



Development Management Plan (Regulation 19)

Housing and Economic Land Availability Assessment (HELAA)

Appendix 1: Draft Methodology

January 2018

1. Introduction

- 1.1. The Housing and Economic Land Availability Assessment (HELAA), is a technical study that determines the suitability, availability and achievability of land for development. It is an important evidence source to inform plan making, but does not in itself represent policy, nor does it determine whether a site should be allocated for future development.
- 1.2. The HELAA builds on and expands the remit of the Strategic Housing Land Availability Assessment (SHLAA) and –in line with Planning Practice Guidance - includes the consideration of sites for economic uses as well as for housing.

2. Policy Context

National Planning Policy Framework (2012)

- 1.3. Paragraph 158 of the NPPF requires local planning authorities to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics of the area. Local planning authorities should ensure that their assessment of and strategies of housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.
- 1.4. Paragraph 161 states that the review of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments.

Employment

- 1.5. Paragraph 161 says that local authorities should use the evidence base to assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet identified needs.

Housing

- 1.6. Paragraphs 47 and 48 requires local planning authorities to:
 - Identify and update annually a supply of specific, deliverable¹ sites sufficient to provide five years worth of housing with an additional

¹ To be considered 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

buffer of 5% to ensure choice and competition in the market for land (where persistent under delivery the buffer should be increased to 20%).

- Identify a supply of specific, developable² sites for growth, for years 6-10 and where possible, years 11-15.

- 1.7. Local Planning Authorities may also make an allowance for windfall sites in the five-year supply if compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.

National Planning Practice Guidance, Housing and Economic Land Availability Assessment (2014)

- 1.8. National Planning Practice Guidance says that an assessment of land availability should identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. This assessment should:
- Identify sites and broad locations with potential for development
 - Assess their development potential
 - Assess their suitability for development and the likelihood of development coming forward (the availability and achievability)
- 1.9. The assessment should be undertaken and regularly reviewed working with other local planning authorities in the relevant housing market area or functional economic market area, in line with the Duty to Co-operate.
- 1.10. From the outset the following stakeholders should be involved:
- Developers, those with land interests and land promoters
 - Local property agents
 - Local communities
 - Partner organisations

planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

² To be considered 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.

- Local Enterprise Partnerships
- Businesses and business representative organisations
- Parish and town councils
- Neighbourhood forums preparing neighbourhood plans.

Reigate & Banstead Core Strategy (2014)

Employment

- 1.11. The Core Strategy sets out that the Council will plan for a range of employment premises to cater for the needs of business, taking a flexible approach to meet their changing needs as well as supporting the provision of affordable business units to support small businesses and start-ups.
- 1.12. Policy CS5 establishes a commitment to plan for the delivery of additional floorspace to meet growth needs, focussed on retaining and making the best use of existing employment land, particularly within both town centres and industrial areas. It also recognises the need to avoid the protection of sites where they have no reasonable prospect of being used for employment over the life of the plan.
- 1.13. The Core Strategy identifies that approximately 46,000sqm of employment floorspace is likely to be needed throughout the plan period (2012 to 2027) however that this should be subject to regular monitoring of demand levels. It also recognises that over the course of the plan period, unanticipated strategic proposals may come forward that would result in a major loss or gain of employment provision.

Housing

- 1.14. The Core Strategy plans for the provision of a total of at least 6,900 homes between 2012 and 2027, equivalent to an annual average provision of 460 homes per year.
- 1.15. The Core Strategy sets the strategic approach to the distribution of growth and allocation of development across the borough. It recognises the constrained nature of the borough and seeks to maximise opportunities within the urban area. It however recognises that some development on land outside the current urban area will be needed and sets out three broad areas of search illustrated in Figure 1:
- Land around Horley
 - Land to the east of Redhill and east of Merstham
 - Land to the south and south west of Reigate

Figure 1 Core Strategy Diagram



Reigate & Banstead Development Management Plan

- 1.16. Following adoption of the Core Strategy in 2014, the Council is now preparing its Development Management Plan, which will include detailed policies to guide the consideration of planning applications, and site allocations for new development.
- 1.17. Regulation 18 consultation was carried out in Autumn 2016. This consultation document was supported by various evidence documents, which are summarised below. This HELAA will form part of the evidence base to the DMP.

