLAAs is 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".

2.2 To that end, the SHLAA is one of the key evidence base studies to inform the partial review of the Core Strategy. It is an assessment of how much land is potentially available for housing across Epsom & Ewell. It forms the basis for understanding the potential future supply of land likely to be available for development over the current plan period of 2007-2026 and the new plan period of 2015-2017 which should respond to the Objectively Assessed Housing Need (OAHN) figure.

2.3 To produce the SHLAA, the Council has followed and developed the methodology set out in government guidance; varying it where appropriate to suit local circumstances. It builds on and updates the Council's previous SHLAA which was published in 2009.

2.4 The SHLAA should identify a five year supply of specific deliverable sites. It should also identify a supply of specific developable sites for the next 6-10 years and where possible for 11-15 years.

2.5 The SHLAA is also used to guide decisions on individual housing proposals and planning applications, most notably on the matter of demonstrating a five year supply of housing. However, the SHLAA does not allocate sites for housing; that is done through more detailed planning assessment and consultation.

2.6 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.

### **3 Epsom & Ewell Strategic Housing Land Availability Assessment**

- 3.1 A large proportion of development in Epsom & Ewell is delivered on small sites of less than 10 units and the Council has sought to ensure that only those sites that will deliver a higher proportion of development (5 units or more) are considered within the SHLAA.
- 3.2 Therefore, only those sites able to support 5 or more net dwellings have been considered as a candidate sites and had their development potential assessed. This approach is in accordance with the National Planning Practice Guidance and reflects local circumstances.
- 3.3 For sites with an estimated yield of 4 or less, a windfall allowance of 27 units per annum for years 6-10 and 20 units per annum for years 11-15 has been included within the housing land supply. This figure is based on historic completion information and reflects the source of supply relating to small sites within the Borough. It should be noted that a windfall allowance has not been included within the five year housing land figures as these are considered to be included within the current permissions.
- 3.4 The purpose of the SHLAA is to provide a realistic assessment of how much land is available for housing. Potential housing sites were identified from a number of sources, including:
- Previously identified sites within the SHLAA 2009;
  - Previously allocated sites and identified preferred housing sites;
  - Planning enquiries, refusals and withdrawals;
  - Call for Sites submissions;
  - Sites that have previously benefited from a planning permission but which has since expired;
  - Review of Council Assets;
  - Review of Empty Property Register; and
  - Sites identified from visual surveys / site visits and local knowledge.
- 3.5 The SHLAA has also assessed sites with planning permission. These sites have been checked to establish whether they have a realistic chance of delivering units within the next five years and beyond.
- 3.6 In total 264 sites were assessed against a series of criteria. These criteria looked to assess site 'suitability', 'availability', and 'achievability'.

- 3.7 If development of the site would be contrary to national and current local policy (as set out in the Core Strategy and Development Management Policies Document) the site was deemed unsuitable and discounted from the housing land supply. This also applied to land affected by land designations identified within the Epsom & Ewell Constraints Study.
- 3.8 The availability of sites for development was closely scrutinised and a cautious approach to assessing availability of sites was taken. This has included proactively contacting landowners of 'long standing' sites where there has been no or limited recent interest.
- 3.9 With regards to the achievability of development sites, local evidence prepared to support the introduction of CIL suggests that the majority of residential development across the whole of Epsom & Ewell is viable, including the policy required within the Core Strategy. 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

#### 4 SHLAA Outcomes

- 4.1 Following Officer's assessment of the sites, 203 were discounted from the housing land supply. It was considered that 113 of these sites were unsuitable for residential development when assessed against the current policies. Just 20 sites were discounted solely for the reason that they were not considered to be available and no sites discounted solely on the grounds of achievability (viability).
- 4.2 In total the SHLAA identified 61 opportunity sites that have the potential to accommodate 1,819 new homes within the Borough. The development of these sites would in principle, comply with the existing Local Plan. Of the 61 sites 15 are deemed to be deliverable within the next five years. The table below provides a summary of the SHLAA Opportunity Sites.

- 4.3 Table 1: Summary of SHLAA Opportunity Sites

\*This figure has not been rationalised to take account of non-implementation.

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

- 4.4 Tables 2, 3 & Appendix 4 of the SHLAA Findings Report provide a further breakdown of the SHLAA Opportunity sites as well as estimated yields and timeframes for delivery. This has also been disaggregated on a ward level. For land classifications refer to Table 4 of the SHLAA Findings Report.

Housing Land Supply Position

- 4.5 National planning policy requires local authorities to demonstrate a five year supply of housing land and an additional buffer to allow flexibility in delivery. A 5% buffer is the minimum and is considered appropriate to Epsom & Ewell given the Borough's strong record of housing delivery to date. The SHLAA has produced housing land supply calculations and trajectories these are available to view in sections 4.4 and 4.5 of the appended SHLAA Findings Report.
- 4.6 The SHLAA indicates that Epsom & Ewell has 5.7 years housing land supply when assessed against the Core Strategy housing target of 181 units per annum. Furthermore, the Borough has the potential housing sites to exceed the housing requirement as set by the Core Strategy.
- 4.7 However, Government guidance is clear that where evidence in Local Plans has become outdated (pre-NPPF) information provided in the latest full assessment of housing needs should be considered. The joint Strategic Housing Market Assessment 2016 (SHMA) sets an Objectively Assessed Housing Need (OAHN) figure of 418 units per annum over a 15 year time horizon (2015-2035).
- 4.8 In total, the SHLAA has identified a forward supply of 2,275 units for the next 15 years (2017-2032). Against the OAHN figure of 7,106 units between 2015 and 2032, the Council has 1.3 years housing land supply. Consequently, Epsom & Ewell can achieve less than 40% of the projected housing need resulting in a residual requirement of 4,381 units, across the forthcoming 17 year plan period.