Employment Area Review (2016)

- 1.18. Reigate & Banstead's Employment Area Review provides a review of the employment areas in the borough, assessing their role and characteristics, and appraises future opportunities and pressures.
- 1.19. It identifies four principal employment areas (Holmethorpe, Wells Place, Salfords and Perrywood) which accommodate a significant and critical mass of employment provision and benefit from good connectivity.
- 1.20. The remainder of the employment sites in Reigate & Banstead play a different but nonetheless important role in the borough's economic offer. Whilst they have a smaller critical mass of employment and occupy less prominent locations, they provide a valuable stock of smaller, more affordable accommodation suited to the needs of start-up and SME businesses.

Local Economic Needs Assessment Update (2016)

- 1.21. This study provides an up-to-date assessment of future local needs for additional employment accommodation to support economic growth in Reigate & Banstead, including both the quantitative and qualitative requirements for land and floorspace. It was prepared to provide an up to date assessment of local employment needs recognising that circumstances may have changed since the publication of the Core Strategy
- 1.22. It recommends that as a minimum, the following additional floorspace should be provided:
 - 6,500sqm of additional industrial space
 - 11,000sqm of additional storage and distribution space
 - 25,500sqm of office space
- 1.23. For B-use classes, the paper estimates that there is potential for at least 18,000sqm of additional employment floorspace to be met through better use of existing designated employment sites.
- 1.24. Within the office sector, the paper notes opportunities for new office development exist within the borough's town centres, particularly Gloucester Road Car Park, the Royal Mail Depot and Reading Arch Road in Redhill. These sites were consulted on as potential development opportunities as part of the Regulation 18 DMP consultation.

2. Methodology

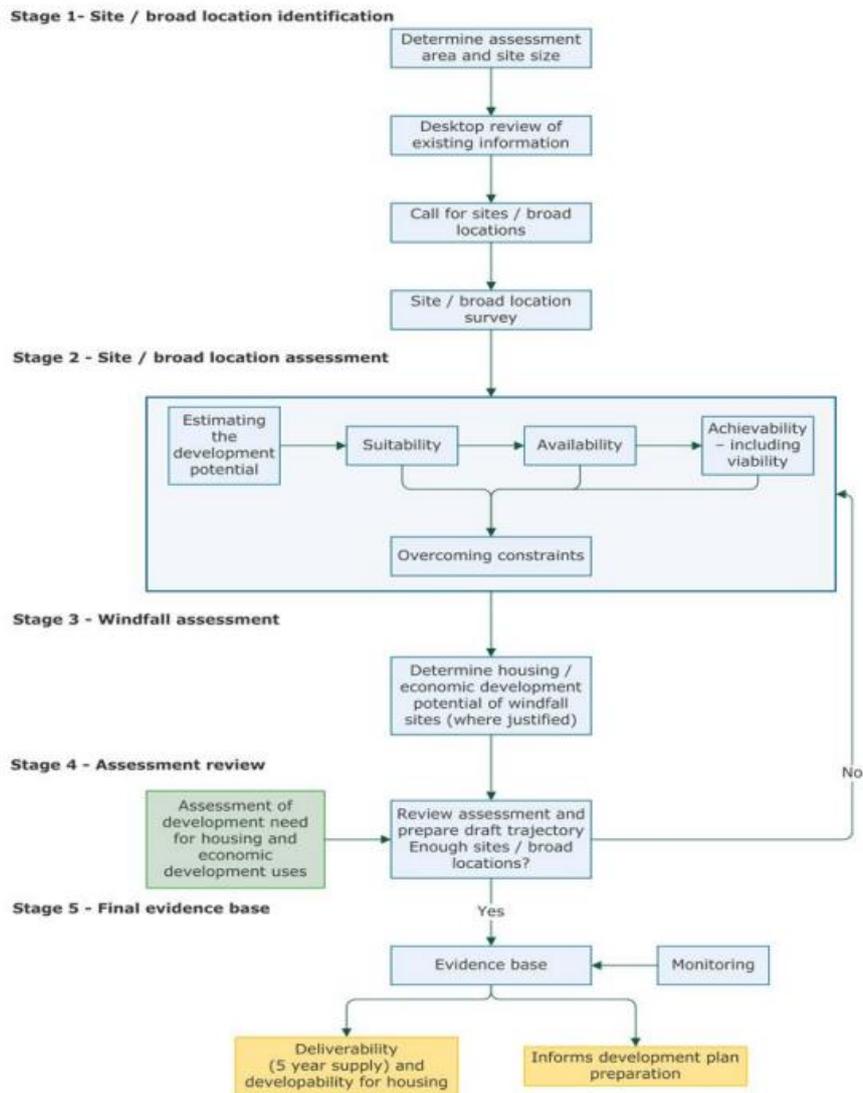
2.1. Reigate & Banstead's HELAA will be prepared in line with National Planning Practice Guidance. This says that the assessment should:

- Identify sites and broad locations with potential for development
- Assess their development potential
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability)

2.2. National Planning Practice Guidance sets out a broad methodology:

- Stage 1: Site/ broad location identification
- Stage 2: Site/ broad location assessment
- Stage 3: Windfall assessment
- Stage 4: Assessment review
- Stage 5: Final evidence base

Figure 2 HELAA Assessment Methodology as set out in National Planning Practice Guidance



Stage 1: Site/ Broad Location identification

Geographical Scope

- 2.3. The National Planning Practice Guidance states that the HELAA ‘should identify all sites and broad locations regardless of the amount of development needed to provide an audit of available land’. The assessment will therefore cover entirety of the Local Planning Authority area of Reigate & Banstead Borough Council. It will assess all identified or submitted sites within the borough boundary regardless of their location.
- 2.4. Due to different plan making timeframes across the area, the geographic scope of the HELAA will be limited to Reigate & Banstead borough; however the Council will work closely with neighbouring authorities to ensure that

evidence base documents are complementary and that strategic planning issues are addressed at the appropriate geographic level.

Site Size Threshold

- 2.5. Reigate & Banstead's 2014 SHLAA and 2016 SHLAA Addendum and Five Year Land Supply assess small sites as those delivering less than 5 units. This is in line with National Planning Practice Guidance which states that the assessment should consider all sites and broad locations capable of delivering five or more dwellings. For economic development sites, in line with National Planning Practice Guidance a threshold of 0.25ha (or 500m² floorspace) will be introduced.

Desktop Review of Existing Information

- 2.6. National Planning Practice Guidance advises that plan makers should be proactive during the Desktop Review stage in identifying a wide range of possible sites and broad locations for development including existing sites that could be improved, intensified or changed.
- 2.7. The HELAA will be updated from a baseline database of sites that were originally promoted to the Council or identified by officers in the 2016 SHLAA Addendum. Each of the sites will be fully reviewed, based on up to date information.
- 2.8. The Council has maintained an "open" Call for Sites for housing since the SHLAA Addendum was produced and has continued to encourage landowners and other stakeholders to submit sites for consideration. This Call for Sites has been expanded to allow land owners and other stakeholders to submit sites for a variety of uses including housing, employment, gypsy and traveller accommodation and other economic development uses including public and community uses, retail, built leisure and recreation facilities, arts, culture and tourism development.
- 2.9. In addition, the Council will also identify sites from:
 - Land allocated (or with permission) for employment or other land uses which are no longer required for those uses
 - Unimplemented or under construction planning permissions for residential and economic use
 - Pre-application enquiries where the site is subsequently submitted to the Council for consideration through the HELAA process
 - Applications recently refused planning permission or which have been withdrawn
 - Land in the Council's ownership, and surplus or likely to become surplus public sector land

- Potential permitted development opportunities
- Other vacant, derelict or underutilised sites
- Discussions with property agents, land promoters and the Council's Property Team
- Business requirements and aspirations – enquiries received by local planning authority
- Sites within the Core Strategy broad areas of search for urban extensions.

Broad Location Survey

- 2.10. Broad locations are areas where housing development is considered feasible and will be considered, but where specific sites cannot yet be identified as deliverable or developable. The guidance suggests that broad locations can be within and adjoining settlements (where housing development is or could be encouraged) as well as outside settlements (e.g. major urban extensions, growth areas, new free-standing settlements).
- 2.11. The 2012 SHLAA identified four broad locations considered to have realistic development potential during the plan period, these were:
- Redhill Town Centre
 - Banstead Town Centre
 - Sustainable Urban Extensions
 - Urban Open Land
- 2.12. The principle of development in these broad locations is now included in the adopted Core Strategy, and they therefore continue to represent realistic and feasible locations for future development in the borough. No further urban broad locations will be identified given the stage in the plan-making process that the Council is at, however the HELAA will instead consider specific sites within these (and other) urban locations.
- 2.13. The Core Strategy also identifies several Urban Extensions broad locations outside the urban area:
- Non-Green Belt land around Horley (Land in the Rural Surrounds of Horley)
 - Land East of Redhill and East of Merstham
 - Land South and South West of Reigate
- 2.14. Similar to the approach for urban broad locations, no further broad locations outside these will be identified in the HELAA, but specific sites in these locations will be considered.