**5 SHLAA Recommendations**

- 5.1 Members are advised that the SHLAA is a starting point for the Council in its responsibility to prepare an up to date local plan to ensure that there is an adequate land supply to meet the needs of the Borough.
- 5.2 The SHLAA sets out a series of recommendations seeking to respond to the housing land supply position when considered against the OAHN figure, including the need for further work to be undertaken to enable the Council to assess the options for and implications of meeting the OAHN for the Borough.
- 5.3 To increase the 5 year housing land supply figure, in the short term, Officers should undertake a review of the sites within 6-10 years timeframe to consider if there are any opportunities which could enable sites to come forward earlier. This could include positive intervention such as preparing Development Briefs to provide greater certainty for the market or promoting the use of Planning Performance Agreements committing to clear time scales for decisions on planning applications.

- 5.4 Another key recommendation is for Officers to revisit some of the policy assumptions relating to site suitability and capacity. For example, constraints relating to building heights and densities. In addition, work will need to be undertaken to consider, in full, the approaches that could be applied to achieving the residual housing need figure in the existing built up area. This will likely take the form of an Alternative Sources of Housing Land Supply Paper.

## 6 Financial and Manpower Implications

- 6.1 The preparation and implementation of the Council's local plan imposes significant demands on staff in the Planning Policy Team and the wider Place Development Service. Since the preparation of the last Local Plan Programme additional staff resources have been secured and deployed. It is anticipated that these new resources will make a valuable contribution towards managing the process and meeting the milestones set out in the new Programme.
- 6.2 However, it may prove necessary to deploy other corporate resources, such as the Communications Team and/ or Senior Officers of the Borough Council, in order to maintain progress. Contributions from these sources may be particularly sought during Consultation and Duty to Co-operate stages of the process, when their input can be best deployed.
- 6.3 **Chief Finance Officer's comments:** *In 2016/17 approval was granted for an additional funding of £54,000 per annum for 2 years to provide additional staffing resources within the Planning & Policy team to assist in the delivery of the Council's Local Plan. The additional staffing cost over the 2 year period totalled £108,000 with £80,000 being funded from CIL admin fee and £28,000 coming from S106 monitoring fund.*
- 6.4 *Any request for further funding to increase the level of resources required to deliver the Local Plan will need to be referred to Strategy & Resources Committee for approval with an explanation on how it can be financed.*

## 7 Legal Implications (including implications for matters relating to equality)

- 7.1 All statutory Local Plan documents are subject to public examination. The recently adopted "Your Involvement in Planning" document addresses those equality issues related to consultation and engagement.
- 7.2 **Monitoring Officer's comments:** *The local plan must be prepared in accordance with procedures laid down by statute and with due regard to national planning policy. As stated, the SHLA is a key part of the evidence base, without which we cannot proceed to the next stage of plan preparation.*

## **8 Sustainability Policy and Community Safety Implications**

- 8.1 The partial review of the Core Strategy will contribute towards delivering the Council objectives for maintaining and enhancing the Borough as a sustainable place to live, work and visit by providing guidance to new development proposals.
- 8.2 Any future policy options relating to the allocation of land for housing, as part of the Core Strategy review process, will be subject to a full Sustainability Appraisal report. This will be subject to public consultation at an appropriate time in the process.

## **9 Partnerships**

- 9.1 The Duty to Co-operate requires that Local Planning Authorities engage with partners and neighbouring authorities on strategic issues, including provision of housing land and meeting housing need. We have provided an opportunity for our neighbours to engage through a specific Duty to Co-operate Consultation relating to the SHLAA methodology and helpful responses were received. Further engagement with our Housing Market Area partners and neighbouring local authorities may be necessary as we seek an appropriate strategy to respond to housing need.

## **10 Risk Assessment**

- 10.1 The Council is currently unable to demonstrate a five year supply of housing land against the OAHN figure and, as such, the Core Strategy policy setting a housing target is considered out of date. Work is progressing to update the Core Strategy and produce a new housing target to deliver sustainable growth.
- 10.2 Failure to produce a new housing target and the necessary 5 year housing supply could lead planning applications for residential development need to be determined in accordance with Paragraph 49 of the National Planning Policy Framework. This states that without a five year supply adopted Council policies on the supply of housing cannot be considered up-to-date. Without a five year supply there is a presumption in favour of granting planning permission to applications for new housing unless the development can be shown to cause demonstrable harm to other factors that outweigh the need to provide new housing.
- 10.3 By proactively planning for future growth identifying where it should and should not go, we will place ourselves in a stronger position to resist unsustainable levels of growth in the wrong locations

## **11 Conclusion and Recommendations**

- 11.1 The Members of the Committee are asked to note the findings of the SHLAA 2017, the five year housing land supply position and housing trajectory against the OAHN figure.

LICENSING AND PLANNING POLICY COMMITTEE  
12 July 2017

11.2 The Committee are also asked to acknowledge that the outputs from the SHLAA will be used to inform the partial update of the Core Strategy.

**WARDS AFFECTED: (All Wards);**