- 2.15. A separate piece of work is underway to test whether the DMP should safeguard land for longer term development needs beyond the current plan period.

Stage 2: Site/ Broad Location Assessment

Estimating Development Potential

- 2.16. An estimation of the potential capacity of each site will be guided by an assessment of the physical characteristics of the site and any known constraints which would impact upon dwelling yield. Density assumptions will be guided by relevant Local Plan policies as well as densities achieved on similar schemes locally. Densities will be typically applied on a gross rather than net basis, with allowances/ reductions for site specific landscaping and infrastructure therefore inherent within the density applied in each case.
- 2.17. In some cases, the gross site area will be reduced to exclude any areas within a specific site which are not considered to be developable for housing/ employment. This may be, for example, land within Flood Zone 2/ the flood plain or land which is otherwise unsuitable (e.g. topography or dense woodland). In this way, we can be more certain that the capacities ascribed to each site are achievable.

Assessing Suitability

- 2.18. In line with National Planning Practice Guidance, the assessment of the suitability and development potential of sites will be guided by policies in the Core Strategy and saved policies of the 2005 Borough Local Plan. The assessment will also take account of relevant policies in the emerging Development Management Plan and the National Planning Policy Framework.
- 2.19. In line with National Planning Practice Guidance, the assessment of the suitability will consider the extent to which a site could meet needs of the community and wider housing market area and functional economic area, for example:
- Market housing
 - Private rented
 - Affordable housing
 - Self build schemes
 - Housing for older people
 - Employment and other economic development uses including employment, public and community uses, retail, built leisure and recreation facilities, arts, culture and tourism development.
 - Mixed use – housing/ economic development

2.20. In line with the previous SHLAA Practice Guidance and the National Planning Practice Guidance, the assessment of the suitability of sites will consider:

- Policy restrictions (existing designations, protected areas, planning policy etc.)
- Physical problems or limitations such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination
- Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation
- Appropriateness and likely market attractiveness for the type of development proposed
- Contribution to regeneration priority areas
- Environmental/ amenity impacts experienced by would be occupiers and neighbouring areas

2.21. This will be informed by a wide range of information the Council has access to from various sources and stakeholders including:

- Surrey County Council Highways
- Water and sewerage infrastructure providers
- Location of educational facilities
- Public Rights of Way
- Local Wildlife sites
- Sites of Special Scientific Interest
- Areas of Outstanding Natural Beauty
- Areas of Great Landscape Value
- Biodiversity Opportunity Areas
- Scheduled Monuments, Listed Buildings and Registered parks and gardens (Historic England)
- Conservation Areas and Locally Listed Buildings
- Information on the location of oil pipelines (suppliers and National Pipeline Agency)
- Information on gas and electricity infrastructure (suppliers and National Grid)
- Flooding (Environment Agency)
- Information about land contamination and soil quality.
- Property history information in relation to planning applications
- Tree Preservation orders
- Mineral Safeguarded Areas and waste sites (Surrey County Council)
- The Council's most up to date evidence base and corporate strategies.

Assessing Availability

- 2.22. National Planning Practice Guidance says that a site can be considered available for development, when there is confidence that there are no legal or ownership problems, such as:
- Unresolved multiple ownerships
 - Ransom strips
 - Tenancies
 - Operational requirements of landowners
- 2.23. For new housing sites submitted since the 2016 SHLAA Addendum and employment sites, availability will be assessed using the Call for Sites process and/ or engagement with the landowner. The following questions will be used to help determine if a site is available:
- Is there a willing land owner?
 - Are there multiple owners/ ransom strips?
 - Is the site available now?
 - Is the site likely to be available in the next 10 years?
 - Are there any legal or ownership problems?
 - What is preventing the site from being available and what measures could be taken to address this?
- 2.24. National Planning Practice Guidance advises that consideration should be given to the delivery records of developers or landowners and whether the planning background of a site shows a history of unimplemented permissions. For sites with extant planning permissions, the Council will contact the original applicant seeking confirmation of their intention, or otherwise, to implement consent. Where information is not received, in line with the definition contained in the NPPF³, extant planning permissions will be considered to be deliverable unless there are clear constraints to such permissions being implemented within 5 years. Where there is evidence of a history of unimplemented planning permissions, and no applicant confirmation, sites will be excluded.
- 2.25. For housing sites previously considered through the SHLAA and re-assessed as being suitable for housing, the Council will contact all landowners/ those promoting sites to ascertain whether the sites remain available for housing development, whether they would like to promote the site for other uses (including employment), and understand their intentions for delivery.
- 2.26. In accordance with the NPPF and NPPG, where information is received that the site is no longer available, it will be concluded that the site is no longer available. Any other intelligence obtained by the Council which is material to the availability of sites will also be reflected.

³ National Planning Policy Framework (Page 12, Footnote 11)

Assessing Achievability

- 2.27. A site will be considered achievable where there is a reasonable prospect that development will occur on the site at a particular point in time. A key determinant of this will be the economic viability of the site. This will be influenced by:
- Market factors: The likely appetite and demand for the type of units which the site would provide; impact of adjacent uses; economic viability of existing/ proposed/ alternative uses in terms of land values; potential rates of delivery; and any 'abnormal' factors which could impact upon viability.
 - Cost factors: Potential site preparation costs relating to any physical constraints and exceptional works necessary, relevant planning standards or obligations, prospect of funding or investment to address identified constraints or assist development.
 - Delivery factors: The size and capacity of the development; any actions required to bring the site forward or overcome constraints to development, the likely complexity of such actions and how they may impact upon delivery timescales; whether there are single or multiple developers offering housing/ employment products; the developers own phasing; and the realistic build-out rates on larger sites (including the likely earliest and latest start and completion dates).
- 2.28. Given the thrust of the NPPF and NPPG in respect of financial viability, full viability appraisals will be carried out for all specifically identified sites and a sample of unidentified sites. The sample will contain a wide cross-section of sites in terms of their characteristics, size, location and type of units.

Summary of Site Assessments

- 2.29. The deliverability of a site is crucial to establishing a robust land supply for housing and economic development and is particularly important in identifying whether there is sufficient land supply. Assessments of suitability, availability and achievability will be summarised in order to determine whether the site is deliverable, developable or not currently developable.
- 2.30. To be considered deliverable, sites should be: immediately available; be in a suitable location; and be achievable with a realistic and viable prospect for development that can be delivered within five years.
- 2.31. In the extent where it is unknown whether a site could be developed, the site will be regarded as 'not currently developable'. This may be, for example because one of the constraints to development (either in respect of policy,

physical or availability) is severe and it is not known when – or whether – it might be overcome.

Stage 3: Windfall Assessment

- 2.32. Windfall sites are sites which have not been specifically identified as part of the Local Plan process. The term covers sites that have unexpectedly become available, ranging from large sites (for example resulting from a factory closure) to small sites such as a residential conversion. The majority of windfall sites will be previously developed.

Housing

- 2.33. The NPPF allows local planning authorities to include an allowance for windfall sites in the five year supply if there is compelling evidence that such sites consistently become available and will continue to form a reliable source of supply. It is however clear that it should not include development on residential gardens.
- 2.34. In Reigate & Banstead, the contribution made by windfall developments to the housing supply has been endorsed through the Local Plan preparation process. The Core Strategy Inspector's Report recognises that 'historically, windfall sites have provided a substantial source of housing supply'.
- 2.35. The 2016 Housing Monitor establishes a windfall allowance of 75 dwellings per year. This includes the windfall allowance found sound at the Core Strategy Inspection (50 dwellings per annum) and an allowance for office to residential conversions (25 dwellings per annum).

Employment

- 2.36. To assess the windfall potential of employment sites, past trends will be analysed and evidence based judgements will be made to inform projected future supply.

Stage 4: Assessment Review

- 2.37. Once all of the sites have been surveyed to ascertain their development potential, an indicative trajectory will be produced to show how far the housing and economic development needs of the Borough can be provided for over the next 10 years.
- 2.38. If an insufficient supply of land suitable for housing and employment is identified, the Council will undertake actions consistent with national guidance. This will include:

- Carry out further consultation to generate further sites for consideration
- Work with neighbouring Local Authorities through Duty to Cooperate to attempt to try and identify alternative options
- Proactively engage with landowners/ developers to facilitate measures to 'free up' sites and bring them forward

Stage 5: Final Evidence Base

- 2.39. In line with National Planning Practice Guidance, the HELAA will contain:
- A list of all sites considered, cross-referenced to their locations on maps
 - An assessment of each site in terms of its suitability for development, availability and achievability including whether the site is viable
 - More detail for those which are considered to be realistic candidates for development
 - clearly evidenced and justified reasons where sites have been discounted
 - The potential type and quantity of development that could be delivered on each site, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome
 - An indicative trajectory or anticipated development and consideration of associated risks
 - Any other information which the Council feel is relevant to the HELAA process and its conclusions.
- 2.40. The final report will be published on Reigate & Banstead Borough Council's website.